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IDAA Public Consultation

Fields marked with * are mandatory.

Introduction

As announced in the Clean Industrial Deal, the European Commission will put forward a proposal for an **Industrial Decarbonisation Accelerator Act**. Its general objective will be to increase sustainable and resilient industrial production in energy-intensive sectors in the EU by supporting decarbonisation investments.

The initiative will focus on energy-intensive industries (i.e. chemicals, steel, pulp and paper, refineries, cement, non-ferrous metals, glass and ceramics) and, where relevant, consider related downstream industries within a value chain logic.

The impact assessment will assess and identify the scope of the relevant sectors and consider measures aligned with the following objectives:

- 1. speed up permitting procedures for industrial decarbonisation;
- 2. identify and promote priority industrial decarbonisation projects and clusters;
- 3. create and protect lead markets for European low-carbon products.

As an integral part of the process, the Commission is launching a public consultation to gather views from all interested parties. The questionnaire consists of five parts:

- Part 1 collects some information about you.
- Part 2 focuses on barriers to industrial decarbonisation.
- Part 3 contains questions related to permitting for industrial decarbonisation.
- Part 4 contains questions on identifying and promoting priority projects.
- Part 5 comprises questions on how to create and protect lead markets for European low-carbon products.

Your feedback will feed into the analysis of the impact assessment.

You can save your replies as a draft and finish later. Please be concise in those questions with a free text box for additional comments. If you wish, at the end of the questionnaire, you can also upload a document with further comments and views.

About you

French
German
Greek
Hungarian
Irish
Italian
Latvian
Lithuanian
Maltese
Polish
Portuguese
Romanian
Slovak
Slovenian
Spanish
Swedish
*I am giving my contribution as
Academic/research institution
Business association
Company/business
Consumer organisation
EU citizen
Environmental organisation
Non-EU citizen
Non-governmental organisation (NGO)

*Language of my contribution

Bulgarian

Croatian

Czech

Danish

Dutch

English

Estonian

Finnish

Public authority			
Trade union			
Other			
*First name			
The Bioenergy Association			
*Surname			
of Finland			
*Email (this won't be pub	olished)		
info@bioenergia.fi			
*Organisation name			
255 character(s) maximum			
Bioenergia ry - the Bioener	gy Association of Finla	nd	
*Organisation size			
Micro (1 to 9 empl	oyees)		
Small (10 to 49 en	nployees)		
Medium (50 to 249	employees)		
Large (250 or mor	e)		
Transparency register r Check if your organisation is on influence EU decision-making.		ster. It's a voluntary database fo	or organisations seeking to
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*Country of origin Please add your country of origin	in, or that of your orgar	nisation.	
This list does not represent the of the entities mentioned. It is a	•	,	d to the legal status or policy
Afghanistan	Djibouti	Libya	Saint Martin
Aland Islands	Dominica	Liechtenstein	Saint Pierre and Miquelon

	Albania	0	Dominican	0	Lithuania	Saint Vincent
			Republic			and the
						Grenadines
	Algeria		Ecuador	0	Luxembourg	Samoa
	American Samoa		Egypt	0	Macau	San Marino
	Andorra		El Salvador		Madagascar	São Tomé and
						Príncipe
	Angola		Equatorial Guinea	3 [©]	Malawi	Saudi Arabia
0	Anguilla		Eritrea		Malaysia	Senegal
0	Antarctica		Estonia		Maldives	Serbia
	Antigua and		Eswatini		Mali	Seychelles
	Barbuda					
0	Argentina		Ethiopia		Malta	Sierra Leone
	Armenia		Falkland Islands	0	Marshall Islands	Singapore
	Aruba		Faroe Islands	0	Martinique	Sint Maarten
	Australia		Fiji	0	Mauritania	Slovakia
	Austria	0	Finland	0	Mauritius	Slovenia
	Azerbaijan		France		Mayotte	Solomon Islands
	Bahamas		French Guiana	0	Mexico	Somalia
	Bahrain		French Polynesia		Micronesia	South Africa
	Bangladesh		French Southern		Moldova	South Georgia
			and Antarctic			and the South
			Lands			Sandwich
						Islands
0	Barbados		Gabon		Monaco	South Korea
	Belarus		Georgia		Mongolia	South Sudan
	Belgium		Germany		Montenegro	Spain
	Belize		Ghana		Montserrat	Sri Lanka
	Benin		Gibraltar	0	Morocco	Sudan
0	Bermuda		Greece	0	Mozambique	Suriname
	Bhutan		Greenland	0	Myanmar/Burma	Svalbard and
						Jan Mayen
	Bolivia		Grenada		Namibia	Sweden

