

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

Recital 19

Modificare come segue:

Demand-side measures should focus on establishing low-carbon requirements, for steel, cement and aluminium, **low-carbon requirements and/or relating to the use of sustainable carbon sources for chemicals and plastics used in end-product, such as ones** used in buildings, infrastructure and motor vehicles, **as well as fertilisers** where appropriate, since those sectors are the most energy-intensive industries. Targeted Union wide demand-side measures can help create lead markets for low-carbon and Union-produced energy-intensive industrial products, supporting decarbonisation while strengthening the Union's industrial base, **and should be complemented by adequate supply-side support measures are in place to enable Union producers to effectively respond to and benefit from such market opportunities.**

MOTIVAZIONE

This amendment clarifies that demand-side measures may include requirements relating to the use of sustainable carbon sources for plastics and chemicals where carbon feedstock for the sector nature cannot be substitute. for the chemical sector in fact the transition depends both on lower-emission production processes and on the progressive substitution of fossil carbon feedstocks with recycled, bio-based and carbon capture and utilisation sources. The amendment also broadens the reference to energy-intensive sectors by including chemicals, plastics, reflecting their role in industrial value chains and their relevance for defossilization. It further clarifies that demand-side measures should be accompanied by adequate supply-side conditions enabling Union producers to respond to the demand created. By linking demand-side requirements with enabling conditions on the supply side, the provision improves the feasibility and impact of lead market measures. It also reduces the risk of unmet demand being fulfilled primarily by imports, due to a lack of EU supply competitiveness, thereby supporting the objective of strengthening the Union's industrial base. This improves the coherence of the Regulation with its objectives of creating lead markets, supporting industrial decarbonisation and strengthening the Union's industrial base.

EMENDAMENTO

Eliminare il recital 22

MOTIVAZIONE

The recital was initially meant to support the introduction directly in IAA, through a set of articles in a dedicated chapter, of a voluntary Union label on greenhouse gas intensity of steel.

Such policy option was eventually discarded, to instead focus on the implementation of existing commitments in the context of Union products legislation, already designed to introduce performance and information requirements (the Ecodesign for Sustainable Production regulation and the Construction Product regulation).

Therefore such recital no longer serves its intended purpose and would unduly interfere with the already advanced work on ESPR delegated act on steel intermediate products.

EMENDAMENTO

Article 1 – paragraph 2 – point b

Subject matter and scope

Modificare come segue:

(b) create lead market for certain products in strategic sectors by laying down Union origin requirements, low-carbon requirements and **for chemical and plastics requirements relating to the use of sustainable carbon sources, or any combination thereof**, in the context of public procurement, public support schemes.

MOTIVAZIONE

The amendment clarifies that lead market measures may also be based on Union Origin requirements related to products obtained from sustainable carbon sources, in addition to low-carbon requirements. This ensures that circular carbon feedstocks, including recycled, bio-based and carbon capture and utilisation sources, are adequately reflected in the framework. It improves consistency with the objective of supporting the transition towards climate neutrality across industrial value chains. The amendment maintains the existing structure and instruments of the Regulation while enhancing its technological neutrality. It also contributes to a more comprehensive and effective demand-side framework.

EMENDAMENTO

Article 3 - point 3 (Definitions)

To Article 3, point 3, the following sentence shall be added:

“(3) ‘ [...] Such projects specifically include the production of sustainable biofuels, renewable fuels of non-biological origin (RFNBOs), and the total or partial conversion of conventional refineries into biorefineries.”

MOTIVAZIONE

This amendment is essential to strengthen the Union's energy security and strategic autonomy by including renewable fuel production among strategic projects to reduce dependency on crude oil imports.

The modification ensures regulatory coherence with the RED III and ReFuelEU directives, promoting true technological neutrality indispensable for decarbonizing 'hard-to-abate' sectors such as heavy transport, aviation, and maritime shipping.

EMENDAMENTO

Articolo 3(16)

'sustainable carbon sources' definition

Integrare come segue

means biomass that complies with the sustainability criteria laid down in Article 29 (2-7) of Directive (EU) 2018/2001, waste and carbon from capturing carbon dioxide emissions.

