

## POSITION PAPER

# Position on the Industrial Accelerator Act (IAA)

1. September 2026

### Summary

Deutsche Bauchemie supports the European Commission's important objective of strengthening the competitiveness of Europe as an industrial location and counteracting the continuing de-industrialisation through investment, innovation and production. Achieving this objective, however, requires improved regulatory framework conditions, particularly through the reduction of bureaucracy, the simplification of existing rules and the consistent implementation of the omnibus approach.

The creation of lead markets for low-carbon products envisaged in the Industrial Accelerator Act can, in principle, make a contribution, provided that support measures remain the primary instrument. Any low-carbon requirements for concrete and mortar products should only be introduced following a detailed impact assessment under clearly defined conditions. Such requirements must be compatible with the Construction Products Regulation (CPR), should not extend beyond public procurement procedures and public support schemes, and must not impose any additional administrative burden, particularly for SMEs.

Deutsche Bauchemie takes a critical view of the possibility of establishing far-reaching demand-side requirements for chemical products and mixtures by means of delegated acts. Essential prerequisites for such measures are currently lacking, including harmonised rules on mass balance accounting and robust impact assessments, particularly with regard to the construction sector. Such fundamental industrial policy interventions should, where considered useful and necessary, be addressed within the framework of dedicated initiatives and on the basis of a comprehensive impact assessment.

### Strengthening industry, improving framework conditions, safeguarding competitiveness

Europe's ongoing de-industrialisation must be addressed consistently. The European Commission's efforts to strengthen Europe's industrial competitiveness through the Industrial Accelerator Act (IAA) and to actively advance the transition towards a climate-neutral economy are an important commitment to tackle this challenge.

For this transformation to succeed and for de-industrialisation to be reversed, European industry requires reliable and practicable framework conditions. These include, in particular, the simplification of existing legislation, the reduction of excessive administrative burdens, and the establishment of innovation-friendly framework conditions across the entire value chain. Accordingly, the objective of improving the regulatory framework through omnibus legislation must be pursued consistently.

**Measures to strengthen demand for low-carbon concrete and mortar of Union origin – assess their appropriateness and, if necessary, introduce them in a targeted manner without additional administrative burden**

The Industrial Accelerator Act aims to boost demand for products of Union origin and/or products that meet certain sustainability criteria – for example, low-carbon products.

The proposal focuses on introducing corresponding low-carbon and Union-origin requirements for concrete and mortar, thereby placing particular emphasis on cement.

As a general principle, it should be noted that the environmental performance of construction products can only be meaningfully assessed at the level of the construction works. Under both established practice and new regulatory requirements, the environmental performance of construction products is assessed not only against one, but against a multitude of environmental indicators.

For buildings, increasingly stringent requirements have been introduced under the Energy Performance of Buildings Directive, particularly with regard to the carbon footprint. These requirements should lead to increased demand for low-carbon products, especially in the context of public procurement. If the carbon footprint is also to be systematically addressed in infrastructure projects, corresponding objectives should be established at the level of the construction works rather than at product level, thereby stimulating demand.

The introduction of low-carbon requirements for concrete and mortar in the IAA at product level must not be at the expense of the technical performance, durability, or fitness for use of concrete and mortar systems. If such requirements are deemed necessary and appropriate, they should only be introduced under clearly defined conditions.

In particular, this requires a precise, meaningful, and proportionate definition of the scope, as well as the actual availability of low-carbon cements, cements of Union origin, and the corresponding raw materials. Any requirements introduced under the IAA must be aligned with the product-specific provisions of the existing EU regulatory framework, including the new Construction Products Regulation. For construction products covered by a harmonised technical specification under the CPR, requirements under the IAA should only be imposed where the relevant assessments and classifications are already provided for within that harmonised technical specification. Furthermore, it must be ensured that compliance with any potential Union-origin requirements along the value chain – particularly for small and medium-sized enterprises (SMEs) – can be demonstrated using existing data and without creating disproportionate additional administrative burdens.

