

The background of the entire page is a photograph of a rolling green landscape. In the foreground, there is a lush green field. Behind it, a hillside is covered with a mix of green trees and rows of young, thin trees, possibly a reforestation project. In the distance, more hills and mountains are visible under a clear blue sky with some light clouds. The Bellona Europa logo is positioned in the top left corner, and the title 'Annual Report' is centered in the upper half. The website 'eu.bellona.org' and the issue number '2025' are at the bottom.

BELLONA
E U R O P A

Annual Report

eu.bellona.org

Issue
2025

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Executive Summary

As we progress toward a net-zero future, Bellona Europa is actively collaborating with civil society, industry, institutions, and governments on key issues such as energy systems, the deployment of climate infrastructure, green public procurement, carbon accounting, and sustainable economy policies.

In June 2024, Bellona Europa outlined its four-year Roadmap, emphasising three critical areas that must be prioritised to achieve climate neutrality: deploying essential climate infrastructure, ensuring science-based policy-making, and developing efficient markets for a net-zero world.





A Word from Our Executive Director

Against a backdrop of growing geopolitical uncertainty and shifting political priorities, the need for ambitious and effective climate action has remained as urgent as ever. At the same time, the European Union is facing a series of critical decisions on its carbon markets, the Carbon Border Adjustment Mechanism (CBAM), lead market creation, clean product labelling for materials such as steel and cement, CO₂ transport and storage infrastructure, the EU's long-term budget, and the climate policy framework beyond 2030, among many other important issues. Taken together, these developments have made for an exceptionally busy period for Bellona Europa, with our team working across a wide range of policy files to help ensure Europe stays on track to meet its climate and industrial objectives.

And the team has risen to the challenge. Bellona Europa has had the privilege of speaking at multiple high-level roundtables and consultations, at the invitation of the European Commission, on the future of cement, on

the future of the EU ETS, and on the future of the EU's broader climate frameworks. Meanwhile, our reach continues to grow at phenomenal rates, with Bellona Europa's outputs getting picked up consistently in specialist media and, increasingly, in generalist press, where our recommendations are seen as nuanced and well-informed.

All of this is made possible by our generous funders, our exceptional team, and the vibrant NGO community in Brussels which continues to fight against environmental crises in the face of populism, misinformation, and efforts to undermine the independence of civil society.

Despite these challenges, I remain hopeful about what we can achieve together.

With many thanks,

Jonas Helseth
Executive Director
Bellona Europa aisbl

Mission & Vision

Bellona Europa is an independent, non-profit and non-governmental organisation that meets environmental and climate challenges head on. We are solutions-oriented and have a systems-thinking and scientific approach to assess the economics, climate impacts and technical feasibility of the climate actions we need. To do this, we work with civil society, academia, unions, governments, institutions, and industries.

01

Integrate scientific systems-thinking and foresight in policymaking

Bellona Europa is an independent non-profit organisation tackling climate and environmental challenges through science-based, practical solutions. We work with civil society, academia, governments, institutions, unions, and industry to drive the transition to a climate-neutral society.

02

Accelerate credible climate solution and the availability of decarbonisation infrastructure

Bringing different groups involved in every step of a credible climate solution is important to make it happen faster. This means involving industry, unions, civil society, policy-makers and academia. Only with their participation and support can the right projects actually happen.

03

Ensure transparency and accountability through awareness-raising and public participation

In times when democracies face challenges and require bold decisions to address climate change, Bellona Europa strives to enable broad participation and agreement. This is achieved by providing access to information and ensuring that hypes and greenwashing are exposed and discouraged.





Zero-Emission Construction Sites

Why is Bellona tackling ZECS? This is a question we came across quite a few times, mostly from like-minded policy officers in other NGOs, industry associations, and research institutes, holding the belief that the climate impact of construction equipment is limited.

Well, we disagree. The construction process is the second largest source of embodied carbon emissions. When we zoom down to cities, we can see that construction sites can account for a substantial share of local climate emissions. Additionally, ZECS fits perfectly with the European Zero Pollution Action Plan, as construction equipment is a major source of fine particulate matter (PM2.5), nitrogen oxides (NOx), and environmental noise (which ranks among the top three environmental hazards to public health).

