

# Consultation on the draft new State aid Framework to support the Clean Industrial Deal (Clean Industrial Deal State Aid Framework – CISAF)

Fields marked with \* are mandatory.

## Introduction

---

Following the adoption of the [Clean Industrial Deal](#) Communication on 26 February 2025, the Commission is consulting the general public on a [draft new State aid framework](#).

The Commission invites you to provide your views on the draft Clean Industrial Deal State Aid Framework via the form below. The Commission is particularly interested in views on those parts marked in [ ]. In case you consider any such parts not appropriate in their current form and want to propose alternatives, please ensure to submit relevant data and evidence to substantiate your view.

Thank you for your collaboration!

## About you

---

Please specify the language of your contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish

- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

\* Please specify in which role you provide your contribution

- EU Citizen
- Commercial company / business
- Consumer organisation / NGO
- Business association
- Academic / research institution
- Public authority
- Other

\* Please specify the Member State for which you provide your your comment.

- AT - Austria
- BE - Belgium
- BG - Bulgaria
- HR - Croatia
- CY - Cyprus
- CZ - Czechia
- DK - Denmark
- EE - Estonia
- FI - Finland
- FR - France
- DE - Germany
- EL - Greece
- HU - Hungary
- IE - Ireland
- IT - Italy
- LV - Latvia
- LT - Lithuania
- LU - Luxembourg
- MT - Malta
- NL - Netherlands
- PL - Poland
- PT - Portugal
- RO - Romania
- SK - Slovak Republic
- SI - Slovenia
- ES - Spain
- SE - Sweden

\* Please provide your full name

\* Please provide your e-mail address (this will not be published)

Please provide the name of the organisation or company you represent (if any)

Please indicate the size of your organisation

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more employees)

If your organisation is registered, please provide your transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making. More information can be found [here](#).

Please specify your country of residence or the location of the headquarter of the organisation / company you represent

- AF - Afghanistan
- AL - Albania
- DZ - Algeria
- AD - Andorra
- AO - Angola
- AG - Antigua and Barbuda
- AR - Argentina
- AM - Armenia
- AU - Australia
- AT - Austria
- AZ - Azerbaijan
- BS - Bahamas
- BH - Bahrain
- BD - Bangladesh
- BB - Barbados
- BY - Belarus
- BE - Belgium
- BZ - Belize
- BJ - Benin
- BT - Bhutan
- BO - Bolivia

- BA - Bosnia and Herzegovina
- BW - Botswana
- BR - Brazil
- BN - Brunei Darussalam
- BG - Bulgaria
- BF - Burkina Faso
- BI - Burundi
- CV - Cabo Verde
- KH - Cambodia
- CM - Cameroon
- CA - Canada
- CF - Central African Republic
- TD - Chad
- CL - Chile
- CN - China
- CO - Colombia
- KM - Comoros
- CG - Congo
- CR - Costa Rica
- CI - Côte D'Ivoire
- HR - Croatia
- CU - Cuba
- CY - Cyprus
- CZ - Czechia
- CD - Democratic Republic of the Congo
- DK - Denmark
- DJ - Djibouti
- DM - Dominica
- DO - Dominican Republic
- EC - Ecuador
- EG - Egypt
- SV - El Salvador
- GQ - Equatorial Guinea
- ER - Eritrea
- EE - Estonia
- SZ - Eswatini
- ET - Ethiopia
- FJ - Fiji
- FI - Finland
- FR - France
- GA - Gabon
- GM - Gambia
- GE - Georgia
- DE - Germany
- GH - Ghana
- GR - Greece

- GD - Grenada
- GT - Guatemala
- GN - Guinea
- GW - Guinea Bissau
- GY - Guyana
- HT - Haiti
- HN - Honduras
- HU - Hungary
- IS - Iceland
- IN - India
- ID - Indonesia
- IR - Iran
- IQ - Iraq
- IE - Ireland
- IL - Israel
- IT - Italy
- JM - Jamaica
- JP - Japan
- JO - Jordan
- KZ - Kazakhstan
- KE - Kenya
- KI - Kiribati
- KW - Kuwait
- KG - Kyrgyzstan
- LA - Laos
- LV - Latvia
- LB - Lebanon
- LS - Lesotho
- LR - Liberia
- LY - Libya
- LI - Liechtenstein
- LT - Lithuania
- LU - Luxembourg
- MG - Madagascar
- MW - Malawi
- MY - Malaysia
- MV - Maldives
- ML - Mali
- MT - Malta
- MH - Marshall Islands
- MR - Mauritania
- MU - Mauritius
- MX - Mexico
- FM - Micronesia
- MC - Monaco
- MN - Mongolia

