



Opinion of the European Economic and Social Committee

Proposal for a Regulation of the European Parliament and of the Council establishing a framework of measures for the acceleration of industrial capacity and decarbonisation in strategic sectors and amending Regulations (EU) 2018/1724, (EU) 2024/1735 and (EU) 2024/3110

COM(2026) 100 final – 2026/0068 (COD)

(C/2026/5099)

Rapporteur: **Konstantinos DIAMANTOUROS**

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Legislative procedure	EU Law Tracker
Referral	European Parliament, 24.3.2026 Council of the European Union, 27.4.2026
Legal basis	Article 114 of the Treaty on the Functioning of the European Union
European Commission documents	COM(2026) 100 final – 2026/0068 (COD) Summary
Relevant Sustainable Development Goals (SDGs)	SDG – 8-9-11-12
Section responsible	Single Market, Production and Consumption
Adopted in section	2.7.2026
Adopted at plenary session	15.7.2026
Plenary session No	607
Outcome of vote (for/against/abstentions)	177/5/5

1. RECOMMENDATIONS

General comments

1.1. The European Economic and Social Committee (EESC) **welcomes the adoption of the Industrial Accelerator Act (IAA)** by the European Commission at a time when many industries are facing the pressures of declining competitiveness in Europe's economy, along with aggressive industrial strategies and economic coercion from certain third countries.

1.2. Given that the IAA introduces significant new elements into the EU acquis, the EESC welcomes the targeted approach followed and the fact that the IAA follows some of the key recommendations of the Draghi report.

1.3. The EESC supports the **European Commission's goal of increasing manufacturing's share of EU GDP to 20 % by 2035**. At the same time, it encourages the European Commission to include additional qualitative criteria to measure the quality of the industrial transformation, in particular, the reduction of fossil fuel use in industry, the electrification of industrial processes, the uptake of low-carbon and resource-efficient products in public procurement, progress towards climate neutrality and strategic autonomy and the contribution to employment.

1.4. The EESC believes that the proposal should clarify that its scope refers solely to road transport when referring to pure electric vehicles (PEV).

Acceleration areas

1.5. The EESC expresses an overall positive assessment of the measures proposed on **industrial permitting**, including mandatory digital permitting, single permit applications and access points, time limits and the designation of acceleration areas provided that these measures improve coordination and administrative efficiency while safeguarding environmental standards, public participation, access to justice and the quality of assessments.

1.6. The EESC stresses that accelerating procedures alone will be insufficient unless it is supported by improved access to energy infrastructure for electrification and closer coordination with national permitting requirements. The proposal should therefore also address the structural causes of permitting delays, including insufficient staffing and expert capacity in competent authorities, lack of financial resources, fragmented governance, insufficient upstream planning and the absence of standardised criteria and guidance. Particular attention should also be paid to large scale projects (e.g. exceeding EUR 1 billion), which are often subject to the longest permitting delays.

1.7. With regard to industrial manufacturing acceleration areas, the EESC points out that they will only add value if they lead to genuinely faster permitting and priority access, rather than merely mapping industrial areas.

1.8. The EESC believes that Natura 2000 sites and other sensitive nature areas should be designated as industrial manufacturing acceleration areas only in exceptional cases, and that further clarification is needed on Article 25.3 (b) which states that Member States should 'prioritise locations where the deployment of a specific sector or sectors of industrial manufacturing projects is not expected to have a significant environmental impact'.

1.9. Last but not least, the EESC stress that Member States should take into account regional disparities when designating acceleration areas to ensure that they do not lead to an increase in inequalities between regions.

Made in EU

1.10. Temporary nitrogen emissions continue to delay industrial decarbonisation projects. Under the Birds and Habitats Directives, Member States must limit nitrogen impacts on nature. Due to the additionality principle, emission reductions already required by law cannot be used to permit new projects. As a result, even projects that reduce overall nitrogen emissions may be blocked. The EESC therefore recommends extending the approach proposed in the Grids Package – exempting temporary construction-related emissions, within the appropriate assessment under the Birds and Habitats Directives, where these are demonstrably outweighed by long-term emission reductions accruing to the affected site – to industrial decarbonisation projects under the Industrial Accelerator Act.

1.11. The EESC agrees with the creation of a European preference for the technologies covered under the IAA. Any extension to other products (e.g. the building of ships and rail rolling stock) should be guided by transparent criteria and a comprehensive cost-benefit analysis that takes into account the entire European supply chain.

1.12. Importantly, the EESC considers that steel should benefit from the same approach as cement and aluminium and include both low carbon and 'Made in EU requirements.

