

Carbon Gap Response to the Public Consultation on the Multiannual Financial Framework 2028–2034 (Competitiveness)

1. Introduction

The next Multiannual Financial Framework (2028–2034) will be critical to delivering Europe's climate neutrality target and strengthening its industrial competitiveness. Carbon dioxide removal (CDR) must be a priority: according to the [IPCC](#) and the [ESABCC](#), it is essential to achieving net-zero, and positioning Europe as a leader in clean technologies.

Yet CDR remains severely underfunded, receiving less than [0.1%](#) of the EU's projected climate budget for 2021–2027. An estimated [€2.88–5.85 billion](#) will be needed in the EU over the next two decades to develop CDR methods and address cross-cutting research gaps. Funding remains fragmented, often conflated with CCS, and the complex landscape poses barriers for innovators.

Scaling CDR will drive innovation, potentially creating [670,000 high-quality jobs](#), and building critical value chains in sectors like chemicals, hydrogen, and carbon management. [With 400–800 Mt of CO₂](#) needing to be removed annually by 2050, deeper support for RD&I and deployment is essential in the next MFF.

2. Principles for European Competitiveness Fund design

Several principles should guide the design of a European Competitiveness Fund to support European climate goals, particularly carbon dioxide removal:

2.1. Ringfence climate funding

The consultation proposes flexibility in resource allocation for emerging needs. While this has merit, it raises significant concerns regarding **climate funding stability**. The EU already faces a substantial climate funding gap, and any diversion of climate-dedicated budget would further undermine the EU's ability to meet its goals and international commitments.

Carbon Gap strongly urges that **climate funding within the new MFF structure be explicitly ring-fenced and protected from potential reallocations**. This protection is essential for maintaining the EU's climate credibility, ensuring investor confidence, and enabling the long-term planning required to transition technologies from research to deployment. Climate change continues to aggravate regardless of political cycles or shifting priorities – the physical urgency remains, and is now more pressing than ever. EU climate spending must reflect that reality.

2.2. Balance simplification with strategic focus

The existing EU funding landscape is notoriously complex, creating barriers to effective participation and slowing innovation. While consolidating various funding programmes

into a Competitiveness Fund could improve accessibility, simplification alone is insufficient. Any new structure must ensure:

2.2.1. Targeted support across all Technology Readiness Levels (TRLs), particularly ensuring robust funding for early-stage research, innovation, and demonstration activities.

2.2.2. Inclusive criteria to unlock high-impact innovation across diverse actors. Funding criteria should be designed to ensure that resources reach the most promising and impactful climate innovation projects, not just those with the greatest capacity to navigate complex application processes. This means recognising structural differences between early-stage innovators and more established players, and reducing barriers that prevent high-quality proposals from under-resourced but high-potential actors.

2.3. Specific recommendations for CDR funding

Building on [DG RTD's analysis of research needs for climate neutrality by 2050](#), which recognizes CDR as a priority EU research area, the EU must develop a detailed roadmap to address remaining CDR research and funding gaps. Carbon Gap proposes six recommendations for bringing the portfolio of CDR methods from lab to scale:

2.4. Recognise CDR as a strategic priority in the Competitiveness Fund

If the Commission proceeds with a single Competitiveness Fund, **carbon dioxide removal (CDR) must be recognised as a strategic priority pillar**. CDR is essential for achieving the EU's 2050 climate neutrality target and offers high innovation potential, cross-sectoral benefits, and long-term industrial value.

Explicit prioritisation of CDR would enable dedicated support for research, infrastructure, and market development; improve coordination across funding instruments; enhance policy coherence across EU climate, industrial, and innovation strategies; and send a clear signal to innovators, investors, and Member States.

2.5. Increase EU RD&I funding for CDR

At least **€2.6 billion** should be committed to CDR research, development, and innovation during the upcoming EU 7-year financial cycle 2028–2034 through the next MFF, RD&I Framework Programme, and other funding mechanisms (*see point 2.6*). This estimate is based on Carbon Gap's in-depth [analysis](#) of current [CDR funding support](#) at EU level, and remaining funding needs, which based on [RMI's Applied Innovation Roadmap for CDR](#), identified a funding gap of €2.88–5.85 billion over the next 15–20 years in Europe to bring a broad portfolio of carbon removal methods to maturity. This focuses on early-stage technologies, mainly between TRL 1–7, not extending to the deployment stage.

