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EU public procurement rules – revision

Position of the EU Batch Hot Dip Galvanizing Industry

EGGA – Galvanizing Europe welcomes the Commission’s initiative to revise the public procurement directives, aiming to: give preference to European products, ensure added value within the EU, secure supply chains for key technologies and services, simplify procurement rules, and strengthen the role of public procurement as a driver of strategic investment.

To achieve these objectives, public procurement directives should: 1) avoid the application of the lowest-price award criterion; 2) strategically make the implementation of environmental requirements - particularly circular economy principles - as well as social and labour requirements mandatory, setting ambitious levels to ensure high environmental and social performance in line with the EU’s commitment to sustainable development. In particular, infrastructure and construction, including critical infrastructure, should always be procured strategically, with ambitious minimum requirements for durability and reusability to ensure long-lasting, circular solutions; 3) ensure that a defined share of the annual value of public procurement contracts is sourced from European-made products and services to guarantee baseline levels of EU industrial resilience; reward EU industrial resilience through the award of bonus points to products and services in all public procurement irrespective of this minimum share; 4) and simplify and harmonise public procurement rules across the EU, in particular to facilitate SME participation.

Batch galvanizing for a circular and resilient European steel industry

The batch galvanizing industry provides the most durable form of steel protection by zinc, by applying a thick, strongly bonded coating of zinc metal to approximately 8 million tonnes of steel products every year.

With a service life that can exceed 100 years, galvanized steel is widely used in infrastructure, including highway guardrails and railway steelwork, construction works, such as bridges, overpasses, ports, and quay walls, and vital net-zero technologies, notably electricity transmission towers and solar structures.

Batch galvanizing is generally performed locally, close to fabricated steel producers, supporting regional industrial ecosystems and reducing transport requirements.

Galvanized steel products are durable, robust and adaptable, avoiding premature replacement, reducing maintenance needs and facilitating reuse. When the reuse cycles come to an end, steel and zinc are recycled together in established steel recycling processes, ensuring high-value material recovery in a closed loop.

RECOMMENDATIONS

1. From the lowest-price criterion to the most economically advantageous tender

Using the lowest-price criterion in public procurement undermines the EU's objectives of environmental sustainability and social and labour responsibility, and unfairly favors non-European companies that are not subject to equally stringent regulations, to the detriment of European industry, its competitiveness, and long-term resilience.

EGGA recommends:

- Public tenders should **systematically apply the Most Economically Advantageous Tender (MEAT) criterion**, with ambitious pre-qualification and award criteria covering technical quality, environmental sustainability (with a focus on circularity), and social and labour impacts, while **avoiding the use of the lowest-price award criterion**.
- Life-cycle costing (LCC) and total cost of ownership (TCO) should be applied for projects and supplies with a design life exceeding 10 years or significant maintenance needs.

2. Public procurement as a driver of a sustainable circular economy

Public procurement has significant potential to drive sustainability in Europe, but further measures are needed to fully support a sustainable EU market. Promoting sustainability and developing markets for sustainable products is a key pillar of the Commission's 2026 Work Programme. Public procurement can serve as one of the most effective tools to achieve this objective, particularly by fostering circular economy practices and prioritising long-term durability, reusability, and recyclability, especially in construction, infrastructure, and other strategic sectors. Public procurement should favour products and solutions that ensure optimal durability, minimise maintenance, extend replacement cycles, and are designed for enabling reuse, adaptation, or repurposing, thereby maximising the value and sustainability of public assets.

EGGA recommends:

- Infrastructure and construction, including critical infrastructure, should always be **procured strategically**, with **ambitious minimum requirements for durability and reusability to ensure long-lasting, circular solutions**, taking into account the ability to deliver climate-resilient infrastructure and assets that last longer and support multiple service lives.
- Include **corrosion resistance as a mandatory criterion in infrastructure and construction procurement**, based on the most advanced technical standards when defining minimum requirements.
- Moreover, **additional bonus points** should be awarded in infrastructure and construction procurement **to products and solutions that exceed minimum durability requirements**, are **designed for multiple service lives** and are **fully recyclable** at the end of life.

3. Prioritising European products in procurement

The Political Guidelines for the next European Commission (2024–2029), presented by President von der Leyen, underline the importance of prioritising European products in public procurement.

We consider this a strategic priority of great importance: maintaining a strong European industrial capacity, particularly in key sectors such as construction, infrastructure, and other strategic industries (including solar and grid technologies), is essential. Only by doing so can Europe protect its industrial base, enhance supply security, and create jobs. Relying solely on the enforcement of the EU's objectives on environmental sustainability and social and labour responsibility in public procurement

is not sufficient. It is necessary to ensure that a minimum manufacturing capacity remains in Europe and is able to innovate and grow.

EGGA recommends:

- The **“Made in Europe” criterion should be mandatory for critical infrastructure** where there is a risk to the security of supply or dependence on external suppliers, and where EU production is possible.
- Member States should ensure that **at least 50% of the total annual value of public procurement contracts** awarded at national level, in particular in construction, infrastructure, and other strategic industries (e.g., net-zero technologies), is sourced from European-made products, components or services that can be produced in the EU.
- Irrespective of these minimum requirements, contribution to EU industrial resilience should carry a **minimum mandatory weighting** among the award criteria, comparable to that of environmental sustainability, circularity, and other relevant procurement criteria.

4. Modernising and simplifying public procurement to facilitate SME's participation

We welcome efforts to streamline and update the public procurement directives. Today's rules are often overly complex, discouraging many contracting authorities from applying strategic non-price criteria and limiting the participation of SMEs. A clear, simplified and coherent framework is essential to address these challenges, guide implementation consistently across Member States and enable more proportionate and efficient procurement procedures.

EGGA recommends:

- The directives should include **clear provisions that facilitate the practical application of strategic non-price criteria**, while being drafted in a way that **minimises the risk of inconsistent implementation across Member States**, ensuring harmonised adoption throughout the EU.
- Reduce ex-ante burdens, strengthen ex-post verification, and ensure proportionality in solvency; favour functional batches and faster procedures without undermining integrity and competence, so as not to exclude the industrial chain (including specialised SMEs).



The general (batch) galvanizing industry provides the most effective long-term corrosion protection for steel products, through the application of a metallurgically-bonded coating of zinc metal. It is a service that is applied after manufacture of the product and normally on a sub-contract basis. The coating ensuring many decades of maintenance-free durability for vital net-zero technologies, such as solar power installations and wind energy equipment. A galvanized coating is sufficiently durable and robust to provide corrosion protection across more than one product lifecycle. Both zinc and steel are recovered at eventual end-of-life.

The European General Galvanizers Association (EGGA) is the federation of the national galvanizers associations within Europe. The industry comprises about 700 general galvanizing plants (mostly SMEs) employing an estimated 40,000 people in Europe. EGGA monitors and responds to issues affecting the general galvanizing industry in Europe, in particular environmental, technical and regulatory matters. EGGA also provides a platform for coordination of marketing and other initiatives for the industry.

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