Carbon Gap

6 May 2025

Carbon Gap's Response to the MFF Public Consultation – Performance Evaluation

Carbon Gap welcomes the Commission's initiative to improve the performance of EU funding under the next Multiannual Financial Framework (2028–2034). As the EU faces an accelerating climate crisis and growing global competition in clean tech, the design of funding instruments will directly shape Europe's ability to reach climate neutrality, lead in innovation and stay competitive.

Carbon dioxide removal (CDR) is both a climate necessity and a strategic enabler of Europe's long-term industrial and technological leadership.
The Intergovernmental Panel on Climate Change (IPCC) and the European Scientific Advisory Board on Climate Change both highlight the crucial role CDR must play in keeping global temperature rise within safe limits. The latter estimates that the EU will need between 400Mt and 800Mt of CDR from both the land sector and novel technologies to reach climate neutrality by 2050. Scaling up the CDR sector also represents a significant economic opportunity for the EU. By 2050, it could become a EUR 220 billion annual market, creating 670,000 high-quality jobs, driving innovation, and positioning Europe as a global leader in the green economy.

CDR encompasses a diverse set of approaches — from engineered to nature-based — that cut across traditional funding silos such as climate, industry, land use, oceans, and innovation. With scientific uncertainties, limited maturity, and evolving regulatory frameworks, CDR requires tailored and flexible funding support. Yet **the MFF has so far underdelivered:** 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 over the next two decades to develop CDR methods and address cross-cutting research gaps. Today's fragmented funding landscape creates barriers for the very innovators Europe most needs. To ensure the next MFF delivers impact, these structural challenges must be addressed.

Fragmented access hinders innovation

EU funding remains a maze. For CDR innovators, complexity is a barrier, not a gateway to support. Despite tools like the Funding & Tenders Portal, calls remain scattered across programmes, each with its own structure, timeline, and rules – navigating them remain daunting. This structural complexity is particularly harmful to CDR actors, the CDR.fyi Carbon Removal Map shows that around 179 CDR suppliers in Europe — many of whom are interdisciplinary, small-scale, and first-time applicants and have a hard time identifying suitable opportunities. Carbon removal often falls between thematic cracks, reducing visibility and access for a sector critical to Europe's climate goals.

Excessive administrative burden blocks innovation

Even when applicants identify relevant funding opportunities, they face significant hurdles: understanding eligibility requirements, complying with technical specifications, and navigating complex application procedures that demand substantial time and resources. These barriers disproportionately affect smaller actors — including CDR start-ups and research centres — at precisely the stage when Europe most needs to de-risk and accelerate their development.

A thriving innovation ecosystem requires robust, support mechanisms that lower administrative barriers and reward relevance and impact. The ability to bear heavy administrative burden and to navigate complex funding landscapes should not be a requirement to access EU funding.

Strategic recommendations for the next Multiannual Financial Framework:

To deliver a future-fit Multiannual Financial Framework, Carbon Gap recommends the following:

1. **Create a central entry point for carbon dioxide removal innovation:**

Establish a Commission-hosted entry point – maintained by DG RTD, CINEA and DG CLIMA- that clusters relevant calls across EU programmes in one searchable, thematic portal. It should offer immediate clarity on which opportunities apply to each stage of development and it should reflect the EU's strategic vision for CDR development.

Carbon Gap has developed a comprehensive database of existing funding opportunities for carbon removal projects, as a first step toward making EU and member state funding for CDR more visible and accessible.

Why it matters: *A single, dedicated access point reduces friction for applicants navigating fragmented funding landscapes, while improving coordination and strategic alignment across the funding cycle.*

2. **Simplified access for (early-stage) actors:**

Harmonise eligibility criteria across programmes and streamline application processes by establishing a common baseline of requirements, particularly for small grants and pilot projects. This would reduce the need for applicants to navigate distinct processes for each call. In parallel, introduce simplified procedures for small grants and pilot projects — such as shorter application forms, more manageable reporting obligations, and faster decision timelines — to ensure that early-stage innovators can access support without disproportionate administrative burden. These simplified processes should maintain robust standards, particularly around environmental integrity and sustainability, to ensure quality is not compromised.

