



Derisking finance for competitive sustainability: Proposals to make ECF's InvestEU Instrument lift European cleantech

April 2026

Introduction

In the next Multiannual Financial Framework (MFF) 2028-2034, the EU main derisking instrument is what until now is called InvestEU, and from 2028 it will become the central implementing financial instrument for the European Competitiveness Fund (ECF). Under the Commission's proposal, an "exclusivity clause"¹ newly makes the future ECF InvestEU the single access point to implement budgetary guarantees and financial instruments across the whole of the next EU long-term budget.

The ECF regulation replaces the existing InvestEU regulation (Regulation (EU) 2021/523)² and instead of reintegrating the existing InvestEU governance and operational requirements, it almost exclusively relies on provisions of the Financial Regulation (2024/2025) and the newly proposed Performance Regulation for its implementation and reporting framework. The lack of granularity and departure from existing best practices in this new frame risks creating a less precise and more opaque implementation framework for InvestEU.

This briefing identifies several regulatory gaps in the proposed draft legislation of the ECF InvestEU instrument and proposes recommendations to strengthen its contribution to a more impactful and focused EU long-term budget. InvestEU uses financing tools that, if done well, are more cost-efficient than grants, leveraging contributions from private and other public funding sources. However, it has received recurring criticism, including from the European Court of Auditors (ECA)³ and independent research⁴, on its insufficient proof of additionality, intransparent governance and excessive risk-averseness. The briefing proposes safeguarding the sustainability proofing of InvestEU and reforms to improve existing practice, while aligning it with a more robust horizontal sustainability framework under the Performance Regulation. It also recommends a more targeted design of financial instruments to prioritise strategic projects for Europe's competitive sustainability that ensures increased connectivity with National and Regional Partnership Plans.

We propose improvements in the following four areas: 1) A stronger framework for sustainability and additionality assessment and reporting, 2) Improved expert governance, 3) Increased use of standardised financial instruments and 4) Maximise synergies with National and Regional Plans.

1) A stronger framework for sustainability and additionality

The existing InvestEU 'sustainability proofing' established under article 8 of Regulation (EU) 2021/523 follows detailed Commission guidance⁵ and is mandatory for projects above €10 million. The guidance requires two main evaluation steps: First, it requires that financing and investment operations are screened to determine whether they have an environmental, climate or social impact in line with the Commission's own technical guidance. For climate screening, the implementing partners and project promoters may use, "to the extent possible", the DNSH criteria on climate mitigation of the EU Taxonomy Regulation. But this is not mandatory - alternatively, they can use the Paris alignment low-carbon criteria of the EIB, or they could apply another internationally recognised and published methodology for assessment of Paris alignment with the low-carbon goals.

In a second step, if the screening identifies potential impacts, operations shall be subject to climate, environmental and social sustainability proofing with a view to minimising detrimental impacts and to maximising benefits to the climate, environment and social dimensions. In practice, however, implementing partners are only mandated to establish mitigating measures "to the extent possible and on a best effort basis".

The **climate proofing** is operationalised by: a) quantifying the carbon footprint of the investment, b) compatibility testing of proposed projects with EU climate neutrality objectives and c) monetisation of the emissions and integration into the final economic appraisal. The results of this evaluation are integrated into an economic appraisal that is reported to the InvestEU Investment Committee, which will take multiple criteria into consideration when deciding on the project approval. The goal of this process is to support the consideration and integration of low-carbon solutions during the planning and design stages, including at the stage of ranking and selection of alternative investment options, with a view to promoting low-carbon considerations and solutions.

¹ Article 23, European Commission. (2025). Proposal for a Regulation of the European Parliament and of the Council establishing the European Competitiveness Fund (ECF), COM(2025) 555 final. Available at <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52025PC0555>

² European Parliament & Council of the European Union. (2021). Regulation (EU) 2021/523 Establishing the InvestEU Programme. Official Journal of the European Union. Available at <https://eur-lex.europa.eu/eli/reg/2021/523/oj/eng>

³ European Court of Auditors. (2025). Special Report 07/2025: The European Fund for Strategic Investments. Available at <https://www.eca.europa.eu/en/news/NEWS-SR-2025-07>

⁴ Counter Balance. (2023). Industry Support at All Costs: How InvestEU Undermines the Just Transition. Available at <https://counter-balance.org/publications/industry-support-at-all-costs-how-investeu-undermines-the-just-transition>

