

# IOGP Europe position on the Industrial Decarbonization Accelerator Act

## Call for Evidence

### Executive Summary

**IOGP Europe welcomes the opportunity to respond to the European Commission’s consultation on the Industrial Decarbonization Accelerator Act (IDAA) and remains committed to supporting the EU’s decarbonization agenda.**

The **Clean and Industrial Deal (CID)** sets a new course for EU climate and energy policies, aiming to equip the EU to meet its climate goals while maintaining a competitive industrial base. This includes reducing regulatory complexity, supporting innovation, and strengthening Europe’s energy and industrial foundations. However, persistent barriers—such as fragmented regulation, limited funding access, and slow deployment of key technologies—continue to hinder progress, particularly in energy- and emissions-intensive sectors. To address these challenges, the **IDAA** should act as a catalyst by enhancing coordination among existing institutions, supporting Member States in implementing best practices, and ensuring streamlined and coherent access to EU and national funding mechanisms.

**Permitting** is key to industrial transformation and achieving the EU’s decarbonization goals. Timely, clear, and consistent permits are essential for strategic investments, but across the EU, complex and outdated permitting systems often create bottlenecks to sustainable development. In worst-case scenarios, permitting for CCS projects can take up to six years. To meet the goals of the **EU Green Deal** and the **Net Zero Industry Act (NZIA)**, permitting must shift from being a complex legislative barrier to a **strategic enabler of clean industrial investment**: through simplified, predictable, and digitalized procedures, supported by adequate administrative capacity, improved coordination between authorities, and greater harmonization of rules across Member States and beyond.

At the same time, the IDAA should **enable the scale-up of Priority Projects** that deliver the most efficient and cost-effective reductions in GHG emissions and are crucial for hard-to-abate sectors. These projects are key to the EU’s decarbonization pathway and should include **carbon capture and storage (CCS), low-carbon hydrogen, electrification, and low-carbon industrial processes**, selected based on their relevance to sectoral and regional needs. Importantly, the IDAA must uphold **technology neutrality**. A one-size-fits-all approach risks undermining innovation and its deployment. Instead, support should be tailored to allow the most effective solutions to scale.

Finally, the **creation of lead markets** is a critical first step toward establishing a fully functional and competitive market **for low-carbon products** in the EU. These markets can unlock scalable and cost-effective decarbonization solutions, such as low-carbon hydrogen and CCS, that are essential for industrial sectors. However, this potential can only be realized if the demand side is activated early, supported by predictable, investment-friendly policy frameworks that reflect market realities.

This document outlines the key challenges identified in each section of the questionnaire and provides IOGP Europe recommendations to address them.

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# 1. Barriers to industrial decarbonisation

## **Industrial decarbonization is held back by weak business models driven by high costs, low demand, and regulatory gaps**

The IDAA should prioritize the removal of structural barriers that prevent the development of a robust business case for industrial decarbonization projects. While funding mechanisms exist and industry actors are ready to invest, projects frequently stall due to i) high capital and operational costs, ii) long return-on-investment periods, and iii) regulatory uncertainty. A core issue remains the lack of a viable business case, driven by high costs, limited demand for low-carbon products, and insufficient regulatory incentives, which continues to undermine investment decisions. Even with EU ETS prices fluctuating between €60–100/tCO<sub>2</sub>, this market signal alone is insufficient to close the cost gap, particularly for capital-intensive technologies such as CCS, hydrogen, or low-carbon process transformation.

This is particularly relevant for the scale-up of the CCS industry, where the mismatch between supply and demand for low-carbon solutions is more evident. Despite CCS being pivotal for EU decarbonization, a viable business case still hinges on the development of a comprehensive value chain and demand-side certainty. While targeted investments are moving forward in favourable market conditions (e.g. Canada and Australia), broader deployment in Europe remains limited due to weak demand signals, even in the face of emerging infrastructure obligations.