	Bonaire Saint Eustatius and Saba		Guadeloupe	0	Nauru	0	Switzerland
0	Bosnia and Herzegovina	0	Guam	0	Nepal	0	Syria
0	Botswana	0	Guatemala	0	Netherlands	0	Taiwan
0	Bouvet Island		Guernsey		New Caledonia	0	Tajikistan
0	Brazil		Guinea		New Zealand	0	Tanzania
0	British Indian Ocean Territory	0	Guinea-Bissau	0	Nicaragua	0	Thailand
0	British Virgin Islands	0	Guyana	0	Niger	0	The Gambia
0	Brunei		Haiti		Nigeria	0	Timor-Leste
0	Bulgaria		Heard Island and	0	Niue	0	Togo
			McDonald Islands	3			
0	Burkina Faso		Honduras	0	Norfolk Island	0	Tokelau
0	Burundi		Hong Kong		Northern	0	Tonga
					Mariana Islands		
0	Cambodia		Hungary		North Korea	0	Trinidad and
							Tobago
0	Cameroon		Iceland		North Macedonia	0	Tunisia
0	Canada		India	0	Norway	0	Türkiye
0	Cape Verde		Indonesia		Oman	0	Turkmenistan
0	Cayman Islands		Iran		Pakistan	0	Turks and
							Caicos Islands
0	Central African		Iraq		Palau	0	Tuvalu
	Republic						
0	Chad		Ireland		Palestine	0	Uganda
0	Chile		Isle of Man		Panama	0	Ukraine
0	China		Israel	0	Papua New	0	United Arab
					Guinea		Emirates
0	Christmas Island		Italy	0	Paraguay	0	United Kingdom
0	Clipperton		Jamaica		Peru	0	United States

0	Cocos (Keeling)	Japan	Philippines	0	United States
	Islands				Minor Outlying Islands
0	Colombia	Jersey	Pitcairn Islands	0	Uruguay
0	Comoros	Jordan	Poland	0	US Virgin Islands
0	Congo	Kazakhstan	Portugal	0	Uzbekistan
0	Cook Islands	Kenya	Puerto Rico	0	Vanuatu
0	Costa Rica	Kiribati	Qatar	0	Vatican City
0	Côte d'Ivoire	Kosovo	Réunion	0	Venezuela
0	Croatia	Kuwait	Romania	0	Vietnam
0	Cuba	Kyrgyzstan	Russia	0	Wallis and
		, 0,			Futuna
0	Curaçao	Laos	Rwanda	0	Western Sahara
0	Cyprus	Latvia	Saint Barthélemy	0	Yemen
0	Czechia	Lebanon	Saint Helena	0	Zambia
			Ascension and		
			Tristan da Cunha	i	
0	Democratic	Lesotho	Saint Kitts and	0	Zimbabwe
	Republic of the		Nevis		
	Congo				
	Denmark	Liberia	Saint Lucia		

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. Fo r the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published. Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

*Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, 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 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 that you responded to this consultation as, 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.

I agree with the personal data protection provisions

Barriers to industrial decarbonisation

	strongly disagree	slightly disagree	neutral	slightly agree	strongly agree	don' t know
Industry does not have sufficient access to affordable and decarbonised energy.	0	0	•	0	0	0
Unfair competition from non-EU countries hinders industrial decarbonisation investments.	0	0	0	•	0	0
Decarbonisation technologies are not yet available or deployed at large scale.	•	0	0	0	0	0
High carbon abatement costs are a major barrier to adopting decarbonisation technologies in industry.	0	0	0	0	•	0
High capital costs are a major barrier to industrial decarbonisation.	0	•	0	0	0	0
High operation costs are a major barrier to industrial decarbonisation.	0	0	0	0	•	0

The complexity and duration of permitting for industrial decarbonisation projects is an obstacle to investing in Europe.	•	•	•	•	•	0
Barriers to industrial decarbonisation are greater for SMEs than for larger companies.	©	•	0	0	0	©
Tariffs on industrial products are a barrier to industrial decarbonisation.	0	•	0	•	0	0

Are there any other barriers to industrial decarbonisation? Please give a maximum of three examples.

