EuLA Feedback on the Commission's Public Consultation on the European Grids Package

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EuLA, the European Lime Association, represents European non-captive lime production through its 24 covered Member States (companies & national associations). Lime is one of the essential building blocks of modern industry. It is used in many essential processes, such as making construction buildings, producing iron and steel, treating contaminated land, purifying drinking water, making sugar and even cleaning gases from powers stations. Lime and its derivatives are also important additives for making paper, glass, and agricultural products.

The European Lime Association (EuLA) welcomes the opportunity to contribute to the development of the EU Grids Package. Reliable and affordable energy infrastructure is essential for the lime sector's viability while achieving decarbonisation goals. As outlined in EuLA's pathway to net-zero roadmap, achieving climate neutrality will require tenfold increase in our electricity consumption, driven primarily by the need for carbon capture technologies.[1] Without timely and affordable access to clean electricity and CO_2 transport and storage infrastructure, our transition will not be feasible. To fully realise this potential, structural and meaningful engagement with EIIs like ours must be embedded in the design and implementation of the Grids Package. The Grids Package is an opportunity to ensure that infrastructure development aligns with industrial decarbonisation pathways and the EU's climate objectives.

1. CO_2 Infrastructure as a Priority for Hard-to-Abate Industries

For lime and similar process industries, CO_2 transport and storage infrastructure is not optional, it is existential**. Unlike many sectors, lime process emissions (69% of total emissions) cannot be eliminated by fuel switching alone.** Dedicated CO_2 transport pipelines and shared storage hubs are therefore critical to achieving net-zero and even carbon-negative lime production. This means that CO_2 networks should be planned alongside electricity and hydrogen networks to capture synergies, reduce costs, and prevent infrastructure lock-in. Delays in CO_2 infrastructure risk delaying industrial CCS investment decisions, increasing costs, and jeopardising the EU's climate neutrality target.

By 2030, our customers will require low-carbon lime to decarbonise their products and operations, significantly reducing their Scope 3 emissions. Fair and regulated access to CO_2 transport infrastructure is essential. All producers, regardless of size, must have equal access, supported by adequate network capacity and geographic coverage. This should be coupled with

[1] EuLA, A Pathway of Negative Emissions by 2050, 2023

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a standardised tariff (e.g., €/tCO_2 transported) to ensure long-term economic predictability and accommodate production and transport volume fluctuations.

EuLA calls for the Grids Package to:

- Treat CO_2 infrastructure as core trans-European energy infrastructure on a par with electricity and hydrogen.
- Member States should map industrial CO_2 capture needs and integrate them into their network development plans.
- Extend fast-track permitting to CO_2 transport and storage projects

2. Support Integrated and Technology-Neutral Planning

The development of infrastructure for electricity, hydrogen, and CO_2 must follow an integrated, technology-neutral approach. This requires effective coordination between public authorities, system operators, and private sector actors to ensure that infrastructure corridors (e.g., electricity lines, hydrogen and CO_2 pipelines) are planned and used efficiently. The lime industry requires both access to clean electricity and CO_2 transport and storage to enable net-zero and even carbon-negative solutions.

3. Grid Readiness for Long-Term Contracts (PPAs) and CCfDs

Industrial decarbonisation relies not only on physical infrastructure but also on predictable, affordable access to low-carbon electricity. For instance:

- **PPAs:** Long-term renewable PPAs require stable grid connections and cross-border transmission rights. The Grids Package should support a European PPA market by facilitating long-term transmission rights and ensuring clear visibility of connection timelines.
- **CCfDs:** Effectiveness of CCfDs depend on timely availability of electricity and CO_2 infrastructure. While grid development itself is best supported through dedicated financing instruments, the Grids Package should ensure that industrial users relying on CCfDs can access the infrastructure they need when they need it.

The Grids Package should therefore recognise that long-term energy contracts depend on infrastructure availability and incorporate industrial stakeholders in grid and CO_2 network planning.

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4. Improve Permitting and De-risk Infrastructure

Lengthy permitting delays and investment uncertainty are key bottlenecks. EuLA supports the extension of fast-track permitting procedures and calls for targeted EU risk-sharing instruments, including guarantees and predictable revenue frameworks, to enable investments in industrial decarbonisation infrastructure.

Conclusion

A successful European Grids Package must serve as a cornerstone for industrial decarbonisation and competitiveness. For the lime industry, the transition to carbon neutrality is not just a matter of ambition but of infrastructure, as we will need up to ten times more electricity compared to today, alongside access to CO_2 transport and storage networks. We look forward to working with policymakers to ensure that industries like lime are supported in the transition to climate neutrality.

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