MOTIVAZIONE

For biomass, the land use and biodiversity sustainability criteria outlined in art. 29 (2-7) of RED III, are tailored only for biofuels, bioliquids and biomass fuels, they cannot be directly applicable to all possible sectors: however, they should be considered as a suitable base for designing biomass sustainability criteria related also to chemical and plastic sectors.

Other provision of article 29 of the RED should be not take into account since they are not directly related to biomass. Additionally aspect such as GHG saving related to the final products should be defined via targeted methodology for defining low-carbon chemical products is to be developed for the application of the requirements laid down in Annex II and Delegated Acts under Article 16 (1), thereby ensuring that chemical products are effectively integrated into the demand-side measures established under the Regulation.

EMENDAMENTO

The following point is added to Article 3:

(42) 'Union origin steel' : steel for which the melting and pouring stages are carried out in the territory of the Union and for which traceability of those stages is ensured through

MOTIVAZIONE

The definition of 'Union-origin steel' is introduced to establish a clear and verifiable criterion for identifying steel produced within the Union on the basis of its full manufacturing chain. This criterion ensures that the origin determination reflects genuine industrial activity rather than mere finishing or processing operations performed on steel produced elsewhere. The introduction of this concept supports the Union's objectives of strengthening the resilience of domestic steel supply chains, promoting the use of low-carbon steel in regulated products, and ensuring a level playing field for Union steel producers operating under the Union's environmental and industrial standards.

EMENDAMENTO

Article 4 - paragraph 1 (Single access points)

In Article 4(1), after the words 'application for industrial manufacturing projects,' the following shall be inserted “including biofuel production and refinery conversion projects,”

MOTIVAZIONE

This amendment is necessary to accelerate the transition of a sector that requires significant investments. Currently, bureaucratic complexity causes major delays, hindering energy security and the decarbonization of heavy transport. Access to the one project-one digital procedure through the single access point would ensure timeline certainty and administrative savings, facilitating the conversion of existing refineries into sustainable facilities.

EMENDAMENTO

Article 5 (1)

Permit-granting procedure

Member States shall establish a single permit-granting procedure based on a single application covering all permits required for industrial manufacturing projects, **including sustainable carbon processes, such as recycling ones.** [...]

MOTIVAZIONE

We welcome the approach in Article 5 of the IAA introducing a single application, single procedure, and comprehensive decision on a digital portal for manufacturing industry projects. However, to effectively improve the functioning of the internal market by establishing a framework to support the development, competitiveness and resilience of the Union's manufacturing sector, it is necessary to explicitly assure that also sustainable carbon process - such as recycling technologies - related to strategic sectors listed in Annex I could benefit of the same or similar permit-granting procedure via IAA or the Circular Economy Act. Additionally it is unclear how the proposed IAA framework and timeline would interact with this upcoming IED digital permitting system, and whether the two processes will be fully interoperable or will create parallel, potentially overlapping procedures.

EMENDAMENTO

All'art.7 aggiungere un nuovo punto 3:

"3. (New) 3. For steel products and components containing steel, only steel that has been originally melted and poured within the Union, in accordance with Regulation (EU) 2025/0726 shall qualify as being of Union origin.

MOTIVAZIONE

For steel, the current definition using Regulation (EU) No 2013/952 cannot apply, as its 'last substantial transformation' rule would undermine the objective by allowing third-country steel to gain Union origin status through minor downstream processing. Such a loophole would risk diverting decarbonisation investments away from Europe and rewarding imports of partly finished products instead of supporting genuine EU -based production. The "melt and pour" criteria adopted in Regulation EU 2025/0726 ensures that the major steelmaking processes and decarbonisation takes place in the EU, and therefore ensures a lead market demand that recognises EU investments.

EMENDAMENTO

Article 8

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, shall be deemed to be of Union origin *only where the Commission has determined, by means of an implementing act, that such third country ensures effective reciprocity, regulatory alignment, comparable sustainability requirements, fair competition conditions and does not create risks of circumvention or strategic dependency.*

2) as written in the proposal

3) *In order to avoid trade flows being diverted to 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, the Commission shall continuously monitor and assess, on at least an annual basis, trade flows and market developments to identify:*

- *a significant increase in imports suggests circumvention;*
- *distortions identified by trade defense or anti-subsidy investigations;*
- *discrepancies between trade flows and production capacity indicating transshipment.*

Where such circumstances are identified, the Commission shall take appropriate measures, including the suspension or limitation of equivalence under paragraph 1, and is empowered to adopt delegated acts in accordance with Article 30 to exclude, in whole or in part, a third country from the scope of paragraph 1.