For more mature CDR solutions approaching commercial deployment, additional funding mechanisms will be required to achieve commercial scale once the technology is ready (*see point 2.7*).

2.6. Prioritize CDR R&I areas based on strategic needs

A coordinated CDR innovation strategy is urgently needed to set clear RD&I priorities, timelines, and to guide the use of resources in Europe. There are at least [16 known carbon removal methods](#), but many are still scientifically uncertain or economically unviable. Ocean-based methods, for example, operate in open systems where environmental impacts are not yet well understood. These approaches cannot scale responsibly until research addresses the ‘do no significant harm’ principle, removal performances and measurability. Other methods may not face such hurdles but remain at low maturity, with high uncertainty around scalability, cost, and performance. Some promising solutions may not even exist yet.

The need for RD&I goes beyond unproven early-stage methods. It must also help develop the core enablers of a functioning CDR ecosystem, including CO₂ infrastructure, trustworthy measurement, reporting and verification (MRV) systems, and cross-cutting issues such as the quantification of CDR’s climate benefits, second-order effects and societal readiness, as well as research governance options and their implications.

To guide funding decisions, Carbon Gap proposes [five strategic objectives for RD&I](#):

1. **Unlock new CDR methods** – to expand the portfolio of scalable solutions.
2. **Optimise existing concepts** – to lower costs and improve performance.
3. **Strengthen MRV** – to ensure credibility and permanence.
4. **Advance governance** – to develop effective, trustworthy “rules of the game”.
5. **Improve CO₂ transport and storage** – to build enabling infrastructure for durable removals.

Moreover, the [European Commission's report on R&I for climate neutrality by 2050](#) is an important first step. It identified CDR as a key solution in need of R&I support and highlighted critical gaps requiring attention, as seen in the table below. While the report’s results should not be interpreted as a strict ranking, they provide an example of priority areas where timely investment can maximise impact and EU value-added. Although valuable, this report does not yet constitute a full roadmap. Its recommendations must be made more comprehensive and specific to inform funding decisions and track progress over time.

Summary of CDR research gaps

CDR area	Core gaps
Direct air capture (DAC)	-Development of DAC modules and their production -Research on materials (including sorbents) -Business cases
Point source capture technologies (including biomass)	-R&D of capture modules -Basic materials research -Case, innovation and scaling of deployment
Permanent storage & utilisation of captured CO2	-Geological storage capacities -Applications for utilising CO2 in products -Infrastructure for transport and storage
Terrestrial ecosystem based-removal	-Effectiveness of afforestation and reforestation projects -Biomass harvesting systems energy crops -MRV -Effectiveness of soil carbon enhancements through enhanced mineralization, altered soil management, and biochar applications -Business cases, barriers among farmers and communities
Marine and ocean CDR	-Governance frameworks -Phytoplankton diversity and abundances -Remote sensing -Co-benefits -Effects on ecosystems -Economic feasibility and effectiveness.

Source: [European Commission's report on R&I for climate neutrality by 2050](#)

RD&I needs for CDR clearly extend well beyond the areas identified in the [Commission's report](#), as highlighted by [Carbon Gap's CDR Research Gaps Database](#). The Commission should build on this and other initiatives to develop a formal, **EU-level CDR RD&I roadmap**.

2.7. Support the scale-up of CDR deployment with dedicated funding instruments

Further along the innovation lifecycle, CDR methods critically need support that gets them out of the lab and across the valley of death. For many technologies, there is a substantial funding gap between promising research and commercial deployment. Projects often fall between the cracks in terms of the type of support different institutions can offer, with the risk of profiles not aligning well with the instruments available. Targeted public interventions are therefore critical to bring European innovations to real-world settings. These could include:

2.7.1. Establish an EU Carbon Removal Pilot Procurement Programme to directly procure high-quality, permanent CDR from diverse EU-based suppliers. The proposed budget for the first round is [€50 million for a three-year period](#), potentially sourced from the Innovation Fund. Matched private investment can be directly encouraged through the design of these schemes. In the US DOE's CDR Purchase Pilot Prize, the scheme was designed to encourage participating

CDR suppliers to secure private purchases alongside the public ones, to improve their ranking in the prize award process. The US prize was also accompanied by a Voluntary Carbon Removal Purchasing Challenge, encouraging private companies to support the effort by making their own purchases and notifying the government. This led private firms (Meta and Google) to mobilise a further US\$70m for CDR.