Beyond pollution, electrifying construction can support the broader industrial transition, including battery manufacturing and charging infrastructure. Meanwhile, European construction equipment manufacturers face growing pressure from Asian competitors, particularly China, which is rapidly advancing in electric machinery supply.

ZECS are, frankly, a no-brainer, yet they don't get the attention they deserve. For cities, emission-free equipment delivers compliance with climate and air quality goals. But European and national decision-makers are failing to see this transition for what it is: a competitiveness risk, a fossil fuel dependency, and a market failure that only regulatory action can correct.

2025 Highlights

Bellona has worked on ZECS for nearly ten years. However in the past two years we witness an increased interest. In 2024, with Oslo, Hafslund Rådgivning, and SINTEF, we launched the **Power Up a Renewable Society (PURE) Project**, resulting in two publications pro

- [From Oslo to the EU: The journey towards clean construction](#)
- [Zero-Emission Construction Sites: Turning Europe's Silent Revolution into Policy](#)

In 2025, the European Commission's [Big Buyers Working Together Project](#) funded a major update to our [Emission-free Construction Equipment Database](#) (launched in 2019), giving us a clearer picture of market supply across Europe and beyond. We also co-organised a [webinar](#) to launch the updated database. This partnership increased the visibility of our work on ZECS through the [promotion of the database](#) on DG GROW communication channels.

In a separate grant from NetZeroCities together with Hafslund Rådgivning, we were tasked

with developing an [EU-level impact assessment](#). This assessment focused on the climate, environmental, and energy systems effects of ZECS, along with policy recommendations for various governance levels and the legal foundation for extending zero-emission construction requirements to privately owned sites.

In the same year, we were invited to speak on the topic at several events: the Big Buyers Working Together annual event, the Non-Road Mobile Machinery Forum, the Drive to Zero Global MoU Conference, and the Leap to Zero Conference. Importantly, we also began our ZECS work in Germany with the support of our colleague at Bellona Deutschland.

In short, 2025 is the year Bellona established itself as a reference NGO for zero-emission construction sites in Europe, deepening ties with the Big Buyers Working Together Community of Practice, the Dutch Ministry of Infrastructure and Water Management, and broad European construction industry.

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The EU already has the regulatory backbone to deliver zero-emission construction - but it **needs to be updated and consistently enforced.**

- **Linda Zarai**
Policy Advisor, Clean Construction
Bellona Europa



Net-Zero Cement Pathways for European Cement

[Net-Zero Cement Pathways for European Cement](#), as the name says, is a report focusing on cement decarbonisation, investigating the different available levers to reduce emissions, their potential, the policy changes needed to enable the transition, and what is happening in the sector. The reception of the report has been great so far, allowing Bellona Europa to become a central actor in the dialogue surrounding cement and the construction sector in general. Specifically, it resulted in a series of engagements and speaking opportunities in specialised fora, such as [CarbonZero](#) in Bucharest (presentation, panel and conference - October 2025), Zero Emission Platform Policy & Funding Working Group (presentation - October 2025), Incite workshop organised by the Joint Research Center (attendance - October 2025), Global Cement and Concrete Association webinar on co-processing (presentation - January 2026), [Sectoral Policy Dialogue on Cement organised by DG CLIMA and Commissioners Hoekstra and Rosewall](#) (attendance - March 2026), and Low Carbon Cement roundtable organised by CONCITO in Copenhagen (presentation - May 2026). Except for the various events, the report has also been picked up by relevant stakeholders such as the OECD who suggested it as relevant material for cement-specific projects.

2025 Highlights

Cement is the key ingredient of concrete, the most used material in the world, second only to water. Without it, it would not be possible to house the world's growing population. This comes at a price for our environment: cement production in Europe alone produces more than 90 Mt of CO₂ every year, about 4% of total emissions. As there are no scalable alternatives, we have to understand which decarbonisation levers are available to European producers, what is their potential, and how we can enable a faster and cheaper transition.

Our work in 2025 built on our ongoing work on embodied carbon and our previous publication on the matter. We decided to go deeper into how to decarbonise cement production and started with understanding the challenge at hand by reading reports and articles and meeting with all possible stakeholders: clinker producers, trade association, civil society organisations, and alternative cement producers. The only goal of this investigation work was to reach a proper understanding on how the industry sector works, which problems it faces when it comes to decarbonisation, and how the existing regulatory framework helps or hinders the green transition for cement.

