CARBON CAPTURE COALITION

Reporting Mechanisms for 45Q in Light of GHGRP Repeal; Part 2

August 5, 2026

Meeting Summary

The Coalition held its second discussion on reporting mechanisms for secure geologic storage under Section 45Q in anticipation of EPA's repeal of the Greenhouse Gas Reporting Program (GHGRP). Coalition staff presented our draft consensus position, which recommends extending Treasury's existing safe harbor by continuing to use the Subpart RR quantification methodology with independent third-party certification rather than adopting ISO 27914, as it is not “fit-for-purpose.” Members discussed Treasury's ongoing development of sub regulatory guidance, the lack of a pathway for approving new MRV plans, the lack of transparency provisions in ISO standards, and the need to maintain regulatory certainty for industry. Participants broadly agreed that ISO 27914 is overly broad, duplicates Class VI regulatory requirements, and is not fit-for-purpose for Treasury's needs. **The meeting concluded with a request for member feedback by August 28**, after which the Coalition will finalize its position and engage Treasury.

N.B.: after our meeting, Treasury issued Notice 2026-50, which extends the safe harbor and requests comments on whether the International Organization for Standardization’s standard 27914:2026—Carbon dioxide capture, transportation and storage—Geological storage could be used as an alternative, including the verification methods set forth therein.

Important Documents:

- Draft consensus position
- Meeting Slides
- February Coalition letter to Treasury
- December Coalition letter to Treasury
- Notice 2026-50 (Aug. 2026)
- Notice 2026-1 (Dec. 2025)

Key Takeaways:

- Treasury is expected to issue sub-regulatory guidance extending or expanding the current 45Q safe harbor while developing a permanent reporting framework after EPA finalizes the GHGRP repeal, which is currently under review at the Office of Management and Budget (OMB).
- **The Coalition's draft position supports retaining the Subpart RR quantification methodology with independent third-party certification and continuing recognition of ISO 27916 for EOR projects.**
- Two members expressed their **opposition** of adoption of **ISO 27914**, citing its broad scope, duplication of Class VI requirements, and lack of alignment with Treasury's limited need for CO_2 quantification, specifically.
- Participants emphasized the need for Treasury to establish a process for approving **new or revised MRV plans** following the repeal of Subpart RR reporting.
- Coalition members were asked to provide comments on the draft consensus position by **August 20**.
- * Given the new Notice 2026-50, the Coalition will work to finalize the consensus position and use it as the basis for draft comments in response to Notice 2026-50.

Action Needed:

- Coalition members to review the draft consensus position and **submit any comments or concerns by August 28.**
- Coalition staff will incorporate member feedback, finalize the consensus position, and use it as the basis of our draft comments in response to Notice 2026-50.

Upcoming Events:

- **September 28:** In-person **Policy Blueprint** workgroup meeting
- **October 21:** Carbon Capture Coalition's **2026 Innovation and Policy Forum** in Chicago, IL. Includes an optional **ADM Decatur CCS site tour.** Registration is now open.

Meeting Notes

Welcome & Housekeeping

- This meeting served as the second discussion focused on potential reporting mechanisms for claiming 45Q amid the anticipated repeal of the Greenhouse Gas Reporting Program (GHGRP).
- Meeting objectives included:

    - Summarize previous discussions.
    - Discuss the draft consensus position.
    - Discuss next steps for Treasury engagement.

Background

- The Coalition has been working on this issue since **June 2025**.
- Major milestones include:
    - **November 2025:** Submitted comments on EPA's GHGRP repeal proposal.
    - **December 2025:** Requested that Treasury establish a safe harbor for 45Q claimants.
        - **December 2025:** Treasury issued initial safe harbor guidance.
        - Subsequent meetings with Treasury focused on identifying technical deficiencies in the safe harbor that need addressing.
    - **July 2026:** EPA's GHGRP repeal entered OMB/OIRA review and is expected to be released imminently.

Summary of Previous Convening

- Reviewed anticipated repeal of the GHGRP.
- Bob Van Vorhees presented available reporting mechanisms for geologic storage, including:
    - Subpart RR
    - ISO 27916 (EOR)
    - Newly published ISO 27914
- Discussed how Treasury currently recognizes existing reporting pathways and potential alternatives after GHGRP repeal.