2.7.2. Design a CDR-compatible Industrial Decarbonisation Bank: The Clean Industrial Deal announced an upcoming €100 billion Industrial Decarbonisation Bank (IDB) to finance the industrial transition. [The IDB should:](#)

- a. Explicitly include engineered and nature-based CDR within its mandate;
- b. Launch a dedicated pilot facility (€1-2 billion) to test innovative financing models like CCfDs and guarantees, building on the approach of the EU Hydrogen Bank;
- c. Ensure coordination with Horizon Europe, the Innovation Fund, and national development banks, to guarantee continuity in the support across a project's lifecycle;
- d. Align funding with the EU's Certification Framework to guarantee integrity;
- e. Build internal CDR finance expertise across EU institutions.

2.8. Make RD&I funding for CDR more visible, accessible and secure

This can be done by designing comprehensive funding calls that clearly and directly target a portfolio of CDR methods, and addressing the structural issues that become barriers to applications themselves. For example:

- 2.8.1. Establish a CDR Helpdesk and Technical Assistance Facility** to guide innovators in navigating funding opportunities, improving application quality, and increasing project readiness.
- 2.8.2. Appoint an EU CDR Research and Innovation coordinator** to oversee and align CDR-related research and funding across EU programmes, ensuring coordination between ocean, land, and industrial research clusters.
- 2.8.3. Ensure strategic visibility for CDR across existing funding instruments:** the European Commission should ensure CDR is systematically prioritised across all relevant EU funding programmes. In the current structure, this would require integrating CDR at the strategic planning and thematic prioritisation levels.

Opportunities to improve CDR visibility in existing EU programmes

Programme	Where to improve CDR visibility
Horizon Europe	Establish a dedicated “Destination” and integrate CDR into Work Programme priorities
Innovation Fund	Define CDR as a thematic priority in calls and an explicit eligible project category
LIFE Programme	Prioritize CDR under the Climate Action sub-programme and explicitly name CDR approaches in calls
European Innovation Council (EIC)	Launch a “Challenge Call” for durable CDR innovation; integrate CDR into the EIC Work Programme as a strategic emerging technology

Source: Carbon Gap's analysis

Without explicit prioritisation and larger visibility, Europe risks underfunding a sector critical to climate resilience, clean technology leadership, and global competitiveness.

2.9. Leverage the full spectrum of RD&I funding schemes

The EU must channel resources in a coordinated way across different funding mechanisms, ensuring continuity in support across a project's lifecycle and strengthening EU CDR research communities. For example, some ways greater support could be leveraged:

2.9.1. Carve out CDR-dedicated challenges in the European Innovation Council, for example:

EIC Pathfinder: Breakthrough CDR Technologies

Objective: Support high-risk, high-reward research to deliver additional, durable, verifiable CDR solutions

Scope: Grants up to €4 million / 3–5 years / early-stage development (TRL 1–3) for validation in lab.

- Direct Ocean Capture.
- Ocean Alkalinity Enhancement.
- Enhanced Rock Weathering.
- Bigdata/space tech/AI-driven MRV Systems.

Offers future alignment with CRCF

EIC Accelerator: Scaling Deep-Tech CDR

Objective: Accelerate commercialisation of innovations with high potential for scalability

Scope: Grants up to €2.5 mn / co-invest up to 10 mn / projects (TRL 6–8) to validate, demonstrate in field.

- Direct Air Capture processes.
- Energy-efficient carbon capture and pressurising processes.
- Energy grid management of intermittency and CCUS/CDR.
- Biochar Carbon Removal.
- Biomass burial, bio-based long-lasting products.
- Accelerated Mineralisation in long-lasting products (cement).
- Digital MRV and market infrastructure.

Alignment with Industrial Carbon Management Strategy & CRCF today

Source: Negative Emission's Platform & Carbon Gap

2.9.2. Establish an EU CDR Mission "Building Europe's Carbon Removal Ecosystem"

Building on the global [CDR Mission under Mission Innovation](#), the EU should launch its own dedicated CDR Mission to accelerate the development of technologies, infrastructures, MRV systems, governance frameworks, and societal safeguards needed for scalable, verifiable carbon removal in Europe.

