

MEMORANDUM OF UNDERSTANDING (MoU)
BETWEEN
THE MINISTRY OF CLIMATE, ENERGY AND UTILITIES OF DENMARK
AND
THE MINISTRY OF THE ENVIRONMENT OF FINLAND
ON CROSS-BORDER TRANSPORTATION OF CO₂ WITH THE PURPOSE OF
PERMANENT GEOLOGICAL STORAGE

The Ministry of Climate, Energy and Utilities of Denmark and the Ministry of the Environment of Finland (hereinafter referred to individually as a “Participant” and collectively as the “Participants”),

In pursuit of the long-term temperature goal of the Paris Agreement on climate change adopted at the 21st Conference of the Parties to the UNFCCC in Paris on 12th December 2015, hereinafter the “Paris Agreement”,

Emphasising the importance of carbon capture and storage (CCS) in achieving national and European climate goals.

Have reached the following understanding:

Section 1 – Scope

This MoU is an arrangement in the sense of Article 6 paragraph 2 of the London Protocol, as amended by Resolution LP. 3(4). Any definitions used should be understood as they are understood in the context of the London Protocol and applicable European Union legislation.

This MoU applies to cross-border transportation of CO₂ between the Participants with the purpose of permanent geological storage.

Section 2 – Allocation of permits

The Participants confirm that necessary permitting procedures for the activities are in place, and that the permits can be granted by the competent authorities of the Participants if the relevant requirements for obtaining such permits are met, to safeguard the provisions of the London Protocol Annex 2, and other applicable international law.

The Participants recognise that all necessary permit responsibilities will be allocated to the relevant authorities of each Participant’s country in accordance with the London Protocol. A current list of relevant permitting authorities is:

For Denmark:

- The Danish Energy Agency (Energistyrelsen) is responsible for the issuance of exploration permits, CO₂ storage permits as well as ETS permits:

Danish Energy Agency (Energistyrelsen)
Carsten Niebuhrs Gade 43
1577 København V

Danish Energy Agency (Energistyrelsen), Esbjerg
Niels Bohrs Vej 8D
6700 Esbjerg

Tel: +45 33 92 67 00
ens@ens.dk

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ens@ens.dk

For Finland:

- The Centres for Economic Development, Transport and the Environment (ELY-Centres) act as competent authorities in the environmental impact assessment procedures for CO₂ capture, transportation and storage projects covered by the Environmental Impact Assessment Directive (2011/92/EU). There are 13 ELY-centres acting as competent authorities and the applicable ELY-centre is determined by the location of the project.
- The Regional State Administrative Agencies (AVI) are responsible for granting environmental permits for the capture of CO₂ streams from installations covered by the Industrial Emissions Directive (2010/75/EU). There are four AVIs granting environmental permits and the applicable AVI is determined by the location of the project.

The relevant contact information for ELY-Centres and AVI can be found on the following webpage <https://www.ely-keskus.fi/ymparistoasiakaspalvelu>

- Energy Authority is responsible for the issuance of ETS permits.

The Energy Authority
paastolupa@energiavirasto.fi
Lintulahdenkuja 2A
FI-00530 Helsinki
Tel. +358 29 5050 000

Section 3 – Arrangements of the Participants

This MoU does not create any rights or obligations under international law and does not impose any financial obligations on the Participants. This MoU does not affect or interfere with existing or future national, regional, or international obligations with regards to transportation and storage of CO₂.

Each Participant intends to conduct the cooperation under this MoU subject to all applicable laws and regulations.

Section 4 – Amendment procedures and mutual understanding

This MoU may be amended at any time in writing by the Participants. The Participants will inform and consult each other should they foresee any necessary amendments.

At any time, the Participants will consult, at the request of any of them, on any matter relating to this MoU, in the spirit of cooperation, good faith and mutual trust, to quickly resolve any difficulties or misunderstandings that may arise.

The Participants will convene at least once a year to evaluate the MoU, unless they decide not to convene by joint written consent. The Participants will convene alternatively in Copenhagen and Helsinki, or in any other place decided upon by the Participants by joint written consent.

Section 5 – Final provisions

This MoU will come into effect upon signature. This MoU may be terminated by either Participant giving three (3) months' written notice to the other Participant. The termination of this MoU will not affect any on-going activities under this MoU, unless otherwise decided by the Participants.

The Participants will notify the International Maritime Organization of this MoU.

Signed in duplicate in Copenhagen on the 5th of September 2025 each in the English language.

*The Minister for Climate, Energy and Utilities
of Denmark*



Lars Aagaard

*The Minister of Climate and the Environment of
Finland*



Sari Multala