

## **NOAH's position on the environmental impacts of CCS**

NOAH finds that CCS with its 40% increase in energy consumption at power plants and the corresponding increase in mining of coal, transportation of coal, combustion, CO<sub>2</sub> capture, compression, transport, injection and storage, is on a course of collision with universal and fundamental principles of environmental legislation and regulation such as dealing with pollution at the source, waste minimization and the polluter pays principle.

Further on we find that the EU CCS Directive is incompatible with EU environmental policy for example the principle of preventive action, the principle of rectifying environmental damage at the source and the principle that the polluter should pay.

NOAH believes that CCS entails an unnecessary additional environmental impact caused by the extra consumption of energy, water and raw materials and associated emissions. Only CO<sub>2</sub> decreases, while emissions of acidifying substances, nutrients (eutrophication) and substances which form low-ozone increase dramatically. CCS represents an old-fashioned end of pipe-solution that only affects – even insufficiently – one out of a multitude of problems associated with the use of coal – namely CO<sub>2</sub>. All other problems such as extraction and transport of coal, heavy metal pollution, acidification, eutrophication and formation of low-level ozone are only getting worse with CCS.

CCS also breaks with the current waste strategy to minimize deposition through the promotion of reuse, recycling, prevention and cleaner technology. NOAH is against the establishment of a new CO<sub>2</sub> infrastructure with pipelines, pressure stations, injection facilities, CO<sub>2</sub> stores etc., because these will tend to disfigure landscape and be (randomly) harmful to local communities.

NOAH does not believe that CCS can be conceived as a benefit for the general public. Expropriation of land and property in connection with seismic studies, drilling, pipelines and injection facilities are accordingly unjustifiable.

NOAH believes that CCS will lead to increased pollution with toxic amine compounds – substances that will be used in large quantities in the CO<sub>2</sub> capture process.

NOAH fears that CO<sub>2</sub> stored at sea by accident can be released to the seabed and the overlying water masses resulting in serious acid damage to the marine environment, or – where leakages are on land – enter into basements and houses and in worst case suffocate residents and make houses uninhabitable.