

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

EMENDAMENTO

Sostituire il Recital 22 con il seguente

The Clean Industrial Deal Communication highlighted the need to create lead markets for industrial products with a low greenhouse gas emissions intensity, including by promoting such products on the internal market through the establishment of a Union labelling scheme, starting with the steel sector. That should be seen in the context of Union products legislation already designed to introduce labelling and information requirements, including comprehensive product labelling requirements to be established under the delegated acts pursuant to Regulations (EU) 2024/3110 and (EU) 2024/1781.

MOTIVAZIONE

The recital was initially meant to support the introduction, through a set of articles in a dedicated chapter on a voluntary Union label on greenhouse gas intensity of steel, of a comprehensive labelling and information requirements for steel products, based on classes of performance.

Being such policy option eventually discarded, to instead focus the proposed regulation on implementing existing commitments under the Construction Product regulation and the Ecodesign for Sustainable Production regulation, such recital on a voluntary Union label on steel no longer serves its intended purpose.

EMENDAMENTO

Article 8

Content equivalent to Union origin in public procurement

1. With respect to the Union origin requirements referred to in Article 11, content originating in third countries with which the Union has concluded an agreement establishing a free trade area or a customs union, or that are parties to the Agreement on Government Procurement, where relevant obligations of the Union exist under that agreement, ~~shall~~ **may** be deemed to be of Union origin.

2. The Commission shall adopt delegated acts in accordance with Article 30 to ~~exclude~~ **include**, in whole or in part, a third country ~~from~~ **in** the scope of paragraph 1 based on any of the following criteria:

(a) that third country has ~~failed to~~ **provided** national treatment related to Union products or entities under the agreements referred to in paragraph 1 in relation to any of the sectors listed in Annex I;

(b) such ~~exclusion~~ **inclusion** is justified to ~~avoid dependencies or any other developments that may threaten the security~~ **ensure the availability** of supply in the Union of the products in question;

(c) such ~~exclusion~~ **inclusion** is justified under any other ~~exception~~ **provision** under the applicable agreement.

Article 9

Content equivalent to Union origin in other forms of public intervention

1. With respect to the Union origin requirements set out in Article 12, content originating in third countries with which the Union has concluded an agreement establishing a free trade area or a customs union ~~shall~~ **may** be deemed to be of Union origin.

2. The Commission shall adopt delegated acts in accordance with Article 30 to ~~exclude~~ **include**, in whole or in part, a third country ~~from~~ **in** the scope of paragraph 1 based on any of the following criteria:

(a) that third country has ~~failed to~~ **provided** national treatment related to Union products or entities under the agreements referred to in paragraph 1 in relation to any of the sectors listed in Annex I;

(b) such ~~exclusion~~ **inclusion** is justified to ~~avoid dependencies or any other developments that may threaten the security~~ **ensure the availability** of supply in the Union of the products in question;

(c) such ~~exclusion~~ **inclusion** is justified under any other ~~exception~~ **provision** under the applicable agreement.

MOTIVAZIONE

With the definition of "Union origin" in the current text of the Industrial Accelerator Act (IAA), what is "produced in the EU" is equated with what is "produced in any third country with which the EU has established a free trade agreement or a customs union," or in countries that are parties to the Government Procurement Agreement (GPA). This potentially extends the concept of Union content beyond the EU to more than 70 countries with which the EU has a free trade agreement and 40 countries with which it has procurement agreements. A country like India, whose unfair competition practices are proven by the European Commission itself (cf. Reg. 2023/265), would therefore be automatically included in the definition of Union content, and a delegated act would be required to exclude it. It would be more logical to reverse the process, including by default only countries that possess the desired characteristics. Furthermore, it is highlighted that for the indication of origin, the option to reference the Member State where the goods originate and/or the Union (e.g., "Made in Italy" and/or "Made in EU") should be allowed. The introduction of mandatory "Made in EU" labeling alone would devalue the already established "Made in Italy," which is a mark of pride for our country.

EMENDAMENTO

Inserire dopo l'art. 10, il seguente art. 10 bis

Art. 10 bis. Recycled products

In conformity with the Directive 2008/98 and Reg. n. 40/2025 the EU promote the recycled products "Made in Europe" with the aim to increase the environmental, economic and social benefits in the European Union.

European Union and Member States must adopt in the public procurement priority criteria for the recycled product "Made in Europe".

MOTIVAZIONE

European Union and Member States should adopt a system emission performance standard credits to incentive proximity recycling reducing CO2 emissions and increasing economic and social benefits in the European Union. The goal is to reward recycled product made in Europe.