All of this has been condensed in our report "Net-Zero Pathways for European Cement" published in October 2025 after been reviewed by several stakeholders with deep knowledge of the sector. The publication and dissemination of the report have received a lot of attention and made Bellona Europa a distinguished voice in the conversation, leading to many relevant meetings and speaking engagements, among which the Sectoral Policy Dialogue on Cement hosted by Commissioners Hoekstra and Roswall.

The report also attracted attention beyond Bellona's immediate stakeholder network, generating coverage and discussion in specialised media and podcasts, including [MLex](#) and [Inside Europe](#) (Deutsche Welle).

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There is no silver bullet to decarbonise cement production, we must deploy all available levers if we want to reach the European climate targets.

- Dr. Marco Sirotti
Embodied Carbon Advisor
Bellona Europa



Member State NZIA Implementation Tracker

As part of the [Article 23 Watch initiative](#), Bellona Europa alongside Carbon Balance Initiative and Clean Air Taskforce, published in 2025 the Article 23 Member State Implementation Tracker, assessing how 11 EU Member States are implementing the legal, administrative and regulatory measures needed to deliver the Net Zero Industry Act's Article 23 obligation. It requires 44 oil and gas producers to collectively develop 50 MtCO₂ of annual injection capacity by 2030, making national implementation critical to whether the EU can meet its CO₂ storage target.

The tracker provides an evidence-based assessment of each Member State's progress across key enabling and enforcement criteria, including single points of contact, permitting frameworks, storage transparency, CO₂ transport access and penalties. It helps improve transparency and accountability by showing where implementation is advancing, where gaps remain, and where urgent national action is needed. The first edition found uneven progress across the 11 Member States, with some countries already developing stronger frameworks while others still lack core administrative or regulatory measures.

2025 Highlights

The tracker gives policymakers, civil society, industry, and the wider public a practical tool to monitor progress, identify regulatory gaps, and push for timely delivery of the EU's 2030 CO₂ storage objective. By making Member State implementation more transparent and accessible, it helps inform public debate and strengthens accountability around the measures needed to develop a functioning European CO₂ market.

The tracker has already helped move the discussion from analysis to practical implementation. Following its publication, the Polish CCUS Association picked up the findings and invited Bellona Europa to contribute to a workshop on the status of single points of contact and good administrative processes for CO₂ storage and infrastructure development. The workshop brought together key Polish stakeholders, including government officials, creating a concrete opportunity to use the tracker's findings to inform national implementation discussions.

One direct outcome was that Polish stakeholders identified Denmark, highlighted in the

tracker as one of the more advanced Member States on single point of contact requirements, as a useful example to learn from. Following the workshop, they decided to reach out to Danish counterparts to exchange knowledge and better understand their approach. In this way, the tracker helped accelerate Member State coordination and peer learning on the practical measures needed to develop the CO₂ market and deliver the Article 23 obligation under the Net Zero Industry Act.

Bellona Europa's work on Article 23 generated coverage across leading European climate and energy media, including [Carbon Pulse](#), [Euractiv](#), [ENDS Europe](#), the Jolt Podcast by [Foresight Climate & Energy](#), and [Carbon Herald](#), and others, helping to raise awareness of industry accountability for CO₂ storage deployment.

