

Feedback on Public Consultation on the proposed changes to Innovation Fund application procedure

The Bioenergy Association of Finland would like to point out some key issues regarding the proposed changes to the current Delegated Regulation. It is important that the application procedure is efficient in order to accelerate the EU's shift to a more sustainable economy. However, it also needs to be ensured that the application procedure does not rule out potential candidates with innovative solutions in low-carbon technologies and processes.

Introducing the option for a one-stage application for the large-scale calls and thus eliminating the first-stage screening of applications, would result in a substantial increase in the amount of effort put into the application process. This does not support the original goal of lowering the barrier to apply which is one of the reasons why the two-stage application process was introduced to begin with. A full-scale application requires a massive amount of R&D resources and therefore the one-stage application could benefit the biggest operators. Channeling the investments solely to the biggest players in the field might not lead to the optimal outcome for innovation nor for climate change mitigation.

Rather than moving back towards the one-stage application procedure it would be beneficial to maintain the two-stage procedure and e.g., specify the application requirements and the criteria regarding projects' maturity level. This could reduce the number of those applications received which do not meet the criteria and thereby reduce the amount of required administrative work.

The amendment proposed in Article 13 is a good addition to the procedure. The project development assistance can support the projects of insufficient maturity but having the potential to meet all selection criteria if further developed. This can further accelerate the implementation of successful projects fostering innovation in low-carbon technologies and processes.

Considering the large number of applications seeking funding compared to the funding available, additional support for innovative clean technologies is needed to meet the EU's climate goals.