

Innovation Funding Agency Business Finland



## **RRF - BATTERY INDUSTRY**

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#### 1. Background of the funding call

The electrification of society and solutions made in the battery industry have a significant impact on how climate change goals can be achieved. Finnish industries can adopt a major role in the electrification of European transport and society at large. Companies operating in Finland offer raw materials and other materials, technologies, processes, expertise and circular economy solutions for the production of batteries and the electrification of society.

Business Finland's funding call is intended for piloting, demonstration and investment projects in the battery industry. Investments in the battery value chain support the EU-level transition to low-emission transport. The goal of the funding call is to advance piloting, demonstrations and investments in the battery value chain and the recycling of battery materials in Finland. The aim is to seek significant new production solutions that support the green transition to improve the competitiveness of Finland's battery industry, especially in battery materials, battery manufacturing, reuse and recycling. Furthermore, projects support increases in business operations and employment in Finland, and also internationally. From the perspective of environmental impact, increases in reuse and recycling lower the pressure to use virgin materials, which slows nature loss and reduces CO2 emissions indirectly.

Projects will partly be funded from the EU's Recovery and Resilience Facility (RRF) in accordance with the Sustainable Growth Programme for Finland<sup>1</sup>. A total of EUR 70 million in funding has been planned for the funding call (EUR 50 million in 2021 and EUR 20 million in 2022). The deadline for piloting, demonstration and investment projects in the battery value chain is November 30th 2021. The deadline for investment projects for the reuse and recycling of battery materials (RRF) is March 31st 2022.

\* A battery is an electrochemical energy storage consisting of an electrical pair formed by two electrodes, an anode and a cathode. Between the electrodes is an electrolyte, which is often a substance in liquid or gel form. An electrolyte is a medium that carries ions between electrodes.

#### 2. Purpose and scope of the funding call

Summary of funding call principles:

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<sup>&</sup>lt;sup>1</sup> https://vm.fi/en/sustainable-growth-programme-for-finland



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### Who can apply?

- Companies registered in Finland.
- The company must have the financial capability to cover the self-financing share of the investment and for continuous economic business operations.
- Piloting, demonstration and investment projects carried out in Finland.
- Projects that have a significant impact on business and employment.

# What can be funded?

- The value chain, ranging from battery chemicals to battery cells, not including raw materials, battery applications or charging systems.
- Investment projects for the reuse and recycling of battery materials (RRF, EUR 30 million).
- Piloting and demonstration projects in the battery value chain and investment projects at a level exceeding the EU's environmental protection standards or at a level exceeding the sector's technological development level (national funding, EUR 40 million). \*

### **Funding**

- Investment aid can be applied for when the application to be funded is used in commercial production. Maximum aid levels:
- •SMEs: 45%\*
- Large companies, including midcap: 35%\*
- Piloting and demonstration projects can be funded through R&D funding, exceptionally also using grants. The level of support is 25%, regardless of the company size.
- R&D and investment projects require a separate application.
- \* Note: Regarding investment projects, only additional investment costs arising from solutions exceeding the EU's standards or the sector's technological development level are eligible for support.

Funding will be channeled and tendered through Business Finland on the basis of funding calls, using the Government Decree (1197/2020) entered into force at the beginning of 2021, based on which Business Finland can grant aid for investment projects that advance the circular economy and green growth. The support requires that investments lead to better or more effective environmental protection measures or recycling or reuse activities than conventional reuse and recycling processes of a similar capacity. Investments must represent the latest technology in the sector. In addition, funding can be provided using the Government decree on funding for research, development and innovation activities (1444/2014), based on which aid can also be granted for piloting and demonstration projects through this funding call. Regarding the applications assessed through this funding call, Business Finland may also take into account the applications received for the investment aid for the circular economy call that ended on 16 April 2021 when the applications potentially meet the criteria set for this funding call and succeeded well in the comparison for the spring funding call. Business Finland will notify the applicants separately of the aforementioned procedure, and the applicants must be prepared to provide necessary additional information concerning this funding call.

Funding has been allocated to the funding call as follows:

- 1) Investment projects for the reuse and recycling of battery materials (RRF funding, EUR 30 million)\*
- 2) Piloting and demonstration projects and investment projects in the battery value chain at a level exceeding the EU's environmental protection standards or at a level exceeding the sector's technological development level (national funding, totaling EUR 40 million). \*
- \* Note: Regarding investment projects, only additional investment costs arising from solutions exceeding the EU's standards or the sector's technological development level are eligible for support.

