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Betreft Rapportage ministerie KGG wetgevingsonderhandelingen en  
raadplegingen EU tweede kwartaal 2025

**Ons kenmerk**

DEIZ / 101069518

**Bijlage(n)**

5

Geachte Voorzitter,

Met de Kamer is over EU-informatievoorziening afgesproken dat elk ministerie ieder kwartaal de EU-kwartaalrapportage, met daarin de stand van zaken van de onderhandelingen over EU-wetgevingsdossiers en de stand van zaken betreffende EU-raadplegingen naar de Kamer stuurt. Hierbij doe ik dat voor dossiers en raadplegingen op het terrein van het ministerie van Klimaat en Groene Groei. Het overzicht van het tweede kwartaal van 2025 vindt u in de bijlage. Graag merk ik op dat ik de maand juli bij het tweede kwartaal van 2025 heb gerekend vanwege het zomerreces.

In deze periode is vanuit KGG op de volgende raadplegingen gereageerd:

- Concept herziening EU-emissiehandelssysteem voor de maritieme sector, luchtvaart en vaste installaties, en de marktstabiliteitsreserve
- Concept verordening Versnelling van Industriële Decarbonisatie.

Sophie Hermans  
Minister van Klimaat en Groene Groei

**EU-wetgevingsonderhandelingen KGG**  
**Kwartaalrapportage, tweede kwartaal 2025**

Titel	Document nummer	Korte beschrijving	Stand van Zaken
<b>Verlenging gasopslagverordening</b>	COM(2025)99	Het voorstel van de Commissie over verlenging van de tijdelijke gasopslagbepalingen zoals vastgelegd in de Verordening Gasleveringszekerheid.	De onderhandelingen in triloog zijn afgerond en er is een politiek akkoord bereikt tussen de Commissie, de Raad en het Europees Parlement. Het voorstel zit in de afrondende procedurele fase.
<b>EURATOM</b>	COM(2025)60	Het voorstel van de Commissie over de procedurele verlenging van het huidige onderzoeks- en opleidingsprogramma van Euratom (2021-2025) met twee jaar, dus voor 2026 en 2027.	Er is overeenstemming bereikt en het voorstel is afgerond.
<b>Verordening inzake de uitfasering van de invoer van Russisch aardgas en de verbetering van de monitoring van potentiële energieafhankelijkheid</b>	COM(2025)828	Het voorstel van de Commissie om de invoer van Russisch gas en olie volledig uit te faseren, door onder meer een verbod op import van Russisch pijpleidingengas en LNG in te voeren en lidstaten te verplichten tot nationale diversificatieplannen.	Voorstel wordt besproken op ambtelijk EU-niveau in Raadskader.
<b>Wijziging EU-klimaatwet</b>	COM(2025)524	Het voorstel van de Commissie voor de wijziging van de Europese klimaatwet, met daarin een bindende EU-klimaatdoelstelling voor 2040 van netto 90% broeikasgasemissiereductie ten opzichte van 1990 als tussenstap richting klimaatneutraliteit in 2050.	Voorstel wordt besproken op ambtelijk EU-niveau in Raadskader.

## Introduction

As announced in the Clean Industrial Deal, the European Commission will put forward a proposal for an **Industrial Decarbonisation Accelerator Act**. Its general objective will be to increase sustainable and resilient industrial production in energy-intensive sectors in the EU by supporting decarbonisation investments.

The initiative will focus on energy-intensive industries (i.e. chemicals, steel, pulp and paper, refineries, cement, non-ferrous metals, glass and ceramics) and, where relevant, consider related downstream industries within a value chain logic.

The impact assessment will assess and identify the scope of the relevant sectors and consider measures aligned with the following objectives:

1. speed up permitting procedures for industrial decarbonisation;
2. identify and promote priority industrial decarbonisation projects and clusters;
3. create and protect lead markets for European low-carbon products.

As an integral part of the process, the Commission is launching a public consultation to gather views from all interested parties. The questionnaire consists of five parts:

- Part 1 collects some information about you.
- Part 2 focuses on barriers to industrial decarbonisation.
- Part 3 contains questions related to permitting for industrial decarbonisation.
- Part 4 contains questions on identifying and promoting priority projects.
- Part 5 comprises questions on how to create and protect lead markets for European low-carbon products.