An EU CDR Mission would focus funding, align research and policy efforts, and ensure coherence across climate, industrial, and innovation agendas. It would provide a strategic platform to coordinate work across multiple dimensions of research, close critical gaps, and position Europe as a global leader in durable carbon removal solutions – while ensuring internal capacity to meet the EU's own climate targets.

2.9.3. Establish a CDR innovation partnership

Modelled after the [Clean Hydrogen Joint Undertaking](#), a CDR Innovation Partnership could pool public and private funding to coordinate research, innovation, and market deployment efforts across Europe.

Time lost at this stage will not be recovered, and will increase costs, by requiring more action later on. Carbon removal methods will simply not be ready to fulfill their critical role in achieving climate neutrality and net negative emissions. Beyond climate goals, failing to support CDR development jeopardizes Europe's global leadership in an emerging market.

By engaging with private actors, the CDR Innovation Partnership would allow public funds to act as a **multiplier**, unlocking significantly greater volumes of private investment. This would not only mobilise capital at the pace needed to scale CDR technologies, but also align private RD&I efforts with EU climate goals and regulatory frameworks. Using public funding in this way – to reduce risk, crowd in private capital, and accelerate deployment – is essential to ensuring that CDR solutions are developed and commercialised in time to meet the EU's 2050 climate neutrality target.

Additional resources:

1. [Rising to the challenge: Funding CDR research, development & innovation for a net zero competitive EU](#) (Carbon Gap)
2. [EU CDR Research Gap Database](#) (Carbon Gap)
3. [The Rocky Mountain Institute \(RMI\)'s Applied Innovation Roadmap for CDR](#)
4. [CDR funding tracker](#) (Carbon Gap)
5. [The Case for Carbon Removal in the EU Decarbonisation Bank: Pragmatic, Possible, and Pivotal](#) (Carbon Gap)
6. [Introducing an EU Pilot Procurement Programme](#) (Carbon Gap)
7. [Research and Innovation for climate neutrality by 2050: A report by the European Commission Directorate-General for Research and Innovation](#) (DG RTD).
8. [AR6 Synthesis Report](#) (IPCC)
9. [2040 climate target and 2030-2050 GHG budget report](#) (ESABCC)
10. [Carbon dioxide removal: Europe and Germany's role in Catalyzing a Trillion-Euro Industry](#) (BCG & DvNE)
11. [Envisioning a carbon removal strategy for Europe](#) (Carbon Gap)

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Public Consultation - EU funding for competitiveness

Fields marked with * are mandatory.

Introduction

In 2025, the European Commission will put forward a comprehensive proposal for the next long-term budget – the multiannual financial framework (MFF). This includes EU funding providing financial support to hundreds of thousands of beneficiaries, including research and technology organisations, small and medium /sized businesses, startups and scale-ups, educational and research institutions, industry clusters, and many others.

Today, EU funding in support of competitiveness is spread over too many overlapping programmes, many of which fund the same thing but with different requirements and difficulties in combining funding effectively, which hinders access to EU funding and limits the impact that the funding can have.

As highlighted in President von der Leyen's Commission's [Political Guidelines](#), as well as in the [Competitiveness Compass](#), the Commission will work on a simpler, more focused and impactful MFF that reflects the European strategic priorities (with the ambition of being an “investment-focused Commission”),

The guidelines also announced the creation of a European Competitiveness Fund, as part of the proposal for the next MFF. As set out in the Competitiveness Compass, this investment capacity should channel investment in strategic technologies along the entire investment journey, from research, through scale-up, industrial deployment, to manufacturing – using the power of the EU budget to de-risk and mobilise private investment for our common goals.

The Commission's proposal for the next MFF will be focused on the things that matter most, in areas where the EU can achieve more than Member States acting alone. This requires a careful assessment both of what has worked well in the past and what could be improved in the future. The next MFF will draw lessons from the current budget – notably in terms of simplicity and flexibility, speed and strategic focus.

As an integral part of the process, the Commission is launching a series of public consultations to gather views from all interested parties on the future EU budget. This consultation covers EU funding in support of EU competitiveness. The decision to cluster issues serves to support the preparatory work and does not pre-empt the architecture of future programmes. This questionnaire consists of 3 parts:

Part 1 collects some information about you Part 2 contains questions related to EU funding for competitiveness. Part 3 comprises 2 closing questions.

