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Consultation on the draft new State aid Framework to support the Clean Industrial Deal (Clean Industrial Deal State Aid Framework – CISAF)

Fields marked with * are mandatory.

Introduction

Following the adoption of the Clean Industrial Deal Communication on 26 February 2025, the Commission is consulting the general public on a draft new State aid framework.

The Commission invites you to provide your views on the draft Clean Industrial Deal State Aid Framework via the form below. The Commission is particularly interested in views on those parts marked in [ ]. In case you consider any such parts not appropriate in their current form and want to propose alternatives, please ensure to submit relevant data and evidence to substantiate your view.

Thank you for your collaboration!

About you

Please specify the language of your contribution

English

* Please specify in which role you provide your contribution

- ◯ EU Citizen
- ◯ Commercial company / business
- ◯ Consumer organisation / NGO
- ◯ Business association
- ◯ Academic / research institution
- ◯ Public authority
- ◉ Other

* Please provide your full name

European association

* Please provide your e-mail address (this will not be published)

felicia.covalciuc@aecm.eu

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

European Association of Guarantee Institutions (AECM)

Please indicate the size of your organisation

- [x] Micro (1 to 9 employees)
- [ ] Small (10 to 49 employees)
- [ ] Medium (50 to 249 employees)
- [ ] Large (250 or more employees)

If your organisation is registered, please provide your transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making. More information can be found here.

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

BE - Belgium

The Commission will publish all contributions to this consultation. Please do not include any confidential information in your reply.

You can choose whether you would prefer to have your personal details published or to remain anonymous when your contribution is published. For the purpose of transparency, the type of respondent (e.g., 'EU citizen', 'commercial company' or 'consumer organisation'), country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published. Please opt in to select the privacy option that best suits you.

Privacy setting

- ( ) **Anonymous**
  Only organisation details are published: The type of respondent indicated above, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin, and your contribution will be published as received. Your name and email address will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.
- (•) **Public**
  Organisation details and respondent details are published: The type of respondent as indicated above, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin, and your contribution will be published. Your name will also be published (your email address will not be published).

* Protection of personal data

- [x] I agree with the personal data protection provisions.

General comments

Please provide any comments you may wish to bring to the Commission's attention in relation to the draft proposal for a new Clean Industrial Deal State aid Framework.

5000 character(s) maximum

The European Association of Guarantee Institutions (AECM) and its members see that there is a demand for investments related to the sector of electromobility. Companies operating in this field and looking to make investments can only be supported under the GBER. These investments are currently excluded from the provisions of the TCTF under section 2.8 (Recital (85) a i)), and the same is now reflected in the present document. This raises the question whether this topic (e.g., electric drives for vehicles) should be considered. Other aspects of economic transformation could also be included in this context, as the new state aid framework could serve as a key instrument for supporting industry and SME in the transformation.

We also believe that it is important to ensure that the scope of the funding is interpreted as broadly as possible. In the case of the TCTF, the framework was limited to manufacturer financing. An expansive scope of application should therefore be applied in case of the CISAF.

Point (156) – Reporting Requirements
We suggest requiring Member States to publish relevant information on aids exceeding EUR 300,000, instead of EUR 100 000. This thresholds aligns with the de minimis thresholds and ensures transparency while avoiding excessive administrative burdens for smaller aid amounts.

Aid to accelerate the rollout of renewable energy

Please provide any comments specific to section 4.1 of the draft framework (“Aid schemes to accelerate the rollout of renewable energy”).

5000 character(s) maximum

To ensure legal clarity, we recommend that the European Commission explicitly states in point (39) of the draft proposal that compliance with the ‘Do No Significant Harm’ (DNSH) principle should be assessed at the scheme level. This clarification will eliminate any ambiguity and prevent Member States from cascading the requirement at the individual project level. A uniform, scheme-level approach would enhance consistency, reduce administrative burdens, and prevent unnecessary fragmentation of compliance mechanisms.

If you consider the proposed completion deadlines or exemptions therefrom (see point (37)) are not appropriate, please provide concrete justification for any alternative timeline or other exemptions you would consider more appropriate.

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

5000 character(s) maximum

Please provide any comments specific to section 4.3 and Annex I of the draft framework (“Aid for capacity mechanisms following a target model”).

5000 character(s) maximum

Aid to deploy industrial decarbonisation

Please provide any comments specific to section 5 of the draft framework ("Aid to deploy industrial decarbonisation").

5000 character(s) maximum

We propose increasing the aid intensity for investments categorised under point (90)(d) from 20% to 25%. This increase would improve financial viability and incentivise broader participation in projects contributing to the EU’s climate and energy goals.

If you consider that the prioritisation of technologies for decarbonisation of industrial heat in this section on decarbonisation and energy efficiency is not appropriate (see point (73)), please explain and provide evidence for other criteria you would consider more appropriate.