Why it matters: *Lowering complexity increases participation of small actors with high innovation potential, who often lack the capacity to navigate fragmented systems. At the same time, maintaining strong sustainability safeguards ensures that simplicity does not come at the cost of impact quality.*

3. **Improve predictability of funding calls:**

Increase advance communication and ensure predictable call timelines of funding calls so potential applicants can ready their resources and build their cases in time for application deadlines.

Why it matters: *Many high-potential actors — particularly smaller innovators — miss funding windows due to short notice or opaque publication cycles.*

4. **Provide dedicated support for emerging sectors:**

Introduce targeted support services – thematic helpdesks, coaching, webinars, and matchmaking tools - focused on strategic sectors like CDR that are essential to Europe's net-zero strategy but still emerging within EU funding frameworks.

Why it matters: *Tailored services help emerging sectors navigate and succeed within established funding structures.*

5. **Track how funding reaches emerging technologies:**

Introduce specific performance indicators that track how well EU funding reaches emerging net-zero technologies, including CDR, in programmes such as Horizon Europe's successor, and the LIFE programme. This would help the Commission monitor alignment with more specific strategic priorities and adjust support as needed.

Why it matters: *While EU programmes track broad climate spending, they do not currently distinguish emerging sectors like carbon removal in their public reporting. A dedicated indicator would increase accountability for how EU funds are reaching strategic innovation frontiers.*

By adopting these measures, the next MFF can go beyond streamlining, by making EU funding not just available but workable for the next generation of climate solutions. Supporting carbon removal is more than a climate imperative — it's a test for whether EU funding can adapt to the technologies that will define the next industrial era. Europe's leadership in net-zero innovation depends on a funding architecture that is accessible, responsive, and strategically aligned with tomorrow's challenges.

Additional resources:

1. CCU vs CCS vs CDR – what's the difference? (Carbon Gap)
2. An overview of carbon dioxide removal (CDR) methods (Carbon Gap)
3. CDR funding opportunities tracker (Carbon Gap)
4. Rising to the challenge: Funding CDR research, development & innovation for a net zero competitive EU (Carbon Gap)
5. EU CDR Research Gap Database (Carbon Gap)

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Public consultation on the Performance of the EU budget

Fields marked with * are mandatory.

Introduction

The European budget is at the centre of the EU policy action. Over decades, it has helped improve the quality of life and livelihoods of people and regions across Europe and beyond.
The true value of the EU budget lies in the tangible impact it delivers on the ground. Through performance-based budgeting, which links the disbursement of EU funds to the results achieved, the EU ensures that every euro is spent effectively and efficiently to achieve its goals and objectives. This means that European citizens get better value for money. The performance dimension of the EU budget is key to ensuring maximum transparency and accountability, giving citizens a clear view of how their contributions are being used and the results achieved.
The current multiannual financial framework (MFF) — the EU's long-term budget — runs until the end of 2027. It supports the long- term objectives of sustainable and inclusive growth in the EU and the climate and digital transitions. In 2025, the Commission will put forth comprehensive proposals for the next multiannual financial framework.
Following the political guidelines of President von der Leyen for 2024-2029, the Commission will work for a more focused, simpler and more impactful European budget that fits our ambition. The next MFF will also need to be aligned with recent legal developments, including the 2024 Financial Regulation recast1 – which includes new requirements regarding gender equality, performance indicators and the principle of 'do no significant harm' to climate or environmental objectives.
This requires a careful assessment of what has worked well in the past and what could be improved in the future. The next EU budget will draw lessons from the current budget – notably in terms of simplicity and flexibility, speed and strategic focus.
The Commission is launching a series of public consultations to gather views from all interested parties. The decision to cluster issues serves to support the preparatory work and does not pre-empt the architecture of future programmes. This consultation focuses on the performance dimension of the EU budget, meaning: 1) the tools used to promote general priorities and principles across the EU budget (e.g. gender equality, digitalisation, climate and biodiversity, 'do no significant harm' to climate or environmental objectives), to ensure that EU spending is geared towards those objectives (also sometimes referred to as 'mainstreaming'); 2) the performance framework, including to monitor and report how effectively the EU budget is achieving its objectives.
This questionnaire consists of four parts:
Part 1 collects information about you. Part 2 contains questions related to the promotion of general EU priorities and principles. Part 3 contains questions related to the monitoring and reporting tools of the EU budget. Part 4 contains 2 closing questions.