To address these challenges, **the IDAA should help create conditions for viable business models to emerge. This means deploying targeted public support instruments such as carbon contracts for difference (CCfDs), improving access to risk-sharing mechanisms (e.g. financial guarantees), and ensuring long-term regulatory clarity.** Demand-side measures are equally important. **Public procurement must be leveraged more effectively to create early markets for low-carbon products. In parallel, a harmonized EU-wide label on the carbon intensity of industrial products would enhance transparency and comparability.**

The IDAA should act as a catalyst to stimulate CO<sub>2</sub> capture demand in alignment with the NZIA 50 MtpaCO<sub>2</sub> injection capacity objective by 2030. However, National Energy and Climate Plans (NECPs) indicate that only 27–45 Mtpa of capture capacity can be available by that date and currently, projects in Final Investment Decision (FiD) only account for 0,6 Mtpa. Without sufficient demand signals, fulfilling the NZIA obligation will be out of reach in the absence of a comprehensive regulatory framework that enables the development of CCS at the required level. In these circumstances, in order to meet the target, additional flexibility in the NZIA may be required (e.g., as an extended implementation timeframe). **We recommend that Final Investment Decision (FID) be recognised as the primary compliance benchmark for project milestone, rather than operational capacity, given the long lead times required for permitting and construction.**

## **Unclear IDAA scope risks diluted impact and missed priorities**

To operationalize these objectives, the scope of the IDAA must be clearly defined. It should prioritize sectors with the highest GHG abatement potential and the least abatement cost in euro/ton of CO<sub>2</sub>, while also enabling cross-sectoral infrastructure that benefits multiple sectors and jurisdictions. **First-of-a-kind and full-scale commercial projects should be prioritized**, especially those with cross-border impact or strategic importance. Industrial clusters, where shared infrastructure and co-location synergies can drive down costs and accelerate deployment, should also be central.

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# 2. Speed-up permitting for industrial decarbonization

## **Administrative fragmentation and complexity**

Administrative fragmentation undermines permitting efficiency across the EU. Despite shared legal frameworks under directives such as the Industrial Emissions Directive (IED) and Energy Efficiency Directive (EED), national implementation remains inconsistent. For example, while the EED requires large entities to conduct energy audits to support IED compliance through Best Available Techniques (BATs), the integration of audit findings into permitting processes varies widely. Some Member States apply audit insights meaningfully; others do not, diluting the intended impact.

Companies active in multiple Member States face fragmented permitting procedures, duplicative documentation and unclear expectations. These differences cause delays, increase administrative burden and undermine investment certainty, especially for cross-border infrastructure such as CO<sub>2</sub> and hydrogen pipelines. The resulting fragmentation weakens the internal market and obstructs the deployment of decarbonization technologies.

In addition to fragmentation between Member States, permitting procedures often reflect internal inconsistencies across regulatory frameworks. For example, legislation such as REACH and waste directives may require a level of technical detail at the application stage that is not yet available. This is because detailed engineering work, which produces that data, typically occurs only after permit approval. Permitting systems should account for this sequencing by allowing for phased or conditional approvals where appropriate.

Recent evidence underlines how widespread the problem has become. A [2023 BusinessEurope](#) survey found that 60% of companies reported that permitting procedures took between one and six years, with over 80% identifying permitting as a key obstacle to industrial investment. [The European Court of Auditors has reported](#) permitting durations of up to 11 years for offshore renewables.

Permitting complexity is embedded across regimes and requires horizontal reform. The 2024 [Draghi](#) and [Letta](#) reports explicitly identify complex and inconsistent permitting as a barrier to competitiveness, calling for a horizontal EU-wide initiative to streamline and harmonize processes. **We support the adoption of a horizontal permitting Omnibus to simplify and harmonise implementation and reduce legal conflict between directives. The Commission should streamline and harmonize administrative permitting processes across Member States, launch wider introduction of one stop shops and mandate national-level interoperability.** Without meaningful streamlining and harmonization, Europe will struggle to deliver the infrastructure needed for industrial decarbonization and transformation.