### I. Barriers to industrial decarbonisation

Question: To what extent do you agree with the following statements?

	strongly disagree	slightly disagree	neutral	slightly agree	strongly agree	don't know
1. Industry does not have sufficient access to affordable and decarbonised energy.				x		
2. Unfair competition from non-EU countries hinders industrial decarbonisation investments.				x		
3. Decarbonisation technologies are not yet available or deployed at large scale.				x		

	strongly disagree	slightly disagree	neutral	slightly agree	strongly agree	don't know
4. High carbon abatement costs are a major barrier to adopting decarbonisation technologies in industry.				x		
5. High capital costs are a major barrier to industrial decarbonisation.					x	
6. High operation costs are a major barrier to industrial decarbonisation.					x	
7. The complexity and duration of permitting for industrial decarbonisation projects is an obstacle to investing in Europe.					x	
8. Barriers to industrial decarbonisation are greater for SMEs than for larger companies.			x			
9. Tariffs on industrial products are a barrier to industrial decarbonisation.			x			

10. Question: Are there any other barriers to industrial decarbonisation? Please give a maximum of three examples. (*500 character(s) maximum*)

- Rigid EU laws: e.g. renewable energy permits that promote long-term decarbonisation are denied due to short-term damages. Differences in national legislation, such as permitting schemes, also impede cross-border projects.
- Insufficient availability of (secondary) critical raw materials and insufficient (incentives to) investment in (reuse) secondary materials.
- Lack of interconnections between industrial clusters (e.g. infrastructure for CO<sub>2</sub>, H<sub>2</sub>).

## II. Speed-up permitting for industrial decarbonisation

Question: To what extent do you agree with the following statements?

	strongly disagree	slightly disagree	neutral	slightly agree	strongly agree	don't know
11. The challenges related to permitting processes are widespread across Member States.					x	
12. The challenges related to permitting processes are different across Member States.				x		
13. The current permitting framework in my country or region does not handle permits related to industrial decarbonisation projects in energy intensive industries efficiently.					x	
14. The complexity, duration and uncertainty of the outcome of permitting for construction (housing) projects is an obstacle to more housing projects being developed in Europe and a root cause of the affordability crisis.	x					

Question: How important are the following potential challenges faced in the permitting process for industrial decarbonisation [rate each of them from 1 (very important) to 5 (not important), don't know]:

	1	2	3	4	5	don't know
15. Long response time of public authorities				x		
16. Lack of administrative capacity (e.g. understaffed public authorities)		x				
17. Fragmented regulatory landscape and complexity of the process	x					
18. Multiple authorities involved		x				
19. Lack of digital integration					x	
20. Lack of technical knowledge at permitting authority level			x			

Question: To what extent do you agree with the following statements?

	strongly disagree	slightly disagree	neutral	slightly agree	strongly agree	don't know
21. Decarbonising energy-intensive industries requires addressing significant cross-border challenges (e.g. infrastructure, supply chains, regulatory alignment).					x	
22. Industrial clustering can streamline and improve the efficiency of the					x	

	strongly disagree	slightly disagree	neutral	slightly agree	strongly agree	don't know
permit-granting process.						
23. European legislation could be simplified to facilitate industrial permitting of decarbonisation projects.				x		
24. Data repositories and data spaces can facilitate the permit process by re-using existing, relevant data sets.			x			

25. Question: How long does it take on average in your country or region between submitting the request for a permit for an industrial decarbonisation project and granting the permit? Please provide your answer in months – or 'don't know'.

*This depends on the size and complexity of the project. The formal process from application to permit is legally 6 months. However, in certain instances the preceding period (prior to the start of the application – encompasses doing research, forms etc.) can take up to several years. Nevertheless, as it stands, the permit granting processes are facing huge delays due to complexity. In the case of The Netherlands, balancing numerous activities and policy objectives in a small and densely populated country can lead to conflicting outcomes, further delaying procedures.*

26. Question: Based on your experience, what would be a reasonable maximum timeframe between submitting a permit for an industrial decarbonisation project and receiving the approval (excluding judicial appeals)? Please provide your answer in months – or 'don't know'.

*Reasonable would be 6 months (NB: from submission to award of the permit; excluding the preceding period).*

27. Question: How long does it take in your country or region between the request for grid access and the actual connection to the energy grid for an investment in decarbonisation? Please provide your answer in months – or 'don't know'.