It should take about 10 minutes to complete the survey. You can save your replies as draft and finish later. Please be concise for the questions that have a free text box for additional comments. You can upload a document stating your views at the end of the survey.

About you

*Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English (selected)
- 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

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eloisa@carbongap.org

Which EU funds are you familiar with?

250 character(s) maximum

* 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
- Åland Islands
- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium (selected)
- Belize
- Djibouti
- Dominica
- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Libya
- Liechtenstein
- Lithuania
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Saint Martin
- Saint Pierre and Miquelon
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka

- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Türkiye
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine

		Papua New Guinea	United Arab Emirates
Christmas Island	Italy	Paraguay	United Kingdom
Clipperton	Jamaica	Peru	United States
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. **Fo r 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.

- [x] **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.

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

Promotion of general EU priorities and principles

The EU budget currently supports a number of general EU priorities and principles, such as gender equality, digitalisation, climate action, biodiversity and contributions to the UN Sustainable Development Goals. How do you assess the effectiveness of each of those tools?

	Very effective	Effective	Moderately effective	Not effective	Don't' know/not applicable
Embedding policy priorities into the design of EU funds, for instance by defining specific objectives (e.g. gender equality).			X		
Applying principles and rules to ensure that funded projects are aligned with such priorities and principles.			X		
Establishing a strong performance framework to measure the results achieved through the EU budget (e.g. through indicators).		X			
Using minimum spending targets either at the level of the entire EU budget or within specific EU funds.	X				

If you replied ‘moderately effective’ or ‘not effective’, please give us more details on why you think those tools have not been effective/very effective?

The EU budget currently supports a number of general EU priorities and principles, such as gender equality, digitalisation, climate action, biodiversity and contributions to the UN Sustainable Development Goals. How effectively do you believe the EU budget promotes each of these general priorities?

	Very effective	Effective	Moderately effective	Not effective	Don’t know/not applicable
Gender equality	○	○	○	○	●
Digitalisation	○	○	○	○	●
Climate action	○	○	●	○	○
Biodiversity	○	○	○	○	●
UN Sustainable Development Goals	○	○	○	○	●

The EU budget supports gender equality. For instance, by funding dedicated projects (e.g. encouraging women into the labour market, combatting gender segregation, promoting women’s rights and empowerment), and by including this objective in the design of some EU funds (e.g. ‘enabling condition’ in the Common Provisions Regulation, or requirement under some EU funds for proposals to support gender equality or for beneficiaries to have Gender Action Plans). Moreover, the Commission developed a methodology to measure expenditure supporting gender equality in the 2021-2027 MFF, which assigns scores to interventions based on their objectives. It is estimated for the year 2024 that 11% of the EU budget is contributing to gender equality, while 73% has the potential to do so. How do you assess the way in which gender equality has been promoted across the EU budget so far?

- ○ Very effective
- ○ Effective
- ○ Moderately effective
- ○ Not effective
- ○ Don't know/not applicable

Could you please give us more details on why? And which EU funds are you referring to?

500 character(s) maximum

The 2024 Financial Regulation requires that the EU budget is implemented taking into account the principle of gender equality, where feasible and appropriate in accordance with the relevant sector-specific rules. It also requires breaking down by gender the data collected, where appropriate. For the future, how do you think the EU budget could better support gender equality? Please indicate if you agree with the objectives below.

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know/not applicable
More consistency is needed in the way gender equality is embedded in the design of EU funds (e.g. in the form of specific objectives or conditions).						
The EU budget should be used to incentivise gender-specific reforms in the Member States (e.g. by setting milestones and targets)						
Respect and promotion of gender equality as part of the fundamental rights should be a precondition to EU funding.						
Support from the EU budget should be monitored in a consistent way by means of gender-specific indicators.						
Data collected on the implementation of the EU budget should be systematically disaggregated by gender, where appropriate and available.						
Support should be provided to develop capacities of EU funds beneficiaries to mainstream gender equality in						

the implementation of their projects.						