Your feedback will inform the analysis of the impact assessment for the European Competitiveness Fund. 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 want, you can also upload a document with your views at the end of the survey.

About you

Part 1. Questions about you

*** 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

Eloisa Esther

* Surname

Viloria Rosquete

* Email (this won't be published)

eloisa@carbongap.org

* Organisation name

255 character(s) maximum

Carbon Gap

* 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.

159208346089-06

* 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	☐ Dominican Republic	☐ Lithuania	☐ Saint Vincent and the Grenadines
☐ Algeria	☐ Ecuador	☐ Luxembourg	☐ Samoa
☐ American Samoa	☐ Egypt	☐ Macau	☐ San Marino
☐ Andorra	☐ El Salvador	☐ Madagascar	☐ São Tomé and Príncipe
☐ Angola	☐ Equatorial Guinea	☐ Malawi	☐ Saudi Arabia
☐ Anguilla	☐ Eritrea	☐ Malaysia	☐ Senegal
☐ Antarctica	☐ Estonia	☐ Maldives	☐ Serbia
☐ Antigua and Barbuda	☐ Eswatini	☐ Mali	☐ Seychelles
☐ Argentina	☐ Ethiopia	☐ Malta	☐ Sierra Leone
☐ Armenia	☐ Falkland Islands	☐ Marshall Islands	☐ Singapore
☐ Aruba	☐ Faroe Islands	☐ Martinique	☐ Sint Maarten
☐ Australia	☐ Fiji	☐ Mauritania	☐ Slovakia
☐ Austria	☐ Finland	☐ Mauritius	☐ Slovenia
☐ Azerbaijan	☐ France	☐ Mayotte	☐ Solomon Islands
☐ Bahamas	☐ French Guiana	☐ Mexico	☐ Somalia
☐ Bahrain	☐ French Polynesia	☐ Micronesia	☐ South Africa
☐ Bangladesh	☐ French Southern and Antarctic Lands	☐ Moldova	☐ South Georgia and the South Sandwich Islands
☐ Barbados	☐ Gabon	☐ Monaco	☐ South Korea
☐ Belarus	☐ Georgia	☐ Mongolia	☐ South Sudan
 Belgium	☐ Germany	☐ Montenegro	☐ Spain
☐ Belize	☐ Ghana	☐ Montserrat	☐ Sri Lanka
☐ Benin	☐ Gibraltar	☐ Morocco	☐ Sudan
☐ Bermuda	☐ Greece	☐ Mozambique	☐ Suriname
☐ Bhutan	☐ Greenland	☐ Myanmar/Burma	☐ Svalbard and Jan Mayen
☐ Bolivia	☐ Grenada	☐ Namibia	☐ Sweden

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| ☐ Bonaire Saint Eustatius and Saba | ☐ Guadeloupe | ☐ Nauru | ☐ Switzerland |
| ☐ Bosnia and Herzegovina | ☐ Guam | ☐ Nepal | ☐ Syria |
| ☐ Botswana | ☐ Guatemala | ☐ Netherlands | ☐ Taiwan |
| ☐ Bouvet Island | ☐ Guernsey | ☐ New Caledonia | ☐ Tajikistan |
| ☐ Brazil | ☐ Guinea | ☐ New Zealand | ☐ Tanzania |
| ☐ British Indian Ocean Territory | ☐ Guinea-Bissau | ☐ Nicaragua | ☐ Thailand |
| ☐ British Virgin Islands | ☐ Guyana | ☐ Niger | ☐ The Gambia |
| ☐ Brunei | ☐ Haiti | ☐ Nigeria | ☐ Timor-Leste |
| ☐ Bulgaria | ☐ Heard Island and McDonald Islands | ☐ Niue | ☐ Togo |
| ☐ Burkina Faso | ☐ Honduras | ☐ Norfolk Island | ☐ Tokelau |
| ☐ Burundi | ☐ Hong Kong | ☐ Northern Mariana Islands | ☐ Tonga |
| ☐ Cambodia | ☐ Hungary | ☐ North Korea | ☐ Trinidad and Tobago |
| ☐ Cameroon | ☐ Iceland | ☐ North Macedonia | ☐ Tunisia |
| ☐ Canada | ☐ India | ☐ Norway | ☐ Türkiye |
| ☐ Cape Verde | ☐ Indonesia | ☐ Oman | ☐ Turkmenistan |
| ☐ Cayman Islands | ☐ Iran | ☐ Pakistan | ☐ Turks and Caicos Islands |
| ☐ Central African Republic | ☐ Iraq | ☐ Palau | ☐ Tuvalu |
| ☐ Chad | ☐ Ireland | ☐ Palestine | ☐ Uganda |
| ☐ Chile | ☐ Isle of Man | ☐ Panama | ☐ Ukraine |
| ☐ China | ☐ Israel | ☐ Papua New Guinea | ☐ United Arab Emirates |
| ☐ Christmas Island | ☐ Italy | ☐ Paraguay | ☐ United Kingdom |
| ☐ Clipperton | ☐ Jamaica | ☐ Peru | ☐ United States |

