

25 September 2026

Industrial Accelerator Act: “Union-origin” and “Low-carbon” criteria for steel and “Union-origin” for PV trackers and their specific mounting structures

Position following the INTA, ITRE & IMCO Draft Report on proposed Act

EGGA – Galvanizing Europe supports the objectives of the Industrial Accelerator Act (IAA) to reinforce the EU’s industrial capacity, boost competitiveness, accelerate industrial decarbonisation and enhance strategic autonomy, in particular by stimulating industrial manufacturing and increasing demand for low carbon products of Union origin.

The INTA, ITRE and IMCO Draft Report introduces a number of constructive amendments that could strengthen the IAA’s ability to deliver on its objectives. We consider these developments encouraging and set out below the key elements that should be maintained or further strengthened.

KEY RECOMMENDATIONS

ENSURE A ROBUST “UNION-ORIGIN” ALONGSIDE “LOW-CARBON” CRITERION FOR STEEL

1. We strongly support maintaining the approach proposed in the Draft Report adding “Union-origin” (based on steel originally melted and poured in the EU) alongside the low-carbon criterion for steel. We do not support the additional requirement for 75% Union-produced primary iron input, including iron ore reduction in the Union.
2. We accept the proposed progressive approach, which, in the context of procurement, provides for reaching, by 2036, a 50% requirement for low-carbon and Union-origin steel and steel products in the total volume of steel used.

STRENGTHEN UNION-ORIGIN REQUIREMENTS FOR SOLAR PV TO THE FULLEST EXTENT POSSIBLE UNDER THE NZIA

3. The Union-origin requirement to be introduced in NZIA solar procurement, auctions and support schemes should explicitly cover “PV trackers and their specific mounting structures” from one year after the entry into force of the IAA, given the existing EU manufacturing capacity for these key components covered by the NZIA and to ensure that low carbon steel of Union origin is used for solar support structures.
4. The 50% Union added-value minimum threshold for determining origin for solar PV technologies covered by the NZIA should be maintained, as it would help ensure that minimal or non-substantial processing cannot confer Union origin.



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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