The funding does not burden the de minimis aid for companies or the Commission's temporary support program of EUR 1.8 million.



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# 2.1. Investment projects for the reuse and recycling of battery materials (Recovery and Resilience Facility, RRF)

Funding granted for investment projects for reuse and recycling is part of funding provided from RRF.

According to Sustainable Growth Programme for Finland, Finland is aiming to become a global leader in the hydrogen and circular economy, bioproducts with high added value, zero-emission energy systems and other climate and environmental solutions, in addition to improving energy efficiency and accelerating the transition to fossil-free transport and heating.

The investment support accelerates the reuse and recycling of battery materials. The funding will be allocated to commercial facility investments, the deployment of new technologies in existing processes, and digital platforms and service investments that advance reuse and recycling. In a battery ecosystem based on the principles of the circular economy, any waste material generated in the production process, alongside materials from decommissioned batteries, are returned to the material flow of battery manufacturing. The recycling of battery materials and batteries calls for investments in mechanical heat-based and chemical recycling plants.

The support requires that investments lead to better or more effective environmental protection measures or recycling or reuse activities than conventional reuse and recycling processes of a similar capacity. Investments must represent the latest technology in the sector.

Criteria for projects funded from RRF are presented in Section 3.3. The funding provided for investment projects is described in more detail in Section 3.2.

#### 2.2. Projects in the battery value chain (national funding)

National funding allocated to the funding call can be granted for piloting and demonstration projects in the battery value chain, innovative investment projects at a level exceeding the EU's environmental protection standards, and reuse and recycling investment projects at a level exceeding the sector's technological development level. Regarding investment projects, only additional investment costs arising from solutions exceeding the EU's standards or the sector's technological development level are eligible for support. The funding call for the battery industry is allocated to the value chain, ranging from battery chemicals to battery cells, not including raw materials, battery applications or charging systems. Funding for piloting and demonstration projects is described in more detail in Section 3.1 and funding for investment projects in Section 3.2.

#### 3. Funding principles and selection criteria

#### 3.1. R&D funding for piloting and demonstration projects

Business Finland's R&D funding can be used for piloting the functioning of an innovative solution with customers on a sufficiently large scale and for receiving feedback for development activities. Piloting may include:

- Testing an innovative product, production method, process or technology at a production plant, for example.
- Developing and testing an innovative operating model or system in its actual operating environment,
   e.g. in the operations of customer companies.
- Developing an innovative service and ensuring its effectiveness in the customer's operating environment and processes.

In this funding call for the battery industry, piloting and demonstration projects, as well as the research and development activities possibly required for them, can exceptionally be funded in the form of grant. The amount of grant can be up to 25% of the project's total costs, regardless of the size of the company.



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Alternatively, Business Finland's normal piloting loan can be applied for piloting and demonstration projects, with the amount of loan typically being 50% of the project's total costs (link: loan pages). Piloting and demonstration projects related to the funding call for the battery industry can be funded within the scope of national funding allocated to the funding call.

The maximum amount of funding granted is EUR 15 million per company and project, provided that more than half of the project's costs eligible for funding arise from activities included in the category of experimental development.

- The funding will be paid to cover the actual costs of a piloting or demonstration project on the basis of interim and final reports and accounts.
- No advance will be paid.

More information about the selection of project types is presented in Section 3.4.

Business Finland will assess the projects to be funded in accordance with its regular funding criteria: <a href="https://www.businessfinland.fi/en/for-finnish-customers/services/funding.">https://www.businessfinland.fi/en/for-finnish-customers/services/funding.</a>

Business Finland's general funding terms and conditions of companies' research and development projects apply to funding granted for piloting and demonstration projects.

https://www.businessfinland.fi/4b1263/globalassets/finnish-customers/01-funding/08-guidelines-terms/funding-terms/yritysten tutkimus- ja kehitystoiminnan rahoituksen ehdot.pdf

#### 3.1.1 Acceptable costs in piloting and demonstration projects

The content and goals of the project determine which project costs can be accepted. Costs can be accepted earliest starting from the day on which an application was submitted to Business Finland.