1.13. The EESC notes that the definition of 'Made in EU' is broad, as it includes countries with which the EU has concluded a free trade agreement or customs union, as well as parties to the Agreement on Government Procurement. The EESC believes that the proposed extension of Union origin to third countries under Free Trade Agreements (FTA) or Government Procurement Agreements (GPA) participation does not ensure effective reciprocity or equivalent regulatory, environmental and cost conditions. Consequently, the IAA should incorporate explicit safeguards, subjecting any equivalence to Union origin to strict, verifiable conditions that guarantee effective reciprocity, compliance with EU standards, and protection of European value chains against distortive competition.

1.14. The EESC welcomes the fact that the methodologies for the development of a low-carbon criteria will be based on existing EU legislation, including the Construction Products Regulation and the Ecodesign for Sustainable Products (ESPR) framework. The methodology should be EU-harmonised, technologically fair, verifiable and simple, building on EU ETS data to minimise duplicative reporting, and should be introduced well in advance of application. Special attention should be paid to how indirect emissions are integrated into the methodology used to define low carbon criteria. In order to avoid creating distortion within the internal market and penalising facilities that operate in Member States whose energy mix is not yet fully decarbonised.

1.15. With regard to the possibility of derogating from public procurement requirements to buy low carbon and/or Made in EU products where the cost exceeds 25 %, the EESC believes that the proposal should clarify that this threshold applies to the cost of specific component concerned, rather than to the cost of the project as a whole.

1.16. The EESC believes that any addition or removal of trading partners from the list of IAA-eligible countries should be decided through the co-decision procedure, albeit with an accelerated process to allow the EU to react quickly to geopolitical changes.

1.17. The EESC recognises that, while public procurement has a role to play, it is not the only lever. Demand must also be driven by the private sector, and non-regulatory approaches should therefore be explored as a priority. This should take place alongside lead-market instruments such as contracts for difference, green public finance, sustainability criteria for private demand, and incentives that reward fossil-free, low-carbon, circular and resource-efficient products.

1.18. Should the IAA approach prove successful in boosting green production and consumption in Europe, the EESC would support examining an increase in the current threshold for steel, cement and aluminium.

1.19. Last but not least, the EESC suggests that public funds awarded to tenders falling under the scope of the IAA should be conditional on social criteria, provided these are developed and agreed by national social partners. These could include site retention and employment guarantees, qualification and training measures or respect for collective agreements.

1.20. The EESC supports the conditions applying to **foreign direct investment (FDI)**, for investments exceeding EUR 100 million in emerging sectors such as batteries, electric vehicles, photovoltaics and critical raw materials. Such conditions can ensure that investments contribute to EU value creation through technology transfer, local manufacturing and integration into European supply chains, while promoting decarbonisation, circularity, resource efficiency and high environmental and social standards. Nevertheless, it is concerned about the creation of additional bureaucracy and costs for economic operators, notably due to the existence of two overlapping FDI frameworks, namely the IAA and the FDI Screening Regulation.

1.21. The EESC regrets that the IAA pays insufficient attention at the workforce dimension and to the need for a highly qualified workforce to maintain and strengthen Europe's industrial manufacturing power and strategic autonomy. The IAA should therefore be aligned with and linked to other legislative proposals such as the Quality Jobs Roadmap and the forthcoming Quality Jobs Act. This alignment should ensure that industrial decarbonisation is accompanied by just transition measures, reskilling and upskilling, worker participation, quality employment and appropriate conditionalities attached to public support, as agreed by national social partners.

2. EXPLANATORY NOTES

Arguments in support of recommendation 1.1

2.1. The manufacturing sector's share of GDP has declined in recent decades, from 17,4 % in 2000 to its current level of 14,3 %.

Arguments in support of recommendation 1.4

2.2. The current wording of Article 3 paragraph 23 implies that battery-powered rolling stock, as well as fuel cell-powered trains, could potentially fall within the definition of PEV in this Regulation. For legal clarity, it is important to specify that 'PEV' refers to road vehicles only.

Arguments in support of recommendation 1.8

2.3. The current wording is overly vague and risks creating confusion and delays in project implementation.

Arguments in support of recommendation 1.9

2.4. Member States may choose to designate as 'acceleration areas' regions that already boast a rich industrial ecosystem, aggravating the inequality divide within regions that have less industrial activity.

Arguments in support of recommendation 1.10

2.5. European preference is not a 'one size fits all' approach and its suitability for different sectors should always be determined following a robust analysis. The European Commission explicitly identifies the building of ships and rail rolling stock as sectors that will be examined for inclusion in the IAA as part of its review.