The period between the request for access and the actual connection to the energy grid varies and depends on several factors:

- Complexity of the connection: The timeframe for establishing a connection varies between 5.9 months (26 weeks) and 12 months (52 weeks). This period may be extended if the grid operator can demonstrate that it is not feasible to complete the work within the standard timeframe.
- Region-specific constraints: If a large number of connections must be realized simultaneously in a particular region, grid operators may apply an additional waiting period. This additional period can be up to 9.2 months (40 weeks) but will be gradually reduced to zero over the next ten years.
- Existing congestion: If there is pre-existing congestion in the network, the grid operator is not required to realize the connection(s) until three months after the congestion has been resolved.
- Force majeure: Delays due to unforeseen circumstances such as late permit approvals or adverse weather conditions (e.g., frost) are considered force majeure.
- Mutual agreements: The grid operator and the customer may jointly agree on a later delivery date for the connection.
- NB: grid congestion is currently a significant issue in The Netherlands.

- Biggest constraint is not to get the grid access but that the amount of power needed is not there. Hence the delay: in dense areas where power is short in supply, the power is even more constrained. Waiting times are, in some cases, years.

### III. Identify and promote priority projects

Question: To what extent do you agree with the following statements?

	strongly disagree	slightly disagree	neutral	slightly agree	strongly agree	don't know
28. Lack of access to private funding is a major barrier to industrial decarbonisation.				x		
29. Lack of access to public funding is a major barrier to industrial decarbonisation.				x		
30. Transition finance (i.e. financing options dedicated to the improvement of the climate and environmental performance of high impact activities) is difficult to access.			x			

31. Question: How relevant are the following potential risk factors associated with investing in an industrial decarbonisation project? [rate each of them from 1 (very relevant) to 5 (not relevant), don't know]:

	1	2	3	4	5	don't know
Market uncertainty	x					
Regulatory uncertainty		x				
Technological development			x			
Financial risks		x				
Other			x			



32. Question How relevant are the following public support instruments for industrial decarbonisation projects?  
[rate each of them from 1 (very relevant) to 5 (not relevant), don't know]:

	1	2	3	4	5	don't know
Grants following an open call	x					
Two-way Carbon Contracts for Difference following a bidding procedure		x				
Power Purchase Agreements support				x		
Equity investments			x			
Financial guarantees		x				
Tax incentives	x					

33. Question How relevant are the following public funds in supporting industrial decarbonisation projects?  
[rate each of them from 1 (very relevant) to 5 (not relevant), don't know]:

	1	2	3	4	5	don't know
Horizon Europe		x				
Innovation Fund	x					
InvestEU			x			
Cohesion Funds				x		
Recovery and Resilience Facility					x	
Member States funding (State aid)	x					
Other			x			

Question To what extent do you agree with the following statement?

	strongly disagree	slightly disagree	neutral	slightly agree	strongly agree	don't know
34. Introducing a category of priority industrial decarbonisation projects, supported by targeted benefits, will accelerate the EU's industrial decarbonisation efforts.				x		

35. Question: At which stages do energy-intensive industries typically face the most significant funding gaps?  
Please rank the following. [ from 1 (most important) to 5 (least important)].

Research and Innovation -5

Piloting and Demonstration stage 3

First-of-a-kind commercial 1

Full-scale development 2

Operations 4

#### IV. Create and protect European lead markets for low-carbon products

Question: To what extent do you agree with the following statements?

	strongly disagree	slightly disagree	neutral	slightly agree	strongly agree	don't know
36. It is possible to differentiate clean industrial products and technologies from their more carbon-intensive equivalents.	x					
37. Downstream sectors and consumers lack willingness to pay a premium for clean industrial products.				x		
38. Measures to stimulate					x	

	strongly disagree	slightly disagree	neutral	slightly agree	strongly agree	don't know
demand for clean industrial products are essential to drive industrial decarbonisation.						

39. Question: Which sectors are important downstream sectors supporting the uptake of clean energy-intensive materials? [rate each of them from 1 (most important) to 5 (least important), don't know]

	1	2	3	4	5	don't know
Construction & infrastructure		x				
Automotive	x					
Defence		x				
Machinery				x		
Electrical and electronic equipment		x				
Clean energy technologies (e.g. wind, solar, heat pump)		x				
Other	x					

#### Public procurement

Question To what extent do you agree with the following statements?

	strongly disagree	slightly disagree	neutral	slightly agree	strongly agree	don't know
40. Public procurement is a significant driver for lead markets for European and clean industrial products				x		
41. Currently, public procurement		x				

	strongly disagree	slightly disagree	neutral	slightly agree	strongly agree	don't know
is too focused on price (rather than non-price criteria)						

42. Question: Which non-price criteria should be set for public procurement to create lead markets? Multiple answers possible.

