POSITION PAPER

POSITION ON SELECTED PROPOSALS IN THE EUROPEAN PARLIAMENT'S DRAFT REPORT ON THE INDUSTRIAL ACCELERATOR ACT (IAA)

16 October 2026

Introduction

The construction chemicals industry supports the objective of the Industrial Accelerator Act (IAA) to promote investment in climate-friendly production processes and strengthen Europe's industrial competitiveness. The success of the initiative will, however, depend to a large extent on whether existing sector-specific legislation is taken into account, administrative burdens are reduced and new regulatory burdens are avoided.

Against this background, Deutsche Bauchemie assesses the amendments proposed in the European Parliament's draft report as follows:

1. No definition of low-carbon criteria for harmonised construction products under the IAA

The draft report provides for the European Commission to establish low-carbon criteria for the construction products concerned (cement, mortar, concrete) by means of a delegated act under the IAA if the corresponding classes of performance under the Construction Products Regulation (CPR) are not yet in place by the end of 2027 (AM 95).

Deutsche Bauchemie expressly rejects the creation of a parallel system for establishing low-carbon criteria for construction products covered by the CPR outside the framework of the CPR. Any such definition must be established within the legal framework provided for this purpose by the CPR, drawing on the technical expertise envisaged therein. An additional set of rules under the IAA would lead to parallel structures, legal uncertainty and considerable implementation efforts for companies. This applies in particular if differing or further developed criteria are introduced at a later stage as part of the revision of standards already envisaged under the new CPR.

Our demands:

- No introduction of separate low-carbon definitions for construction products under the IAA.
- Avoidance of parallel regulatory structures.

2. A cautious approach to quotas in public procurement

Compared with the Commission proposal, the draft report provides for an extension to additional products and a significant increase in the quotas for the use of low-carbon products and products of Union origin in public procurement (AM 240 and 241).

The common objective must be, above all, to improve framework conditions for the manufacturing industry. As a general principle, the utmost caution is required when introducing market-pull instruments such as quotas.

Mandatory procurement quotas should be subject to a detailed impact assessment. Such quotas can only be meaningfully assessed once the underlying definitions and assessment methods for low-carbon products, as well as the origin criteria, have been clearly established. In particular, it remains entirely unclear how low-carbon criteria for the construction products concerned will be defined in practice. The setting of specific procurement quotas should therefore only be discussed on the basis of the criteria to be applied and taking into account product availability and technical feasibility. This applies in particular to the planned gradual increase in quotas to 50%. When defining the origin criteria ("EU-origin"), it is essential to ensure that evidence of origin can be provided simply and without any additional administrative burden.

Our demands:

- **Low-carbon criteria under the CPR must first be clarified as a prerequisite for considering mandatory procurement quotas and their possible levels.**
- **Origin criteria must be defined taking into account the effort required to provide evidence of origin.**
- **A detailed impact assessment of the relevant quotas must provide the basis for further discussions.**

3. Demand-side requirements for chemical substances and mixtures and other sectors

The draft report calls on the European Commission to establish, within a fixed period following the entry into force of the IAA, requirements to support chemicals and mixtures based on "sustainable" and "low-carbon" raw materials. Under certain conditions, the draft report allows for a subsequent extension of demand-side requirements to other sectors (AM 111 and 115).

Deutsche Bauchemie rejects the imposition of a mandatory deadline for establishing demand-side requirements for the use of chemicals and mixtures by means of delegated acts. The diversity of chemical products, their applications and the complex value chains require a differentiated and in-depth examination as a basic prerequisite for establishing further requirements. Political decisions with significant economic implications should, where necessary, only be taken after they have been discussed within the framework of a dedicated initiative involving a comprehensive impact assessment and the participation of downstream users.

Our demands:

- **No extension of the IAA to chemical substances and mixtures by means of a delegated act.**
- **Retention of a sector-specific approach.**
- **Priority for separate impact assessments and dedicated policy initiatives.**

4. Precise definition of products

Both the Commission proposal and the draft report call for the establishment of minimum low-carbon quotas for construction products manufactured in the EU whose essential performance characteristics are based on concrete and mortar and, in the case of the draft report, also on cement (AM 240).

Deutsche Bauchemie points out that the wording is insufficiently precise. The performance of cement-bound speciality products such as tile adhesives, repair mortars, grouting mortars or flooring systems does not depend primarily on the cement, concrete or mortar they contain, but to a significant extent on their specific formulation and the interaction between the polymers, additives and other functional constituents used. These products therefore do not fall within the intended scope of the provision. To avoid legal uncertainty and restrict the scope to the product groups actually intended, the wording should be clarified to ensure that these speciality products are explicitly excluded from the scope.

In addition, the draft report provides for an extension of the scope to plastic products in the construction sector (AM 18, 241 and 245). Clear definitions and unambiguous specifications are needed here. While AM 241 and 245 provide an exhaustive list of the intended products, the list of intended product groups in AM 18 is not exhaustive. This opens up the possibility of extending the scope to additional product groups. To avoid legal uncertainty and keep the regulatory burden proportionate, the scope should be restricted to the main applications of plastic construction products specified in AM 241 and 245.

Our demand:

- **A precise definition of the product groups falling within the scope of the IAA.**

Deutsche Bauchemie e.V.
German Construction Chemicals Industry Association

Frankfurt, 16 October 2026

The German Construction Chemicals Industry Association (Deutsche Bauchemie) has been representing the interests of its member companies and the German subsidiaries of foreign corporations to the professional public, politics, authorities, science, and media for 78 years. The industrial association is a sector association within the German Chemical Industry Association (VCI). In 2025, the approximately 140 member companies generated a turnover of 4.52 billion euros in Germany with around 32,000 employees.