



**The Maryland Department of the Environment  
Secretary Serena McIlwain**

***Senate Bill 625***

***Carbon Removal Technology and Practices – Regulations and Use of Funding***

**Position:** Letter of Information  
**Committee:** Education, Energy, and the Environment  
**Date:** March 10, 2026  
**From:** Jeremy D. Baker, Director of Government Relations

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The Maryland Department of the Environment (MDE) offers the following **LETTER OF INFORMATION** for SB 625.

**Bill Summary**

Senate Bill 625 would require the Department to adopt regulations governing the permitting of carbon removal technologies by January 1, 2028. The carbon removal practices must be certified by an internationally recognized third-party certification body. State agencies shall use available funding sources to fund carbon removal projects that use carbon removal technologies and practices certified by such internationally recognized third-party certification bodies.

**Position Rationale**

The current language in Senate Bill 625 is broad and unspecific, implicating a wide array of existing technologies (e.g. carbon or direct air capture and underground storage) and emerging technologies (e.g. ocean-based carbon removal and enhanced rock weathering). Senate Bill 625 is filed under Title 2 of the Environmental Article; however the preamble states that the current practice of applying solid waste regulations to carbon removal is unsuitable. Solid Waste regulations are found under Title 9 and any change to applying solid waste regulations to be more suitable should be addressed in Title 9. The bill's preamble indicates a specific need to revise solid waste regulations that are "unsuitable" without specifying what practices are inadequate and must be altered. Certain regulations may be unsuitable due to underlying statutory authorities and directions provided to MDE. Additionally, direct air or carbon capture and sequestration technologies ultimately may require the state to adopt new regulations and seek EPA primacy related to the permitting of Class VI underground injection wells under the Safe Drinking Water Act. In other states, such programs require a large staff of technical subject matter experts and have been deeply controversial with surrounding communities. The broad language requiring each State agency to use all available funding sources would implicate every revenue type - General, Capital, Special, and Federal Funds- to fund carbon removal projects. This could have a significant fiscal impact in the hundreds of millions of dollars. Senate Bill 625 does not limit or constrain the scope or number of projects, or the amount of funding required to facilitate the installation of such projects.

MDE hopes this information is useful to the Committee and is available for questions related to SB 625.

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