- **Resilience (i.e. diversification of supply sources in case of dependencies)**
  - ☐ EU-content
  - ☐ Employment and social requirements
- **Environmental sustainability**
  - ☐ Cybersecurity

*Label on the carbon intensity of industrial products*

Question To what extent do you agree with the following statements?

	strongly disagree	slightly disagree	neutral	slightly agree	strongly agree	don't know
43. Introducing an EU voluntary label on the carbon intensity of industrial products will support the uptake of sustainable industrial products and the creation of lead markets.				x		
44. Introducing an EU voluntary label on the carbon intensity of industrial products will curb the proliferation of labels and ensure a harmonised approach.				x		
45. Introducing an EU voluntary label on carbon intensity will impose significant administrative and compliance costs, which could reduce competitiveness.				x		
46. An EU label on the carbon intensity of industrial products should be mandatory, rather than voluntary.					x	

47. Question: How important would the added value be of an EU label on the carbon intensity of industrial products in terms of: [rate them from 1 (very important) to 5 (not important), don't know]

	1	2	3	4	5	don't know
Increased transparency		x				
Access to green finance		X				
Compliance with regulatory requirements		x				
Increased comparability and market differentiation		x				
Market uptake of greener products	x					

48. Question: In sectors where carbon is indispensable as a feedstock, such as the chemical industry, how important are the following potential barriers to scaling up the use of clean carbon sources – i.e. sustainable biomass, recycled waste, and Carbon Capture Utilisation – to support de-fossilisation efforts? [rate them from 1 (very important) to 5 (not important), don't know]:

	1	2	3	4	5	don't know
High costs		x				
Lack of regulatory incentives	x					
Limited access to clean carbon sources		x				
Undeveloped technologies			x			

#### *Foreign direct investments into decarbonisation*

Question: To increase industrial decarbonisation investments in Europe, what is the role of foreign direct investment from your perspective? Please indicate whether you agree or disagree with the following statements.

	agree	neutral	disagree
49. Foreign direct investments are useful to bring into Europe capital/funding which is not available in the EU.	x		
50. Foreign direct investments are useful to bring into Europe know-how about	x		

	agree	neutral	disagree
products or processes which is not available in the EU.			
51. Foreign direct investments are useful to increase supply security for EU customers by localising production closer to them.	x		
52. Foreign direct investments do not play a role.			x

53. Question: Do you consider it useful to impose conditions on foreign direct investment from an internal market perspective?

Answer

- ☐ Yes, whenever the investor receives public incentives (e.g. grants, loans, expedited permitting)
- ☐ Yes, whenever the sector is sensitive (e.g. high tech, critical inputs)
- ☒ Yes, if either (a) or (b)
- ☐ No
- ☐ Don't know

## **The Government of The Netherlands**

We consider it essential that the following three priorities are reflected in the IDAA:

### **1. Fostering lead market development**

Creating lead markets for energy-intensive industries is an environmental necessity and an economic opportunity to lead in green/clean technologies. Targeted development of European lead markets, focused on current and future comparative advantages, accelerates economies of scale and boosts investment security. The EU should primarily focus on the steel and chemical sectors due to their CO<sub>2</sub> emissions and strategic relevance. Other energy-intensive industries should also be included.

Recommended actions/ areas of intervention:

- Ecosystem: harmonized regulations (ESPR, NZIA, RED, CPR, EVL, high net tariffs, nitrogen depletion), streamlined permitting, and diversified (circular) material (re)use – including a strong market for high-value scrap and, for specific sectors, tradeable certificates tied to product carbon footprint or sustainable carbon content of end-products.
- Green/clean production: qualitative criteria for procurement, product carbon footprint requirements for end-products, minimum recycled/bio-based carbon content targets for end-products, subsidies or guidelines for fiscal incentives to reduce the green premium for low-carbon, sustainable carbon and other circular products.
- Green consumption: a common EU product label (building on ESPR, for green and low-carbon products in suitable sectors), with harmonized standards and certification schemes.