500 character(s) maximum

Lack of ambitious compliance regulations, specially for carbon removals or non-fossil carbon use in industries.

Speed-up permitting for industrial decarbonisation

To what extent do you agree with the following statements?

	strongly disagree	slightly disagree	neutral	slightly agree	strongly agree	don' t know
The challenges related to permitting processes are widespread across Member States.	©	0	0	•	0	0
The challenges related to permitting processes are different across Member States.	©	0	0	0	0	•
The current permitting framework in my country or region does not handle permits related to industrial decarbonisation projects in energy intensive industries efficiently.	0	•	0	•	•	•
The complexity, duration and uncertainty of the outcome of permitting for construction (housing) projects is an obstacle to more housing projects being developed in Europe and a root cause of the affordability crisis.	©	•	•	•	•	•

Please indicate at which administrative level you perceive difficulties.

- Local level
- Regional level
- National level
- Don't know

How important are the following potential challenges faced in the permitting process for industrial decarbonisation [rate each of them from 1 (very important) to 5 (not important), don't know]:

	1	2	3	4	5	don't know
Long response time of public authorities	0	0	•	0	0	0
Lack of administrative capacity (e.g. understaffed public authorities)	0	•	0	0	0	0
Fragmented regulatory landscape and complexity of the process	•	0	0	0	0	0
Multiple authorities involved	0	•	0	0	0	0
Lack of digital integration	0	0	0	0	•	0
Lack of technical knowledge at permitting authority level	0	0	0	0	•	0

	strongly disagree	slightly disagree	neutral	slightly agree	strongly agree	don' t know
Decarbonising energy-intensive industries requires addressing significant cross-border challenges (e.g. infrastructure, supply chains, regulatory alignment).	©	•	0	0	•	•
Industrial clustering can streamline and improve the efficiency of the permit-granting process.	0	0	0	0	•	0
European legislation could be simplified to facilitate industrial permitting of decarbonisation projects.	0	•	0	•	•	•
Data repositories and data spaces can facilitate the permit process by re-using existing, relevant data sets.	0	0	0	0	0	•

Would it be useful to issue permits for the geographical cluster (instead of project-specific permits)? If so, what type of permits?

300 character(s) maximum

Permitting e.g. industrial parks or hubs as a whole vs. individual projects might be useful for example in the case of CCUS infrastructure.

Please indicate for each of the following instruments how relevant it would be to simplify them: [from 1 (very relevant) to 5 (not relevant), don't know]

	1	2	3	4	5	don't know
Strategic Environmental Assessment - "SEA" Directive	0	0	0	0	0	•
Environmental Impact Assessment – "EIA" Directive	0	0	0	0	0	•
The Birds and Habitats Directives	0	0	0	0	0	•
Industrial Emissions Directive	0	•	0	0	0	0
Water Framework Directive	•	0	0	0	0	0
Other	0	0	0	0	0	0

How long does it take on average in your country or region between submitting the request for a permit for an industrial decarbonisation project and granting the permit? Please provide your answer in months – or 'don't know'.

Based on your experience, what would be a reasonable maximum timeframe between submitting a permit for an industrial decarbonisation project and receiving the approval (excluding judicial appeals)? Please provide your answer in months – or 'don't know'.

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How long does it take in your country or region between the request for grid access and the actual connection to the energy grid for an investment in decarbonisation? Please provide your answer in months – or 'don't know'.