MOTIVAZIONE

The introduction of a monitoring and corrective mechanism based on evidence-based safeguards is necessary to ensure that the Regulation operate in a way that preserve a level playing field.

Article 9

Content equivalent to Union origin in other forms of public intervention

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 be deemed to be of Union origin *only where the Commission has determined, by means of an implementing act, that such third country ensures effective reciprocity, regulatory alignment, comparable sustainability requirements, fair competition conditions and does not create risks of circumvention or strategic dependency.*

2) as written in the proposal

3) *In order to avoid trade flows being diverted to 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, the Commission shall continuously monitor and assess, on at least an annual basis, trade flows and market developments to identify:*

- *a significant increase in imports suggests circumvention;*
- *distortions identified by trade defense or anti-subsidy investigations;*
- *discrepancies between trade flows and production capacity indicating transshipment.*

Where such circumstances are identified, the Commission shall take appropriate measures, including the suspension or limitation of equivalence under paragraph 1, and is empowered to adopt delegated acts in accordance with Article 30 to exclude, in whole or in part, a third country from the scope of paragraph 1.

MOTIVAZIONE

The introduction of a monitoring and corrective mechanism based on evidence-based safeguards is necessary to ensure that the Regulation operate in a way that preserve a level playing field. It ensures that the allocation of public resources and market advantages remains aligned with the objective of supporting European competitiveness, rather than inadvertently incentivising the exploitation of preferential trade regimes.

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 **green** 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 in the **green** public procurement 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

To create effective demand for recycled materials, it should establish for specific sectors binding minimum recycled content targets "made in Europe". For example, for plastics linking recycled content requirements to European sourcing is essential to strengthen industrial resilience and reduce dependency on non European resources, while fully valorising Europe's waste management, sorting and recycling capacities.

EMENDAMENTO

Articolo 10

Inserire nuovo comma come segue:

Where low-carbon requirements or performance classes for steel products are established pursuant to Regulation (EU) 2024/1781 or Regulation (EU) 2024/3110, including where such products are included in the working plan adopted under Regulation (EU) 2024/1781, the Commission shall ensure that such requirements are based on actual, verifiable and product-specific greenhouse gas emissions. The methodology shall duly recognise circularity and recycled content, while ensuring that electric arc furnace production routes using recycled scrap are not disadvantaged by theoretical benchmarks, scrap-share adjustment factors or performance classes that do not reflect absolute emissions.

MOTIVAZIONE

The core purpose of establishing low-carbon requirements in public procurement and support schemes is to accelerate the decarbonisation of the steel sector and create market incentives for genuine emissions reduction. This objective can only be credibly achieved if the thresholds against which products are assessed reflect their actual greenhouse gas emissions performance. Two producers using identical scrap ratios may have significantly different actual emissions profiles depending on their energy sources, process efficiency, and abatement technologies. Basing thresholds on input characteristics rather than output emissions therefore introduces a fundamental measurement error that would undermine the environmental integrity of the lead market framework.

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 low carbon 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

Art. 11.3 punto c)

- Sostituire “25%” con “35%”
e
- Inserire il seguente alla fine del punto c)
For the purposes of this point, cost differences shall be assessed only between products, services or works that are technically comparable, including with regard to technical specifications, performance, delivery conditions, contractual duration, certification requirements, environmental characteristics and compliance costs related to Union origin, traceability and low-carbon requirements.

EMENDAMENTO

Art. 12.3 punto b)

- Sostituire “30%” con “35%”
- E inserire il seguente alla fine del punto b)

For the purposes of this point, cost increases shall be assessed only by reference to technically comparable products, projects or technologies, including with regard to technical specifications, performance, delivery conditions, certification requirements, environmental characteristics and compliance costs related to Union origin, traceability and low-carbon requirements.

EMENDAMENTO

Art. 34 Amendments to Regulation (EU) 2024/1735

Articolo 25a punto 3 c)

- Sostituire “25%” con “35%”
- E inserire il seguente alla fine del punto c)

For the purposes of this point, cost differences shall be assessed only between technically comparable products, services or works, including with regard to technical specifications, performance, delivery conditions, contractual duration, certification requirements, environmental characteristics and compliance costs related to Union origin, traceability and low-carbon requirements.