In piloting and demonstration projects, acceptable cost types include:

- Salaries and wages
- Indirect personnel costs (at most 50% of salaries and wages allocated to the project)
- Overheads

1–19 people: 20%
20–49 people: 30%
50 people or more: 50%

- Travel expenses
- Costs of materials and supplies
- Machinery / Equipment costs
- Equipment depreciation/rental costs
- Purchased services

Costs of piloting and demonstration projects may include

- facility design costs
- costs of R&D activities related to the piloting or demonstration project
- costs of materials and supplies
- Leases or depreciation costs for land, buildings and machinery and equipment during the project
- operating costs during piloting
- productization services

In piloting and demonstration projects, operating costs during piloting can be accepted during the period required to indicate the effectiveness of the results of R&D activities.



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In piloting and demonstration projects of large companies (including midcap companies), at least 15% of project costs must be used to purchase services from SMEs or research organizations, or the project must be carried out as a truly joint project with SMEs and research groups.

If, during the project or immediately after it has ended, the beneficiary receives income obtained through costs reported to Business Finland, it must report such income to the Funder without delay and no later than in the final report. Income may be generated through the sale of a prototype, presentation project or the results of test production, for example. If such income is substantial, the Funder has the right not to accept the costs allocated to commercial operations or deduct the income from the costs.

#### 3.2. Funding for investment projects for the circular economy and sustainable green growth

The investment aid for the circular economy is intended for investment projects related to climate change mitigation and other environmental protection to promote the circular economy and sustainable green growth. Funding is granted on the basis of Government decree 1197/2020. The aid can be granted for investments of companies that operate in Finland and invest in new operating and production methods for green growth. Funding can be granted for investments that raise the level of environmental protection above the EU's standards or increase the reuse and recycling of waste using solutions that exceed the current technological development level in the sector.

Funding can be applied for in the form of investment aid if the application to be funded is used in commercial production and the applicant is the user of the investment. If the application to be funded is used in R&D activities after the project, for example, the project is not eligible for funding using investment aid. More information about the selection of project types is presented in Section 3.4.

In investment projects, only additional investment costs arising from solutions exceeding the EU's standards or the sector's technological development level are eligible for support. Maximum support levels for **additional** investment costs **eligible for support**:

- SMEs: 45%
- Large companies (including midcap): 35%

Costs eligible for support will be determined, if required, by comparing the costs of the proposed investment with the costs of an alternative solution at the level of the EU's standards or the sector's general development level, unless the additional costs eligible for support can be identified separate from total investment costs.

Individual aid granted can be at most EUR 15 million for a single company and project.

- Funding will be paid to cover the actual costs of an investment project on the basis of interim and final reports and accounts.
- No advance will be paid.

The general funding terms and conditions of Business Finland's investment aid for the circular economy apply to funding granted for investment projects.

https://www.businessfinland.fi/4907d9/globalassets/finnish-customers/01-funding/08-guidelines-terms/funding-terms/kiertotalouden investointiavustuksen ehdot.pdf



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The content and goals of the project determine which project costs can be accepted. Costs can be accepted earliest starting from the day on which an application was submitted to Business Finland.

Funding can be used for work carried out during the project due to:

- the procurement and installation of machinery or equipment
- the procurement of intangible rights
- The purchase of materials or supplies necessary for the construction, renovation or extension of a building or structure, or the purchase or design of equipment closely related to these, or the payment of salaries
- The design, construction or purchase of equipment for computer networks or other similar networks, or the acquisition of rights of use that are necessary for the construction or operation of networks
- The implementation of an investment or the necessary training of the operating personnel

Unlike in the terms and conditions of R&D funding, only the costs arising from the commissioning of the investment are accepted in the investment aid, not costs arising during the use of the investment.

#### FUNDING CANNOT BE USED FOR THE FOLLOWING:

- investments started before submitting an application
- costs arising from the design of the investment and the preparation of an application before submitting the application
- investments that do not improve the level of environmental protection (compared to the EU's standards, if such exist) or do not exceed the technological development level in the sector
- investments that are carried out to ensure that the company complies with the EU's approved standards or standards that have not yet entered into force (with the exception of the purchase/retrofitting of new transport equipment if the purchase was made before the date of entry into force of EU)
- waste recovery activities other than reuse and recycling
- investments that only increase demand for recycled materials, without also increasing the collection of materials
- mandatory business costs obligated by the EU law or normal operation costs

Costs can be accepted for a product over a period, during which the equipment and services in question are used in the project, insofar as they are directly associated with the investment project. Eligible costs include:

- Salaries and wages
- Indirect personnel costs
- External purchased services
- Materials and supplies
- Equipment purchases

Any costs arising from the auditor's report to be submitted with the final project report can also be accepted as purchased services. Only reasonable costs necessary for the project are acceptable.

