

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

Norway

* Please provide your e-mail address (this will not be published)

katharina.kraak@nfd.dep.no

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

Norway (Ministry of Trade, Industry and Fisheries)

Please indicate the size of your organisation

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

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

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

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

NO - Norway

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

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

Privacy setting

☒ **Anonymous**

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 Your name and email address will not be published.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

☐ **Public**

Organisation details and respondent details are published: The type of respondent as indicated above, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin, and your contribution will be published. Your name will also be published (your email address will not be published).

* Protection of personal data

- ☒ I agree with the [personal data protection provisions](#).

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

Norway supports the European Commission's comprehensive vision for a 'European Green Deal', and for staying on course under the new Commission mandate with the 'Clean Industrial Deal'. This includes the overarching approach in the proposal for State Aid measures to support the 'Clean Industrial Deal' – 'CISAF', complementing the existing state aid guidelines, such as the CEEAG. As part of an overall approach, Norway encloses some general considerations, as a background for our comments in the EU Survey.

The EU and Norway share ambitious goals for climate action and the green transition, as affirmed by the EU-Norway Green Alliance of 24 April 2023. Norway emphasises its particularly strong relationship with the EU as European neighbours, partners and allies, sharing fundamental values and a common regulatory framework through the Agreement on the European Economic Area (EEA Agreement). Our comments in the survey are to be read without prejudice to the scope of the EEA Agreement.

Offshore wind

Norway is part of the North Seas Energy Cooperation. Norway has an ambition to allocate areas for 30 GW of offshore wind production by 2040. The first areas for renewable energy production at sea on the Norwegian continental shelf were opened in 2020. To reach our common objectives it is important that the state aid framework is sufficiently flexible to also allow for solutions tailored to promote less mature technologies, such as floating offshore wind.

Carbon Capture and Storage and Carbon Removals

Norway will work together with the EU to bring technology on carbon capture and storage (CCS) to markets, to foster the decarbonisation of hard-to-abate industrial sectors and to compensate for any residual emissions through CO₂ removals. Norway intends to cooperate further to develop European market rules and infrastructure for CO₂ capture, transport, utilisation and storage.

The development of sufficient capacity on CO₂ capture, transport, injection, and storage on European level must be based on market mechanisms and incentives, in coherence with existing frameworks and EU regulations. Regulation of CCS should consider both the entire value chain perspective and the individual needs and commercial drivers in the different parts of the chain. The costs are still high and public funding is needed for initial projects, but over time projects must become fully commercial and not rely on state aid. A predictable framework for CCS should be developed, to get projects up and running in time.

As a general comment, Norway would like to mention that we welcome the flexibility offered by the new framework. However, we would also like to stress that it will be crucial to apply the framework in a way that ensures the integrity of the internal market, minimises any negative impacts on competition and trade within the EEA, and prevents rent seeking.

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

Norway has among the highest shares of electricity produced from renewable sources in Europe. Hydropower accounts for about 88 per cent of the Norwegian power production capacity, and wind farms for about 11 per cent. In 2023, the overall share of energy from renewable sources of gross final energy consumption in Norway was 75.6 per cent. To be able to remove the remaining fossil fuels and to support the electrification of the society, it is important that the available power can be shared as widely as possible and in the most efficient way. This involves the use of flexibility measures, such as control systems, regulations, various storage solutions, and business models for third parties.

Today, the markets for flexibility are immature, and there is great uncertainty about future cost levels for both electricity and necessary investments to make flexibility available. By a more efficient sharing of the energy, the need for new grid expansion is reduced. Therefore, there will be a need for support for investments that make flexibility available, i.e., pure capacity measures and energy storage. However, it is unclear what kind of investments in measures for load leveling can be supported under the CISAF.

Market based solutions are preconditions for succeeding in deploying renewable energy, while at the same time pursuing the goal of affordable energy to consumers. The deployment of renewable energy should take place within the framework of a well-functioning market and cost-efficient infrastructure development. As a general point, it is important that the state aid framework is sufficiently flexible to also allow for solutions tailored to promote less mature technologies, such as floating offshore wind.