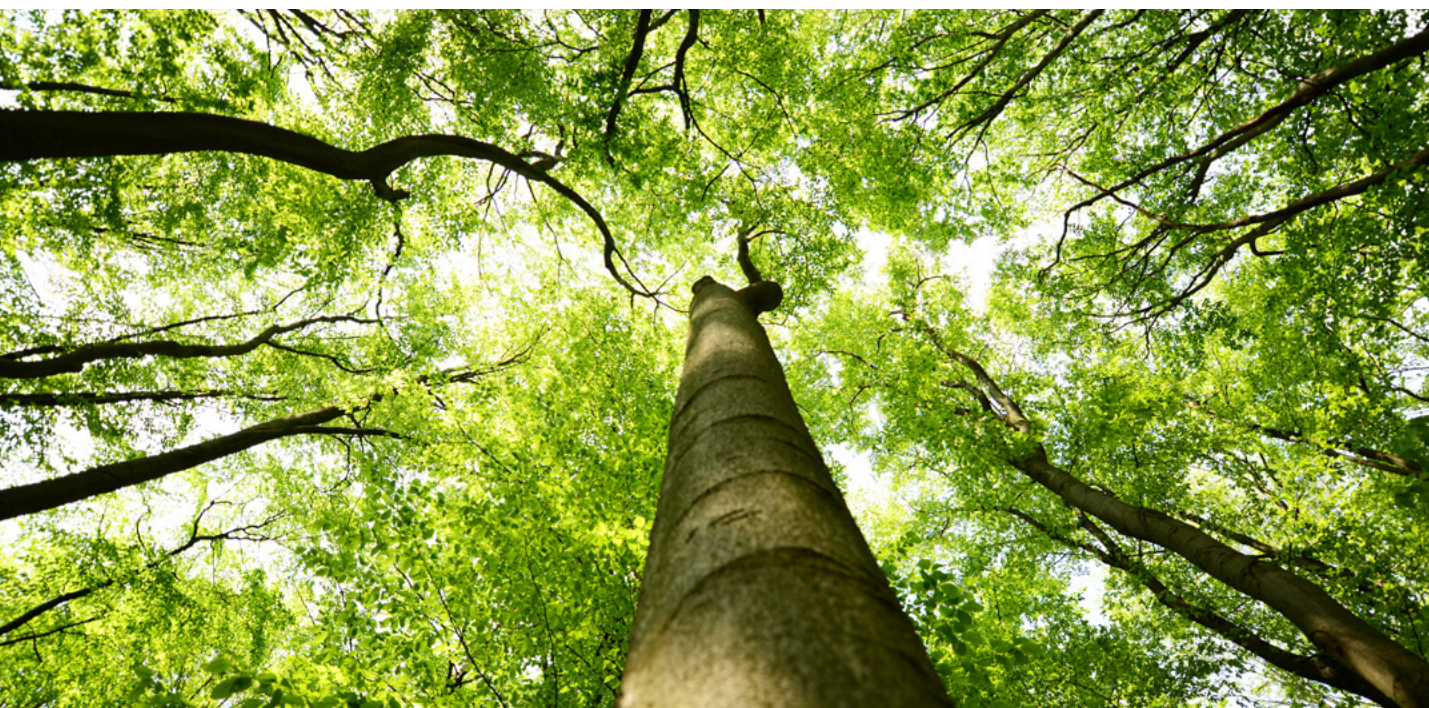
Supporting materials:

- 1) [Article 23 Member State Implementation Tracker](#)
- 2) [Net-Zero Industry Act](#)

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The success of Article 23 will depend **not only on what oil and gas producers do, but also on how effectively Member States create the conditions for delivery.** Transparency allows everyone to see where progress is being made, where gaps remain, and where action is needed to bring the EU's CO₂ storage target within reach.

- **Hanna Biro**
Policy Manager, CCS Industrial Just Transition
Bellona Europa



EU 2040 Climate Target

In 2025, Bellona Europa focused on the EU 2040 climate target as the north star for the post-2030 trajectory, bridging the gap between 2030 ambition and net-zero by 2050. That year, discussions on the revision of the EU Climate Law provided a crucial opportunity to define this next step. In addition, the target serves as a key market signal, shaping the scale and timing of investments needed for the transition across EU industry and infrastructure. Our work further aimed to ensure alignment between the EU's 2040 target and its updated 2035 Nationally Determined Contribution (NDC), to maintain a coherent pathway.

Bellona Europa worked with other civil society organisations and industry partners to push for an ambitious and credible 2040 climate target. Our strategy combined accessible communications and storytelling with targeted policy engagement and bilateral advocacy. We also highlighted the importance of the target for the EU's international credibility and reputation, particularly ahead of COP30, and raised concerns about the risks that excessive reliance on international carbon credits could pose to both climate ambition and European competitiveness.