⁵ European Commission. (2021). Technical Guidance on Sustainability Proofing for the InvestEU Fund. Official Journal of the European Union, OJ C 280, 13.7.2021. Available at https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=oj:JOC_2021_280_R_0001

The **environmental proofing** is addressed through a largely qualitative checklist covering natural capital components (air, water, land and soil, biodiversity) rather than through structured, objective-by-objective assessments mapped to all six Taxonomy objectives.⁶ Critically, two of those six objectives - the transition to a circular economy, and pollution prevention and control - are not systematically addressed as discrete analytical categories in the InvestEU proofing methodology. This structural omission means that investments with significant negative impacts on circular economy objectives (e.g. long-lived single-use plastics infrastructure) or pollution prevention objectives (e.g. diffuse chemical emissions from industrial facilities) can pass InvestEU sustainability proofing without those impacts being specifically assessed or mitigated.⁷

A) No backtracking on InvestEU sustainability performance framework in the forthcoming Commission guidance on DNSH

The new structure of the EU budget proposes a streamlined approach to ensure sustainability assessment horizontally. Instead of fund- or programme-specific rules, the 'performance regulation' (COM 2025/454) defines horizontally applicable requirements, such as the adherence to the Rule of Law mechanism, the Do-no-significant-harm principle (DNSH) and the contribution to environmental and social spending targets.

Such a streamlined and horizontally applicable performance framework is a positive development since uniform rules make the implementation of the next budget simpler and more transparent, but must not lead to a weakening of existing standards and practices.

This is why the forthcoming DNSH guidance, mandated in the performance regulation, must be fully applicable to all operations within the ECF and therefore to all InvestEU operations and must build on existing practice to avoid the dismantling of years of efforts in aligning financing frameworks across Member States with the EU climate and environment targets.

Several improvements to the InvestEU sustainability proofing can be integrated in the new Commission guidance on DNSH to ensure that InvestEU financing aligns with the EU goals for cleantech leadership and decarbonisation pathway. As inspiration for the forthcoming DNSH guidance we propose to include a two pillar approach, consisting of:

- 1) A **non-eligibility list**, (*the what*) that would ex-ante exclude certain activities from receiving EU funding due to their inherent negative environmental impact. Such as 'negative' list could be complemented by a 'positive' list of activities and technologies that would always be in compliance with DNSH. However, caution on the 'positive' list is warranted since the implementation modalities of activities will be crucial to ensure DNSH compliance. This is why the two lists need to be complemented by a:
- 2) **sectoral guidance**, (*the how*) that defines modalities that needs to be respected in the implementation of activities that are not one of the lists. Those modalities are sector- and technology-specific. This guidance would fulfil the function of sustainability proofing in the existing InvestEU framework.

Moreover, two additional changes would ensure that sustainability proofing covers the full spectrum of InvestEU financing:

- **Firstly, the existing *de minimis* exemption of activities with a financial size below €10 million needs to be abolished.** The financial size of an activity is not representative of any expected qualitative ecological, social and climate impacts that should guide the sustainability assessment. In fact, a financially small intervention could come with relatively high negative environmental impacts, such as fossil heating or land use change. This is especially true if those small but harmful interventions are numerous. A **simplified but substantive risk-based assessment, calibrated to the environmental sensitivity of the sector, not the financial size of the operation** is required and should form the base for the negative and positive lists mentioned above.
- **Secondly, any performance requirements, spelled out and agreed upon in the Performance Regulation should also apply to intermediated credit lines** or other debt products. This is not currently the case in InvestEU, as implementing partners mainly rely on the risk management procedures of financial intermediaries and compliance with existing legislation

B) Ensure robust reporting, auditing and evaluation requirements, building on existing InvestEU indicators

Due to the revised MFF structure, the performance regulation also covers all aspects of monitoring, reporting and evaluation of the EU budget, set out in Annex I of the performance regulation. Intervention field 334 covers the specification for the reporting and performance tracking of budgetary guarantees and financial instruments via output and results indicators. This intervention field however is incomplete as it does not include all the indicators of the current InvestEU framework (Annex III of Regulation (EU) 2021/523), which the Commission and implementing partners need to report on, such as geographical coverage.

⁶ Critically, two of those six objectives - the transition to a circular economy, and pollution prevention and control - are not systematically addressed as discrete analytical categories in the InvestEU proofing methodology.