## Legal uncertainty and judicialization

Legal uncertainty in EU permitting arises from overlapping directives and unclear legal definitions, procedures and responsibilities. This complexity often leads to delays, litigation and inconsistent decision-making. Environmental directives such as the Habitats and Water Framework Directives introduce procedural hurdles that elevate litigation risks, even when environmental impacts are negligible or reversible. The Porthos case<sup>1</sup>, delayed for over six years, exemplifies how legal ambiguity can stall strategic projects for multiple years.

This uncertainty is compounded by rules on depollution and restoration, which while necessary, are not always applied in a way that coherently supports climate objectives. Greater clarity is needed on how exemptions, thresholds and 'overriding public interest' clauses are interpreted and applied across legislation. **We recommend that the Commission clarify and align legal obligations across directives to reduce litigation risks and improve consistency, especially for projects spanning jurisdictions.**

By contrast, other jurisdictions have introduced reforms that balance legal clarity with environmental ambition. In the United States, reforms under the National Environmental Policy Act (NEPA) have introduced two-year statutory time limits for environmental assessments and formalized pre-application consultations. Similarly, in China the regulatory framework mandates that the examination and approval department shall make a decision within 60 days from the date it receives an EIA report. These examples show that permitting systems can be rigorous and predictable.

We also support the establishment of legally enforceable time limits for permit granting, with tracking and recourse through national courts. This would reduce unpredictability and enhance investor confidence.

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<sup>1</sup> [Porthos Project](#) is a CCS initiative in the Rotterdam port area, designed to transport and storage of CO<sub>2</sub> from industrial sources in the Port to depleted gas fields beneath the North Sea. In November 2021, nature organisation Mobilisation for the Environment (MOB) filed an appeal against Porthos' use of the construction exemption related to nitrogen deposition during construction. However, a recent ruling by the Dutch Council of State allowed construction to proceed, emphasizing that the temporary increase in nitrogen deposition during construction would not significantly impact nearby nature reserves.

## Capacity and resourcing gaps

Permitting [authorities across the EU are chronically under resourced](#). [As industrial decarbonization accelerates](#), authorities face increasing demand driven by large-scale projects (such as CCS, hydrogen infrastructure, and renewables deployments) that require specialized technical expertise, inter-disciplinary coordination, and digital tools. However, many agencies lack sufficient staffing and training to handle these complex, multi-level applications. In practice, this has led to severe backlogs. Moreover, [policy analyses highlight](#) that many local and regional permitting bodies don't have adequate technical or digital skills and often operate without user-friendly tools, further hampering coordination across jurisdictions. The result is long response times, fragmented procedures and procedural delays. Evidence from [CERRE \(2024\)](#) and the [IEA-EU-ARPE project](#) confirms that understaffing and fragmented governance across multiple uncoordinated agencies are systemic barriers to clean technology deployment.

These constraints have direct consequences for industry. Projects in our sector often involve long lead times and substantial capital investment. Delays in permitting create financial risk, disrupt investment planning and threaten delivery of key infrastructure in the NZIA and broader Green Deal targets. To address this, we recommend using existing EU financing instruments, including the Just Transition Mechanism, the Modernisation Fund and STEP, to fund permitting capacity. Member States should be required to submit annual staffing and capability reports.

We support the establishment of one-stop shops in Member States, aligned with the model set out in the NZIA. These should act as centralized contact points across permitting authorities, reducing fragmentation, streamlining coordination, and improving accountability.

The recently [published Union of Skills](#) also offers a strategic opportunity to close critical capacity gaps. By integrating dedicated training modules for public-sector staff on technical disciplines, regulatory coordination, and digital workflows, this initiative can enhance the ability of permitting authorities to manage complex, multi-level applications efficiently. Without targeted funding and workforce development, authorities will remain unable to meet the complexity, scale, and urgency of industrial decarbonization.