EMENDAMENTO

ART 11, comma 2, sostituire il testo come segue

For the public procurement procedures referred to in Part I of Annex II and Part I of Annex III, contracting authorities and awarding entities shall apply the European Union origin requirements in conjunction with the requirement for the economic operator and the manufacturer of the products referred to in Annex II to have a fixed establishment within the European Union territory, and the low-carbon requirements laid down therein in accordance with Articles 8, 10 and 10-bis.

The base tender price is determined by taking market prices for products of Union origin as a reference parameter”.

MOTIVAZIONE

The amendment raises public procurement standards by imposing, in addition to EU origin requirements and carbon-free criteria, a stable organization within the European territory for operators and producers, with reference to the sectors listed in Annex II.

The aim is to strengthen strategic autonomy, understood as the European Union's capacity to control critical supply chain nodes, reduce excessive dependencies, and protect European companies from the pressure of a globalized market with fewer constraints.

Setting the tender base price on market prices of products of European origin ('Union origin') ensures fair competition, enhancing quality and sustainability over the lowest price alone."

EMENDAMENTO

Article 25

Designating national industrial manufacturing acceleration areas

1. Member States shall designate at least one industrial manufacturing acceleration area on their territory by [OP please insert date: 12 months following the entry into force of this Regulation] to cluster industrial manufacturing projects in one or several of the strategic sectors **or sub-sectors** listed in Annex I.

2. Member States shall designate industrial manufacturing acceleration areas by decision, on the basis of the following elements:

(a) the impact of the industrial manufacturing acceleration area's production on the security of the Union's supply for the strategic sectors **or sub-sectors** listed in Annex I;

(b) the potential of the industrial manufacturing acceleration area to support the deployment of production capacity in the strategic sectors **or sub-sectors** listed in Annex I, to strengthen Union value chains and the Union's innovation potential to accelerate sustainable manufacturing industrial activities, including decarbonisation and circular business practices, and to foster the functioning of the internal market, in alignment with strategic projects and other initiatives, including as Net Zero Acceleration Valleys, carried out pursuant to other Union legislation; [...]

MOTIVAZIONE

We suggest that in the IAA text, when referring to the sectors included in Annex I, a reference to the subsectors should also be included in order to ensure harmonised application of the standard across the entire sector.

EMENDAMENTO

Annex II - Part I - Public procurement procedures sostituire la lett. b) come segue:

- (b) ***Clinker, cement, and any product the performance of which depends mainly on clinker and cement, intended for use in buildings and infrastructure for civil purposes:***
- 1) ***Low-carbon: at least 5% of the total volume of used concrete and cement, shall be low-carbon;***
 - 2) ***Origin: the total volume of clinker in cement, in concrete, and in mortar used, shall originate in countries within the Emissions Trading System (ETS) framework or in countries that apply systems recognized by the European Commission as equivalent to the ETS;***

Annex II - Part II – Other forms of public intervention sostituire la lett. b) come segue:

- (b) ***Clinker, cement, and any product the performance of which depends mainly on clinker and cement:***
- 1) ***Low-carbon: at least 5% of the total volume of concrete and cement used in the product or project that receives support shall be low-carbon;***
 - 2) ***Origin: the total volume of clinker in cement, in concrete and in mortar used in the product or project that receives support shall originate in countries within the Emissions Trading System (ETS) framework or in countries that apply systems recognized by the European Commission as equivalent to the ETS;***

MOTIVAZIONE

The proposed Regulation is intended to strengthen the Union's strategic autonomy and economic security by introducing "EU origin" and/or "low-carbon" requirements for certain products and services.

In light of this objective, imposing an EU-origin requirement for concrete and mortar in Annex II would be ineffective. Concrete, in particular, is a product with short setting times which, for technical and logistical reasons, must be supplied from plants located close to the construction site (approximately within a ~30 km radius). In practice, even in cross-border procurement contexts, the EU origin of concrete is inherently ensured, and the introduction of a formal "Union origin" requirement would not generate any real additional benefit in terms of economic security.

By contrast, the NACE 23 products for which European resilience against extra-EU competition needs to be strengthened are cement — the main component of concrete and mortar — and its precursor clinker, which is characterized by high energy intensity and whose production is associated with the cement plant's direct CO₂ emissions. Accordingly, the proposed amendment applies the EU-origin requirement to cement clinker. This is also consistent with the wording already used in the Green Public Procurement (GPP) criteria for buildings and roads, issued by the Italian Ministry of the Environment and Energy Security.

