



CISAF and Simplified Procedures

Agenda

Policy and Legal Context

Objectives and Scope of CISAF

Simplified Procedures for Renewable Energy Deployment

Industrial Decarbonisation and Funding Gap Assessment

Support for Clean Technology Manufacturing

Critical Raw Materials and De-risking Measures

Intersection of CEEAG and CISAF

Conclusions and Enforcement Takeaways

Why CISAF?

01

Responds to investment leakage risks and global subsidy competition

02

Builds on experience under the TCTF transition measures

03

Seeks faster deployment of strategic projects

04

Enhances predictability for Member States





Legal Basis

- Assessment under Articles 107(3)(c) and 108 TFEU

- Framework sets compatibility conditions used by the Commission

- Notification remains central outside exemptions

CISAF in the State Aid Architecture

- 01 Relationship with GBER
- 02 Relationship with CEEAG
- 03 Relationship with IPCEI practice
- 04 Framework-specific compatibility pathways



Objectives of CISAF

- 01 Accelerate clean energy rollout
- 02 Facilitate industrial decarbonisation
- 03 Support clean-tech manufacturing
- 04 Mobilise private capital



Scope of Measures



Clean energy measures



Electricity cost support



Industrial decarbonisation



Manufacturing capacity



De-risking measures

Necessity

Appropriateness

Proportionality

Limitation of distortions

Authority Review Questions

- 01 Is aid needed?
- 02 Is there a credible counterfactual?
- 03 Is aid limited to the minimum?
- 04 Can competition concerns be mitigated?



Renewable Energy Support



**SUPPORT FOR
RENEWABLE ELECTRICITY
GENERATION**



**SUPPORT FOR
RENEWABLE FUELS**



**EMPHASIS ON RAPID
DEPLOYMENT**



**ALIGNMENT WITH
DECARBONIZATION
GOALS**



Simplified Procedures

- Standardized compatibility conditions
- Reduced analytical burden where conditions met
- Greater legal certainty



Competitive Bidding

- Generally preferred allocation mechanism

- Support cost-efficient aid allocation

- Important safeguard against overcompensation



Exceptions to Auctions

- Demonstration projects

- Insufficient competition

- Objective justification required

Funding Gap Methodology

- 01 Aid linked to minimum necessary amount
- 02 Comparison against credible counterfactual
- 03 Review of assumptions essential





Hydrogen Measures

- Support for renewable hydrogen value chain

- Industrial demand-side implications

- Interaction with decarbonisation objectives

Storage and Flexibility



BATTERY STORAGE



DEMAND RESPONSE



**GRID INTEGRATION AND
SECURITY BENEFITS**

Industrial Decarbonisation



Electrification



Fuel switching



Efficiency improvements



CCUS-related
investments

Manufacturing Support

- Expansion of EU clean-tech production
- Strategic autonomy rationale
- Supply-chain resilience

NZIA Technologies

- **Solar**
- **Wind**
- **Batteries**
- **Heat pumps**
- **Electrolysers**
- **Grid technologies**

Critical Raw Materials



Strategic inputs for clean technologies



Supply security considerations



Link to manufacturing chapter

CRMA Interaction



RESILIENCE OBJECTIVES



**PROCESSING AND
RECYCLING IMPORTANCE**



**STRATEGIC VALUE
CHAINS**



De-risking Private Investment

- Guarantees

- Risk-sharing

- Catalyzing institutional capital



CEEAG versus CISAF

- CISAF as targeted Clean Industrial Deal framework

- CEEAG remains broader environmental framework

- Choice of legal basis affects assessment

Key Enforcement Takeaways



FOCUS ON
PROPORTIONALITY AND
INCENTIVE EFFECT



ROBUST EVIDENCE
REMAINS ESSENTIAL



SIMPLIFICATION DOES
NOT ELIMINATE
SCRUTINY



MONITORING AND
TRANSPARENCY REMAIN
CRITICAL



Thank you!

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