Our advocacy took place in a challenging political context. The legislative proposal was published later than expected, while discussions increasingly shifted from the technical level to heads of state and government of EU Member States. At the same time, the European Parliament delayed its position pending signals from the Council, creating additional uncertainty around the process. In response, we adapted our strategy throughout the year, tailoring our messages to evolving political dynamics.

2025 Highlights

In 2025, Bellona Europa advocated for a science-based EU 2040 climate target, that limits the use of international carbon credits, aligns with scientific recommendations, and clearly distinguishes between gross emission reductions, permanent carbon removals and the land sink sector.

Throughout the year, our analysis shaped the public debate and policy process. Our work was featured in major media outlets, including [The Guardian](#), Contexte briefings, and [Carbon Pulse](#), and [Mlex](#). We published a [policy briefing](#) and four press releases ([April](#), [July](#), [September](#), [November](#)), reacting and analysing key policy moments, including the legislative proposal and high-level meetings of EU environment ministers.

Our experts were invited to discuss the topic in a dedicated [podcast episode](#). Bellona joined several letters from the [Coalition for](#)

[Higher Ambition](#), as well as NGO letters on [LU-LUCF](#) and on [international credits](#). Together with Nordic energy companies, we co-authored an op-ed in [The Parliament magazine](#). Our team held advocacy meetings with policy-makers in Brussels and Strasbourg, engaging with representatives from different Member States and political groups, and the European Commission.

These efforts helped secure several important outcomes: the preservation of a binding 90% target, stronger quality safeguards for international credits, and the inclusion of a potential contribution from removals. However, political pressure resulted in a weaker framework for protecting land sinks, a higher ceiling for international credits, and a strengthened review process for the target.

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In 2025, we advocated for a **science-based EU 2040 climate target as the north star for 2030 to 2040**. With the target now in place, we are working to shape the post-2030 climate policy package to **ensure its integrity and keep the EU on track towards climate neutrality**.

- Amélie Laurent
Policy Advisor, Carbon Accounting
Bellona Europa



Carbon Removal Certification Framework

Bellona Europa is a member of the European Commission’s Expert Group on Carbon Removals, the body that shapes the technical details of the delegated acts underpinning the CRCF; the EU’s primary legislation governing carbon farming, permanent carbon removals, and carbon storage in products.

The CRCF is fast becoming a cornerstone of Europe’s post-2030 climate architecture. How its methodologies are designed will directly determine the environmental integrity of certified carbon removals, how permanent removals interact with the EU ETS, and whether carbon farming can credibly be integrated into EU climate targets. Getting these rules right matters enormously – both for climate ambition and for the credibility of emerging EU carbon markets, including the Buyers Club and the upcoming EU Purchasing Facility.

With a seat at the table, Bellona Europahas ensured that robust environmental standards remain central to the process – providing technically grounded, solutions-oriented feedback at every stage of methodology development.

2025 Highlights

Bellona’s engagement with the CRCF Expert Group took multiple forms throughout the year. During Commission-hosted Expert Group sessions, Bellona intervened directly to flag methodological weaknesses and propose concrete improvements. In parallel, joint [state-ments](#) coordinated with aligned organisations helped consolidate recommendations and amplify calls for environmental integrity across the different delegated acts.

Beyond the formal Expert Group, Bellona Europa engaged bilaterally with Member State experts to build understanding and support for robust approaches. Positions and takeaways were published on Bellona’s [website](#), providing accessible analysis of complex technical documents –content that gained notable traction, including being [cited](#) by the European Parliament’s Research Service (EPRS).

Bellona also worked with journalists to help them navigate the technical detail and accurately communicate what was at stake in the methodology discussions. This resulted in coverage and citations in leading outlets including [Euractiv](#), [Carbon Pulse](#), [Ends Europe](#), and others.

As a result, Bellona Europa became a recognised [reference](#) and source of expertise on the CRCF regulation – one increasingly sought out by policymakers, researchers, and media as the framework moves from design to implementation.

[Read more here.](#)

“

The CRCF is shaping the rules for what counts as a real carbon removal in Europe. **Our role in the Expert Group means we can push for the environmental integrity these methodologies need** – before the rules are locked in and the implications of the CRCF in the post 2030 climate architecture.