By way of example, in 2024 average Italian energy consumption in the cement sector amounted to 3.7 GJ/t of clinker and 119 kWh/t of cement, compared with an average national electricity consumption for concrete production of approximately 3 kWh/m³. Moreover, only cement and clinker fall within the scope of the ETS and CBAM, and are therefore exposed

to competitive risks and carbon leakage towards countries that have not adopted comparable levels of climate mitigation.

Import data confirm the criticality of the issue: in 2025, Italian imports of cement and clinker amounted to 5,425,372 tonnes, of which 3,866,383 tonnes came from extra-EU countries (+36% compared with 2024); approximately 90% of extra-EU imports came from Turkey (61%), Algeria (20%), and Tunisia (11%), with extra-EU import growth of +1,181% between 2018 and 2025. At EU level, imports of cement and clinker from extra-EU countries exceeded 11.5 million tonnes in 2024 and were concentrated among a limited number of suppliers. **Turkey clearly remained the leading exporter to the European market**, with 4.4 million tonnes equal to 38% of the total, followed at a distance by Ukraine and Algeria (both at 14%), while smaller shares were accounted for by Egypt (9%) and Tunisia (8%).

Based on these data, the provision of a minimum 5% share of concrete and mortar produced with “made in EU” materials would have no concrete impact and would, in fact, represent a missed opportunity.

It is therefore proposed:

- **to recalibrate the “EU origin” requirement by focusing the measure on the parts of the value chain that are genuinely vulnerable and by applying the requirement only to clinker as the precursor, as explained above;**
- **to require that all clinker contained in cement, in concrete and in mortar used in public works or falling under other forms of public intervention originate in countries within the ETS framework or applying systems recognized by the European Commission as equivalent to the ETS.**
- **to apply the low-carbon requirement to cement and concrete, but not to clinker, in line with the work of European and Italian technical standardization bodies; referring to low-carbon clinker is technically incorrect.** The low-carbon requirement is defined for cement and concrete, and is determined by numerous factors, including the clinker content of cement.

For clinker, again in line with what is already provided for under the Italian GPP, origin is required from countries falling within the ETS or equivalent systems, because the definition of “EU origin” under the IAA also includes third countries with which the European Union concludes agreements for public procurement, including major European importers of cement and clinker such as Turkey. In this way, the measure is ineffective in protecting European cement manufacturing. Origin from ETS countries or equivalent systems, by contrast, protects industry that is investing to achieve the greenhouse-gas reduction objectives shared in Europe.

In addition, the request is for 100% ETS-origin clinker (with tolerance down to 90%). Reducing it below this threshold would be equally ineffective and could even be interpreted as an invitation to use extra-EU/non-ETS supplies for the remaining quantities. For this reason, rather than imposing values lower than 100% clinker originating from ETS countries, it would be preferable to eliminate the requirement.

EMENDAMENTO

Annex II Parte I lett.a)

Dopo la parola "steel" inserire la parola "cast iron"

*Steel, **cast iron**, and any product the performance of which 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;*

MOTIVAZIONE

The integration of cast iron products aims to boost markets — such as urban furniture (manhole covers) or infrastructure (pipes) — which, at both national and European levels, see the participation of an extremely small, if not non-existent, number of manufacturing companies."

EMENDAMENTO

Annex II, Parte I lett. A) dopo le parole “shall be low-carbon” inserire le parole “***and of Union origin***”.

MOTIVAZIONE

Robust Union origin requirements are necessary also for steel. Without a minimum share of low-carbon steel of Union origin, public procurements and support schemes will most likely be met by imported steel, thus jeopardising the decarbonisation efforts in Europe. The European Commission wrongly justifies the absence of combining low-carbon requirements with EU origin requirement in light of the proposed post-safeguard steel measure, which is meant to restore the viability of EU steel production and its capacity utilization after years of dumped imports pushed by global overcapacity. Both measures are needed to maintain the viability of the sector in the continent and enhance the EU strategic autonomy.

EMENDAMENTO

(a) Battery energy storage systems

Annex II – Part I – Public Procurement

From the date entry into force of this Regulation until [2 years after entry into force of this Regulation], the battery energy storage systems shall originate in the Union and, for projects including battery energy storage exceeding 1 Megawatt-hour, contain a battery management system, **a power plant control and an inverter** that originates in the Union.

From [OP: Please insert the date = 2 years after entry into force of this Regulation], the battery energy storage systems shall originate in the Union and contain battery cells, a battery management system, **a power plant control, an inverter** as well as one additional main specific component that originate in the Union.