⁷ CAN Europe. (2026). Input to Consultation: Methodology Guidance for the Application of the 'Do No Significant Harm' Principle in the 2028–2034 EU Budget. Available at <https://caneurope.org/publications/can-europe-input-to-consultation-methodology-guidance-for-the-application-of-the-do-no-significant-harm-principle-in-the-2028-2034-eu-budget/>

Additionally, the reporting and performance tracking of the ECF InvestEU Instrument should also cover relevant sectoral interventions of Annex I, at a minimum building on the current requirements of Annex III of InvestEU⁸ (e.g. energy indicators such as “number of households, number of public and commercial premises with improved energy consumption classification”). Considering the structure and scope of Annex I, we recommend that funding via financial instruments or budgetary guarantees therefore is reported according to intervention field 334, as well as the thematic intervention fields in Annex I.

Finally, ECF InvestEU should provide stronger requirements for auditing and evaluation. In the current period, evaluations of InvestEU’s additionality rely on survey data from beneficiaries. This is not a credible and scientifically robust method to evaluate impact. Moreover, the next InvestEU programme period should include actual auditing at both, the project level and the level of the implementing partner. *De minimis* thresholds could ensure proportionality and to limit administrative burden for smaller projects.

C) Ensure additional public value of InvestEU via additionality assessment and conditions for public funding

The draft proposal for ECF InvestEU omits existing provisions on additionality, and falls back to more general references in the EU Financial Regulation via the Performance Regulation. Considering that additionality is a critical condition for a successful implementation of InvestEU, Article 14 and Annex V of the current InvestEU regulation should be reintroduced into the ECF InvestEU.

They define in detail how InvestEU must fulfill additionality criteria, address market failures or sub-optimal investment situations. They aim to ensure InvestEU financing increases its impact on the ground and its capacity to raise private investments where most needed, while ensuring it does not substitute and crowd out normal private financing. These ex-ante eligibility criteria need to be specific enough to effectively target InvestEU.

In addition, the EIB Group Contribution to InvestEU⁹ notes that new policy priorities highlight the need for a more flexible interpretation of additionality that embraces both traditional market-failure logic and the newer imperatives of strategic autonomy, resilience and competitiveness. Ex-ante assessments are already carried out by the implementing partners under the current InvestEU program, and so this will not increase complexity or reporting burdens for end beneficiaries.

Article 10 of the ECF Regulation defines a set of conditions that should be considered for the development of ECF work programmes. The definition of conditions attached to public funding is key to ensure return for the Union as a whole.¹⁰ The scope of Article 10 on EU Preference Criteria comprises the ECF InvestEU Instrument, as it currently only mentions award procedures in paragraph 1. Moreover, this article should integrate additional conditions for support for corporations (excluding SMEs) in line with Europe’s climate, environment and social objectives. This includes requirements for: a) publicly available transformation plan at the entity level, b) adherence to collective bargaining agreements, c) demonstration of responsible tax behaviour, and d) substantial reinvestment ratio demonstrating a commitment to innovation and value creation in Europe.

2) Improved expert governance for ECF InvestEU

The existing InvestEU governance functions should be continued. This includes the presence of an expert in sustainable investments and sector-specific knowledge in all panel configurations of the Investment Committee to ensure an effective application of the climate and environment mainstreaming target in financial operations. Also, the Investment Committee should be required to give particular attention to compliance with additionality, effects on crowding-in of private investments and alignment with the Performance Regulation.

The Investment Committee should be in coordinated dialogue and consultation with the policy and sector-specific Thematic Stakeholders Platforms, which can support in providing on-the-ground know-how of investment needs and realities. Operations above EUR 200 million must include a dedicated procedure in consultation with independent, sector-specific experts to drive effective due diligence and reduce failures due to lack of oversight and mismanagement.

The Advisory Board on the ECF InvestEU Instrument needs to integrate sector experts, finance, industry and civil society representatives with investment experience on-the-ground and perspectives on the investment needs. The Board’s advice should be based on the **assessments of strategic priorities developed by the Commission on the basis of the evidence presented by the Observatory of Emerging Technologies and following recommendations from the ECF Strategic Stakeholders Board.** These assessments serve to identify which technology sectors Europe should prioritise for its decarbonisation, resilience, and competitiveness, and therefore where the ECF InvestEU support is needed. These assessments can be focused on aspects of competitiveness and strategic importance, investment gaps across the value chain of strategic technologies, from innovation, to production, and deployment, to identify and prioritise actions under the ECF and budget needs. The data gathered should unveil manufacturing bottlenecks, deployment barriers, financing gaps and market failures across the full investment journey.

⁸ E.g. energy indicators such as “Number of households, number of public and commercial premises with improved energy consumption classification” or “Investment contributing to the implementation of plans and programmes required by the Union environmental *acquis* relating to air quality, water, waste and nature”).