- Dr. Louis Hennequin
CDR Research and Technology Advisor
Bellona Europa



Electricity Grids

Electricity grid infrastructure plays a central role in the EU's energy transition. Transmission and distribution networks determine how much renewable energy can be integrated, how far industrial processes can be electrified, and how efficiently energy flows across borders. Because grid assets last several decades, investment decisions taken now will shape the energy system well beyond the 2030 and 2050 policy horizons. The quality of planning is therefore important not only for near-term deployment but for whether the energy system remains aligned with long-term climate goals.

The current period is particularly complex. Scenarios that poorly represent emerging industrial demand, or that treat energy efficiency as a fixed assumption rather than an actively evaluated option, risk producing infrastructure plans misaligned with actual needs, with consequences for costs, security of supply, and decarbonisation.

Bellona Europa's work focuses on the governance and methodology behind EU-level grid planning, particularly the Ten-Year Network Development Plan. The core concern is that planning assumptions and scenario construction require stronger transparency, independent scientific input, and clearer methodological standards if the resulting infrastructure is to be reliably aligned with EU climate and affordability goals. To address this, Bellona Europa developed policy analysis and recommendations aimed at strengthening the governance framework.

2025 Highlights

Bellona Europa produced two policy outputs examining the governance and methodology behind EU-level grid planning. The [Grids Package Position Paper](#) set out concrete recommendations for improving the planning framework across four areas: the methodology and transparency of the EU central scenario; the energy efficiency first principle as a binding alternatives test; independent scientific input through the European Scientific Advisory Board on Climate Change; and the congestion income ring-fencing mechanism. The accompanying policy brief, [Infrastructure Planning in a Decarbonising Europe](#), provided the analytical underpinning by identifying structural gaps in how industrial demand and energy efficiency are currently treated in the planning process.

Both outputs were shared and discussed with relevant stakeholders across the policy landscape, building the relationships and techni-

cal credibility needed for the legislative phase ahead.

The publication of the EU Grids Package in December – the most significant revision of EU energy infrastructure planning legislation in years – validated the focus of this work. The proposal directly addresses the planning and governance gaps Bellona had been analysing, confirming that this was an area in need of reform. With the European Parliament process now underway, 2026 is where the foundation built this year will translate into direct legislative influence.

Read more:

[Infrastructure Planning in a Decarbonising Europe: Industrial Demand and Energy Efficiency in the TYNDP - Bellona EU](#)

[Position-Paper-EU-Grids-Package.pdf](#)



Without infrastructure that is correctly located and correctly governed, **decarbonisation, security of supply and affordable electricity cannot be delivered together.**

- Ganni Vassallo
Policy Advisor Grids
Bellona Europa



Indirect Emissions in the CBAM

From the beginning, the Carbon Border Adjustment Mechanism (CBAM) was designed to ensure that imported goods face a carbon cost comparable to that paid by European producers. However, one major issue remained unresolved: how to treat indirect emissions from electricity consumption.

The challenge stemmed from the interaction between CBAM and Indirect Cost Compensation (ICC), the mechanism that compensates certain industries for carbon costs passed through electricity prices. Including indirect emissions in CBAM while maintaining ICC risked creating double protection against carbon leakage. As a result, indirect emissions were largely left outside the CBAM framework, leaving significant emissions unpriced and weakening incentives for industrial decarbonisation.

Bellona Europa saw an opportunity to break this deadlock. Rather than viewing CBAM and ICC as mutually exclusive, we developed a proposal to reform ICC so that indirect emissions could be incorporated into CBAM while preserving appropriate carbon leakage protection. This approach would strengthen the integrity of the EU carbon pricing framework and ensure that electrification remains aligned with climate objectives. Our proposal was published in September 2025 [Closing the CBAM gap: Including indirect emissions for EU competitiveness and global decarbonisation.](#)

2025 Highlights

Following the publication of Bellona’s policy paper in September 2025, the proposal gained increasing attention among policymakers, industry representatives and civil society organisations. What had long been considered a divisive issue began to attract broader interest as stakeholders explored pathways to reconcile carbon leakage protection with effective carbon pricing. This was something we also brought as a speaking point in meetings and public events.

In the [CBAM report](#) published in December 2025, among the different options the Commission proposes a similar proposal can be found in technical solution number five.