- ME - Montenegro
- MA - Morocco
- MZ - Mozambique
- MM - Myanmar
- NA - Namibia
- NR - Nauru
- NP - Nepal
- NL - Netherlands
- NZ - New Zealand
- NI - Nicaragua
- NE - Niger
- NG - Nigeria
- KP - North Korea
- MK - North Macedonia
- NO - Norway
- OM - Oman
- PK - Pakistan
- PW - Palau
- PA - Panama
- PG - Papua New Guinea
- PY - Paraguay
- PE - Peru
- PH - Philippines
- PL - Poland
- PT - Portugal
- QA - Qatar
- MD - Republic of Moldova
- RO - Romania
- RU - Russian Federation
- RW - Rwanda
- KN - Saint Kitts and Nevis
- LC - Saint Lucia
- VC - Saint Vincent and the Grenadines
- WS - Samoa
- SM - San Marino
- ST - Sao Tome and Principe
- SA - Saudi Arabia
- SN - Senegal
- RS - Serbia
- SC - Seychelles
- SL - Sierra Leone
- SG - Singapore
- SK - Slovakia
- SI - Slovenia
- SB - Solomon Islands

- SO - Somalia
- ZA - South Africa
- KR - South Korea
- SS - South Sudan
  
- ES - Spain
- LK - Sri Lanka
- SD - Sudan
- SR - Suriname
- SE - Sweden
- CH - Switzerland
- SY - Syrian Arab Republic
- TJ - Tajikistan
- TZ - Tanzania
- TH - Thailand
- TL - Timor-Leste
- TG - Togo
- TO - Tonga
- TT - Trinidad and Tobago
- TN - Tunisia
- TR - Turkey
- TM - Turkmenistan
- TV - Tuvalu
- UG - Uganda
- UA - Ukraine
- AE - United Arab Emirates
- GB - United Kingdom
- US - United States of America
- UY - Uruguay
- UZ - Uzbekistan
- VU - Vanuatu
- VE - Venezuela
- VN - Viet Nam
- YE - Yemen
- ZM - Zambia
- ZW - Zimbabwe

The Commission will publish all contributions to this consultation. Please do not include any confidential information in your reply.

You can choose whether you would prefer to have your personal details published or to remain anonymous when your contribution is published. For the purpose of transparency, the type of respondent (e.g., 'EU citizen', 'commercial company' or 'consumer organisation'), country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published. Please opt in to select the privacy option that best suits you.

Privacy setting

- Anonymous**

Only the type of respondent as indicated above, your country of origin, and your contribution will be published as received.

Your name and email address will not be published. Please do not include any personal data in the contribution itself.

**Public**

Your name, the type of respondent indicated above, your country of origin, and your contribution will be published (your email address will not be published).

#### Privacy setting

**Anonymous**

Only organisation details are published: The type of respondent indicated above, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin, and your contribution will be published as received. Your name and email address will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

**Public**

Organisation details and respondent details are published: The type of respondent as indicated above, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin, and your contribution will be published. Your name will also be published (your email address will no be published).

#### \* Protection of personal data

I **agree** with the [personal data protection provisions](#).

## General comments

---

**Please provide any comments you may wish to bring to the Commission's attention in relation to the draft proposal for a new Clean Industrial Deal State aid Framework.**

*5000 character(s) maximum*

- Establishing a procedural exception for faster approval of the screening of the State Aid permit process is necessary and justified. Europe has not yet regained its economic strength and time continues to put pressure on the expected Green Transition deliverables);
- A flexible approach towards aid intensity and Funding Gap analysis is necessary to increase the speed in providing State Aid and accommodates better the volatility of the market situation.

## Aid to accelerate the rollout of renewable energy

---

**Please provide any comments specific to section 4.1 of the draft framework (“Aid schemes to accelerate the rollout of renewable energy”).**

*5000 character(s) maximum*

- We agree that aid may be granted only with respect to newly installed or repowered capacities.
- In the language, it would be useful to clarify whether the provisions set out under point (42) and its sub-sections a.-d. need to be respected simultaneously (e.g. aid granted per undertaking per project remain below EUR 30 million **and** installed wind generation capacity below 18 MW).

**If you consider the proposed completion deadlines or exemptions therefrom (see point (37)) are not appropriate, please provide concrete justification for any alternative timeline or other exemptions you would consider more appropriate.**



- We consider the deadlines sufficient for the mentioned scope of point 37, except in case of *force majeure*.

**Please provide any comments specific to section 4.2 of the draft framework (“Aid for non-fossil flexibility support schemes”).**

*5000 character(s) maximum*

.....

**Please provide any comments specific to section 4.3 and Annex I of the draft framework (“Aid for capacity mechanisms following a target model”).**

*5000 character(s) maximum*

- .....