### **2. Strengthening Industrial Clusters through Cross-Border Infrastructure**

A genuine cluster approach treats co-located companies as interconnected ecosystems, fostering collaboration on knowledge, infrastructure, and resources. The Netherlands applies this nationally; a European extension with attention for cross-border infrastructure could strengthen competitiveness, improve efficiency, and accelerate decarbonization.

The transition of industrial clusters increasingly depends on robust cross-border infrastructure (e.g. for CO<sub>2</sub>, hydrogen, electricity). Yet, key investments face obstacles from fragmented regulations, cross-border permitting, unclear cost-sharing, and nascent markets for CO<sub>2</sub> and hydrogen.

Recommended actions/ areas of intervention:

- European CO<sub>2</sub> network strategy: a coordinated EU strategy is urgently needed. Member States should develop regulatory frameworks to support implementation.
- Funding for cross-border infrastructure: accessible EU-level funding options should be explored.
- Technical agreements: Member States must agree on key specifications (e.g. hydrogen purity, pressure, flow) to ensure cross-border interoperability and safety.

### **3. Streamlining/improving permit procedures**

Many decarbonisation/defossilisation projects face delays due to complex permitting and litigation.

Recommended actions/ areas of intervention:

- Fast-tracked, coordinated permitting for strategic projects: includes the option to apply centralized coordination of permits for key decarbonization/defossilisation projects, provided it is expected to lead to actual acceleration of the permitting process.
- Defined areas around EIIs: clearly defined spatial/environmental zones (inspired by NZIA valleys) provide regulatory clarity and focus, streamlining permitting. Applicants must ensure

clean production to minimize environmental impact, preserving capacity for future projects and maximizing cluster efficiency. This reduces uncertainty and accelerates decisions.

- Incentivising impact reduction for faster permitting: it could be determined whether acceleration is possible by stimulating companies to implement measures that reduce (local) environmental impacts.



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<b>Submitted by</b>	Hendrik Goris
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<b>Organisation</b>	Dutch Government
<b>Organisation size</b>	Large (250 or more)
<b>Scope</b>	National
<b>Level of governance</b>	Authority
<b>Country of origin</b>	Netherlands
<b>Initiative</b>	<a href="#">EU emissions trading system for maritime, aviation and stationary installations, and market stab reserve – review</a>

“Please find attached the response by the Netherlands to the consultation/call for evidence for: - an Evaluation and Impact Assessment run in parallel for the Review of the EU ETS for maritime, aviation and stationary installations and of the Market Stability Reserve; - an Evaluation of the operation of the Innovation Fund; - an Evaluation of the operating rules of the Modernisation Fund;”



Feedback from: Dutch Government

**EN**

(63.2 KB - PDF - 3 pages)

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**Response by the Netherlands to the Call for Evidence for:**

- an Evaluation and Impact Assessment run in parallel for the Review of the EU ETS for maritime, aviation and stationary installations and of the Market Stability Reserve;
- an Evaluation of the operation of the Innovation Fund;
- an Evaluation of the operating rules of the Modernisation Fund;

**The EU ETS is the backbone of the Union's climate policy architecture and has consistently delivered significant emission reduction at low societal costs.** To keep the EU climate goals within reach, the ambition of the EU ETS should at least be retained at the current level. The EU ETS price signal should be the main driver of investments in emission reduction across the EU, ensuring a level playing field. Through the incorporation of safeguards against carbon leakage, the instrument has demonstrated that competitiveness and climate action can go hand in hand. Given the above, scope extension should be considered wherever possible. The effectiveness and credibility of the system depends on its environmental integrity. International credits should therefore be kept outside of the system, in order to keep the allowance price stable and foster innovation within the EU.

**Financial incentives for carbon removals should swiftly be developed and implemented for instance through public procurement, using ETS revenues.** At present, integration of permanent carbon removals into the EU ETS could lead to mitigation deterrence and insufficiently stimulates technologies with a lower technology readiness level due to relatively high costs. Given the current stage of development, public procurement could be examined and considered to strike a better balance between stimulating innovation and scale while avoiding mitigation deterrence, for instance through reverse auctions financed by ETS revenues. Dedicated funding per removal technology may prevent counterproductive competition and allow for early development of new methods, while still allowing proven technologies to grow to scale. Auctions-as-a-service should allow Member States to supplement the efforts at the European level. The ETS and/or other instruments could potentially fit the market for carbon removals better at a later stage of development.