Smarter regulatory design can help relieve pressure. Risk-based permitting frameworks, such as those introduced in Greece, allow oversight to be tailored to the environmental impact and complexity of each project. This helps authorities focus resources where they are most needed without compromising standards. These approaches should be promoted more widely.


Industry also plays a supporting role: early engagement with authorities, civil society and affected communities helps identify potential objections and build trust. Many companies also work with experienced contractors or engineering partners to prepare technical documentation and manage procedural steps. These practices can ease administrative burden and reduce delays, though they cannot compensate for under-resourced permitting systems.

Finally, inter-agency coordination must be subject to clear and enforceable timelines. Poorly sequenced or open-ended consultations remain a source of delay, particularly for cross-sectoral and cross-border projects. Standardized deadlines would improve predictability and discipline across permitting regimes. In this context, we recommend exploring the principle of tacit approval, under strict environmental safeguards, as a backstop where decisions are not issued within a legally defined timeframe. Selectively applied, this tool could strengthen accountability and reduce unnecessary friction in permitting systems.

## Lack of digitalization

The persistence of paper-based systems continues to undermine permitting efficiency. The previously mentioned reports from CERRE and the European Court of Auditors, underline the need to accelerate the digitalization of permitting processes, with a focus on replacing manual procedures with integrated digital tools.

However, digitalization alone will not solve structural inefficiencies. While many Member States already provide electronic forms and checklists, time is often lost responding to disproportionate and overly detailed requests for supplemental data. This not only delays decision-making but also places unnecessary burden on applicants. Digital systems must therefore be paired with procedural discipline and risk-based information requirements to deliver meaningful gains.



Efforts to create a centralized EU-wide permitting portal are unlikely to improve outcomes. Language barriers, institutional fragmentation and divergent administrative structures limit the effectiveness of top-down digital solutions. Instead, the focus should be on upgrading national permitting systems with harmonized minimum standards and interoperability to enable coordination across borders where needed.

Digital tools should also foster transparency and engagement. Public dashboards and participation portals can improve visibility and trust. Standardizing data formats, equipping local authorities with adequate IT infrastructure, trained staff and enabling digital public participation are key enablers. Without these enablers, even well-designed platforms risk underperformance or low uptake.

### **Inconsistent implementation across Member States**

Permitting variation is not only a regulatory issue but also a reflection of legitimate national differences. Geological and geographical considerations, industrial profile conditions, infrastructure availability and energy mix all shape how permitting systems are designed and applied. For example, countries reliant on fuel imports or lacking access to CO<sub>2</sub> storage face different permitting needs and constraints than those with established domestic infrastructure.

Cross-border infrastructure and projects affecting shared environmental resources require a common baseline of clarity, consistency and interoperability. In its absence, applicants face overlapping or conflicting requirements, delaying deployment and increasing administrative burden.

Coordination must also extend to regional and local levels, where discretionary interpretations by competent authorities can further complicate implementation and reduce predictability for investors.

A horizontal EU initiative to align permitting across frameworks such as the Industrial Emissions Directive (IED), Strategic Environmental Assessment (SEA), Water Framework Directive (WFD) and others would promote legal coherence while respecting national administrative structures. This would help reinforce the single market and enable faster scale-up of clean technologies.

### **Regulatory durability and political continuity**


Securing a permit does not guarantee delivery. Even when projects obtain the necessary permits and governmental support for decarbonization projects, they remain exposed to political risk. In addition to challenges related to lack of business cases highlighted in the above, changes in government can lead to policy reversals or the withdrawal of support mid-project, undermining investment certainty. This is particularly relevant for long-lead, capital intensive projects such as the electrification of offshore installations.

This risk is evident in Norway, where in 2023 the government approved a plan to electrify the Melkøya LNG facility. Following the approval, planning and investment activities began. However, the decision was met with political and local opposition, resulting in a parliamentary vote to reverse the approval. Although the vote did not pass, this example illustrates how political volatility, despite formal approval, can undermine investment confidence and jeopardise delivery.