Bellona Europa’s work on CBAM and industrial competitiveness was featured in leading European policy and market intelligence outlets, including [Carbon Pulse](#), [ENDS Europe](#), [Euronews](#), [Argus Media](#), and others.

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For years, the issue on how to include indirect emnissions in the **CBAM could not advance due to the percieved incompatibility** with ICC. **Our work showed that a third way is possible.**

- Francesco Lombardi Stocchetti
Policy Advisor, Sustainable Finance & Economy
Bellona Europa

Bellona across geographies

Beyond its work in Brussels, Bellona advances industrial decarbonisation and environmental accountability through dedicated teams and partnerships across Europe. The paragraphs below summarise 2025 activity by geography.

Germany

From its Berlin base, Bellona Deutschland drove the parliamentary process on CO₂ transport and storage (KSpTG), which was approved by both Bundestag and Bundesrat – permitting CO₂ transport and offshore storage in Germany for the first time, with onshore storage left to the states via an opt-in clause. Bellona Deutschland contributed assessments during the Bundestag expert hearing and convened its CCS Forum, a multi-stakeholder dialogue platform spanning industry, civil society, academia and unions. The second round of Carbon Contracts for Difference, now open to CCS, was launched, though with reduced funding. Bellona also expanded into the chemical sector (a paper on CCU, a Dormagen chemical-park field trip, and involvement in the German Chemical Agenda 2045 initiative) and recruited a transformation economist to strengthen work on the German climate fund and green lead markets.

The Nordics

Bellona built relationships with Nordic industry, policymakers, state agencies, municipalities, civil society, and academia along the CCS, cement, and steel value chains, as well as the broad construction sector, including machinery manufacturers and infrastructure owners. Bellona has spoken at conferences on CDR, CCS, CO₂ markets, and embodied carbon across Denmark, Sweden, Finland, and in Brussels. It assessed Nordic CCS policy (including in the National Energy and Climate Plans and on Article 23 NZIA implementation) and advised the Nordic Carbon Removal Association. Together with the Nordic Council of Ministers and other Nordic NGOs, it published a series of op-eds in Nordic and European outlets on the need for Green Public Procurement for low-carbon infrastructure. With Nordic industry representatives, it co-drafted an op-ed on the need for an ambitious 2040 climate target. In June 2025 Bellona hosted the “EU Carbon Pathways” CO₂ market event in Brussels with Danish, Polish and EU actors, producing the follow-up publication on potential CO₂ market failures, and in December 2025 it hosted in Stockholm the closed-door policy roundtable “How can the EU clean industrial deal deliver lead markets for Swedish low carbon construction?” attended by industry, decision-makers, academics, and civil society. This latter event was then followed by two op-eds published in 2026.

Norway

Bellona’s work helped secure a parliamentary majority requiring the government to present CCS subsidy and CO₂ transport coordination plans, and a national carbon removals support scheme announced for the 2027 budget. On oil and gas accountability, a Bellona policy report contributed to a €60 million penalty against Equinor for pollution-control violations, covered in 60+ news articles including the Financial Times and The Guardian.

Poland

Bellona Europa is a member of CCUS Poland, the multi-stakeholder platform established in 2024. In 2025 it deepened this engagement: Bellona staff were re-elected to the association’s Board, and was invited as speaker at CCS events in Poland. The organisation signed a government-initiated letter of intent, and joined Polish government-led working groups on CCS strategy, communication and legislation. Through its active membership in CCUS Poland, Bellona is supporting development of Poland’s forthcoming CCUS Strategy and dedicated national CCS legislation on CO₂ transport and storage. This builds on the earlier CCS4CEE project and continues through the EUKI-funded GreenHorizon and Horizon Europe COREu projects, which develop regional CCUS clusters and their links to a European CO₂ network. CCUS Poland is also positioned as a key setting for preparing the next EU Industrial Carbon Management Forum, to be hosted in Warsaw in early 2027, where Bellona Europa is planning to take an active part.

In June 2026, beyond the period covered by this report, Poland adopted legislation expanding the areas eligible for onshore CO₂ storage, a milestone Bellona had long advocated for through CCUS Poland and earlier regional work.