**Waste incineration should be part of EU ETS from 2028 onwards to enhance the business case for recycling, CCS and BECCS.** It is necessary to, as soon as feasible, make the waste sector fit for a circular and net zero economy. With the right incentives, the waste sector has the potential to become net zero or even net negative due to its large share of biogenic emissions. Additional ETS revenues (or an equivalent amount) should at least partly be earmarked to support the sector in realizing this potential. The adoption of municipal waste incineration into the EU ETS should be part of a larger policy package. First of all, evasion via landfills should be reduced and prohibited, e.g. through EU-wide standards or binding targets for member states. Bringing landfills under EU ETS is not a feasible solution. Secondly, the risk of increased export towards third countries with lower environmental standards needs to be managed by stricter regulation. Thirdly, we welcome the intention to assess the risk of oversurrendering in relation to non-permanent CCU and fuels with recycled carbon content in the ETS. It remains paramount however, to ensure the environmental integrity of the ETS and avoid introducing loopholes that could lead to undersurrendering.

**CBAM is a durable and effective instrument to reduce the risk of carbon leakage, as free allocation is not sustainable with a gradually decreasing amount of allowances.** The CBAM scope should be extended to indirect emissions embedded in the production of all CBAM sectors. This provides effective carbon leakage protection in the context of increasing electrification of industrial processes, while contributing to a level playing field and not facing budgetary constraints as compared to indirect cost compensation.

**Free allocation towards sectors that are currently not covered by CBAM, should be targeted towards sectors with the highest risk of carbon leakage.** This should be effectuated by removing free allocation for sectors not or minimally at risk for carbon leakage, in any case including district heating which is not liable for carbon leakage.

**Beyond 2030 the MSR should continue its vital contribution to a stable and effective EU ETS.** For the MSR to effectively balance supply and demand and minimise price volatility, the parameters of the reserve regarding the thresholds, intake and release rates, will need to be

## Non Paper ETS-1

updated reflecting a lower ETS cap. The application of the linear reduction factor to the thresholds would make for a durable adjustment, providing long term clarity to the market in line with the rule-based functioning of the MSR. In addition to balancing supply and demand, the MSR has been essential in mitigating the waterbed effect of additional emission reduction through national policy in ETS sectors. The Commission should allow for the MSR to continue performing this function in the future. Possible adjustments that may further improve the performance, include an increase of the intake rate and a strengthening of the cancellation mechanism.

**The Netherlands maintains its support for the assessment of CORSIA in relation to the contribution of international aviation to the climate goals of the Paris Agreement.** The Netherlands strongly prefers action at a global level, coordinated with ICAO. However, if action at the global level proves to be insufficient, additional EU policy will be necessary. In its assessment of the effectiveness of reducing CO<sub>2</sub> emissions caused by international aviation through the global system of CORSIA and the possible application of the EU ETS to departing flights to third countries, the European Commission should also consider potential economic and aero-political consequences of a possible accompanying proposal.

**In view of the IMO Net Zero Framework and the Paris agreement, possible amendments to EU ETS maritime should be considered in detail in the Impact Assessment, considering potential overlaps and gaps in scope, and assessing benefits and downsides of global and EU systems in parallel.** The Netherlands strongly prefers action at a global level to create a level playing field and avoid possibilities of evasion and is therefore encouraged by the recent agreement at the IMO, to be adopted in October. However, should the IMO instruments prove to be insufficient, additional EU policy would still be necessary. To ensure an adequate contribution from the EU to the Paris goals in an efficient and feasible manner, clarity is required on the main regulatory driver or drivers of emission reduction and the energy transition in shipping. Therefore, an assessment of the IMO instrument, ETS-Maritime, FuelEU Maritime and all their various possible combinations, ranging from the IMO instrument only to all instruments together, is of great importance in the upcoming revision. Next to emission reduction goals, other elements to reflect on include simplicity, administrative burden for the sector, financial implications, robustness of the EU ETS system and the timing of the instruments and their combinations.

**To lower the risk of evasion and further stimulate climate action in the maritime sector, smaller vessels above 400 GT need to make a contribution equivalent to vessels above 5000 GT.** Given that this category of vessels is not covered by the IMO NZF, the assessment should cover the effects of a possible scope extension to FuelEU Maritime and EU ETS Maritime for this category. For any system to function well, monitoring, reporting and verification are essential elements. The Netherlands therefore stresses with great urgency the need to use the review of the MRV regulation for shipping for the necessary improvements, also given the inclusion of offshore per 1 January 2027.