A similar dynamic exists in the UK context. The Rosebank offshore development, while aligned with the UK's net zero strategy and supported through the Environmental Impact Assessment (EIA) process, still highlights how future elements of the project, such as electrification, depend on regulatory consents, infrastructure access and policy continuity. The Environmental Statement makes clear that while the FPSO is electrification-ready, the delivery of electrification is conditional on grid connections, area solutions and ongoing political alignment.

While legal protections such as grandfathering help preserve permit validity, they are not sufficient to ensure delivery. Grandfathering safeguards the legal standing of a permit but does not guarantee the enabling conditions required for implementation, such as continued government support, fiscal clarity, or access to shared infrastructure. A project can remain legally permitted but effectively stalled due to shifts in political priorities or the withdrawal of supporting policies.

The previously mentioned Porthos CCS project in the Netherlands illustrates this risk. Despite political alignment and eventual legal clearance, the project faced multi-year delays, reflecting how unresolved legal or procedural uncertainty can weaken regulatory durability and delay implementation even after formal approval.



To address this, permitting procedures should not be viewed as a one-off legal event, but as part of a broader delivery framework. The effectiveness of a permitting regime depends not only on granting the permit, but on ensuring that the conditions required to fulfil it remain in place throughout the project lifecycle. This is critical for strategic decarbonization projects, which rely on multi-actor coordination, cross-sector dependencies and long-term political backing.

To mitigate this, permitting regimes must be underpinned by both legal and political stability. Cross-party agreements, multiannual energy and climate planning frameworks and binding legislative commitments are essential to insulate strategic infrastructure from political cycles. Decarbonization investments depend not only on obtaining permits, but on the expectation that the conditions under which they were approved will remain valid, stable and politically supported throughout the project lifecycle.

### **Generic permitting process is currently not fit for purpose for strategic sectors**

Current permitting frameworks are poorly adapted to support industrial decarbonization at scale. They treat each facility in isolation, requiring separate approvals even when operations are part of an integrated value chain. This site-by-site approach creates delays, especially for projects that rely on shared infrastructure such as CO<sub>2</sub> transport networks or centralized waste treatment facilities.

Permitting at a cluster level would enable more efficient deployment of shared assets and better reflect how industrial decarbonization operates in practice. Greece has already implemented reforms in this direction, introducing a risk-based approach and ex post inspection regimes for industrial parks. This has contributed to the reduction of time taken to obtain a permit in Greece while maintaining environmental oversight.

The challenge is particularly acute for first-of-a-kind technologies or installations that fall across multiple regulatory categories. In the absence of precedent or applicable standards, authorities often default to the strictest elements of each relevant BREF document, even where these may conflict or impose impractical technical conditions. This limits site-specific optimization and may prevent integrated designs that are both environmentally sound and economically viable.

Rigid, fragmented permitting also obstructs the development of circular industrial models. Industrial clusters that reuse waste heat, process by-products across installations or coordinate logistics are often treated as a series of separate entities, rather than as an integrated system. For example, in a cluster comprising a refinery, a waste handling facility and an onshore fish cultivation operation, where each installation benefits from the other's excess energy or waste streams, permits would likely be assessed separately by different authorities or departments. In most cases, these entities do not coordinate and instead each facility is treated as an independent asset. This leads to conflicting permit conditions, reduces system-wide flexibility and undermines the cooperation such models require, resulting in lost opportunities for efficiency, innovation and circularity.

A more integrated, site-based permitting regime is needed. Authorities should be encouraged to take a more holistic view of installations operating within a common system, applying environmental requirements in a way that enables operational integration rather than constraining it. Site-specific permitting would still require robust safeguards but should aim to deliver coherent outcomes rather than aggregating the most stringent individual standards by default.