⁹ European Investment Bank Group. (2026). EIB Group’s Contribution to InvestEU 2021–Mid 2025: An Independent Evaluation. Available at <https://www.eib.org/files/publications/20250297-260326-evf-eib-group-s-contribution-to-investeu-2021-mid-2025-en.pdf>

¹⁰ Fiscal Matters. (2024). Vital Conditions to Support Businesses Towards a Stronger, Fairer and More Sustainable Economy. Available at <https://www.fiscalmatters.eu/post/vital-conditions-to-support-businesses-towards-a-stronger-fairer-and-more-sustainable-economy>

3) Standardised financial instruments to boost deployment of cleantech

The deployment of clean assets at scale across the Union remains a substantial roadblock to energy security in light of mounting fossil fuel costs. However, the switch to less emitting technologies is lagging, notably in the buildings, transport and agriculture sectors, where the largest clean investment gaps lie.¹¹ While EU instruments for innovation and scale up of manufacturing have been growing in the last years, support for the deployment at affordable rates for the end-user is still missing. Public and private funding spent on scaling and buildup of European cleantech manufacturing industry risks being wasted, if end-users are not incentivised, nor able, to buy European clean products.

An increased use of financial instruments, be in the form of loans for better-than-market conditions or guarantees could change this in a cost-efficient manner. In the current stage of the energy transition, many of the clean assets reached a level of maturity that their deployment does not require a grant to be deployed. Grants should be reserved for strategic projects that lack bankability and financially vulnerable groups.

A) Add a new instrument to the ECF toolbox: a “Lead Markets Booster” to de-risk the deployment of clean technologies and solutions.

A dedicated instrument in the ECF toolbox could serve as a framework to establish loan facilities for end-users in the ECF Work Programmes. Dedicated loan facilities - for example for renovation loans or EV social leasing schemes - could help in the development of simple financial instruments, available across the Union.

An effective scale strategy for European technologies requires that the ECF boosts the uptake of these technologies, including smaller businesses and households. The new instrument could support small businesses and consumers in accessing finance for their transition, to lower their energy bills and increase their resilience to climate risks.

Facilities would be particularly helpful to scale up the use of financial instruments in countries that lack well-established national promotional banks. The loan facilities could maintain an open architecture that could offer implementation via EIB or other financial intermediaries. To allow for the set up of those facilities, the ECF toolbox should be complemented by a **“Lead Market booster” for cleantech deployment**.

To address the largest demand-side investment gap, in the buildings sector, the Booster can include a **pilot EU Renovation Loan Facility** managed by the EIB with financial contributions from Member States and regions to support the implementation of building renovations targets in their NRPPs. The Facility could then use the resources to support the large-scale deployment of heating and cooling solutions, like EU-made heat pumps.

B) Simpler implementation of financial instruments at scale through standardization fit for the beneficiary and clean technologies

Under the “Lead Markets Booster”, the ECF InvestEU framework should incentivise the use of asset-specific ‘*off-the-shelf*’ standardised financial products that target end-users that wish to switch to decarbonised assets but lack access to finance.

The advantage of standardised products would be that a lengthy project-by-project assessment of additionality could be replaced by ex-ante eligibility assessments based on structural conditions of asset, beneficiary and geography of the intervention.

Concrete examples could be an EU renovation loan¹² or an EV social leasing programme that integrate the regional default risk ratios and instrument-specific leverage factors. Collateral requests will vary depending on sector, end-beneficiary, region, instrument and technology. The use of standardised financial products could drastically reduce the administrative burden and “time to market” in the deployment of financial instruments.

Leading practice in some Member States¹³ and international financial institutions point to **developing positive lists of eligible clean projects or technologies as a way forward for smart simplification in the reporting of banks and final beneficiaries**. These eligibility lists can build on the EBRD Green Eligibility Checker lists¹⁴ that are now starting to be used under InvestEU, and developed in more countries. The asset-specific lists can be attached to the standardised financial products to reduce the administrative burden and facilitate self-declarations of compliance for small-scale retail transactions under InvestEU.

