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FEEDBACK PAPER

Swedenergy feedback on the proposal for a regulation establishing a Union framework of measures for strengthening Europe's net-zero technology products manufacturing ecosystem (Net Zero Industry Act)

Swedenergy collects and gives voice to around 400 companies that produce, distribute, sell and store energy. Our goal is to develop the energy industry – for the benefit of all, based on knowledge, an overall view of the energy system and in cooperation with our environment.

Detailed views

Article 1

Article 1.2 should not be limited to the 2030 target only. There should also be measures assigned to the 2050 target. Otherwise, long-term investments, that contribute mostly after 2030, will not be incentivised.

Article 3

In Article 3.1, conventional large-scale nuclear power is not included in the definition of "net-zero technologies" although it contributes to 50% of the clean energy within the European Union today and although it has reached a technology readiness level of 8 or above. Several member states are planning to partly rely on conventional nuclear power to reach their climate targets. Member states that have plans to build conventional nuclear power will likely rely on competence and supply chains outside the EU. Thus, they would benefit from having conventional nuclear power included in the list of "net-zero technologies". A valuable consequence of including conventional large-scale nuclear power in this definition would be that this technology would become a "strategic net-zero technology" since it would fulful the three listed inclusion critieria. Having access to yet another "strategic net-zero technology" would be beneficial to several member states and would thus increase the possibility for the EU to reach its 2050 climate target.

Article 16

Swedenergy support the goal of an annual injection capacity. However, a defined pathway for increasing storage capacity for 2035, 2040, 2045 and 2050 should also be defined.

Swedenergy 2 (2)

Article 17

Swedenergy supports the article.

Åsa Pettersson CEO Swedenergy