Delivering this model would require substantial regulatory reform. Existing frameworks are not designed to accommodate shared, or cluster-level permitting and would need new legal provisions, clearer allocation of responsibilities among authorities, and dedicated coordination mechanisms. Despite the complexity, the case for reform is strong, especially for strategic sectors such as CCS, hydrogen and critical raw materials, where permitting delays of 6 to 15 years risk derailing 2030 deployment targets.

A dedicated, fit-for-purpose permitting regime should apply to infrastructure designated under strategic frameworks such as the NZIA, the Critical Raw Materials Act (CRMA), and the Hydrogen and Decarbonized Gas Package. Without tailored frameworks for these sectors, Europe risks missing its industrial and climate objectives.

## Good practices from EU Member States and third countries

Several international approaches offer valuable models that the EU should consider adopting or standardizing:

- Germany applies the IED-Installations concentration principle, empowering a lead authority to coordinate permitting across domains and reduce fragmentation
- The Netherlands has implemented [“one stop shops”](#) that centralize multi-agency coordination, with digital systems that allow real-time status tracking and integrated data access
- In Finland, the “Licensing and Supervision Project” has aimed to simplify and digitalize procedures across environmental and safety permits.
- Risk-based approaches in countries like Greece have streamlined permitting in industrial zones by tailoring oversight intensity to project complexity and environmental sensitivity as well as providing permits on an industrial park level as opposed to individual industrial projects. These reforms have seen the successful move from [6-month permitting process to as short as 10 days](#).
- Some Member States already allow permit-free trial options for test facilities and grant early construction permissions for site infrastructure, accelerating project delivery without undermining legal control.
- In the United States, reforms under the NEPA have introduced two-year statutory time limits for environmental assessments and formalized pre-application consultations.
- China mandates that environmental authorities must decide on an EIA application within 60 days, creating predictability without compromising environmental standards.

These examples demonstrate that time discipline, digital integration, early engagement, and streamlined authority coordination can coexist alongside environmental protection. Experience should be drawn from these existing models that have proven successful in several jurisdictions.

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## 3. Identification and promotion of priority projects

### Fragmented EU funding delays industrial decarbonization projects

The effectiveness of EU funding instruments depends not only on their availability but on how well they are coordinated across programmes and calls. While mechanisms such as the Innovation Fund, InvestEU, and national state aid schemes offer substantial support, their timelines, eligibility criteria, and objectives are often misaligned. This fragmentation makes it difficult for industrial actors to combine or sequence funding sources in a way that supports project progression. The IDAA should therefore help streamline and align the design, launch, and timing of funding calls across instruments to ensure they reflect the realities of permitting processes and investment cycles. This is particularly important during capital-intensive and high-risk phases, such as demonstration and first-of-a-kind commercial deployment, where tailored and timely support can be decisive for project viability.

### Cross-border and regulatory misalignment delays strategic EU decarbonization projects

Greater coordination across Member States and between EU institutions is also essential. Strategic decarbonization projects, especially those involving CO<sub>2</sub> or hydrogen infrastructure, frequently span national borders and regulatory regimes. The IDAA should facilitate structured cooperation between relevant authorities, infrastructure developers, and industry actors. Alignment with frameworks such as TEN-E, TEN-T, and the NECPs should be actively promoted to ensure policy coherence and efficient delivery.

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## 4. Creation and protection of lead markets for EU low-carbon products

Lead markets can catalyze the emergence of a functional market for low-carbon products, unlocking scalable decarbonization solutions, such as low-carbon hydrogen and CCS, provided the demand side is enabled early and supported through predictable, investable policy frameworks. This would be necessary for the establishment of a sustainable business case for CCS value chains and is particularly relevant to create stable demand for CO<sub>2</sub> transport and storage also in order to meet the 50 Mtpa CO<sub>2</sub> injection capacity objective set by NZIA.

To effectively establish such markets, demand-side measures should play a central role in creating value for low-carbon products and addressing the existing premium. These measures should be technology-neutral, market-based, and investment-friendly, ensuring that all decarbonization pathways contributing to climate targets are eligible and competitive.