¹¹ Climate Strategy & Partners. (2024). Filling the EU Climate Investment Gap more Efficiently. Available at <https://www.climatestrategy.es/press/MFFReport2024.pdf>

¹² Climate Strategy & Partners. (2023). The EU Renovation Loan: A New Instrument to Fund the EU Renovation Wave. Available at https://www.climatestrategy.com/en/informe_23.php

¹³ Instituto de Crédito Oficial (ICO). (2025). Línea Verde del ICO: Herramienta Lista Positiva. [ICO Green Line – Positive List Tool]. Available at <https://www.ico.es/herramienta-lista-positiva-linea-ico-verde-mrr>

¹⁴ InvestEU. (2024). InvestEU Tech Selector. Available at <https://investeu.techselector.com/investeu-en/>

Implementing partners should prioritise financing projects, especially in cooperation with local and regional governments, that increase access to affordable and sustainable housing, energy and transport for lower income households. **Increased engagement with implementing partners and national retail lenders will be important to promote the uptake of standardised instruments** for the deployment of clean technologies. This could be done, for instance, in the new **"Policy Review Dialogues" established under the ECF** that the Commission will organise with implementing partners.¹⁵ This engagement exercise should be proactive at the national and regional level by also integrating Member State and regional authorities in the Dialogues.

Furthermore, in order to promote the standardisation of financial instruments, increase their impact and accelerate their uptake, their additionality assessments could be determined in an ex-ante standardised manner, moving away from project-by-project evaluations.

These additional considerations can serve to guide the Commission and implementing partners in the design of the termsheets for standard instruments that are specific to the asset, beneficiary and geography. In other words, standard instruments would be predetermined to effectively target the identified needs on the ground and reflect market conditions to incentivise uptake and simplify and accelerate deployment. Therefore, the future InvestEU investment guidelines should integrate:

1. **An "end-beneficiary led approach" of the additionality principle** including thresholds determining their level of access to finance based on financial reference values such as income, relative size, asset ownership, creditworthiness and developmental stage and size). Distinguishing between types of beneficiary, helps to assess additionality and acts as a better guide in the design of targeted financial instruments that address key finance access gaps that exist at the household and retail levels. This can then deliver instruments and processes that standardise InvestEU implementation while ensuring alignment with EU policy objectives.
2. **A design of financial instruments that is asset-specific.** In today's economy, specific assets (such as PV panels, EVs, home retrofits, battery storage) rely on low costs of capital to be competitive across geographies. An identification of those could further help in the standardisation of public support via financial instruments, especially if matched with the end-beneficiary angle mentioned above. **Considering asset-specificity can therefore further help in the identification of added value.** The de-risking of deployment of renovation loans or EV leasing schemes as examples highlight that when identifying an end-beneficiary and a specific asset, the additionality assessment could be conducted ex-ante.

This requires that the ECF Work Programmes identify specific facilities to finance a determined set of assets/technologies/solutions under the toolbox of InvestEU (whether that is the Single Market Value Chain Builders or the EU Tech Frontrunners). In this line, to cover a gap in the demand-side and boost lead markets, a new tool is proposed (see recommendation 2) that should include a determination of assets or solutions under its scope (for instance, an EU Renovation Loan Facility).

3. **Integrate geography considerations (with special attention to just transition regions) as one of the conditions under which the ECF InvestEU may address market failures or sub-optimal situations.** This would lead to preferential access to EU financing for those end-beneficiaries or projects in regions where access to affordable finance for the transition is difficult (e.g. rural areas or lower-income regions).

C) Include social investments and just transition considerations in the ECF InvestEU instrument.

The current InvestEU programme has a dedicated window for Social Investments and Skills, encompassing education, training, healthcare, social housing and skills. On top of this, a Just Transition Scheme (JTS) was set up as an horizontal objective of InvestEU to catalyse private and public investments into territories which carry the environmental and social consequences of the transition out of fossil fuels.

The proposal of ECF InvestEU, does not foresee a dedicated window for social or just transition investments. This sheds doubts on the future of those investments, even though just transition is mentioned among the objectives of the ECF (Art. 3.2(k)).

To ensure continued social investments, we recommend prioritising ECF InvestEU projects in just transition regions. For example, the EIB, as principal implementing partner, should ensure the necessary incentives so that a significant amount of InvestEU activities target affordable and sustainable essential services, most notably energy, housing and transport for low - and middle income households. Moreover, the proposed standardised financial instruments could specifically facilitate deployment in Europe's just transition regions.

¹⁵ Mentioned in article 14 of the ECF Regulation: "The Commission and implementing partners shall establish regular Policy Review Dialogues to discuss progress with the implementation of the financial products and engage on relevant policy developments". European Competitiveness Fund ('ECF'). Available at <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52025PC0555>

4) Maximise synergies with National and Regional Partnerships

Following the current model of InvestEU, the Commission proposes to integrate a Member State compartment in the ECF InvestEU, allowing Member States to use financial instruments 'as a service'. Contributions from national budgets or the national and regional partnership plans (NRPPs) to the ECF InvestEU instrument could increase the efficiency compared to grant financing due to a more targeted, less costly financing strategy.

