

# From Crisis Response to Industrial Strategy

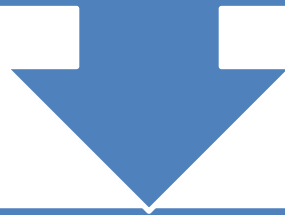
The Evolution of EU State Aid from the TCF to the CISAF

Guest lecture – Competition Law Research Centre  
December 18<sup>th</sup>, 2025



# State Aid Supporting Green Transition

GBER (General Block Exemption Regulation)



Key frameworks:

CEEAG (Climate, Energy and  
Environmental Aid Guidelines)

TCF -> TCTF -> CISAF

# Context & Motivation



Russia's aggression against Ukraine triggered energy shocks, inflation, and supply disruptions



The Commission responded with the Temporary Crisis Framework (TCF, 2022) and the Temporary Crisis and Transition Framework (TCTF, 2023)



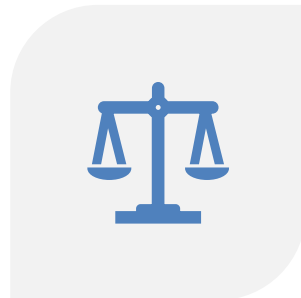
These instruments evolved from short-term relief into vehicles for structural change in industrial policy



TCF (03/2022): liquidity support;  
energy affordability; security of  
supply



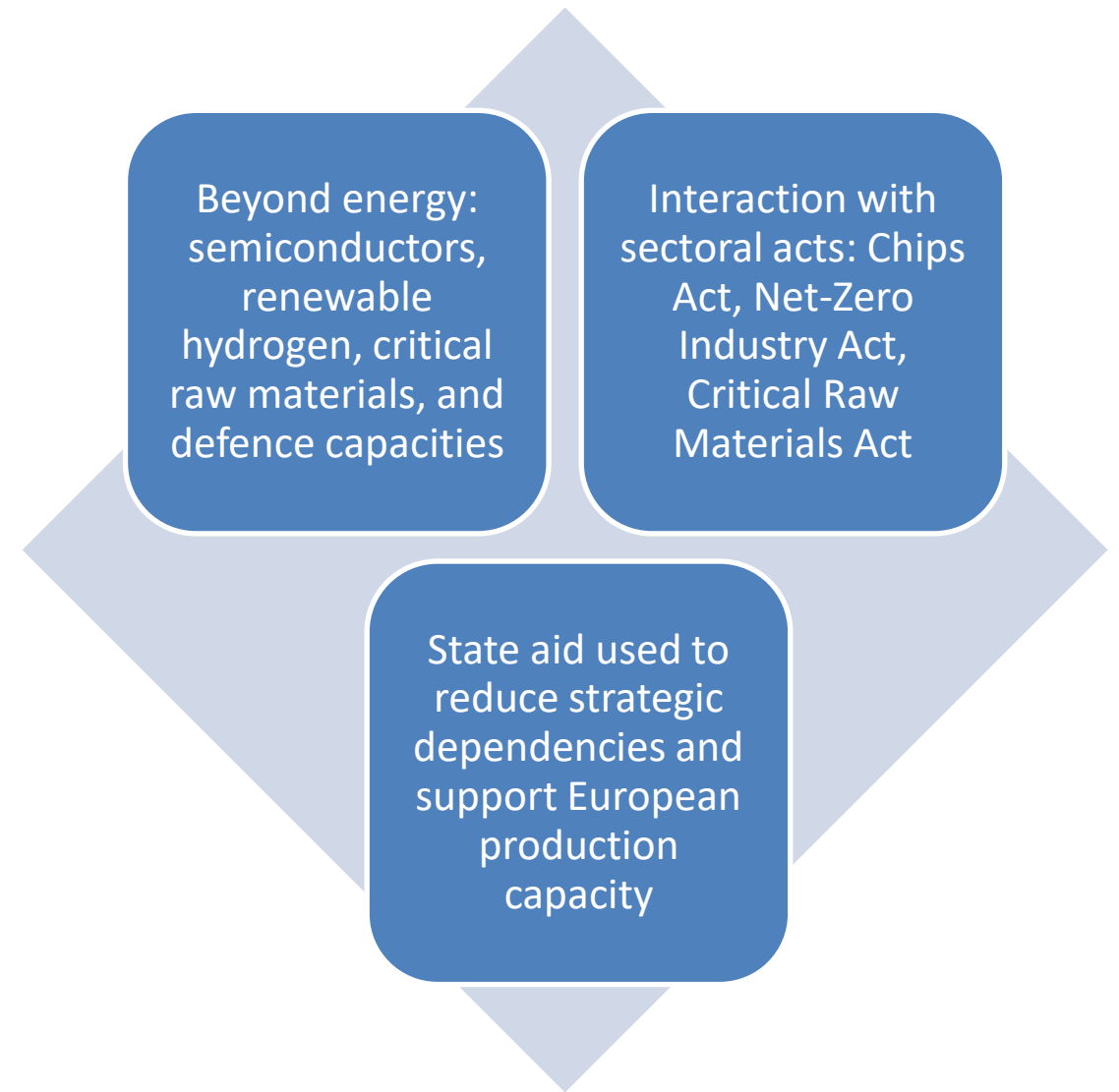
Amendments (07/2022; 10/2022):  
renewables, storage, industrial  
decarbonisation