Don't know

Please identify the type of permits relevant to your industrial decarbonisation project:

Building or construction permits

- Environmental permits
- Health & safety permits
- Grid connection permits
- Other

How relevant are the following measures for speeding up permitting for industrial decarbonisation? [rate each of them from 1 (very relevant) to 5 (not relevant), don't know]

	1	2	3	4	5	don't know
Single points of contacts	•	0	0	0	0	0
Time limit for permit-granting process	0	0	0	0	0	0
Time limit for the environmental impact assessment	•	0	0	0	0	0
Joint environmental assessment when required under multiple legal acts	•	0	0	0	0	0
Online information on permit-granting process	0	0	0	0	0	0
Online information about spatial planning data (zoning spatial plans)	•	0	0	0	0	0
Tacit approvals for certain administrative decisions	•	0	0	0	0	0
Overriding public interest status when it exists in national law	0	•	0	0	0	0
Fully digitalised processes	•	0	0	0	0	0
Improved administrative cooperation via digital tools	•	0	0	0	0	0
Other	0	0	0	0	0	0

Identify and promote priority projects

	strongly disagree	slightly disagree	neutral	slightly strongly agree agree		don' t know
Lack of access to private funding is a major barrier to industrial decarbonisation.	•	•	0	0	©	0
Lack of access to public funding is a major barrier to industrial decarbonisation.	0	0	•	0	0	0

Transition finance (i.e. financing options dedicated to the improvement of the climate and environmental performance of high impact activities) is difficult to	•	0	•	•	•	0
access.						

How relevant are the following potential risk factors associated with investing in an industrial decarbonisation project? [rate each of them from 1 (very relevant) to 5 (not relevant), don't know]:

	1	2	3	4	5	don't know
Market uncertainty	•	0	0	0	0	0
Regulatory uncertainty	•	0	0	0	0	0
Technological development	0	0	•	0	0	0
Financial risks	0	•	0	0	0	0
Other	0	0	0	0	0	0

How relevant are the following public support instruments for industrial decarbonisation projects? [rate each of them from 1 (very relevant) to 5 (not relevant), don't know]:

	1	2	3	4	5	don't know
Grants following an open call	•	0	0	0	0	0
Two-way Carbon Contracts for Difference following a bidding procedure	•	0	0	0	0	0
Power Purchase Agreements support	0	0	0	0	•	0
Equity investments	0	•	0	0	0	0
Financial guarantees	0	0	0	0	0	0
Tax incentives	0	0	0	0	0	0

How relevant are the following public funds in supporting industrial decarbonisation projects? [rate each of them from 1 (very relevant) to 5 (not relevant), don't know]:

, .	· •		, ,			
	1	2	3	4	5	don't know
Horizon Europe	0	•	0	0	0	0
Innovation Fund	•	0	0	0	0	0
InvestEU	•	0	0	0	0	0

Cohesion Funds	0	0	0	0	0	•
Recovery and Resilience Facility	•	0	0	0	0	0
Member States funding (State aid)	0	•	0	0	0	0
Other	0	0	0	0	0	0

To what extent do you agree with the following statement?

	strongly disagree	slightly disagree	neutral	slightly agree	strongly agree	don' t know
Introducing a category of priority industrial decarbonisation projects, supported by targeted benefits, will accelerate the EU's industrial decarbonisation efforts.	©	•	0	0	©	0

At which stages do energy-intensive industries typically face the most significant funding gaps? Please rank the following. [from 1 (most important) to 5 (least important)].

Use drag&drop or the up/down buttons to change the order or accept the initial order.

#	First-of-a-kind commercial
#	Full-scale development
#	Operations
#	Piloting and Demonstration stage
#	Research and Innovation

Create and protect European lead markets for low-carbon products

	strongly disagree	slightly disagree	neutral	slightly agree	strongly agree	don' t know
It is possible to differentiate clean industrial products and technologies from their more carbon-intensive equivalents.	0	0	0	•	•	0
Downstream sectors and consumers lack willingness to pay a premium for clean industrial products.	0	0	0	•	•	0

Measures to stimulate demand for clean industrial products are			•	
essential to drive industrial decarbonisation.				

