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**14 March 2025, Brussels**

# FEAD call for evidence - IED Transformation plans and Investment gap

*Call for evidence – questions related to investment gap for the transformation of the installations covered by the IED 2.0 towards a clean, circular and climate neutral industry*

For the study assessing the potential investment gap, we ask for you to share relevant studies, data and other information relevant to the scope of work to inform the evidence base for the study. The responses and the information provided will ensure that no key sources are missed within our evidence review process and therefore will enable a thorough and more accurate assessment to take place. Please can you share any studies, data or other information which:

1. Define transformation pathways for one or more industrial sectors covered by the IED 2.0 to meet decarbonisation, depollution and circularity goals up to 2050, and describe the key underlying technologies and techniques which will drive the transformation;
2. Assess the costs of sectoral transformation in terms of depollution, decarbonisation and circularity;
3. Identify relevant funding sources and financing options available to IED 2.0 installations to support implementation of depollution, decarbonization and pro-circular techniques (including any analysis of funding sources accessed to date, and the potential of different sources to contribute going forward);
4. Explore how the costs of transformation and access to funding may vary by size of business (in particular assessing potential implications for SMEs).

*Call for evidence – questions related to transformation plans*

For the study developing the content of the transformation plans we are seeking initial views and inputs to inform the development of the first draft content of the plans. A small number of open-ended questions are set out below to invite any initial views and supporting evidence.

An initial proposal for the overall content of the transformation plans is set out below. Please provide any feedback in relation to these headings, including scope and any concerns or challenges.

* General objectives: the general objectives should articulate the overarching aims of the transformation plan, aligning with the goals of IED 2.0 and EU policies such as climate neutrality, zero pollution, and a circular economy.
* Baseline performance: provides information on emissions and resource consumption for the baseline year under which the plan is produced. This would allow the level of ambition in the specific targets to be appraised and also allows tracking of progress in interim years. Much of this information is likely to be already reported under the IEPR or included within the EMS.
* Specific time-bound targets (quantitative): specific quantitative time-bound targets translate the general objectives into measurable outcomes, providing benchmarks for environmental performance to track progress. These should include targets for greenhouse gas emissions reduction, improvements in energy and resource efficiency, and reductions in specific emissions of pollutants. These elements may be linked to BAT-AELs, BAT-AEPLs and benchmarks (for performance levels), and units and metrics for reporting contextual fields under the Industrial Emissions Portal.
* Intermediate targets and milestones: intermediate targets and milestones provide a roadmap for achieving the specific quantitative time-bound targets. The milestones should detail key steps or achievements, such as obtaining permits, taking investment decisions for commissioning new techniques, starting operation of new techniques, while the intermediate targets should relate to interim emissions reductions.
* Measures to achieve targets including techniques: this section outlines the practical measures and technologies planned to meet the targets, emphasising Best Available Techniques (BAT) and innovative approaches (e.g. emerging techniques). It should detail investments in emissions control, resource optimisation and process improvements.
* Consideration of cross-media effects/impacts on other objectives: the transformation plan should evaluate potential cross-media effects, ensuring that measures to achieve one objective (e.g. emission reduction) do not inadvertently cause harm in another area (e.g. resource efficiency). This includes the identification of potential co-benefits as well.
* What sector-specific elements should be reflected (if any) in the proposed content for the transformation plans?
* Do you anticipate any specific concerns in relation to confidential business information (CBI) with the drafting of transformation plans (e.g. planned investments), and do you have any suggestions on how this could be avoided?