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VERBUND AG (Transparency Register No. 09571422185-81) contribution to the Consultation on the Review of the Communication on important projects of common European interest (IPCEI)

On VERBUND AG

VERBUND AG is an Austrian state-owned and publicly listed energy utility, with a strong focus on the generation and supply of renewable electricity and renewable hydrogen. VERBUND is currently actively participating and promoting several Hydrogen IPCEI candidate projects such as “Green Hydrogen@Blue Danube” and “Carbon to Product” (C2PAT), which has been submitted to the national Hydrogen IPCEI pre-selection procedures in Austria and/or in Germany.

Remarks on the draft communication

VERBUND welcomes the revised draft communication on important projects of common European interest. The revised draft communication provides more detail on selection criteria for IPCEIs and thus provides more certainty to project promoters as well as Member States.

We also welcome the attempt to open the IPCEI process more to the **participation of SMEs**. However, VERBUND would like to point to the fundamental issue that by design IPCEIs tend to be large-scale projects with a high investment intensity. Both factors are not beneficial to the active participation of SMEs. It is therefore more realistic to assume that SMEs, rather than promoting a project, will more likely join already existing projects at a later stage. Thus, we believe that SMEs would benefit from a strengthening of the match-making phase, which happens once projects are more developed.

Potential room for improvement

In point 17 of the draft communication defines a minimum threshold of four Member States that need to participate in an IPCEI. VERBUND would suggest to lower this threshold to three Member States in order to align it with the thresholds of other European support mechanisms such as Horizon Europe. This would create a coherent approach across support mechanisms and lower the entry barrier for medium-sized project promoting companies.

Furthermore, VERBUND would strongly support if the revised communication could entail a section where the IPCEI selection process is mapped out based on certain generally valid process milestones. We are aware that IPCEI selection and implementation processes vary in size, complexity and duration. However we also believe that certain milestones of general validity could be defined, without specifying concrete time schedules. Such a process structure would provide a much needed overview and point of

orientation for project promoters. It could be also used as a project management tool for the Commission and Member States.

Eventually, VERBUND would welcome if the revised communication could provide more detail on the nature of projects subsumed under point 26. For this purpose we would suggest to include an Annex to the Communication which lists up to five exemplary projects per sector (environment, energy, transport, health or digital). A list of exemplary projects could also be helpful for projects under points 23 and 24.

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