We recommend the following key elements when creating a market for low-carbon products:

**Market-based incentives linked to lifecycle GHG emissions performance:** market-based policies, such as tax incentives or product-level subsidies, should be deployed to stimulate demand for lower carbon-intensity products. These instruments should be grounded in robust, technology-neutral lifecycle CO<sub>2</sub> emission performance standards, enabling fair competition across all decarbonization pathways, including low-carbon hydrogen, CCS-based products, and low-CO<sub>2</sub> materials.

**Transparent GHG performance methodologies for products:** developing a clear and transparent methodology for assessing life-cycle product-level GHG performance is critical to ensuring transparency, comparability, and the credibility of market claims, while avoiding unnecessary administrative burden.

**Public procurement with performance-based criteria:** public authorities should integrate lifecycle GHG performance into procurement decisions, particularly for infrastructure, transport, and energy projects. This can be a useful tool to aggregate demand and reduce market uncertainty for emerging low-carbon value chains.

**Effective implementation of CBAM:** a robust Cross-Border Adjustment Mechanism is essential to ensure a level playing field for EU producers investing in emissions reductions. Revenues generated could be channeled back into demand-side measures or innovation support.

**Recognition of low-carbon products across EU instruments:** the definition and certification of low-carbon intensity products should be integrated consistently into funding programmes, infrastructure planning, and market incentives.

# IDAA Public Consultation

Fields marked with \* are mandatory.

## Introduction

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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

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\* Language of my 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

\* 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**

Gabrielle

**\* Surname**

van Melkebeke

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gvm@iogp.org

**\* Organisation name**

*255 character(s) maximum*

IOGP 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.

3954187491-70

**\* 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.*

- Afghanistan
- Djibouti
- Libya
- Saint Martin
- Åland Islands
- Dominica
- Liechtenstein
- Saint Pierre and Miquelon

- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
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- Bangladesh
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- Bhutan
- Bolivia
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- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Lithuania
- Luxembourg
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- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
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- Mexico
- Micronesia
- Moldova
- Monaco
- 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
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- Chad
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- 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
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- 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
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- 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
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and  
Futuna
- Western Sahara
- Yemen
- Zambia
- 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. **For 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

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**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**

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.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Unfair competition from non-EU countries hinders industrial decarbonisation investments.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Decarbonisation technologies are not yet available or deployed at large scale.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
High carbon abatement costs are a major barrier to adopting decarbonisation technologies in industry.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
High capital costs are a major barrier to industrial decarbonisation.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
High operation costs are a major barrier to industrial decarbonisation.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

The complexity and duration of permitting for industrial decarbonisation projects is an obstacle to investing in Europe.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Barriers to industrial decarbonisation are greater for SMEs than for larger companies.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Tariffs on industrial products are a barrier to industrial decarbonisation.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

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

500 character(s) maximum

1. Absence of demand-side markets that value the high cost of lower carbon goods, combined with fragmented and misaligned regulatory frameworks, including permitting, delay deployment and investment. Need to ensure a technology-neutral and aligned approach.
2. Limited infrastructure and underdeveloped supply chains for decarbonisation technologies (e.g. CCS, H2, CO2 transport).
3. High energy costs and limited availability of renewable energy, especially in central and landlocked Member States

### 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.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The challenges related to permitting processes are different across Member States.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The current permitting framework in my country or region does not handle permits related to industrial decarbonisation projects in energy intensive industries efficiently.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

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.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
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**What are the reasons for differences in permitting across Member States? What good practices can you identify?**

*300 character(s) maximum*

Differences stem from industrial structure, energy mix and implementation variance. Best practices include one-stop shops, risk-based permitting, and digital tools. EU-level guidance and harmonised transposition are essential to reduce complexity and gold-plating.