**The Innovation Fund functions well, and its focus should remain on the most innovative, cost efficient and climate effective projects in the EU.** The Auction-as-a-Service instrument under the fund should also be used for scaling up permanent carbon removal technologies. The announced new financing mechanism as part of the Clean Industrial Deal, referred to as the Industrial Decarbonisation Bank, should not operate at the expense of investments in innovative decarbonisation projects. Within the Innovation Fund, it is important to stimulate a diversity of sectors and activities. Considering that the Innovation Fund is already significantly oversubscribed, possibilities for expansion should be explored, for example through financing from other underutilized EU funds.

**The Modernisation Fund should focus exclusively on priority investments.** Non-priority investments under the fund can create reliance on fossil fuels. Limiting the scope to priority investments would also simplify the governance of the fund.

**The Netherlands support the Commission's intent to revise only the provisions concerning the ETS1, including aviation and maritime, during the next revision of the Directive.** The ETS2 is vital for reaching the collective 2030 climate target of the EU as well as national targets of Member States under the ESR. Revising the directive with respect to ETS2 before its full entry into force risks undermining the system's credibility and effectiveness, and by

## **Non Paper ETS-1**

extension, risks failing 2030 climate targets. To mitigate the risk of excessive prices in the first years of ETS2, various safeguards have been adopted.

Any amendments to these safeguards before the start of ETS2, should only be made through a revision of the MSR decision. A revision to make the ETS2 fit for purpose after 2030, should follow only once the system is in force and experience on its administration and implementation has been collected.

Aan de Minister van Klimaat en Groene Groei  
de Secretaris-generaal

Auteur

Datum

1 augustus 2025

Kenmerk

DEIZ / 100370988

Kopie aan

Bijlage(n)

7

# nota

TER INFORMATIE

Beslisnota Rapportage ministerie EZ  
wetgevingsonderhandelingen en raadplegingen  
EU tweede kwartaal 2025

Parafenroute

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## Aanleiding

Elk vakdepartement brengt periodiek de Eerste en Tweede Kamer op de hoogte van de lopende EU-wetgevingsonderhandelingen en de reacties op raadplegingen van de Europese Commissie. Dit is conform de afspraken met de Kamers over EU-informatievoorziening. U informeert met de bijgaande brieven beide Kamers over de stand van zaken betreffende EU-wetgevingsonderhandelingen en de EU-raadplegingen op het beleidsterrein van het ministerie van Klimaat en Groene Groei in het tweede kwartaal van 2025 (waarbij de maand juli bij het tweede kwartaal is toegevoegd). Met deze brieven stuurt u conform de afspraken een afschrift van de Nederlandse inbreng op twee EU-raadplegingen als bijlage mee.

## Geadviseerd besluit

U kunt akkoord gaan met de bijgevoegde brieven aan de Eerste en Tweede Kamer en deze ondertekenen.

## Kernpunten

### Overzicht EU-wetgevingsonderhandelingen.

Ten opzichte van het eerste kwartaal van 2025 zijn de volgende voorstellen door de Commissie gepubliceerd en worden deze besproken op ambtelijk EU-niveau in het Raadskader:

- Verordening inzake de uitfasering van de invoer van Russisch aardgas en de verbetering van de monitoring van potentiële energieafhankelijkheid
- Wijziging EU-klimaatwet

Ten opzichte van het eerste kwartaal van 2025 is voor het volgende voorstel de triloog afgerond:

- Verlenging gasopslagverordening

Ten opzichte van het eerste kwartaal van 2025 is het volgende voorstel afgerond na overeenstemming:

- EURATOM

Ontvangen BBR

Het is gebruikelijk om bij de voortgangsrapportage niet in te gaan op de inhoudelijke beoordeling van de voorstellen. Hierover wordt de Kamer separaat geïnformeerd via BNC-fiches, geannoteerde agenda's en verslagen van Raden.

EU-raadplegingen

Door KGG is er in het tweede kwartaal van 2025 op de volgende EU-raadplegingen gereageerd:

- Herziening EU-emissiehandelssysteem voor de maritieme sector, luchtvaart en vaste installaties, en de marktstabiliteitsreserve
- Verordening Versnelling van Industriële Decarbonisatie

Deze consultatiereacties vindt u bijgevoegd.

De reacties op EU-raadplegingen zijn voorafgaand aan verzending aan u ter goedkeuring voorgelegd.