If the beneficiary is liable to pay VAT, the VAT related to the costs is not an acceptable cost.

In cases where an investment project is funded by leasing, sub-payment or similar means, costs up to the purchase price of the acquisition may be accepted. Operating lease costs are not accepted – assets must be transferred to the ownership of the funding recipient at the end of the funding lease period.



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Eligible costs do not include, for example, the general expenses and travel costs of the recipient of the funding, the costs of sales and marketing, the costs of normal operations, banking and financial costs, or the costs of drawing up contracts.

Funding will be paid to cover the actual costs of an investment project on the basis of interim and final reports and accounts.

If, during the project or immediately after its conclusion, the beneficiary receives income generated by project costs declared to Business Finland, the beneficiary must report the income to the Funder immediately and no later than in the final report. Such income may be generated when the investment is deployed, for example.

#### 3.3. Special criteria for RRF funding

In funding decisions, Finland complies with all valid state subsidy regulations and guidelines, and addresses DNSH technical guidance C(2021) 1054 final. With regard to projects within the scope of the EU Emissions Trading System (ETS), estimated greenhouse gas emissions must be below the reference value that has been defined as a benchmark value<sup>2</sup> for free allocation in Commission Implementation Regulation (EU) 2021/447. Funding will not be granted for projects that promote the use of fossil fuels<sup>3</sup>, activities related to waste landfills, incinerators<sup>4</sup> and mechanical biological treatment plants<sup>5</sup>; and activities where the long-term disposal of waste may cause harm to the environment.

Projects must fulfill relevant and binding environmental regulations valid in the EU and at a national level. The projects to be funded must fulfill the selection and eligibility criteria set out in DNSH technical guidance 2021/C58/01 and the criteria set for the fulfillment of the 100% climate change objective presented in intervention field 045a/045bis in Annex VI to Regulation (EU) 2021/241 on establishing the Recovery and Resilience Facility.

The DNSH criteria are presented in Appendix 1.

Investment P1C2I3 (reuse and recycling of central materials and industrial side streams) is within the scope of support in accordance with the intervention field of the use of recycled materials as raw materials compliant with the efficiency criteria (045a/045bis), which fully promotes the climate change objective. The investments to be funded must enable the utilization of the waste flow or side stream in question as new raw material by at least 50% with regard to weight so as to fulfill the EU's climate and environmental criteria set for funding.

<sup>&</sup>lt;sup>2</sup> Where the activity supported achieves projected greenhouse gas emissions that are not significantly lower than the relevant benchmarks an explanation of the reasons why this is not possible should be provided. Benchmarks established for free allocation for activities falling within the scope of the Emission Trading System, as set out in the Commission Implementing Regulation (EU) 2021/447.

<sup>&</sup>lt;sup>3</sup> Except projects under this measure in power and/or heat generation, as well as related transmission and distribution infrastructure, using natural gas, that are compliant with the conditions set out in Annex III of the "Do no significant harm" Technical Guidance (2021/C58/01).

<sup>&</sup>lt;sup>4</sup> This exclusion does not apply to actions under this measure in plants exclusively dedicated to treating non-recyclable hazardous waste, and to existing plants, where the actions under this measure are for the purpose of increasing energy efficiency, capturing exhaust gases for storage or use or recovering materials from incineration ashes, provided such actions under this measure do not result in an increase of the plants' waste processing capacity or in an extension of the lifetime of the plants; for which evidence is provided at plant level.

<sup>&</sup>lt;sup>5</sup> This exclusion does not apply to actions under this measure in existing mechanical biological treatment plants, where the actions under this measure are for the purpose of increasing energy efficiency or retrofitting to recycling operations of separated waste to compost bio-waste and anaerobic digestion of bio-waste, provided such actions under this measure do not result in an increase of the plants waste processing capacity or in an extension of the lifetime of the plant, for which evidence is provided at the plant level.



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Projects funded through RRF must primarily be completed no later than in December 2025.

Funding for investment projects for reuse and recycling is described in Section 3.2.

#### 3.4. Instructions for selecting the project type

If the customer's project scope includes content similar to piloting and demonstrations (3.1) and investments (3.2) related to separate solutions, these must be defined in separate funding applications. Through the funding call, the development of a single solution cannot be funded in the form of a piloting and demonstration project and an investment project. Instead, either a piloting and demonstration project or an investment project must be selected, depending on the solution's development rate and purpose.