**Please indicate at which administrative level you perceive difficulties.**

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

**What is the average length of the planning/zoning permit procedure? (specify in months)**

**What is the average length of the building permit procedure? (specify in months)**

**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	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of administrative capacity (e.g. understaffed public authorities)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fragmented regulatory landscape and complexity of the process	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Multiple authorities involved	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Lack of digital integration	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of technical knowledge at permitting authority level	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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).	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Industrial clustering can streamline and improve the efficiency of the permit-granting process.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
European legislation could be simplified to facilitate industrial permitting of decarbonisation projects.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Data repositories and data spaces can facilitate the permit process by re-using existing, relevant data sets.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

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

Yes, where appropriate. Cluster-level permits could accelerate deployment by enabling integrated planning for emissions, waste, byproducts and infrastructure. This supports circular industrial models and shared assets but requires coordinated authority oversight and clear legal frameworks to be effective

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	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environmental Impact Assessment – "EIA" Directive	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Birds and Habitats Directives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Industrial Emissions Directive	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water Framework Directive	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other



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

*100 character(s) maximum*

Industrial Emissions Portal Regulation, REACH & CLP, Waste Framework Regulation and Directives, CCS /CCU

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’.

It depends on multiple factors such as the size of the project, the stakes of the project and the location but on average it takes from 12 months in the very best-case scenario up to 72 months (6 years) and in the most extreme cases up to 132 (11 years) months to complete.

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’.

6- 9 months

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’.

Provided the grid has capacity to accept the connection, permission to connect can take less than year. If this is not the case, grid connection can take multiple years and depend on the grid companies’ network plans.

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

### 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.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of access to public funding is a major barrier to industrial decarbonisation.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Transition finance (i.e. financing options dedicated to the improvement of the climate and environmental performance of high impact activities) is difficult to access.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

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	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regulatory uncertainty	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Technological development	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Financial risks	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify other potential risk factors associated with investing in an industrial decarbonisation project:

*200 character(s) maximum*

Lack of a viable business case due to high costs, no or very limited demand for higher value low-carbon products, and insufficient regulatory incentives undermines investment decisions.

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	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Two-way Carbon Contracts for Difference following a bidding procedure	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Power Purchase Agreements support	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Equity investments	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Financial guarantees	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Tax incentives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Innovation Fund	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
InvestEU	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Cohesion Funds	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Recovery and Resilience Facility	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Member States funding (State aid)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify other EU funds.

100 character(s) maximum

Instruments such as CCS & H2 Bank, use auctions and guarantees to de-risk & scale up CCS and H2 infra

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.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

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.

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

**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.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Downstream sectors and consumers lack willingness to pay a premium for clean industrial products.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measures to stimulate demand for clean industrial products are essential to drive industrial decarbonisation.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

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	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Automotive	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Defence	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Machinery	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Electrical and electronic equipment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Clean energy technologies (e.g. wind, solar, heat pump)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

*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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Currently, public procurement is too focused on price (rather than non-price criteria)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

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.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Introducing an EU voluntary label on the carbon intensity of industrial products will curb the proliferation of labels and ensure a harmonised approach.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Introducing an EU voluntary label on carbon intensity will impose significant administrative and compliance costs, which could reduce competitiveness.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
An EU label on the carbon intensity of industrial products should be mandatory, rather than voluntary.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to green finance	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Compliance with regulatory requirements	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased comparability and market differentiation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Market uptake of greener products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

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	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of regulatory incentives	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Limited access to clean carbon sources	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Undeveloped technologies	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

#### 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.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Foreign direct investments are useful to bring into Europe know-how about products or processes which is not available in the EU.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Foreign direct investments are useful to increase supply security for EU customers by localising production closer to them.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Foreign direct investments do not play a role.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

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	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Requirement to appoint EU-citizens to key management positions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Requirement to hire EU-citizens as staff and train them	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Requirement to perform value added production in the EU (as opposed to mere assembly of imported component)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Requirement to transfer intellectual property rights and know-how to the EU investment and/or to grant irrevocable licences to these rights	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Requirement to perform research, development and innovation activities in the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Requirement to source equipment and inputs in the EU	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Requirement to supply EU customers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

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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