MOTIVAZIONE

The current 25%/30% price-gap allowance risks weakening the effectiveness of Union-origin requirements, as structural cost distortions and unfair global competition may make non-EU alternatives significantly cheaper than European products. Raising the threshold to 35% would ensure that the derogation remains an exceptional safeguard rather than a systematic escape clause, while preserving the objective of anchoring industrial value creation in Europe.

EMENDAMENTO

Inserimento Articolo 12a

Article 12a – Simplified compliance for SMEs

The Commission shall develop standardised templates, digital tools and simplified reporting procedures to support small and medium-sized enterprises in demonstrating compliance with Union origin, low-carbon, recycled content and traceability requirements under this Regulation.

Such procedures shall be proportionate to the size of the economic operator, the value of the contract or support scheme concerned, and the administrative capacity of small and medium-sized enterprises.

MOTIVAZIONE

SMEs play a central role in European industrial value chains, particularly in manufacturing, components, recycling and downstream processing. Without simplified and proportionate compliance tools, Union origin, low-carbon and traceability requirements may create excessive administrative burdens and favor large integrated operators. The amendment ensures that SMEs can effectively participate in public procurement and public support schemes while preserving the integrity of the Regulation.

EMENDAMENTO

All'art.14, comma 2, sostituire la lettera b) con la seguente:

(b) 'made in the EU' shall be equivalent to the 'Union origin' referred to in Article 7 **(1) (3)** of this Regulation **and refer to the country of "melt and pour" in accordance with Regulation EU 2025/0726**

MOTIVAZIONE

The "melt and pour" criteria adopted in Regulation *EU 2025/0726* ensures that the major steelmaking processes and decarbonisation takes place in the EU, and therefore ensures a lead market demand that recognises EU investments. Without referring to the country of "melt and pour" the article risks rewarding imports of partly finished products to be counted as Union origin, instead of supporting genuine EU -based production.

EMENDAMENTO

Articolo 16:

Eliminare Paragrafo 1, punto (a)

Proposal for a Regulation

Article 16 – paragraph 1 – subparagraph point a

<i>Text proposed by the Commission</i>	<i>Amendment</i>
(a) the production and sales of substances and mixtures of Union origin derived from sustainable carbon sources;	(a) the production and sales of substances and mixtures of Union origin derived from sustainable carbon sources.

Inserire Paragrafo 1, punto (c)

Proposal for a Regulation

Article 16 – paragraph 1 – subparagraph 1 – point c – (new)

<i>Text proposed by the Commission</i>	<i>Amendment</i>
	(c) The use in end market products of low-carbon substances and mixtures of Union origin.

MOTIVAZIONE

This amendment clarifies that demand-side measures under this provision are to be applied at the level of final products and end-use applications, thereby ensuring consistency with the objective of creating lead markets. It avoids the imposition of requirements directly on substances and mixtures, which could be circumvented through imports of finished goods and would not effectively generate demand for Union-produced chemicals. The amendment enhances legal clarity and ensures that measures contribute to effective value-chain pull while remaining proportionate and enforceable.

EMENDAMENTO

Article 16 – paragraph 1 – subparagraph 1

Delegation of powers

In the preparation of the delegated acts, the Commission shall **by [xx months from the date of entry into force of this Regulation], adopt a work plan based on preparatory studies and consultation of Member States and relevant stakeholders, including industry. The Commission** should take into account: [...]

MOTIVAZIONE

Concerning the chemical sector, ensuring stable and predictable demand is essential to support both competitiveness and decarbonisation across the value chain, including petrochemicals, polymers and upstream feedstocks. This amendment introduces a work plan for the preparation of delegated acts concerning demand-side and market-mobilising measures for products from the chemical industry. It ensures that such measures are developed on the basis of preparatory studies and consultation of Member States and relevant stakeholders, including industry. This is necessary given the complexity and heterogeneity of chemical value chains and the need to design measures that are technically feasible and proportionate. The work plan provides greater predictability for operators and supports the timely preparation of future measures. It thereby improves the transparency, effectiveness and implementability of the framework.