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| ☐ Cocos (Keeling) Islands | ☐ Japan | ☐ Philippines | ☐ United States Minor Outlying Islands |
| ☐ Colombia | ☐ Jersey | ☐ Pitcairn Islands | ☐ Uruguay |
| ☐ Comoros | ☐ Jordan | ☐ Poland | ☐ US Virgin Islands |
| ☐ Congo | ☐ Kazakhstan | ☐ Portugal | ☐ Uzbekistan |
| ☐ Cook Islands | ☐ Kenya | ☐ Puerto Rico | ☐ Vanuatu |
| ☐ Costa Rica | ☐ Kiribati | ☐ Qatar | ☐ Vatican City |
| ☐ Côte d'Ivoire | ☐ Kosovo | ☐ Réunion | ☐ Venezuela |
| ☐ Croatia | ☐ Kuwait | ☐ Romania | ☐ Vietnam |
| ☐ Cuba | ☐ Kyrgyzstan | ☐ Russia | ☐ Wallis and Futuna |
| ☐ Curaçao | ☐ Laos | ☐ Rwanda | ☐ Western Sahara |
| ☐ Cyprus | ☐ Latvia | ☐ Saint Barthélemy | ☐ Yemen |
| ☐ Czechia | ☐ Lebanon | ☐ Saint Helena
Ascension and
Tristan da Cunha | ☐ Zambia |
| ☐ Democratic Republic of the Congo | ☐ Lesotho | ☐ Saint Kitts and Nevis | ☐ Zimbabwe |
| ☐ Denmark | ☐ Liberia | ☐ Saint Lucia | |

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

* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

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](#)

Since 2021 have you applied for EU funding managed directly or indirectly by the European Commission?

Maximum 1 selection(s)

☐ Yes

☒ No

Part 2. EU funding on Competitiveness

The Commission has preliminarily identified the following challenges linked to competitiveness. How important are these challenges in your view?

	Very important	Important	Moderately important	Not important	No opinion
The innovation and technological gap for the EU in strategic technologies, with respect to key competitors globally		<input data-bbox="911 1682 943 1727" type="radio"/>	<input data-bbox="1086 1682 1118 1727" type="radio"/>	<input data-bbox="1262 1682 1294 1727" type="radio"/>	<input data-bbox="1406 1682 1437 1727" type="radio"/>
Underinvestment in research and innovation		<input data-bbox="911 1816 943 1861" type="radio"/>	<input data-bbox="1086 1816 1118 1861" type="radio"/>	<input data-bbox="1262 1816 1294 1861" type="radio"/>	<input data-bbox="1406 1816 1437 1861" type="radio"/>
Disparities in innovation and industrial capacity across Member States	<input data-bbox="751 1951 783 1995" type="radio"/>		<input data-bbox="1086 1951 1118 1995" type="radio"/>	<input data-bbox="1262 1951 1294 1995" type="radio"/>	<input data-bbox="1406 1951 1437 1995" type="radio"/>
Lack of fertilisation between civil and military research and development	<input data-bbox="751 2063 783 2107" type="radio"/>	<input data-bbox="911 2063 943 2107" type="radio"/>	<input data-bbox="1086 2063 1118 2107" type="radio"/>	<input data-bbox="1262 2063 1294 2107" type="radio"/>	

Insufficient innovation and manufacturing capacity for strategic technologies					
Insufficient focus of EU funding on EU strategic priorities					
Lack of coherence between EU, national and regional policies for competitiveness					
Climate resilience and costs associated with decarbonisation					
Excessive dependence of the EU on non-EU countries for critical inputs, raw materials and strategic technologies					
Access to finance for small businesses and for scale-up companies from research to manufacturing					
Attracting world class researchers, skilled workers and entrepreneurs from abroad					
Incapacity to translate innovation into marketable technologies, and failure to integrate these technologies into the EU's industrial base					
Mismatch between skills and labour market demands					
Digitalisation and diffusion of advanced technologies in key sectors					
Insufficient private investment, including by institutional investors					
Challenges related to the effective protection of EU funds against fraud, corruption and other illegal activity					
Other (please specify below)					

If other: please specify below

500 character(s) maximum

Carbon Gap rates the importance of these challenges through a Carbon Dioxide Removal (CDR) lens.