**No extension of the scope to chemical products by means of delegated acts**

Through the IAA, the European Commission seeks to obtain far-reaching powers to stimulate and steer demand for chemical products and mixtures by introducing demand-side measures at Union level.

Such measures could potentially affect a large number of industrial value chains and downstream sectors. The European construction industry, in particular, continues to face persistently challenging economic conditions. Efforts to reduce construction costs and strengthen the sector's competitiveness must therefore not be jeopardised by additional regulatory demand-side requirements. On the contrary, any future measures must contribute to enhancing the competitiveness of the downstream sector.

The availability, technical feasibility, and market maturity of low-carbon and circular raw materials vary considerably across industries and applications. Horizontal, cross-sectorial requirements would fail to reflect

the realities of different industrial value chains and could adversely affect competitiveness, investment, and innovation capacity. Any such measures must be examined on a sector-by-sector basis and be clearly linked to existing sector-specific legislation, such as the Construction Products Regulation.

Moreover, key prerequisites for the practical implementation of potential demand-side requirements are currently lacking. In particular, there are no harmonised European rules on mass balance accounting, nor agreed methodologies for the attribution and verification of low-carbon and circular raw materials.

Interventions in complex industrial value chains, such as those in the construction sector, should therefore take place exclusively within the framework of a dedicated initiative and on the basis of robust impact assessments. Such assessments must take particular account of the following aspects:

- Impacts on competitiveness, innovation, and product costs;
- The availability and technical suitability of alternative raw materials;
- Effects on different value chains and industrial ecosystems;
- Interactions between intermediate products and end markets;
- The consideration of alternative policy instruments and measures.

Deutsche Bauchemie considers the Commission's proposal an important recognition of the strategic importance of the chemical industry. However, Deutsche Bauchemie takes a critical view of Article 16, which would empower the European Commission to establish far-reaching additional requirements for different industrial value chains, including the construction sector, through delegated acts. Such powers go far beyond the establishment of purely technical provisions. Fundamental policy decisions with potentially significant economic consequences should – where necessary – be addressed through a separate initiative supported by a comprehensive impact assessment.

#### **Deutsche Bauchemie recommends:**

- consistently pursuing efforts to reduce regulatory and administrative burdens;
- introducing the low-carbon and Union-origin requirements for concrete and mortar envisaged under the IAA in a targeted manner only where justified by a thorough needs analysis and comprehensive impact assessment, and in a manner that avoids any additional administrative burdens;
- as a general principle, prioritising requirements relating to environmental performance at the level of the construction works over product-level requirements within the construction sector;
- subjecting any potential demand-side requirements for chemical products to a comprehensive impact assessment covering the sectors concerned, particularly the construction sector, and addressing such requirements through dedicated initiatives;
- establishing harmonised European rules on mass balance accounting, attribution, and verification as a mandatory prerequisite for any future demand-side requirements;
- Ensuring that, in each case, the most suitable policy instruments are selected and that all measures remain proportionate, practicable, and supportive of competitiveness.

The transformation of industry and the reversal of de-industrialisation can only succeed if necessarily ambitious climate and environmental objectives are effectively reconciled with competitiveness, technological openness, and practical implementation conditions. **To enable European industry to deliver innovative and competitive solutions, it is essential to provide the appropriate framework conditions.**

**Deutsche Bauchemie e.V.**

Frankfurt, 1 September 2026

*For 78 years, Deutsche Bauchemie has represented the interests of its member companies and the German subsidiaries of foreign groups vis-à-vis the specialist public, policymakers, authorities, academia and the media. As a sector organisation, the industry association is affiliated with the German Chemical Industry Association (VCI). In 2025, its approximately 140 member companies generated revenue of EUR 4.52 billion in Germany with around 32,000 employees. The association is headquartered in Frankfurt and has its European office in Brussels.*