EMENDAMENTO

Article 16 – paragraph 1 – subparagraph 3 (new)

Delegation of powers

Such measures shall be proportionate and may target final products, or materials, substances or mixtures incorporated in final products, provided that the corresponding obligations are placed on the operators placing those final products on the market and not on producers of base materials or intermediate products.

MOTIVAZIONE

This amendment clarifies that demand-side measures under this provision are to be applied at the level of final products and end-use applications, thereby ensuring consistency with the objective of creating lead markets. It avoids the imposition of requirements directly on substances and mixtures, which could be circumvented through imports of finished goods and would not effectively generate demand for Union-produced chemicals. The amendment enhances legal clarity and ensures that measures contribute to effective value-chain pull while remaining proportionate and enforceable. Measures can be evaluated per value chain for final products or materials/chemicals in the final products but should not be placed on intermediate producers: e.g. plastics in cars, not plastics or polymers brought on the market.

EMENDAMENTO

Article 16 – paragraph 3b (new)

Delegation of powers

The Commission is empowered to adopt delegated acts in accordance with Article 30 to amend ANNEX I in order to enlarge the list of Strategic sectors taking into consideration additional sectors that could support the development, competitiveness and resilience of the Single Market, considering also the evolution of the Union legislative framework and the geopolitical context.

MOTIVAZIONE

Annex I should remain sufficiently flexible to allow for future integration of additional strategic sectors, in particular recycling technologies, once the forthcoming Circular Economy Act clarifies the relevant regulatory framework and industrial needs. This dynamic and adaptive approach would ensure coherence across EU legislation and enable the Industrial Accelerator Act to effectively support circular and low carbon value chains over time.

EMENDAMENTO

Article 16 – paragraph 1 – subparagraph 4 (new)

Delegation of powers

2. The Commission is empowered to adopt delegated acts in accordance with Article 30 in order to amend Annex II or Annex III **by adding products to those annexes or by amending** the Union origin requirements, low-carbon requirements, **requirements relating to the use of sustainable carbon sources**, or any combination thereof set out for products referred to therein, **in particular to adjust low-carbon requirements to the further development of Union climate policy**, taking into account the following criteria:

[...]

MOTIVAZIONE

This amendment broadens the empowerment for the Commission to amend Annex II and Annex III so that additional products may be brought within the scope of the lead-market framework. It also clarifies that delegated acts may adapt not only Union-origin and low-carbon requirements, but also requirements relating to the use of sustainable carbon sources. This is necessary to ensure that the framework can evolve in line with technological developments, market conditions and the further development of Union climate policy. The amendment provides flexibility to integrate additional energy-intensive products and value chains, including those relevant for the chemical sector, while preserving the criteria-based structure of the delegation. It therefore improves the adaptability, coherence and long-term effectiveness of the Regulation.

EMENDAMENTO

Article 16 – Paragraph 4 (new)

4. The Commission shall within [X] months from the entry into force of this Regulation adopt delegated acts in accordance with Article 30 to supplement Annex II and Annex III by:

(a) defining the categories of chemical input materials used in the production of the products listed in Annex II and Annex III for which low-carbon requirements, requirements relating to the use of sustainable carbon sources, Union origin requirements, or any combination thereof, may apply;

(b) specifying the minimum shares of those materials that shall be containing low-carbon content, sustainable carbon content, Union origin content, or any combination thereof; and

(c) establishing methodologies for the calculation and verification of those shares, including, where appropriate, the use of appropriate allocation methodologies.

MOTIVAZIONE

The amendment introduces an empowerment for the Commission to specify, through delegated acts, the categories of input materials and corresponding minimum shares subject to low-carbon, **sustainable carbon sources** and/or Union-origin requirements under Annex II and III. This ensures that the frameworks established in Annex II and III can be effectively implemented and adapted over time, taking into account the technical complexity and diversity of industrial value chains, in particular in sectors relying on chemical inputs. The current Regulation sets requirements at product level but does not sufficiently define how upstream materials contributing to those products should be treated, which may limit the effectiveness of demand-side measures.