## Aid to deploy industrial decarbonisation

---

**Please provide any comments specific to section 5 of the draft framework (“Aid to deploy industrial decarbonisation”).**

*5000 character(s) maximum*

- We also welcome section 5.3.2. setting out an alternative way of determining the maximum aid amount.

**If you consider that the prioritisation of technologies for decarbonisation of industrial heat in this section on decarbonisation and energy efficiency is not appropriate (see point (73)), please explain and provide evidence for other criteria you would consider more appropriate.**

- .....

**For aid schemes covering investments relying wholly or partly on the use of hydrogen, section 5, point (82),**

**the new framework takes into account the fact that Article 22a of [Directive \(EU\) 2018/2001](#) on the promotion of the use of energy from renewable sources (RED) establishes targets for renewable fuels of non-biological origin (RFNBO) for hydrogen in industry. The draft framework does so by laying down a minimum share of renewable hydrogen calculated by reference to the average share of electricity from renewable sources in the Member State concerned, as such project-level contribution to meeting national targets established by EU law is considered a positive effect in the balancing exercise under Article 107(3)**

**(c) TFEU. If you consider that the scope for aid for investments for industrial use of hydrogen should be defined differently, please provide justification and any available evidence for the scope of projects for which you consider that State aid for other types or combinations of hydrogen is required.**

- .....

**If you consider that the zero indirect emissions presumption for electrification projects in this section on decarbonisation and energy efficiency is not appropriate (see point (98)), please explain and provide evidence for an alternative presumption you would consider more appropriate.**

- It is important that the requirement of using only renewable energy can be fully covered by the projections foreseen in the most recent National Energy and Climate Plan ('NECP'), otherwise it may bring about inefficient investments in energy sector or prevent investment in industrial decarbonisation.

**If you consider that the safe harbour for natural gas based projects in this section on decarbonisation and energy efficiency is not appropriate (see point (101)), please explain and provide evidence for an alternative presumption you would consider more appropriate.**

- .....

The draft framework allows to provide support for investment costs related directly to the achievement of the greenhouse gas emission savings or energy efficiency. Such support for these investment costs does not cover production capacity increases, but it also does not prevent companies from proceeding at the same time with capacity increases insofar as the increases are not financed by State aid under the decarbonisation section. This is without prejudice to the compatibility of aid for such capacity increases under other sections of the framework, other frameworks or the Treaty. For simplification reasons, the draft framework nevertheless allows increases of capacity up to 5% without having to differentiate between costs for decarbonisation and those related to capacity increases (see point (103)). Do you think the 5% flexibility margin proposed to be appropriate? If not, please substantiate your view with concrete evidence and data.

- .....

## **Aid to ensure sufficient manufacturing capacity in clean technologies**

---

**Please provide any comments specific to section 6 of the draft framework ("Aid to ensure sufficient manufacturing capacity in clean technologies").**

*5000 character(s) maximum*

- We welcome a special state aid framework covering also CCUS as high CAPEX is required in CCUS technologies. There should be paid more attention to the aspect that biogenic CO2 availability is rather dispersed and the market is not properly developed.
- The operative deployment of technology is necessary, considering ambitious climate objectives and the need for security of supply of critical raw materials. The development on CCU enables us to replace a range of fossil raw materials and it is important to guarantee that innovative solutions should fit into regulative framework. It is crucial that different regulative acts are in full alignment concerning CCUS, ie. certification regulation, EU ETS.

**The list of clean technologies in point (122) eligible for manufacturing aid should be defined by reference to identifiable market failures in ensuring resilient supply of such technologies. Please indicate whether you consider that the scope for aid for clean tech manufacturing equipment and**

components activities under section 6 should be aligned with the scope of the corresponding section of the [Temporary Crisis and Transition Framework](#) (as set out in the draft for consultation of stakeholder views), with the scope of the Annex of the [Net Zero Industry Act](#), or with some other subset of such technologies. Please provide justification and any available evidence for the scope of projects for which you consider that State aid for additional manufacturing capacity is required.

- The aspect of critical raw materials should be covered properly. Additionally, is important to keep in mind that the whole system of promoting strategic sectors should be coherent and not bringing about too many different strict rules as launching a new technologies includes anyway several risks.

## Aid to reduce risks of private investments

---

Please provide any comments specific to section 7 of the draft framework ("Aid to reduce risks of private investments in renewable energy, industrial decarbonisation, clean technology manufacturing and energy infrastructure").

*5000 character(s) maximum*

- .....

Do you agree that the inclusion of aid to investors in energy infrastructure projects as foreseen in point

(146) is necessary?

- Yes
- No
- I don't know

If no, please explain why and provide justification for any alternative scope.

- .....

## Thank you!

---

Your contribution is highly welcome. Thank you very much for sharing your views!

If you want to provide additional evidence to support your replies above, please upload here.