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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

* Language of my contribution

- ( ) Bulgarian
- ( ) Croatian
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- ( ) Danish
- ( ) Dutch
- (•) English
- ( ) Estonian
- ( ) Finnish
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* 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)

- ○ Public authority
- ○ Trade union
- ○ Other

* First name

Franklin

* Surname

Streichenberger

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* Organisation name

255 character(s) maximum

CO2 Value Europe

* Organisation size

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

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.

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* Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

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- Mexico
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- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden

- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
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- Tonga
- Trinidad and Tobago
- Tunisia
- Türkiye
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States

- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
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- Democratic Republic of the Congo
- Denmark
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- Latvia
- Lebanon
- Lesotho
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- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena Ascension and Tristan da Cunha
- Saint Kitts and Nevis
- Saint Lucia
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
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- Vatican City
- Venezuela
- Vietnam
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- Zimbabwe

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.

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Barriers to industrial decarbonisation

To what extent do you agree with the following statements?

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

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

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

500 character(s) maximum

Other barriers include EU policy framework complexity and uncertainty: what has been adopted/announced should be guaranteed in order for companies to deliver on scaling up net zero technologies and secure necessary FDIs. Additionally, the fossil/unavoidable process emissions 2040 deadline for e-fuels has already proven to be an issue for the uptake of some CCU projects. Use of unavoidable process emissions from hard-to-abate industries (i.e. cement, lime, etc.) should be authorised and supported

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.	○	○	○	○	◉	○
The challenges related to permitting processes are different across Member States.	○	○	○	○	○	◉
The current permitting framework in my country or region does not handle permits related to industrial decarbonisation projects in energy intensive industries efficiently.	○	○	○	○	○	◉
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.	○	○	○	○	○	◉

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	○	○	○	○	○	◉
Lack of administrative capacity (e.g. understaffed public authorities)	○	◉	○	○	○	○
Fragmented regulatory landscape and complexity of the process	◉	○	○	○	○	○
Multiple authorities involved	○	○	○	○	○	◉
Lack of digital integration	○	○	○	○	○	◉
Lack of technical knowledge at permitting authority level	○	◉	○	○	○	○

To what extent do you agree with the following statements?

	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).	○	○	○	○	◉	○
Industrial clustering can streamline and improve the efficiency of the permit-granting process.	○	○	○	○	◉	○
European legislation could be simplified to facilitate industrial permitting of decarbonisation projects.	○	○	○	○	◉	○
Data repositories and data spaces can facilitate the permit process by re-using existing, relevant data sets.	○	○	○	○	○	◉

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

CCU projects are symbiosis projects thriving where industrial activity is concentrated such as in clusters. Further flexibility and agility is beneficiary within such clusters and could be built through a cluster level permitting process considered under a regulatory sandbox approach.

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	○	○	○	○	○	○
Environmental Impact Assessment – "EIA" Directive	○	○	○	○	○	○
The Birds and Habitats Directives	○	○	○	○	○	○
Industrial Emissions Directive	○	○	○	○	○	○
Water Framework Directive	○	○	○	○	○	○
Other	◉	○	○	○	○	○

Please specify other European legislation that could be simplified to facilitate industrial permitting:

100 character(s) maximum

CCU is covered under 5+ categories under the NZIA which complexifies the permit submission process

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'.

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'.

Don't know

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	○	○	○	○	○	○
Time limit for permit-granting process	○	○	○	○	○	○
Time limit for the environmental impact assessment	○	○	○	○	○	○
Joint environmental assessment when required under multiple legal acts	○	○	○	○	○	○
Online information on permit-granting process	○	○	○	○	○	○
Online information about spatial planning data (zoning spatial plans)	○	○	○	○	○	○
Tacit approvals for certain administrative decisions	○	○	○	○	○	○
Overriding public interest status when it exists in national law	○	○	○	○	○	○
Fully digitalised processes	○	○	○	○	○	○
Improved administrative cooperation via digital tools	○	○	○	○	○	○
Other	○	○	○	○	○	○

Identify and promote priority projects

To what extent do you agree with the following statements?