Which development stages for technologies and products should be supported by the next MFF to support EU competitiveness?

	To a large extent	Somewhat	Very little	Not at all	Don't know/not applicable
Fundamental research	☒	☐	☐	☐	☐
Applied research	☒	☐	☐	☐	☐
Early-stage development of technologies	☒	☐	☐	☐	☐
Scaling up	☒	☐	☐	☐	☐
Industrial deployment	☒	☐	☐	☐	☐
Manufacturing capacities	☒	☐	☐	☐	☐
Other (please specify below)	☐	☐	☐	☐	☐

To what extent does the current EU budget contribute to addressing the following challenges?

	To a large extent	Somewhat	Very little	Not at all
Attracting world class researchers, skilled workers and entrepreneurs from abroad	☐	☒	☐	☐
Facilitating collaboration between research and industry	☐	☐	☒	☐
Translation of innovation into marketable technologies, and integration of these technologies into the EU's industrial base	☐	☐	☒	☐
Disparities in innovation and industrial capacity and resources across Member States	☐	☐	☒	☐
Providing world class technological and research infrastructure across the EU	☒	☐	☐	☐
Reducing excessive dependencies in critical inputs, raw materials and strategic technologies	☐	☒	☐	☐
Fertilisation between civil and military research and development	☐	☐	☐	☐
Ensuring continuity in EU funding across the stages from research to manufacturing	☐	☐	☒	☐
Demand-side public initiatives for innovation and strategic technologies (e.g. procurement, standards)	☐	☐	☒	☐
Decarbonisation and environmental sustainability of strategic sectors	☐	☒	☐	☐

Digitalisation and diffusion of advanced technologies in key sectors	☐	☐	☐	☐
Support for small businesses and for scale up companies from research to manufacturing	☐	☐	☒	☐
Insufficient mobilisation of private financing (e.g. by de-risking private investment)	☐	☐	☒	☐
Other (please specify below)	☐	☐	☐	☒

If other please specify

Carbon Gap assesses these challenges through a Carbon Dioxide Removal (CDR) lens.

The Commission has identified a number of possible measures for EU funding to better support EU competitiveness. To what extent do you think such measures could have a positive impact?

	To a large extent	Somewhat	Very little	Not at all	Don't know/ not applicable
Applying common rules, timelines and eligibility criteria to all relevant EU funds	☒	☐	☐	☐	☐
Increased focus of funding on key current and future strategic priorities	☒	☐	☐	☐	☐
Reducing the number of EU funding programmes	☐	☐	☐	☐	☒
Continuity in EU funding from research to manufacturing	☒	☐	☐	☐	☐
Aligning industrial and research policies and investment at EU and national levels	☒	☐	☐	☐	☐
Increase international collaboration with like-minded non-EU partners	☐	☒	☐	☐	☐
Targeted tools and measures to limit EU dependencies in strategic key sectors	☐	☐	☐	☐	☒
Strengthen business advisory support services (e.g. coaching, mentoring, training) for successful applicants	☒	☐	☐	☐	☐
User-friendly IT tools	☒	☐	☐	☐	☐
Better feedback to applicants	☐	☒	☐	☐	☐
Introduce more flexibility into resource allocation to react to crises and emerging needs	☐	☐	☐	☒	☐

Place greater focus on achieving results, including via performance-based funding (such as financing not linked to costs)	☐	☐	☐	☐	☒
Preventing and combat fraud and corruption better as well as other illegal activities targeting EU funds	☒	☐	☐	☐	☐
Other (please specify below)	☒	☐	☐	☐	☐

If other, please specify

Carbon Gap assesses these measures through a Carbon Dioxide Removal (CDR) lens. The effects of reducing the number of EU funding programmes will depend on the principles and design followed to ensure that the climate budget is protected, and the funds are accurately targeted. For Carbon Gap's full extended position on this topic, please check the answer and attachment below.