Which sectors are important downstream sectors supporting the uptake of clean energy-intensive materials? [rate each of them from 1 (most important) to 5 (least important), don't know]

	1	2	3	4	5	don't know
Construction & infrastructure	•	0	0	0	0	0
Automotive	0	•	0	0	0	0
Defence	0	0	•	0	0	0
Machinery	0	0	0	0	0	•
Electrical and electronic equipment	0	0	0	0	•	0
Clean energy technologies (e.g. wind, solar, heat pump)	0	0	•	0	0	0
Other	0	0	0	0	0	•

Public procurement

To what extent do you agree with the following statements?

	strongly disagree	slightly disagree	neutral	slightly agree	strongly agree	don' t know
Public procurement is a significant driver for lead markets for European and clean industrial products	0	0	0	•	•	0
Currently, public procurement is too focused on price (rather than non-price criteria)	0	0	0	•	0	0

Which non-price criteria should be set for public procurement to create lead markets? Multiple answers possible.

- Resilience (i.e. diversification of supply sources in case of dependencies)
- EU content
- Employment and social requirements
- Environmental sustainability
- Cybersecurity

To what extent do you agree with the following statements?

	strongly disagree	slightly disagree	neutral	slightly agree	strongly agree	don' t know
Introducing an EU voluntary label on the carbon intensity of industrial products will support the uptake of sustainable industrial products and the creation of lead markets.	•	•	•	•	•	0
Introducing an EU voluntary label on the carbon intensity of industrial products will curb the proliferation of labels and ensure a harmonised approach.	•	•	0	0	©	0
Introducing an EU voluntary label on carbon intensity will impose significant administrative and compliance costs, which could reduce competitiveness.	•	•	0	•	©	0
An EU label on the carbon intensity of industrial products should be mandatory, rather than voluntary.	•	•	•	•	©	0

How important would the added value be of an EU label on the carbon intensity of industrial products in terms of: [rate them from 1 (very important) to 5 (not important), don't know]

	1	2	3	4	5	don't know
Increased transparency	•	0	0	0	0	0
Access to green finance	0	0	•	0	0	0
Compliance with regulatory requirements	0	0	0	•	0	0
Increased comparability and market differentiation	0	•	0	0	0	0
Market uptake of greener products	0	•	0	0	0	0

In sectors where carbon is indispensable as a feedstock, such as the chemical industry, how important are the following potential barriers to scaling up the use of clean carbon sources – i.e. sustainable biomass, recycled waste, and Carbon Capture Utilisation – to support de-fossilisation efforts? [rate them from 1 (very important) to 5 (not important), don't know]:

	1	2	3	4	5	don't know
High costs	0	•	0	0	0	0
Lack of regulatory incentives	•	0	0	0	0	0
Limited access to clean carbon sources	0	0	•	0	0	0
Undeveloped technologies	0	0	•	0	0	0

Foreign direct investments into decarbonisation

To increase industrial decarbonisation investments in Europe, what is the role of foreign direct investment from your perspective? Please indicate whether you agree or disagree with the following statements.

	agree	neutral	disagree
Foreign direct investments are useful to bring into Europe capital/funding which is not available in the EU.	•	0	0
Foreign direct investments are useful to bring into Europe know-how about products or processes which is not available in the EU.	0	•	©
Foreign direct investments are useful to increase supply security for EU customers by localising production closer to them.	0	•	0
Foreign direct investments do not play a role.	0	0	•

Do you consider it useful to impose conditions on foreign direct investment from an internal market perspective?

- Yes, whenever the investor receives public incentives (e.g. grants, loans, expedited permitting)
- Yes, whenever the sector is sensitive (e.g. high tech, critical inputs)
- Yes, if either (a) or (b)
- [◎] No
- Don't know

Which conditions on foreign direct investments would you find useful?

	useful	sometimes useful	not useful	don't know
Requirement to form a joint venture with a European partner and/or to restrict foreign ownership percentages	0	•	0	0
Requirement to appoint EU-citizens to key management positions	0	0	•	0
Requirement to hire EU-citizens as staff and train them	0	0	•	0

Requirement to perform value added production in the EU (as opposed to mere assembly of imported component)	0	0	0	•
Requirement to transfer intellectual property rights and know- how to the EU investment and/or to grant irrevocable licences to these rights	0	0	•	0
Requirement to perform research, development and innovation activities in the EU	0	0	•	0
Requirement to source equipment and inputs in the EU	0	•	0	0
Requirement to supply EU customers	0	•	0	0
Other	0	0	0	0

Attach any relevant documents to support your replies

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

Contact

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