The Netherlands

Bellona engaged on Dutch and cross-border CO₂ infrastructure, advocating for a robust governance model for the ARRRA cluster (Antwerp–Rotterdam–Rhine–Ruhr–Area), where a small number of plants account for the bulk of industrial ETS emissions across the Netherlands, Belgium and North Rhine-Westphalia. Bellona contributed to a joint call to action for a regional CO₂ infrastructure strategy spanning the Netherlands, Belgium and North Rhine-Westphalia, and published an open letter to Dutch MPs on the need for a carbon dioxide removal (CDR) policy. On national climate policy, Bellona published an op-ed warning that abolishing the Dutch industrial CO₂ levy risked undermining the country’s 2030 industrial emissions target. Dutch projects (e.g. Yara’s capture project feeding Northern Lights, and the Aramis and Porthos transport infrastructure) featured in Bellona’s wider European CCS market work, and the Dutch business-to-business CCS model was discussed at the Bellona Climate Action Conference 2025.

Baltics (Latvia, Lithuania, and Estonia)

Bellona intensified its presence in Baltic CCS through the earlier CCS4CEE project and the current EUKI-funded GreenHorizonCEE project, building institutional and CSO capacity on carbon management. In October 2025 a change in Latvian law lifted the ban on CO₂ geological storage, allowing the Latvian and Baltic cement industry to plan CCS domestically rather than relying solely on storage abroad – a step Bellona supported, alongside the GreenHorizonCEE national study on carbon-management capacity gaps in Latvia. In Lithuania and Latvia, where governmental support and legal frameworks for CCS still lag, Bellona continued to track project developments (such as Schwenk’s cement CCS plans and PCI-listed CCS Baltic Consortium cross-border project) and to assess both countries’ National Energy and Climate Plans against the Commission’s CCS recommendations.

The Environmental Transparency Center (Vilnius)

The Bellona Environmental Transparency Center (ETC), based in Vilnius, is the Bellona investigative team analysing, documenting and communicating environmental, climate and nuclear risks originating in Russia, working in close coordination with colleagues in Oslo and Brussels. In 2025 its work focused on the Arctic, the Northern Sea Route (NSR) and Russia’s state-controlled nuclear sector.

On environmental risks, ETC researched and published the analytical report “The Northern Sea Route: Russia’s Industrial and Political Expansion, its Environmental Costs, and Arctic Shipping Risks”, assessing environmental degradation, shipping and emergency-preparedness risks, and the geopolitical implications of Arctic fossil fuel transport. Findings were presented at the online seminar “The Northern Sea Route: Not for Transit” (18 September 2025) to EU stakeholders, experts and civil society, alongside targeted briefings and regular analytical publications via the ETC website and newsletters. A structured stakeholder mapping exercise strengthened the targeting and continuity of outreach.

On nuclear risks and the environmental consequences of Russia’s invasion of Ukraine, ETC carried out continuous monitoring of nuclear safety developments in Russia and Ukraine, including Rosatom’s domestic operations and international projects, its sanctions exposure, nuclear fuel supply chains and links to Arctic infrastructure. This fed into articles, briefings and expert-platform engagement, and the seminar “The Transformation of Rosatom and Russia’s Nuclear Sector During the War in Ukraine” (13 May 2025, Oslo).

2025 in Numbers

44

Public speaking engagements

92

Meetings with policymakers

39

Publications



90+

Media mentions



17

Expert group participations

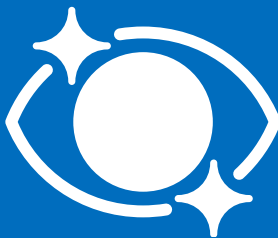


16

Coalition advocacy initiatives

8

Hosted/co-organised events



88k

Total website views

3.3k

Total publications page views

408K

Number of impressions on social media

2k+

Total new social media followers

150k

Total engagement on social media

Financial Metrics

€4.08M

Total funding secured

€780k

Largest programme investment

€453k

Average funding per programme

FUNDING SOURCES (2026)

Funding source	Amount (€)	Share of income
CIFF	1.46M	35.8%
QCF	1.19M	29.1%
LIFE Grant	700k	17.1%
QCF-CDR	447k	11.0%
ECF CCS Forum	127k	10.9%
Mercator	125k	10.8%

Total income: €4.08 million

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