Legislative Work Group

October 14, 2026

CARBON CAPTURE IMPACT

Agenda

- Special Guest Speaker: Yusuf Nekzad, Legislative Director, Rep. Nikki Budzinski (D-IL)
- Pre-election Updates: KDCR
- Bipartisan American Affordability & Jobs Act: What's in it for Carbon Management?
- Lame Duck Strategy & Priorities
- CCC Updates / General Housekeeping

Special Guest Speaker:

Yusuf Nekzad, Legislative Director, Rep. Nikki Budzinski (D-IL)

CARBON CAPTURE IMPACT

Pre-election Updates

KDCR PARTNERS

Permitting Next Steps

Lame Duck Preview

Bipartisan American Affordability & Jobs Act: What's in it for Carbon Management?

CO2 Pipelines & CO2 Storage expressly included as covered projects

Project certainty: existing federal authorizations would receive greater protection, restricting federal agencies from revoking, rescinding, suspending, or materially altering federal authorizations already in effect

Judicial review is subject to modifications under several existing statutes; tighter timelines to sue (150 days)

Increased transparency of reviews of permitting documents and applications

Establishes a federally coordinated approach

Additional staffing and training resources for permitting agencies

What's Missing:

- Optional federal pathway for the siting and construction of interstate CO2 pipelines
- EPA Underground Injection Control well classes (Class VI) are regulated under the SDWA; and not addressed by the permitting bill

BAAJA: Next Steps

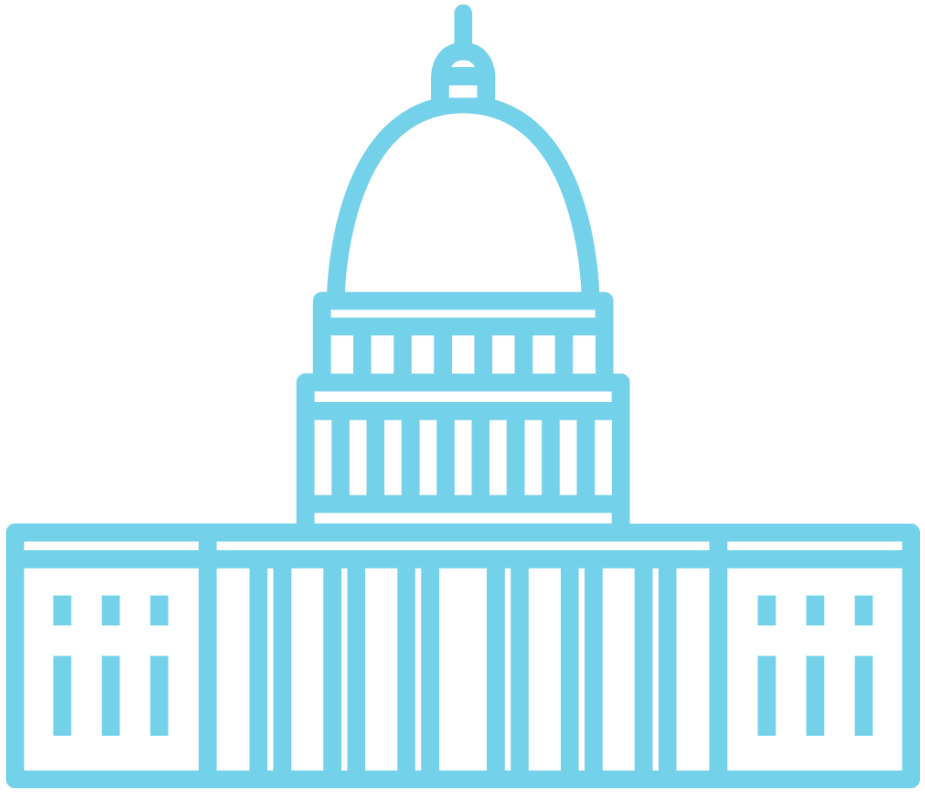
- Broad alignment with the overarching themes of the Carbon Capture Coalition's 2023 *Principles for Responsible Project Permitting*
- Notably misses including critical reforms to carbon management infrastructure permitting:
  - The bill **does not** include an optional federal pathway for CO2 pipeline project permitting or reforms to Class VI application review timelines

- Unclear at this time whether Impact should/will be able to endorse, **staff would like to issue a positive statement on the progress made**
- **Proposed next steps:**
  - Please review the memo Impact staff sent last week
  - If there are any concerns about Impact releasing a short statement regarding the positive development of negotiations, **please let staff know by COB, October 23**.

Lame Duck Strategies & Priorities

Depending on the outcome of the election…

- 45Q – Setting the stage for 120th
  - Marker bill discussions happening with Sen. Dem offices
- FY27 Appropriations
  - Defend HGEO carbon management programs
  - Advocate for protecting IIJA remaining funds (CIFIA, DAC hubs, Demos, CarbonSAFE, etc)
  - Continue work on Class VI related requests
  - Identify potential appropriations-focused GHGRP provisions
- Permitting
  - Advocate for inclusion of an **optional** federal pathway for CO2 pipeline siting and construction



CCC Updates

45Q Safe Harbor

- **GHGRP repeal still pending**
  - Extension of GHG reporting deadlines recently extended (again)
- Comments to Treasury on 45Q safe harbor guidance and long-term solution due **October 30**
  - CCC will provide draft comments to members of the Legislative Work Group & Regulatory & Guidance Work Group on **October 23**
  - **Feedback due by NOON, October 29**

2027 Federal Policy Blueprint

- Topical meetings held over the course of the summer:
  - Transport & Storage
  - Market Development
  - Energy Innovation
  - Investment Certainty
- In-person strategy meeting September 28
  - Staff working on notes & follow-up materials
- Impact to begin discussion on formation of the ‘Roadmap for Action’
- Share the final outline in conjunction with the Policy Forum
- Publish in February 2027

Carbon Capture Impact – 2027 Dues

Organization type	Annual revenue	Annual Dues
Nonprofit & labor organizations	--	$0
Pre-revenue startups (less than 50 employees)	--	$3,500
Pre-revenue startups (50+ employees)	--	$7,500
Small companies	Less than $1 billion	$12,500
Industry trade associations, law firms, and consultants	--	$12,500
Midsize companies	Between $1 and $2 billion	$25,000
Large companies	Over $2 billion	$40,000

Housekeeping

- **CCC 2026 Innovation & Policy Forum**
  - Date: October 20
  - Location: Chicago, IL
  - Optional site visit to ADM on October 21

- **Post-Election Webinar**
  - Tuesday, November 10 @12:30pm ET