By enabling the Commission to define relevant input materials and applicable thresholds, the amendment strengthens the operability and enforceability of the Regulation, while preserving the necessary flexibility to reflect technological progress, market developments and data availability. This is particularly important for the chemical industry, where value chains are heterogeneous and where methodologies for tracking low-carbon and circular inputs are still evolving. The amendment also ensures that demand-side measures extend beyond final materials to the upstream inputs that determine their carbon footprint, thereby improving value chain integration and reinforcing the Regulation's objectives of industrial decarbonisation, resilience and reduced strategic dependencies.

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

ART 34, sostituire lettera c) come segue

'Heat pump technology' means a device or system that transfers heat from ambient air, ground, water, industrial waste heat or other renewable or low-carbon heat sources to provide heating, cooling, hot water or process heat, including hydronic heat pumps, air-air heat pumps, industrial heat pumps and high-temperature heat pumps.

ART 34, 'ANNEX II Union origin requirements for net-zero technologies Part I – Public procurement, sostituire il punto c come segue:

Heat pump technologies: From [OP: Please insert: 3 years after the entry into force of this Regulation], heat pump technologies, including hydronic heat pumps, air-air heat pumps, industrial heat pumps and high-temperature heat pumps, shall originate in the Union.

ART 34, 'ANNEX II Union origin requirements for net-zero technologies Part III – Other forms of public intervention, sostituire il punto c come segue:

Heat pump technologies: From [OP: Please insert: 3 years after the entry into force of this Regulation], heat pump technologies, including hydronic heat pumps, air-air heat pumps, industrial heat pumps and high-temperature heat pumps, shall originate in the Union.

MOTIVAZIONE

The current reference to hydronic heat pumps risks excluding industrial and high-temperature heat pumps, which are commercially available and essential for decarbonising process heat in energy-intensive sectors. The amendment ensures consistency with the Net-Zero Industry Act and introduces a more technology-neutral approach based on performance, efficiency and emission-reduction potential.

EMENDAMENTO

ART 34 ANNEX II Union origin requirements for net-zero technologies Part I – Public procurement, aggiungere il seguente punto:

Geothermal technologies: *From [OP: Please insert: 3 years after the entry into force of this Regulation], geothermal heating, cooling and power generation technologies, including hydrothermal systems, binary-cycle Organic Rankine Cycle systems, Enhanced Geothermal Systems and Advanced Geothermal Systems, shall originate in the Union.*

ART 34 ANNEX II Union origin requirements for net-zero technologies Part III – Other forms of public intervention, aggiungere il seguente punto

Geothermal technologies: *From [OP: Please insert: 3 years after the entry into force of this Regulation], geothermal heating, cooling and power generation technologies, including hydrothermal systems, binary-cycle Organic Rankine Cycle systems, Enhanced Geothermal Systems and Advanced Geothermal Systems, shall originate in the Union.*

MOTIVAZIONE

Geothermal technologies are recognised as net-zero technologies under the Net-Zero Industry Act and will be addressed by the forthcoming EU Geothermal Action Plan. Their inclusion in the IAA procurement framework would ensure regulatory coherence and provide a clear market signal for low-carbon, dispatchable energy solutions and European manufacturing value chains.

EMENDAMENTO
Article 34 point(6)

Article 28e

Content equivalent to Union origin in public procurement

1) With respect to the Union origin requirements referred to in Article 25a, 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, shall be deemed to be of Union origin only where the Commission has determined, by means of an implementing act, that such third country ensures effective reciprocity, regulatory alignment, comparable sustainability requirements, fair competition conditions and does not create risks of circumvention or strategic dependency.

2) as written in the proposal

3) In order to avoid trade flows being diverted to 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, the Commission shall continuously monitor and assess, on at least an annual basis, trade flows and market developments to identify:

- a significant increase in imports suggesting circumvention;
- distortions identified by trade defense or anti-subsidy investigations;
- discrepancies between trade flows and production capacity indicating transshipment.

Where such circumstances are identified, the Commission shall take appropriate measures, including the suspension or limitation of equivalence under paragraph 1, and is empowered to adopt delegated acts in accordance with Article 44 to exclude, in whole or in part, a third country from the scope of paragraph 1.