(a) Battery energy storage systems

Annex II – Part II – Auctions

For auctions published after the date entry into force of this regulation, the battery energy storage systems shall originate in the Union and, for projects including battery energy storage exceeding 1 Megawatt-hour, contain a battery management system, **a power plant control and an inverter** that originates in the Union.

For auctions published from [OP: Please insert the date = 1 year after entry into force of this Regulation] until [OP: Please insert the date = 3 years after entry into force of this Regulation], the battery energy storage system shall originate in the Union and, for projects including battery energy storage exceeding 1 Megawatt-hour, contain **battery cells**, a battery management system, **a power plant control and an inverter** that originates in the Union.

For auctions published after [OP: Please insert the date = 3 years after entry into force of this Regulation], the battery energy storage systems shall originate in the Union and contain battery cells, a battery management system, **a power plant control, an inverter** as well as one additional main specific component that originate in the Union.

(a) Battery energy storage systems

Annex II – Part III – Other form of public intervention

For schemes set up or updated from the date entry into force of this regulation, the battery energy storage systems shall originate in the Union and, for projects including battery energy storage exceeding 1 Megawatt-hour, contain a battery management system, **a power plant control and an inverter** that originates in the Union.

For schemes set up or updated between [OP: Please insert the date = 1 year after entry into force of this Regulation] and [OP: Please insert the date = **2** years after entry into force of this Regulation], the battery energy storage systems shall originate in the Union and, for projects including battery energy storage exceeding 1 Megawatt-hour, contain a battery management system, **a power plant control and an inverter** that originates in the Union.

For schemes set up or updated from [OP: Please insert the date = **2** years after entry into force of this Regulation], the battery energy storage systems shall originate in the Union and contain battery cells, a battery management system, **a power plant control and an inverter** as well as one additional main specific component that originate in the Union.

MOTIVAZIONE

The European supply chain of inverters, power plant control, battery management systems and assembly is ready to meet the needs of new storage systems. Given the current concentration of global battery cell production outside the EU, introducing Union-origin requirements for cells from Phase 1 under Article 26 NZIA is strategically crucial. In fact, earlier drafts of the IAA already foresaw the inclusion of cells from Phase 1, highlighting their central role. Cells are the foundational component of a BESS, determining voltage profiles, thermal behavior, safe operating limits, degradation patterns, and system-level performance, including cybersecurity. Early requirements prevent formal compliance loopholes, such as partial offshoring or reliance on “equivalent content,” ensuring genuine EU-based manufacturing capacity. Introducing cells in the initial phase also provides a timely market signal, supporting rapid BESS deployment, investor readiness, and Europe’s industrial capacity, while strengthening strategic autonomy in net-zero technologies.

EMENDAMENTO

Article [insert number of article]

Amendments to Regulation (EU) 2024/3110 (Construction Products Regulation)

Regulation (EU) 2024/3110 is amended as follows:

1. *in Article 1, paragraph 3 is replaced by the following:*

'3. This Regulation aims to contribute to the efficient functioning of the internal market by ensuring the free movement of safe and sustainable construction products in the Union. It also aims to contribute to the objectives of a green and digital transition by preventing and reducing the impact that construction products have on the environment and on the health and safety of persons, and to support the objective of ensuring a resilient manufacturing industry within the Union.';

2. *in Article 22(9), the first subparagraph is replaced by the following:*

'In order to ensure transparency for users and to promote sustainable products, the Commission is empowered to adopt delegated acts in accordance with Article 89 to supplement this Regulation, by establishing specific environmental sustainability labelling requirements for particular product families and product categories.';

3. *in Annex I, the following point 9 is added:*

'9. Origin of construction works. The construction works and any part of them shall be designed, constructed, used, maintained and deconstructed or demolished in such a way that they contribute to ensuring a resilient manufacturing industry within the Union, by maximising the gross value added generated in the Union.';

4. *in Annex X, the following point 7 is added:*

'7. Origin.'

MOTIVAZIONE

For the ceramic sector, it is of utmost importance to reinsert Article 49—included in previous draft IAA versions circulating—which amended Regulation 2024/3110 on Construction Products (CPR) by adding the origin of products to the mandatory requirements for placing such products on the market. This would, at least partially, bridge the current gap regarding mandatory origin labeling within the European Union.

Indeed, it is believed that this issue, which has been ignored for too long, should be the subject of a dedicated European Regulation. This would align European legislation with that of the main reference markets, fostering European economic growth, enhancing the production of individual Member States, and providing customers and consumers with complete and transparent information on the product's origin, which is an essential element for enabling them to make a correct and informed purchasing choice.