

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 (https://commission.europa.eu/topics/eu-competitiveness/clean-industrial-deal_en) Communication on 26 February 2025, the Commission is consulting the general public on a draft new State aid framework (https://competition-policy.ec.europa.eu/document/download/45b532ce-53fb-4907-975c-79edaa31a166_en).

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

English

*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 provide your full name

Harri Laurikka

*Please provide your e-mail address (this will not be published)

harri.laurikka@bioenergia.fi

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

Bioenergia ry - the Bioenergy Association of Finland

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

(https://commission.europa.eu/about/service-standards-and-principles/transparency/transparency-register_en).

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

Finland

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 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 not be published).

*Protection of personal data

- ☒ I agree with the personal data protection provisions (<https://ec.europa.eu/info/law/better-regulation/specific-privacy-statement>).

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.

5,000 character(s) maximum

Bioenergia ry - the Bioenergy Association of Finland emphasizes the importance of technology-neutrality in application of the State aid Framework. All clean technologies and energy sources deemed sustainable in EU legislation should be treated equally. We do not support enabling public funding for fossil fuels in the 2020s'. Public funding for fossil fuels does not contribute to the transition required in the EU. It is also inefficient use of scarce public funds in Europe.

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").

5,000 character(s) maximum

We welcome the reference to Directive (EU) 2018/2001 (RED III) and the integration of sustainability criteria, which is essential to maintain alignment with the EU's broader climate and energy policy objectives.

Point 36: we highlight the need of enabling preliminary assessments of sustainability as an option to a full compliance check through a certification scheme. In line with the aims of the Commission to avoid excessive administrative and regulatory burden for companies, SMEs in particular, a lighter process to sustainability assessment at an early stage of the project would support accelerating the rollout of renewable energy in the EU.

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.

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

5,000 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").

5,000 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").

5,000 character(s) maximum

Point 75: we recommend revising the language by deleting the words "including biomass". Otherwise, the point seems to deviate from physics and the standard IPCC terminology, where bioenergy is unequivocally renewable energy.

Points 83-84: We strongly support the reference to carbon capturing CCUS technologies. However, we regret the draft seems not to make any distinction between fossil and biogenic carbon. We strongly urge the Commission to include BECCU, BECCS and biochar technologies here with a preferential treatment as they are critical to EU's objective of 90 % emissions reduction by 2040 and climate neutrality by 2050. We underline that BECCU, BECCS and biochar technologies enable negative emissions in the EU and replacement of fossil carbon, and at the same time. do not run the risk of locking-in the use of fossil fuels like fossil CCUS.

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.

Point 73: it is concerning that the draft is not technology-neutral and deprioritises biomass as a decarbonisation option for industrial heat. We strongly support technology-neutrality and believe, it should be left for Member States and/or companies to decide, which decarbonization option they choose. Some sustainable biomasses may be a good alternative in various industries and in various corners of Europe. The Impact Assessment for the 2040 climate target clearly showed that the demand for biomass will increase in the EU and there are new bioenergy raw materials that may be relevant in the period up to 2040.

Therefore, we consider it incomprehensive that the draft seems to put renewable, sustainable biomass and natural gas to an equal footing. We do not support enabling public funding for fossil fuels in the 2020s'.

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 (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02018L2001-20240716>) 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.

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.

We do not support enabling public funding for fossil fuels in the 2020s'.

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").

5,000 character(s) maximum

This section should treat all clean technologies equally. For example, Europe has a significant global market share in many bioenergy technologies.

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 (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02023XC0317%2801%29-20240502>) (as set out in the draft for consultation of stakeholder views), with the scope of the Annex of the Net Zero Industry Act (<https://eur-lex.europa.eu/eli/reg/2024/1735/oj/eng>), or with some other sub-set 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.

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").

5,000 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

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.

Contact

Contact Form (/eusurvey/runner/contactform/New_State_aid_Framework)