A) Boost incentives for the use of InvestEU “as a service” and create a Regional Compartment.

Jacques Delors Institute¹⁶ and also the InvestEU Midterm Review¹⁷ show that additional levers are needed to encourage national and regional authorities to contribute to the InvestEU Member State Compartment (MS-C). They need clarity and guidance on the use, implications and benefits of the MS-C, including: when state aid rules are exempted, clarity on the operational links between NRPPs and ECF InvestEU - including when local managing authorities may contribute directly to the MS-C - and identifying best-practices in different countries. This could prove particularly impactful in countries that lack capable national promotional banks as they could just rely on existing InvestEU frameworks.

The Commission should therefore develop guidance on the state aid and fiscal rules applicable to the MS-C. Additional technical assistance provided by SG REFORM can support national and regional authorities in implementing these guidelines. **Creating a Regional Compartment in InvestEU, coupled with technical assistance, can further facilitate access for local and regional authorities to the EU toolbox of guarantees and financial instruments.** This is not the case currently and is fundamental to address capacity and knowledge barriers at the local level in the design and implementation of financial instruments, as identified by a Climate Strategy.¹⁸

To further incentivise Member States and regions to contribute additional resources to the ECF InvestEU, the Commission could have the possibility to match additional contributions to the ECF instruments with EU-level funds. EU-level funds for this matching mechanism could potentially come from unspent MFF funds from 2021-2027, which would thus serve to reward efficient national spending to contribute to Union competitiveness priorities, while supporting convergence across regions.

B) When contributions to the compartments come from National and Regional Partnership Plans (or other EU funds), the rules of origin of the NRPP regulation should continue to apply.

A reallocation of NRPP funding to InvestEU must not bypass spending requirements for cohesion, decarbonisation, innovation or social objectives in NRPPs, which for instance prioritise investments in SMEs for innovation or social investments. What should be avoided is a situation where reallocations from Cohesion Policy to the Strategic Technologies for Europe Platform (STEP) undermined existing environmental and social objectives¹⁹ by allowing for wider possibilities of productive investments in large enterprises. Investments in large enterprises had been traditionally out of scope of cohesion funding as there is a more pressing need to support SMEs in those regions becoming more competitive, innovative and facilitating their clean transition.

Conclusion

Our recommendations aim to not only bring back best practices from the current InvestEU framework, but also build towards a more targeted use of ECF financing to unlock additional investments aligned within EU strategic priorities. By establishing a robust sustainability and additionality framework, and the development and implementation of standardised financial instruments, the ECF can mobilise more private investments to boost EU leadership in clean technologies and industrial decarbonisation.

Equally important to ensure that InvestEU support is prioritised strategically will be to design an evidence-based governance of the ECF led with sector-specific expert input. This requires defining more precisely the role of Thematic Platforms and the ECF Strategic Stakeholders Board, and ensuring that ECF priorities are fed with data-driven assessments of strategic importance, competitiveness and resilience of sectors and technologies. At the same time, introducing a cost-effectiveness element can help determine which investments in industrial decarbonisation prioritise the adoption of technologies that prove to be the most cost-effective solution, and thus ensure the best use of EU money in industrial priorities.

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¹⁶ Rubio, E. (2020). The Member State Compartment of the InvestEU Fund: How Does It Work? Will It Fly? Jacques Delors Institute, Policy Paper No. 248. Available at https://institutdelors.eu/content/uploads/2025/04/PP247_InvestEUFund_Rubio-EN-1-1.pdf

¹⁷ European Commission. (2024). Interim Evaluation of the InvestEU Programme. Available at https://commission.europa.eu/about/departments-and-executive-agencies/economic-and-financial-affairs/evaluation-reports-economic-and-financial-affairs-policies-and-spending-activities/interim-evaluation-investeu-programme_en

¹⁸ Climate Strategy & Partners. (2024). Filling the EU Climate Investment Gap more Efficiently. Available at <https://www.climatestrategy.es/press/MFFReport2024.pdf>

¹⁹ CAN Europe. (2023). Reaction: The STEP Proposal — Recovery Funds and Cohesion Policy Should Not Be Cannibalised for Financing Dubious Objectives. Available at <https://caneurope.org/the-step-proposal-recovery-funds/>