Part 3. Closing questions

If you would like to add further information – within the scope of this questionnaire – feel free to do so here.

Principles for European Competitiveness Fund design - from a Carbon Dioxide Removal lens (CDR):

1. Ringfence climate funding:

Climate-related funding in the new MFF must be explicitly ring-fenced. Flexibility for emerging needs could divert critical resources. Protecting climate budgets is essential to maintain credibility, support long-term investment, and deliver climate targets.

2. Balance simplification with strategic focus:

While streamlining EU funding can improve access, simplification alone is not enough. The new structure must provide targeted support across all Technology Readiness Levels (TRLs) and adopt inclusive criteria that enable high-impact innovation, including from under-resourced actors.

3. Embed specific recommendations for CDR:

CDR is essential to achieving climate neutrality by 2050. Building on the Commission's Research and Innovation for Climate Neutrality by 2050 report, the EU must adopt a roadmap to bring CDR methods from lab to scale:

3.1. Recognise CDR as a strategic priority in the Competitiveness Fund:

CDR should be formally designated a priority pillar in the Fund. This would enable dedicated investment in research, infrastructure, and deployment, and improve coordination across EU instruments while sending a clear signal to innovators and Member States.

3.2. Increase EU RD&I funding for CDR:

At least €2.6 billion should be allocated to CDR RD&I in the next MFF, next Framework Programme for R&I and other mechanisms, primarily focused on TRL 1–7 (not including deployment). This addresses part of the €2.88–5.85 billion gap in Europe in the next 15-20 years needed to develop a broad CDR portfolio.

3.3. Prioritise CDR R&I areas based on strategic needs:

A coordinated innovation strategy is needed to guide investments, RD&I priorities and timelines. Many of the over 16 known CDR methods remain with low maturity or untested. RD&I must also address CO₂ infrastructure, MRV systems, governance frameworks, and societal impacts. Carbon Gap proposes five strategic objectives for RD&I: (1) Unlock new methods, (2) Optimise existing ones, (3) Strengthen MRV, (4) Advance governance, (5) Improve CO₂ transport and storage.

The Commission's report on R&I needs for climate neutrality by 2050 is an important first step. It highlighted CDR as a key solution in need of R&I support, and critical gaps requiring attention. However, it is not yet a complete roadmap. A formal, detailed EU CDR R&I strategy is needed to guide funding and track progress.

3.4. Support the scale-up of CDR deployment with dedicated funding instruments:

CDR projects face a funding gap between research and commercialisation. Two proposals are made:

- EU Carbon Removal Pilot Procurement Programme: A €50 million, 3-year scheme to procure high-quality permanent removals from EU suppliers, inspired by the US DOE model.
- CDR-Compatible Industrial Decarbonisation Bank: The €100 billion IDB should include CDR in its mandate, launch a €1–2 billion pilot for tools like CCfDs and guarantees, coordinate with EU programmes, and build internal expertise on CDR.

3.5. Make RD&I funding for CDR more visible, accessible, and secure:

To improve accessibility and reduce structural barriers:

- Establish a CDR Helpdesk and Technical Assistance Facility
- Appoint an EU CDR Research and Innovation coordinator
- Ensure visibility across major programmes:
 - o Horizon Europe: add a dedicated “CDR Destination”
 - o Innovation Fund: define CDR as a thematic priority
 - o LIFE: prioritise CDR in Climate Action calls
 - o EIC: launch a CDR “Challenge Call” and designate CDR as a strategic emerging tech

3.6. Leverage the full spectrum of RD&I funding schemes:

EU resources should support projects from early research to deployment. Suggested actions include:

- CDR-dedicated challenges in the EIC: both in the Pathfinder and Accelerator
- EU CDR Mission: a Europe-led mission, that builds up on the current CDR Mission Innovation to coordinate funding, policy, and research for verifiable carbon removal
- CDR Innovation Partnership: inspired by the Clean Hydrogen Joint Undertaking, to pool public-private funds, de-risk investment, and scale up CDR markets in line with EU climate goals.

Attach any relevant documents to support your replies

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

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/Carbon_Gap_Response_to_the_Public_Consultation_on_the_MFF_-Competitiveness.pdf

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