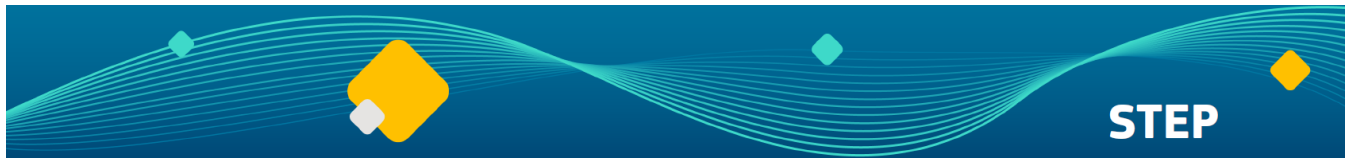


Contribution ID: 85838735-902f-4176-99bb-db31b86d92d7

Date: 21/03/2024 12:40:28

# Industrial Forum members expectations regarding the Strategic Technologies for Europe Platform (STEP)

Fields marked with \* are mandatory.



The **Strategic Technologies for Europe Platform (STEP)** will be launched in April 2024.

In order to design and deliver a STEP Portal that will address the needs of EU industry and companies with regard to access to EU funding, we would like to get your opinion on the following topics. Any practical recommendation is welcome and might be considered for any future development of the Portal in the coming months. All inputs received through this survey will be aggregated and the Commission services will not disclose any specific comment that would allow the direct identification of any organisation.

\*Name of your organisation

European Environmental Bureau (EEB)

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**Which EU fund or programme are you/your members the most familiar with?**

*Between 1 and 8 selections*

- ☐ Horizon 2020/Horizon Europe
- ☒ Innovation Fund
- ☐ EU4Health Programme
- ☐ Digital Europe Programme
- ☐ InvestEU
- ☒ Cohesion Policy Funds (ERDF, CF, ESF+, JTF)
- ☒ Recovery and Resilience Facility
- ☒ Other

If other, please specify

EU state aid (CEEAG)

**1) Based on your experience, how easy it is to identify today the EU funding opportunities matching your members needs?**

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What are the 3 main improvements you would propose to help companies getting the full picture of what is available to them in terms of EU funding?

Our main interest is to understand if and how the funding is "best spent" to match the public interests needs. Proposals:

1) An overview document as to what the eligibility criteria are as to funding allocation as to delivered outcomes that serve public interests e.g. public interests (improved health, environmental and climate protection) return of investment ratio. Minimal expectations are not clear / vague as to whether the funding will actually match delivery expectations on the zero-pollution ambition. Some EU initiatives developed under the EU Green Deal are not yet clear as to what meaning of "essential uses" could be. The Montreal Protocol refers to essential for society to function whilst STEP (Art 2.2) refers as to 'critical technologies' (with significant economic potential or are preventing / reducing strategic dependencies of the Union).

2) a data repository comparing "promises" / "expectations" from the project application phase (accepted to be funded) v. real progress delivered by the beneficiary / industrial sector. Powerful search filters should allow to sort by various industry sectors (See Annex I of Industrial Emissions Directive 2010/75 as amended / NACE codes), environmental themes: Air, water, soil, chemicals, resource use / waste prevention, Decarbonisation, Chemicals (substitution) or general compliance support EU acquis (monitoring of progress, standards making etc)

**2) Based on your experience and needs, can you name 1-2 critical funding gaps in the existing offer of EU funding (in terms of sector, instrument, investment phase)?**

- 1) lack of common benchmark(s) of reference per industry sectors
- 2) lack of integrated approach as to pollution prevention and restoration (funding supports are often single issue / challenge related)
- 3) STEP seems to ignore / not support demand reduction initiatives within the value chain (alternative business models, improved efficiency and circular economy aligned projects).