Summary of Coalition's Key Activities to Date (Timeline)

Date	Activity
June 2025	Coalition begins work on post-GHGRP reporting framework
Nov. 2025	Comments submitted on GHGRP repeal
Dec. 2025	Treasury safe harbor recommendations submitted
Dec. 2026	Treasury releases safe harbor guidance
Winter 2026	Coalition meets with Treasury to discuss deficiencies
July 2026	Coalition begins discussing reporting mechanisms for geologic storage

July 2026	GHGRP repeal enters OMB/OIRA review
August 2026	Draft consensus position circulated for stakeholder review

Repeal of GHGRP at OMB

- EPA's repeal package (both 111(d) and GHGRP) is currently under review at OMB/OIRA.
- No official release date is available.
- Coalition expects EPA to first finalize repeal of the Section 111 power plant regulations before finalizing the GHGRP repeal.
- Treasury has indicated it will likely wait until EPA finalizes its rules before issuing permanent guidance.

Treasury Intel & Next Steps

- Treasury is currently developing **sub-regulatory guidance** that may extend or expand the existing safe harbor (released August 14).
- Treasury is **not actively seeking additional feedback** on the temporary safe harbor.
- Treasury remains interested in stakeholder input for the permanent regulatory framework.
- Coalition anticipates multiple opportunities to engage Treasury before proposed and final rules are issued.

Recap: Reporting Mechanisms for Geologic Storage

- Current recognized mechanisms include:
    - **ISO 27916**
        - Applies to EOR projects.
        - Requires reporting under GHGRP’s Subpart VV.
        - Quantification certified by an independent professional engineer or geologist.
    - **Class VI + Subpart RR**
        - Class VI governs permitting and well construction.
        - Subpart RR provides mass-balance quantification and MRV.
    - **Current Treasury Safe Harbor**
        - Uses Subpart RR methodology.
        - Adds independent certification because EPA no longer collects Subpart RR reports.

Summary of Previous Convening

- Subpart RR vs. ISO 27914 (geologic storage)
- Discussion focused on why ISO 27914 is not an appropriate replacement for Subpart RR.
- Key points:
    - ISO 27914 covers substantially more than CO_2 quantification, including:
        - Site selection
        - Economic assessment
        - Project feasibility
        - Operational management
        - Regulatory requirements
    - Many provisions overlap or conflict with EPA Class VI regulations.
    - Treasury primarily needs a method to verify **how much CO_2 has been permanently stored**, not a comprehensive project development standard.
    - Existing Subpart RR methodology already has approximately **50 approved MRV plans**.
    - Continuing Subpart RR methodology provides continuity and regulatory certainty to operators and regulators.

How We Got Here

- Treasury adopted ISO 27916 for EOR because it already existed as a recognized quantification standard.
- Following the anticipated GHGRP repeal, Treasury is exploring whether ISO 27914 could serve a similar function for dedicated geologic storage.

Why ISO 27914 Is Not Fit-for-Purpose

- Coalition identified several concerns with Treasury adopting ISO 27914:
    - Significantly broader than Treasury's statutory needs.
    - Duplicates many existing EPA Class VI regulatory requirements.
    - Introduces potential regulatory conflicts.
    - Difficult to separate quantification requirements from broader project management provisions.
    - Would create substantial additional administrative burden both for regulators and operators.
    - No known industry organizations support adopting ISO 27914 for Section 45Q implementation.

Coalition Consensus Position

    - The draft position recommends Treasury move to preserve regulatory continuity while maintaining confidence in Section 45Q by:
    - Allowing the continued use of **Subpart RR quantification methodology** with certification by an independent qualified engineer or geologist through extension of Treasury's existing safe harbor.
    - Continue recognizing **ISO 27916** for EOR projects.
- Separately, Carbon Capture Impact will continue separate legislative efforts to restore public transparency for geologic storage reporting.

Discussion and Q&A

- Members seem generally supportive of the Coalition's draft position.
    - Notable themes:
        - New MRV approval pathways are urgently needed.
        - Treasury requires a practical quantification framework rather than a comprehensive CCS management standard.
        - ISO 27914 would effectively duplicate EPA regulation.
        - Other stakeholders and companies have expressed positions consistent with the Coalition's recommendations.
        - Maintaining public transparency remains an important long-term objective despite Treasury's confidentiality constraints.

Next Steps

- **Members to submit comments or concerns on the draft consensus position by August 28; it is located on the member site and is attached to this email.**
- Coalition staff to revise and finalize the consensus position.
- Draft comments in response to Notice 2026-50.Continue monitoring EPA's final GHGRP repeal timeline.

Coalition Next Steps & Timeline

Timeline	Next Step
August 28	Deadline for member feedback
Late August	Finalize Coalition consensus position
September	Share draft comments with Coalition members
After EPA final rule	Treasury expected to begin formal rulemaking on permanent reporting framework
Ongoing	Pursue legislative options to restore public transparency and regulatory certainty