	strongly disagree	slightly disagree	neutral	slightly agree	strongly agree	don't know
Lack of access to private funding is a major barrier to industrial decarbonisation.	○	○	○	○	◉	○

Lack of access to public funding is a major barrier to industrial decarbonisation.	○	○	○	○	◉	○
Transition finance (i.e. financing options dedicated to the improvement of the climate and environmental performance of high impact activities) is difficult to 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	○	◉	○	○	○	○
Regulatory uncertainty	◉	○	○	○	○	○
Technological development	○	○	○	◉	○	○
Financial risks	○	◉	○	○	○	○
Other	○	○	○	○	○	◉

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	◉	○	○	○	○	○
Two-way Carbon Contracts for Difference following a bidding procedure	◉	○	○	○	○	○
Power Purchase Agreements support	◉	○	○	○	○	○
Equity investments	◉	○	○	○	○	○
Financial guarantees	○	○	○	○	○	◉
Tax incentives	○	◉	○	○	○	○

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	○	◉	○	○	○	○

Innovation Fund	◉	○	○	○	○	○
InvestEU	◉	○	○	○	○	○
Cohesion Funds	○	◉	○	○	○	○
Recovery and Resilience Facility	◉	○	○	○	○	○
Member States funding (State aid)	◉	○	○	○	○	○
Other	○	○	○	○	○	◉

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.	○	○	○	◉	○	○

What criteria should be used to identify priority projects? You can select multiple answers.

- ☑ Contribution to strategic value chains
- ☑ Contribution to industrial decarbonisation
- ☐ Contribution to industrial electrification
- ☑ Economic importance
- ☑ Expected increased demand for output
- ☐ Don't know
- ☐ Other

Which benefit(s) should such strategic projects receive? You can select multiple answers.

- ☑ Faster permit-granting procedures
- ☑ Priority status for administrative procedures
- ☑ Better access to funding
- ☐ Other

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
- Piloting and Demonstration stage
- Full-scale development
- Research and Innovation
- Operations

Create and protect European lead markets for low-carbon products

To what extent do you agree with the following statements?

	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.	◉	○	○	○	○	○
Downstream sectors and consumers lack willingness to pay a premium for clean industrial products.	○	○	◉	○	○	○
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	◉	○	○	○	○	○
Automotive	◉	○	○	○	○	○
Defence	○	○	○	○	○	◉
Machinery	◉	○	○	○	○	○
Electrical and electronic equipment	○	○	○	○	○	◉
Clean energy technologies (e.g. wind, solar, heat pump)	◉	○	○	○	○	○
Other	○	○	○	○	○	◉

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	○	○	○	○	◉	○
Currently, public procurement is too focused on price (rather than non-price criteria)	○	○	○	◉	○	○

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

Label on the carbon intensity of industrial products

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.	○	○	◉	○	○	○
Introducing an EU voluntary label on the carbon intensity of industrial products will curb the proliferation of labels and ensure a harmonised approach.	○	○	○	◉	○	○
Introducing an EU voluntary label on carbon intensity will impose significant administrative and compliance costs, which could reduce competitiveness.	○	○	○	◉	○	○

An EU label on the carbon intensity of industrial products should be mandatory, rather than voluntary.	○	○	○	◉	○	○

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	○	◉	○	○	○	○
Access to green finance	○	◉	○	○	○	○
Compliance with regulatory requirements	○	◉	○	○	○	○
Increased comparability and market differentiation	○	○	◉	○	○	○
Market uptake of greener products	◉	○	○	○	○	○

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	○	◉	○	○	○	○
Lack of regulatory incentives	◉	○	○	○	○	○
Limited access to clean carbon sources	○	◉	○	○	○	○
Undeveloped technologies	○	○	○	◉	○	○

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.	○	○	○
Foreign direct investments are useful to bring into Europe know-how about products or processes which is not available in the EU.	○	○	○

Foreign direct investments are useful to increase supply security for EU customers by localising production closer to them.	○	○	○
Foreign direct investments do not play a role.	○	○	○

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

Attach any relevant documents to support your replies

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

e5972a23-3e46-4257-8865-22925e044777/20250708_CVE_IDAA_Call_for_evidence_final.pdf

Contact

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