Arguments in support of recommendation 1.11

2.6. The European Commission analysis identifies steel as a strategic upstream material with only a limited cost pass-through to downstream products.

Arguments in support of recommendation 1.12

2.7. The EESC acknowledges the need to respect the EU's trade commitments with third countries. As regards the need for reciprocal standards, the implementation of the Carbon Border Adjustment Mechanism (CBAM) should ensure that third country manufacturers bear the same carbon costs as EU / EEA / EFTA manufacturers. At the same, the EESC calls on the European Commission and Member States to make more effective use of existing trade defence instruments such as the Foreign Subsidies Regulation to ensure that legal entities from third countries participating in EU tenders under IAA rules do not distort the market. Last but not least, it is imperative to strictly enforce rules of origin to ensure that third countries not covered by the IAA cannot circumvent the rules through resource-shuffling via FTA countries.

Arguments in support of recommendation 1.15

2.8. The Act empowers the European Commission to propose a number of delegated and implementing acts, enabling the EU to respond swiftly to changing circumstances in its relations with trading partners. While the EESC understands the need for speed, it nevertheless considers that such fundamental changes to the law should be decided using the standard legislative procedure.

3. PROPOSED AMENDMENTS TO THE LEGISLATIVE PROPOSAL OF THE EUROPEAN COMMISSION

Amendment 1

linked to recommendation 1.4

Article 3 point (23)

Text proposed by the European Commission	EESC amendment
'pure electric vehicle' or 'PEV' means a vehicle equipped with a powertrain containing exclusively electric machines as propulsion energy converters and exclusively rechargeable electric energy storage systems as propulsion energy storage systems;	'pure electric vehicle' or 'PEV' means a road vehicle equipped with a powertrain containing exclusively electric machines as propulsion energy converters and exclusively rechargeable electric energy storage systems as propulsion energy storage systems;

Amendment 2

Linked to recommendations 1.8

Article 25 paragraph 3 point (c)

Text proposed by the European Commission	EESC amendment
When designating industrial manufacturing acceleration areas, Member States shall:	When designating industrial manufacturing acceleration areas, Member States shall:
(a) define a clear geographic scope for the acceleration area;	(a) define a clear geographic scope for the acceleration area;
(b) prioritise locations where the deployment of a specific sector or sectors of industrial manufacturing projects is not expected to have a significant environmental impact;	(b) prioritise locations where the deployment of a specific sector or sectors of industrial manufacturing projects is not expected to have a significant environmental impact;
(c) prioritise locations outside Natura 2000 sites and outside areas designated under national protection schemes for nature and biodiversity conservation, as well as other areas identified on the basis of sensitivity maps and outside protected areas as referred to in Article 6 of Directive 2000/60/EC;	(c) allocate Natura 2000 sites and areas designated under national protection schemes for nature and biodiversity conservation, as well as other areas identified on the basis of sensitivity maps and protected areas as referred to in Article 6 of Directive 2000/60/EC only in duly justified exceptional cases, where no suitable alternative locations are available and where full compliance with Directives 92/43/EEC and 2009/147/EC is ensured;
(d) take into account climate risks in the areas designated;	(d) take into account climate risks in the areas designated;
(e) prioritise artificial and built surfaces, industrial sites, and brownfield sites, as well as already identified strategic projects pursuant to other Union legislation.	(e) prioritise artificial and built surfaces, industrial sites, and brownfield sites, as well as already identified strategic projects pursuant to other Union legislation.

Amendment 3

linked to recommendation 1.9

Article 25 paragraph 4 new point (i)

Text proposed by the European Commission	EESC amendment
When designating industrial manufacturing acceleration areas, Member States shall take into account, as relevant, the following considerations:	When designating industrial manufacturing acceleration areas, Member States shall take into account, as relevant, the following considerations:
(a) the infrastructural needs of the acceleration area;	(a) the infrastructural needs of the acceleration area;
[...]	[...]
(h) relevant location-specific information made publicly available by industry, including corporate climate transition plans, related targets and actions, investment needs, and required enabling policy frameworks	(h) relevant location-specific information made publicly available by industry, including corporate climate transition plans, related targets and actions, investment needs, and required enabling policy frameworks;
	(i) <i>the effect on regional inequalities.</i>

