

Position on the Industrial Accelerator Act (IAA)

1. Add "Union-origin" criterion for steel products

An IAA draft proposal only requires that at least 25% of the steel used in public procurement and public support schemes be "low-carbon". It does not include the "Union-origin" criterion that is proposed for other energy-intensive products.

Low-carbon requirement alone is not sufficient to protect the EU steel industry, including the steel fabrication sector.

The draft paper suggests the recently imposed trade defence measures are sufficient for steel. This is not the case because the trade defence measures do not extend to downstream steel products.

The Commission's proposal must integrate the "Union-origin" criterion alongside the "low-carbon" requirement for steel.

2. Use ESPR and CPR approach to define "low carbon" steel products

While the objective of creating a lead market for low-carbon steel products is commendable, the introduction of a parallel "voluntary low-carbon steel label" under the IAA, based on a separate methodology unrelated to the ESPR and CPR (currently being developed for mandatory application), would risk creating regulatory fragmentation, methodological inconsistencies and market confusion.

The approach for the ESPR and CPR should be used as the sole basis to define "low carbon" steel for public procurement and public supported projects.

3. Defend EU industrial net-zero capacity

We support the IAA's objective of strengthening EU industrial production of net-zero components through the introduction of the "Union-origin" criterion in addition to the diversification requirement already established by Net-Zero Industry Act (NZIA). We call for a more ambitious approach to protect EU-produced net-zero components, especially in public procurement and support schemes.

There are net-zero components that were unjustifiably excluded from NZIA scope (e.g., ground-mounted solar PV structures). Others, although formally included (e.g., PV trackers and their specific mounting structures), are not supported by an adequate framework enabling them to effectively and fully benefit from their inclusion in the list. The IAA can easily fill some of these gaps:

In public procurement and public support schemes, PV trackers and their mounting structures should be subject to the same EU origin requirements as envisaged for PV inverters.

Electricity transmission and distribution towers, should be subject to the same EU origin requirements as those envisaged for other grid technology components already included in the draft proposal.