Investment aid (3.2) is intended for the procurement of new solutions used in commercial production. A piloting project covers R&D activities carried out on a smaller non-production scale, with the piloting plant not being intended for commercial production. A demonstration project covers R&D activities carried out in an actual operating environment, in which the effectiveness of a process/method is tested, and the testing cannot typically be carried out on a smaller scale. In a demonstration project, the risks of success are always significantly higher than in an investment project, because the effectiveness of the process/method has never before been tested at a sufficiently large scale, and there is, therefore, no certainty over its effectiveness. The content of piloting and demonstration projects must be similar to R&D activities and, in these projects, the beneficiary always bears the risk of the effectiveness of the solution.

- Example: 1: Company A is developing a solution and aims to sell it to others. For testing the solution, company A builds a small-scale piloting plant. This is company A's piloting project (R&D). After the project, the piloting plant may remain with company A for R&D and presentation activities, or it may be sold\* if it proves to be effective.
- Example: 2: Company A is developing a solution and aims to sell it to others. Company B is interested in providing its production process for company A's development activities so that company A can test the effectiveness of its solution. This is company A's demonstration project (R&D). Company B may purchase\* the demonstrated solution after its effectiveness has been proven. Company A bears the risk of developing the solution and proving its effectiveness.
- Example: 3: Company A has been developing a solution and aims to sell it to others. Development has already proceeded so far that company B is willing to purchase the solution. This is company B's investment project.
- Example: 4: Company C is independently developing a solution, which it will also introduce in its production process. This is company C's demonstration project (R&D) if the project involves a clear risk of failure and includes work similar to R&D activities. If development risks are small and it is fairly probable that the solution works, this is company C's investment project.
  - \* If, during the project or immediately after it has ended, the beneficiary receives income obtained through costs reported to Business Finland, it must report such income to the Funder without delay and no later than in the final report. Income may be generated through the sale of a prototype, presentation project or the results of test production, for example. The income must be monitored as long as the acquisition cost is on the beneficiary's balance sheet. If such income is substantial, the Funder has the right not to accept the costs allocated to commercial operations or deduct the income from the costs.

#### 3.5. General selection criteria for all applications

Funding cannot be granted in the following situations:

- The company operates in agricultural primary production or fishing and aquaculture (including the further processing and trade of fish and aquaculture products).
- The company is not registered in the Finnish preliminary tax withholding register.



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- The company has a tax liability, for which no valid payment plan exists.
- The company has significant payment defaults.
- The company has debts in enforcement proceedings, for which no valid payment plan exists.
- The company has unmet obligations related to previous Tekes/Business Finland loans.
- The company does not meet the requirements for continuous profitable business operations
- On 31 December 2019, the company was in a situation that meets the definition of a company in difficulty. However, financing may be granted to companies that were not in difficulty between 31 December 2019 but became companies in difficulty between 1 January 2020 and 30 June 2021.

Granting the investment aid is not appropriate if aid can already be obtained from another support program. Funding can only be granted for companies that operate in Mainland Finland.

Funding from Business Finland is always discretionary. The funding decision will be made in accordance with the selection criteria defined in the funding call and Business Finland's normal funding criteria. Business Finland will consider the project's impact on business, RDI increases in Finland, networks, the green transition, as well as the added value provided by funding from Business Finland and other impact. Business Finland will assess the credibility and feasibility of the information provided by the applicants. In assessing applications, Business Finland may also use information other than that provided by the applicants, in addition to its views on the feasibility and time horizon of the information, any risks involved and other aspects related to the desired impact.

#### 3.6. Other public funding

During reporting, other public funding (granted by the Government, municipality or other public organization, institution or foundation) must also be reported. In addition, funding granted from the EU's resources must be reported. The proportion of funding obtained from Business Finland or other public funding must not exceed the maximum amount of public funding permitted for the project. If necessary, Business Finland will reduce its funding so that the maximum amount is not exceeded.

#### 4. Applying for funding

The funding application must be submitted in Business Finland's online services. Funding for piloting and demonstration projects must be applied by using *research, development and piloting application*. Funding for investment projects must be applied for using the application for *investment aid for circular economy*. All applications are confidential. A project plan and a public description of the project must be attached with the application. Also be prepared to respond to questions related to the DNSH assessment for RRF funding. Under the RRF section in the application, select the **RRF** – **Akkuteollisuus** application identifier.

After the funding decision has been made, the name of the beneficiary will be published, along with the amount of funding and the public description of the project. Projects to be funded will be attached to the Smart Mobility and Batteries from Finland program.