EMENDAMENTO

Article 34 point (6)

Article 28e

Content equivalent to Union origin in auctions

1) With respect to the Union origin requirements referred to in Article 26, content originating in third countries with which the Union has concluded an agreement establishing a free trade area or a customs union shall be deemed to be of Union origin *only where the Commission has determined, by means of an implementing act, that such third country ensures effective reciprocity, regulatory alignment, comparable sustainability requirements, fair competition conditions and does not create risks of circumvention or strategic dependency.*

2) as written in the proposal

3) *In order to avoid trade flows being diverted to third countries with which the Union has concluded an agreement establishing a free trade area or a customs the Commission shall continuously monitor and assess, on at least an annual basis, trade flows and market developments to identify:*

- *a significant increase in imports suggesting circumvention;*
- *distortions identified by trade defense or anti-subsidy investigations;*
- *discrepancies between trade flows and production capacity indicating transshipment.*

Where such circumstances are identified, the Commission shall take appropriate measures, including the suspension or limitation of equivalence under paragraph 1, and is empowered to adopt delegated acts in accordance with Article 44 to exclude, in whole or in part, a third country from the scope of paragraph 1.

EMENDAMENTO

Article 34 point (6)

Article 28g

Content equivalent to Union origin in other forms of public intervention

1) With respect to the Union origin requirements referred to in Article 28a, content originating in third countries with which the Union has concluded an agreement establishing a free trade area or a customs union shall be deemed to be of Union origin *only where the Commission has determined, by means of an implementing act, that such third country ensures effective reciprocity, regulatory alignment, comparable sustainability requirements, fair competition conditions and does not create risks of circumvention or strategic dependency.*

2) as written in the proposal

3) *In order to avoid trade flows being diverted to third countries with which the Union has concluded an agreement establishing a free trade area or a customs the Commission shall continuously monitor and assess, on at least an annual basis, trade flows and market developments to identify:*

- *a significant increase in imports suggesting circumvention;*
- *distortions identified by trade defense or anti-subsidy investigations;*
- *discrepancies between trade flows and production capacity indicating transshipment.*

Where such circumstances are identified, the Commission shall take appropriate measures, including the suspension or limitation of equivalence under paragraph 1, and is empowered to adopt delegated acts in accordance with Article 44 to exclude, in whole or in part, a third country from the scope of paragraph 1.

MOTIVAZIONE

Extending the application of “equivalent content to Union origin” within the NZIA would effectively broaden the notion of Union origin to include dozens of third countries. Such an approach would be inappropriate, as it risks blending EU production with that of external partners under very different competitive conditions.

In a highly strategic and competitive sector such as net-zero technologies, this extension could have significant consequences, including weakening incentives to invest in EU-based manufacturing, exposing EU industry to unfair competition from subsidized or lower-standard production and undermining the Union’s objectives of strengthening industrial resilience and strategic autonomy.

The introduction of a monitoring and corrective mechanism based on evidence-based safeguards is necessary to ensure that the Regulation operate in a way that preserve a level playing field. It ensures that the allocation of public resources and market advantages remains aligned with the objective of supporting European competitiveness, rather than inadvertently incentivising the exploitation of preferential trade regimes.

EMENDAMENTO

**Article 34, point (8), Annex II – Part I – Public Procurement
Letter (a) is amended as follows:**

(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.

**Article 34, point (8), Annex II – Part II – Auctions
Letter (a) is amended as follows :**

(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.

Article 34, point (8), Annex II – Part III – Other forms of public intervention

Letter (a) is amended as follows :

(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

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, Part I, lettera (a)

Sostituire

at least 25% of the total volume of steel used shall be low-carbon;

Con

at least 90% of the total volume of steel used shall be low-carbon and of Union origin;

EMENDAMENTO

Annex II, Part II, lettera (a)

Sostituire

at least 25% of the total volume of steel used in the product or project that receives support shall be low-carbon;

Con

at least 90% of the total volume of steel used in the product or project that receives support shall be low-carbon and of Union origin;

MOTIVAZIONE

The current 25% threshold for low-carbon steel is insufficient to create an effective lead market and risks generating only marginal demand for decarbonised steel. A 90% requirement would provide a strong and credible market signal, particularly in construction and infrastructure, where most construction steel products , including beams, reinforcing bars and structural profiles, are already largely supplied through lower-carbon production routes and can be produced within the Union. Linking the requirement to Union origin would ensure that public procurement and public support schemes effectively reward European producers that have invested in decarbonisation and operate under the Union's environmental and industrial standards.

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

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.