For aid schemes covering investments relying wholly or partly on the use of hydrogen, section 5, point (82), the new framework takes into account the fact that Article 22a of Directive (EU) 2018/2001 on the promotion of the use of energy from renewable sources (RED) establishes targets for renewable fuels of non-biological origin (RFNBO) for hydrogen in industry. The draft framework does so by laying down a minimum share of renewable hydrogen calculated by reference to the average share of electricity from renewable sources in the Member State concerned, as such project-level contribution to meeting national targets established by EU law is considered a positive effect in the balancing exercise under Article 107(3)(c) TFEU. If you consider that the scope for aid for investments for industrial use of hydrogen should be defined differently, please provide justification and any available evidence for the scope of projects for which you consider that State aid for other types or combinations of hydrogen is required.

If you consider that the zero indirect emissions presumption for electrification projects in this section on decarbonisation and energy efficiency is not appropriate (see point (98)), please explain and provide evidence for an alternative presumption you would consider more appropriate.

If you consider that the safe harbour for natural gas based projects in this section on decarbonisation and energy efficiency is not appropriate (see point (101)), please explain and provide evidence for an alternative presumption you would consider more appropriate.

The draft framework allows to provide support for investment costs related directly to the achievement of the greenhouse gas emission savings or energy efficiency. Such support for these investment costs does not cover production capacity increases, but it also does not prevent companies from proceeding at the same time with capacity increases insofar as the increases are not financed by State aid under the decarbonisation section. This is without prejudice to the compatibility of aid for such capacity increases under other sections of the framework, other frameworks or the Treaty. For simplification reasons, the draft framework nevertheless allows increases of capacity up to 5% without having to differentiate between costs for decarbonisation and those related to capacity increases (see point (103)). Do you think the 5% flexibility margin proposed to be appropriate? If not, please substantiate your view with concrete evidence and data.

We suggest modifying the limit financed by State aid under the decarbonisation section on capacity increases resulting from technical necessity from 5% to 20%. This change recognises the realities of industrial investment, while incentivising investments in these sectors.
Many industrial upgrades, such as the installation of more energy-efficient machinery, automation improvements, or digitalisation, result in unavoidable capacity increases. Reality indicates that efficiency-driven upgrades typically result in capacity increases of 10-20%.
Industrial investments are capital-intensive and require economies of scale to remain viable. Restricting capacity increases to 5% may discourage much-needed investments in cleaner and more efficient production methods. On the contrary, raising the capacity increase limit from 5% to 20% better reflects industrial realities and ensures that regulatory constraints do not inadvertently hinder innovation, efficiency, and competitiveness.

Aid to ensure sufficient manufacturing capacity in clean technologies

Please provide any comments specific to section 6 of the draft framework ("Aid to ensure sufficient manufacturing capacity in clean technologies").

5000 character(s) maximum

Point (128) – Guarantee Rates
We advocate for increasing the guarantee rates for non-assisted and assisted areas to better support investments, as follows:

- Non-assisted areas: Increase from 45% to 50%
- Assisted areas under Article 107(3)(c) TFEU: Increase from 60% to 75%
- Assisted areas under Article 107(3)(a) TFEU: Increase from 75% to 80%, provided the total aid does not exceed EUR 525 million.

These adjustments will ensure that enterprises in different economic zones receive appropriate levels of support while maintaining financial prudence.

Point (129) – Financial Contribution by Aid Beneficiaries
We propose reducing the required financial contribution from beneficiaries from 25% to 10%. This reduction would ease financial strain on businesses, particularly SMEs, and encourage higher participation in investment initiatives.

The list of clean technologies in point (122) eligible for manufacturing aid should be defined by reference to identifiable market failures in ensuring resilient supply of such technologies. Please indicate whether you consider that the scope for aid for clean tech manufacturing equipment and components activities under section 6 should be aligned with the scope of the corresponding section of the Temporary Crisis and Transition Framework (as set out in the draft for consultation of stakeholder views), with the scope of the

Annex of the Net Zero Industry Act, or with some other sub-set of such technologies. Please provide justification and any available evidence for the scope of projects for which you consider that State aid for additional manufacturing capacity is required.

Aid to reduce risks of private investments

Please provide any comments specific to section 7 of the draft framework ("Aid to reduce risks of private investments in renewable energy, industrial decarbonisation, clean technology manufacturing and energy infrastructure").

5000 character(s) maximum

Point (149) – Duration of Loans/Guarantees
For large-scale investment projects, we recommend increasing the maximum duration of loans and guarantees from 10 years to 15 years. Given the capital-intensive nature of these projects, a minimum duration of 15 years is essential to ensure financial sustainability and repayment feasibility.

Do you agree that the inclusion of aid to investors in energy infrastructure projects as foreseen in point (146) is necessary?

- (x) Yes
- ( ) No
- ( ) I don't know

Thank you!

Your contribution is highly welcome. Thank you very much for sharing your views!

If you want to provide additional evidence to support your replies above, please upload here.

Contact

Contact Form