Amendment 4

linked to recommendation 1.10

Article 29 second paragraph

Text proposed by the European Commission	EESC amendment
When carrying out its review, the Commission shall pay particular attention to the effectiveness of this Regulation and the persistence of the circumstances that have justified the adoption of this Regulation and to the necessity to introduce Union origin requirements for products from certain sectors critical to the Union's economic security, notably the building of ships and of rail rolling stock.	When carrying out its review, the Commission shall pay particular attention to the effectiveness of this Regulation and the persistence of the circumstances that have justified the adoption of this Regulation and to the necessity to introduce Union origin requirements for products from certain sectors critical to the Union's economic security, notably the building of ships and of rail rolling stock. <i>The Commission shall carry out a full impact assessment before extending the Regulation to other sectors, including rail rolling stock and ships.</i>

Amendment 5

linked to recommendation 1.11

ANNEX II

Text proposed by the European Commission	EESC amendment
Union origin requirements for <i>net-zero technologies</i>	<i>Low-carbon and</i> Union origin requirements for <i>energy-intensive industries</i>

Amendment 6

linked to recommendation 1.11

ANNEX II PART I paragraph 1

Text proposed by the European Commission	EESC amendment
Part I – Public procurement	Part I – Public procurement procedures
1. In accordance with Article 25a, for public procurement procedures published after the entry into force of this Regulation falling within the scope of Directives 2014/23/EU, 2014/24/EU or 2014/25/EU where contracts, works contracts or work concessions include the procurement of the following net-zero technologies, procurement documents shall include the requirements laid down below :	1. In the context of public procurement procedures launched on or after 1 January 2029 falling within the scope of Directives 2014/23/EU, 2014/24/EU or 2014/25/EU, where contracts, works contracts or work concessions include the procurement of products from energy-intensive industries, contracting authorities shall require the following minimum percentage shares :

Amendment 7

linked to recommendation 1.11

ANNEX II PART I paragraph 1 new point (a)

Text proposed by the European Commission	EESC amendment
	(a) Steel, and any product whose performance depends mainly on steel, intended for use in buildings, infrastructure and motor vehicles for civil purposes: at least 25 % of the total volume of steel used shall be low-carbon and of Union origin.

Amendment 8

linked to recommendation 1.11

ANNEX II PART III new point (a)

Text proposed by the European Commission	EESC amendment
	(a) For schemes established or updated on or after 1 January 2029 that benefit households or companies and that primarily aim to support the construction or renovation of buildings for residential and commercial purposes and infrastructure, NZIA technologies, wind energy projects (including onshore and offshore installations and associated infrastructure), and the lease and purchase of motor vehicles for civil purposes, Member States, regional or local authorities, bodies governed by public law or associations formed by one or more such authorities or one or more such bodies governed by public law, shall ensure that only beneficiaries that comply with the following minimum requirements are eligible.

Amendment 9

linked to recommendation 1.12

Article 8 new paragraph 3

Text proposed by the European Commission	EESC amendment
	3. To guarantee effective reciprocity, compliance with EU standards and the protection of European value chains against distortive competition, the European Commission and Member States shall: a) vigorously apply the Foreign Subsidies Regulation and Carbon Border Adjustment Mechanism; b) closely monitor attempts to circumvent Union requirements through resource shuffling by third countries not covered by the Regulation, through Union equivalent countries.

Amendment 10

linked to recommendation 1.14

Article 11 paragraph 3 point (c)

Text proposed by the European Commission	EESC amendment
their application would require a contracting authority or contracting entity to acquire goods, services or works having disproportionate costs or would result in technical incompatibility in their operation and maintenance. Estimated cost differences exceeding 25 %, based on objective and transparent data, may be presumed by contracting authorities and contracting entities to be disproportionate.	their application would require a contracting authority or contracting entity to acquire goods, services or works having disproportionate costs or would result in technical incompatibility in their operation and maintenance. Estimated cost differences exceeding 25 %, for products covered by the Regulation based on objective and transparent data, may be presumed by contracting authorities and contracting entities to be disproportionate.

Amendment 11

linked to recommendation 1.15

Article 8 point 2

Text proposed by the European Commission	EESC amendment
The Commission shall adopt delegated acts in accordance with Article 30 to exclude, in whole or in part, a third country from the scope of paragraph 1 based on any of the following criteria:	The Commission shall adopt legislative proposals in accordance with Article 30 to exclude, in whole or in part, a third country from the scope of paragraph 1 based on any of the following criteria:

Amendment 12

linked to recommendation 1.15

Article 8 new point 3

Text proposed by the European Commission	EESC amendment
	3. Where appropriate, the European Commission shall adopt the proposal through accelerated pathways and derogation procedures. In such circumstances, co-legislators shall examine the Commission proposal through a fast-track procedure.

Brussels, 15 July 2026.

The President
of the European Economic and Social Committee
Séamus BOLAND