Is there any other way in which the EU budget could better support gender equality?

500 character(s) maximum

How do you assess the contribution that the principle of 'do no significant harm' has made to ensuring that the current EU budget and relevant EU funds do not undermine climate and environment objectives?

- Very effective
- Effective
- Moderately effective
- Not effective
- Don't know/not applicable

Do you identify some of the following problems as challenges with the application of the principle of 'do no significant harm' ? Please select all that apply.

- Lack of clear guidance on how to implement the principle of 'do no significant harm'
- Lack of knowledge, skills or human capacity
- Lack of environmental data
- Disproportionate administrative burden
- Difficulties in monitoring and verification
- No significant challenge
- Other, please specify

Specify which EU funds you have experience with, in relation to the implementation of the DNSH principle:

What would be your suggestions to help implementing the DNSH principle?

Performance framework including monitoring and reporting tools

The EU budget has encouraged a stronger focus on performance, for instance by making possible payments to beneficiaries conditional on the achievement of outputs and/or results, or by relying on strategic planning to ensure a stronger focus on results. How do you assess the attempts to strengthen the performance dimension of the EU budget so far?

- Very effective
- Effective
- Moderately effective
- Not effective
- Don't know/not applicable

The EU budget has a system to monitor the support provided for our priorities. It is made up of a set of tools, such as indicators, which are usually set for each EU fund. How do you assess the current monitoring system?

- Very effective
- Effective
- Moderately effective
- Not effective
- Don't know/not applicable

The EU budget uses indicators providing an indication of how each programme has performed. Those indicators could measure ‘inputs’ (e.g. amount of EU funds dedicated to supporting researchers), ‘output’ (e.g. number of researchers supported by a project), ‘results’ (e.g. number of patents thanks to EU funds) or ‘impacts’ (e.g. boosting EU competitiveness thanks to research projects financed through the EU budget). How do you assess those indicators?

	Very effective	Effective	Moderately effective	Not effective	Don't know/not applicable
Input indicators	○	○	○	○	○
Output indicators	○	○	○	○	○
Result indicators	○	○	○	○	○
Impact indicators	○	○	○	○	○

How do you assess reporting obligations when benefiting from an EU fund?

- Very effective
- Effective
- Moderately effective
- Not effective
- Don't know/not applicable

The Commission reports performance information on the EU budget through a number of reports (such as the Programme Performance Statements) and dashboards (such as the Cohesion Open Data Platform and the Recovery and Resilience Scoreboard). How do you assess the way in which the Commission reports information about the implementation of the EU budget?

- Very effective
- Effective
- Moderately effective
- Not effective
- Don't know/not applicable

For the future, would you support the objective of moving towards a simpler and more streamlined reporting system?

- (selected) Yes
- No
- Don't know/not applicable

The Commission manages websites that inform potential beneficiaries about funding opportunities and calls available under EU funds, such as the Funding and Tenders Portal and the EU Rural toolkit. How do you assess the way in which the Commission informs about funding opportunities?

- Very effective
- Effective
- Moderately effective
- (selected) Not effective
- Don't know/not applicable

Would you support the objective of simplifying and streamlining the websites through which the Commission informs applicants about funding opportunities and calls available under EU funds?

- (selected) Yes

- No
- Don't know/not applicable

Please share with us any other ideas about the future performance framework for the EU budget.

500 character(s) maximum

Closing questions

If you wish to add further information — within the scope of this questionnaire — please feel free to do so here.
(500 characters maximum)

Carbon dioxide removal (CDR) is necessary to meet climate neutrality by 2050 and boost clean tech leadership. CDR, however, remains underfunded, and the EU landscape is highly complex, with funds hard to access, especially for early-stage CDR actors. Carbon Gap recommends the following to improve the MFF's performance evaluation and accessibility to funds: a central CDR funding portal, simplified access for (early-stage) actors, predictable call timelines, tailored support services for CDR, and indicators to track how well funding reaches emerging net-zero technologies. Please check the attached document for Carbon Gap's extended recommendations.

Feel free to attach any relevant documents to support your replies.

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

7cede058-d1db-4575-8b6d-075fc39f5700/Carbon_Gap_response_PC_-_Performance_evaluation.pdf

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