#### 4.1. Applying for funding for piloting and demonstration projects

In your application, describe the current state of your company's business activities, your personnel and resources, your future growth vision, the work to be carried out during the project, and your project's goals and costs.

A project plan must be attached with the application. The project plan must also include what kind of environment-related procedures may be required for the implementation of the project (eg. environmental or



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water permit, EIA, Natura assessment, exemption under the Nature Conservation Act) and the scheduling of these processes.

For making its decision, Business Finland may also request other additional information as required.

#### 4.2. Applying for investment aid

If an application concerns investment aid for the circular economy, the funding application must present the solution that exceeds the relevant standards. The description must indicate what EU standards the investment exceeds and present a solution of a similar capacity in line with the EU's standards or the sector's technological development level. Attach a description of the project's circular economy, climate, innovation and environmental impacts with the application. In addition, describe what you would do in a situation in which no funding is granted. Also describe what impact the investment has on the investor's business and the number of jobs, and what indirect impact the investment may have on the business activities of others.

The mandatory project plan project plan to be attached with the funding application must present benchmarking calculations of the costs of the investment in question and a similar investment for determining the proportion eligible for support, unless the costs of an additional proportion eligible for support can be identified separate from the total investment.

A profitability calculation for the investment in question (with and without support) and, if required, for a comparable investment in line with the EU's standards or the sector's technological development level must also be presented in the project plan. The project plan must also include what kind of environment-related procedures may be required for the implementation of the project (eg. environmental or water permit, EIA, Natura assessment, exemption under the Nature Conservation Act) and the scheduling of these processes. For making its decision, Business Finland may also request other additional information as required.

#### 5. Application schedule

- 1. An info session will be held on 29.6.2021 at 2–3 pm.
- 2. The call starts on August 23th 2021.
- 3. Applicants are advised to contact Business Finland well before submitting their application.
- 4. If an applicant wants to have their application processed during 2021, they must submit their application no later than on 30 September 2021.
- 5. The deadline for piloting, demonstration and investment projects in the battery value chain is November 30th 2021. The deadline for investment projects for the reuse and recycling of battery materials (RRF) is March 31st 2022.



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# APPENDIX I: More information about the Do No Significant Harm (DNSH) requirement

Each project funded through the Sustainable Growth Program for Finland must meet the DNSH requirements. The EU Recovery and Resilience Facility (RRF) requires that no measures should cause significant harm to the environment. Economic activities are considered to cause significant harm to the following:

- a) climate change mitigation,
  - where that activity leads to significant greenhouse gas emissions;
- b) climate change adaptation,
  - where that activity leads to an increased adverse impact of the current climate and the expected future climate, on the activity itself or on people, nature or assets;
- c) the sustainable use and protection of water and marine resources, where that activity is detrimental
  - to the good status or the good ecological potential of bodies of water, including surface water and groundwater; or
  - to the good environmental status of marine waters;
- d) the circular economy, including waste prevention and recycling, where
  - that activity leads to significant inefficiencies in the use of materials or in the direct or indirect use of natural resources such as non-renewable energy sources, raw materials, water and land at one or more stages of the life cycle of products, including in terms of durability, reparability, upgradability, reusability or recyclability of products;
  - that activity leads to a significant increase in the generation, incineration or disposal of waste, with the exception of the incineration of non-recyclable hazardous waste; or
  - the long-term disposal of waste may cause significant and long-term harm to the environment;
- e) pollution prevention and control,
  - where that activity leads to a significant increase in the emissions of pollutants into the air, water or land, as compared with the situation before the activity started; or
- f) the protection and restoration of biodiversity and ecosystems, where that activity is
  - significantly detrimental to the good condition and resilience of ecosystems; or
  - detrimental to the conservation status of habitats and species, including those of Union interest.

Examples of how to complete DNSH forms are available in this document (p. 10 ->): https://data.consilium.europa.eu/doc/document/ST-6179-2021-ADD-1/en/pdf

The extensive DNSH pre-assessments prepared during the preparation of the Sustainable Growth Programme for Finland are available in Appendix 3 to the Sustainable Growth Programme for Finland (<a href="https://julkaisut.valtioneuvosto.fi/handle/10024/163176">https://julkaisut.valtioneuvosto.fi/handle/10024/163176</a>) (especially the chapter on investments that promote the reuse and recycling of central materials and industrial side streams, pp. 443–445).