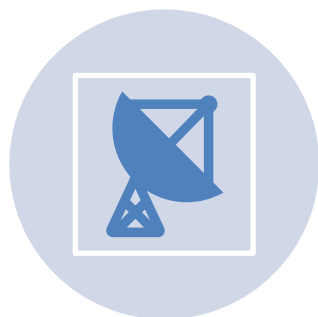
TCTF (03/2023): bridges crisis response with net-zero objectives;  
links to REPowerEU and the Green Deal Industrial Plan

# Legal Foundations & Evolution

# Strategic Sectors & Technological Sovereignty



# Institutional Evolution & Coordination



Closer cooperation between DG COMP and DG GROW (design/assessment of large schemes, IPCEIs)



Joint enforcement synergies (e.g., Foreign Subsidies Regulation) to protect the level playing field



DG COMP operational model: flexible, 'matrix' allocation supporting strategic priorities

# Oversight, Transparency & Proportionality



Publication thresholds; annual reporting; 10-year record-keeping obligations



Necessity, appropriateness, proportionality - core tests to limit distortions



Goal: preserve internal-market discipline while enabling rapid, targeted intervention

# Use of State Aid Frameworks: Poland and Hungary

## Temporary Crisis Framework (TCF)

- Poland: ~€4–5 bn – gas market (€3 bn), energy-intensive users (€1.1 bn)
- Hungary: targeted schemes (hundreds of €m) – energy-intensive sectors, SMEs

2022–2023

2023–2025

## Temporary Crisis and Transition Framework (TCTF)

- Poland: €1.2 bn energy-cost mitigation + transition-oriented measures
- Hungary: limited but targeted support for energy efficiency and renewables



# What is the Clean Industrial Deal (CID)?

Strategic policy framework (2025)

Clean energy, industrial decarbonisation, clean-tech

CISAF as the State aid pillar

# From TCF/TCTF to CISAF



Continuity rather  
than rupture

From crisis  
justification to  
strategic necessity

Same tools, new  
logic

# CISAF: Legal Architecture



Adopted: 25 June 2025



Applies until: 31  
December 2030



Legal basis: Article  
107(3)(c) TFEU



Effective 2025 –2030

# Five Pillars of CISAF



Clean energy rollout



Electricity cost support



Industrial decarbonisation



Clean-tech manufacturing

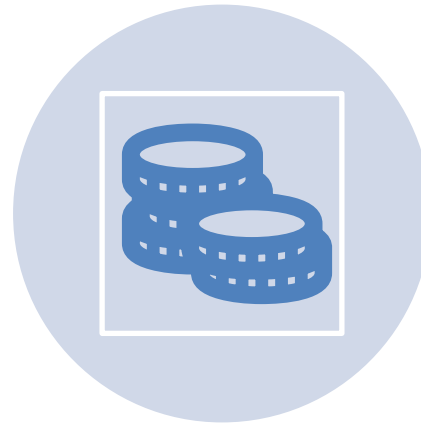


De-risking private investment

# What Is New?



STRUCTURED FUNDING-  
GAP ANALYSIS



LESS SHORT-TERM  
COMPENSATION



CLEAR INDUSTRIAL POLICY  
ORIENTATION

# Early CISAF Measures: Selected Member States

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Italy: multiple CISAF approvals (manufacturing capacity, cleantech investments)

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Spain: framework for strengthening clean technology value chains (IDAE)

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Austria: CISAF Twin Transition Support Programme

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France: offshore wind support aligned with CISAF objectives

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As of now, neither Poland nor Hungary has notified measures under CISAF

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# Implications for State Aid Control

- Normalisation of interventionism
- Commission as policy enabler
- Higher analytical requirements



# Risks and Open Questions



INTERNAL MARKET  
FRAGMENTATION



FISCAL ASYMMETRIES



POST-2030 RECALIBRATION



# Future of State Aid and the Green Transition



STRONGER FOCUS ON GREEN  
TRANSITION AND NEW TECHNOLOGIES



CISAF ADJUSTMENTS DEPENDING ON  
GLOBAL SUBSIDY DEVELOPMENTS



Questions?

# Thank you!

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