To point 9 (competitive bidding procedure): Norway supports the general principle of granting aid through competitive bidding procedures. However, the definition of a competitive bidding procedure in point (9), letter d) is unclearly drafted. Specifically, the wording of subpoint (ii) requiring that 70 % of the total selection criteria used for ranking bids needs to be defined in terms of aid per unit of environmental protection is unclear and ambiguous. As a minimum, the provision should set out that member states may include pre-qualification criteria without regard to the 70 % rule. This is necessary to fulfil the requirements and objectives set out in the Net-Zero Industry Act article 26, as well as the purposes highlighted in points (15) and (16) of the draft state aid framework.

To point 43 (small projects): Specifically, regarding offshore wind, the capacity limitation of 18 MW is too low to account for coming demonstration projects for future offshore wind turbines. The industry is currently testing turbines of up to 25-26 MW. The limitation should be set high enough to allow for single-turbine demonstration projects, as these may be important to test and demonstrate future offshore wind turbines and turbine technology.

As a general comment, we would like to mention that this chapter is rather technical and difficult to follow.

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.

Point of departure for state aid measures must be taken in the freedom of the Member States under the EEA Agreement to exploit their energy resources, determine their energy mix, their national competences for the development of their national electricity grids, including interconnections, and national responsibilities for the enforcement and regulatory oversight.

The framework should open for the necessary national flexibility in this context. The determination of the start of the deadlines, the completion of the project, and any possible extensions, should be subject to the assessment of the national competent authority.

This comment is also relevant for the points (79) and (80), as well as (108).

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

Please see the enclosed general considerations, as an overall background for our approach to the EU Survey. Please also see the Norwegian contribution 30 August 2023 on the Call for evidence on Industrial carbon management, prior to the Communication on the Industrial Carbon Management Strategy (COM (2024) 62 of 6 February 2024).

https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13848-Industrial-carbon-management-carbon-capture-utilisation-and-storage-deployment/F3435244_en

When it comes to more specific comments, for the understanding of the deadlines in points (79) and (80), as well as (108), see comments to point (37) above.

Specifically, we would like to comment on point 79 a). For most CCS projects, the execution time for an EPCI (Engineering, Procurement, Construction, and Installation) project will exceed 36 months. CCS projects are extensive, highly complex projects that must be integrated into existing facilities with minimal disruption to the existing production. An exception for the completion time of 36 months should therefore include CCS projects.

As regards point 92 (Funding gap and individual notification), we have the following comment:

For CCS projects, the eligible investments cost is the cost of carbon capture equipment. We assume that when using the funding gap methodology, OPEX for transportation and storage of CO₂ can be included in the funding gap analysis.

Is the aid however, limited to 100% of the approved investment costs, even if the funding gap analysis indicates a need for more support?

A grant equivalent to 100% of the investment costs will not be sufficient to make an investment decision for most CCS projects. This is due to the high operational costs associated with running the carbon capture facility, as well as the high costs of transportation and permanent storage of CO₂. To include more CCS projects, state aid of up to 100% of the funding gap should be allowed, not limited to the investment costs.

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.

Norway supports the approach in the Clean Industrial Deal, on enabling conditions for hydrogen as an important part of Europe's energy transition, especially in sectors that are hard to decarbonize and where direct use of electricity is not an option.

In line with the communication on the Clean Industrial Deal, a technology-neutral approach is essential, including in the state aid framework, where the focus is emissions reduction and access to sufficient volumes of renewable and low-carbon hydrogen at a reasonable cost for European industry.

According to Directive EU/2023/2413, which amends Directive EU/2018/2001 (RED), Member States must ensure that at least 42 percent of the hydrogen used for final energy and non-energy purposes in industry comes from renewable fuels of non-biological origin by 2030, increasing to 60 percent by 2035. Potential producers of low carbon hydrogen in Norway have expressed concerns about the impact of this target due to the long lead-times and capacity constraints in the development of renewable energy. The requirement for renewable hydrogen could limit the amount of low-carbon hydrogen that can be used in industry, potentially hindering the development of the overall hydrogen market.

Therefore, the requirements in point (82) should be drafted in a more flexible way, so that the national authorities are not obliged to impose conditions on the use of renewable hydrogen in industry. The framework could benefit from changing the word 'must' in the first sentence with 'should' or 'may'.

See in this context also similar provisions in points (101) (b), (107), (110), and (114) (b).

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.

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

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

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

- ☐ Yes
- ☐ No
- ☒ I don't know

Thank you!

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

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

Contact

[Contact Form](#)