**3) What are your expectations regarding the Sovereignty Seal?**

Based on your experience with the Seal of Excellence (awarded under Horizon Europe, Digital Europe Programme, LIFE, Erasmus+), what would be your one suggestion to make sure the future STEP Sovereignty Seal (to be awarded under Horizon Europe, Digital Europe Programme, EU4Health, European Defence Fund, Innovation Fund) brings added value to your project?

this is a preliminary response: the "sovereignty Seal" may be of value only if the project is effectively aligned to both objectives (clean and resource efficient) AND judged "critical" for society to function.

The Regulation allows "any of the STEP objectives" to be met (Art 4.1, this is not in line with 'integrated approach' (best overall outcomes to be delivered, avoiding negative cross media effects), situations should be avoided where a project supporting manufacture of a 'critical component' needed for other Art 2(1) point (a) technologies comes with a (significant) negative impact on the overall greening of the transition overall of the EU economy. This is further in line with the EU taxonomy principle of 'Do no significant harm' (DNSH) when determining techniques that are taxonomy-aligned.

It would be useful that all the minimal environmental and climate performance requirements are compatibility checked as to the project expectations (Art. 4.1). Award criteria should be clearly communicated and strive for a fully integrated approach, we expect those criteria to be dynamic so to ensure continuous improvements on performance from all actors involved.

**4) What is the one feature you would value from a one-stop-shop Portal aggregating EU funding opportunities for clean tech, bio tech and deep/digital tech (the STEP sectors)?**

See Question 1:

1) An overview document as to what the eligibility criteria are as to funding allocation as to delivered outcomes that serve public interests e.g. public interests (improved health, environmental and climate protection) return of investment ratio.

2) powerful multi -criteria search filters for data repository + comparing "promises" / "expectations" from the project funded) v. real progress delivered by the beneficiary / industrial sector with access to evidence.

One of the gaps is also driven by the lack of robust definitions / criteria as to what is the meaning of "clean tech" and "deep industrial transformation" or "clean and resource- efficient technologies". Industry may have a different view as to what this means v. NGOs such as the EEB (involved in the BAT determination for industrial activities within the Industrial Emissions Directive were we will face similar questions). We would expect to be consulted on the minimal criteria / expectations to be set e.g. sectoral scoreboards which take a fully integrated approach, common reference benchmarks of excellence / beyond BAT compliance fit for the zero-pollution ambition. The beneficiary should demonstrate this based on facts. As an example it would be useful to integrate the EMAS / ISO 14001 environmental objectives / indicators in the database to enable comparability.

The second aspect links to "criticality" assessment. What is of "essential use" / critical for society / EU to function is of subjective nature. In our view a refocus of what is 'critical' / "essential" is to be placed in context of the SDGs / planetary boundaries that should be non-negotiable and should not be affected negatively by any of the promoted techniques options that will receive public funds. We expect that no support is provided for any fossil-based technique options, even if that support is considered as "critical" for other components (e.g. some fossil feedstock may be used as a solvent used for the manufacture of pharmaceutical products; e.g. 2 hydrocarbons used for extraction of critical raw materials or other machinery).

Whilst the STEP objectives as per Art 2(1) refer to a list of "critical" technologies such as "clean and resource efficient technologies", there is no further clarification as to what is concretely meant.

Open access to the performance information and comparison against the above mentioned benchmark reference points (e.g. EMAS, BAT) should be made available to external stakeholders involved in standards making processes, notably NGO involved in the Sevilla Process and INCITE (DG JRC / EIPPCB).

## 5) What is the one question on STEP you would like to see answered during the workshop?

1) whether an overview document with eligibility criteria for all mentioned EU funding system exists

2) whether we can get clarify meaning of "clean / resource efficient technologies" and set minimal expectations / benchmarks of reference / excellence for the industry sectors concerned.

3) how the funding will provide best value (Zero pollution ambition and other public interests) for money and will support the EU to be a frontrunner on that field.

Should you have any relevant study or position paper on access to EU funding you would like to share with us, please upload it here below.

Thank you very much for your input. We will carefully look at it and look forward discussing it at the Industrial Forum workshop dedicated to STEP.

## Contact

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

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