Council of the European Union
General Secretariat

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Interinstitutional files:
2026/0068 (COD)

Brussels, 30 July 2026

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WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Delegations
Subject:	Consolidated table with comments from these Member States AT, BE, BG, CZ, DE, DK, EE, EL, ES, FI, FR, IT, LT, LU, LV, NL, PL, PT, RO, SE, SI, SK on Chapters I, II, V and VI of the Regulation for Industrial Accelerator Act - Partial Presidency compromise text ST 10817 /26

Proposal for a Regulation on establishing a framework of measures for accelerating industrial capacity and decarbonisation in strategic sectors (Industrial Accelerator Act) Deadline: ***6 July 2026***
From: AT, BE, BE, BG, CZ, DE, DK, EE, EL, ES, FI, FR, IT, LT, LU, LV, NL, PL, PT, RO, SE, SI, SK **Updated: 28/07/2026 14:51**

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Guidelines to be followed

Please kindly provide your contributions in the table below.

Drafting suggestions: you may use '**track changes**'* or formatting (for example **bold-underline** for additions and ~~strike-through~~ for deletions, **where necessary, in a different colour**). *Track changes can only be connected once the cursor is placed in editable areas (Drafting or Comments columns).

To make it feasible to consolidate all contributions, the structure of the table must not be changed, so **no rows can be added or deleted.**

New provisions may only be added in any of the **'existing cells'.**

Name of document: please add the **two initials** of your delegation's country followed by a space (to the MS Word document name), followed by any optional text, for example, for Austria: **AT comments on … .docx**

Thank you for your cooperation!

Partial Presidency compromise text – doc. 10817/26	Drafting suggestions and Comments
General Comments	DK (Comments): Denmark supports the overall objective of streamlining permitting procedures and the concept of industrial manufacturing acceleration areas. However, Denmark emphasises that the framework must preserve full compliance with existing Union environmental legislation, including project-level assessment requirements under the Environmental Impact Assessment Directive, Habitats Directive and Water Framework Directive, and avoid any duplication or erosion of established assessment layers. EL (Drafting suggestions): GREECE RO

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	(Comments): The Regulation should explicitly enshrine the principles of technology neutrality and level playing field in its core provisions, particularly given that key parameters will be defined through Delegated Acts. These principles must guide the development of implementing measures under Articles 10 and 16, ensuring fair treatment across all decarbonisation technologies, including CCS and low-carbon hydrogen, and balanced application across Member States.
	RO (Comments): As the Partial Presidency compromise text (doc. 10817/26) does not address Article 34 of the Industrial Accelerator Act, which amends Regulation (EU) 2024/1735 (NZIA), the CO_2 storage obligations imposed on oil and gas producers under the NZIA remain wholly unresolved. Given the significant legal and operational challenges these obligations present, including the 15 pending legal challenges before the General Court and the disproportionate burden on certain Member States, we respectfully invite the Presidency and Member States to take up Article 34 in the ongoing negotiations. Permitting simplification alone will not be sufficient to accelerate industrial investment. For energy-intensive industries, investment decisions depend equally on: • timely access to competitive low-carbon electricity; • availability of grid capacity; • predictable investment conditions; • coherent implementation across Member States. The Regulation should therefore better integrate permitting with energy infrastructure planning.
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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 (Text with EEA relevance)	
THE EUROPEAN PARLIAMENT AND THE COUNCIL OF THE EUROPEAN UNION,	
Whereas:	
[…]	
(10) The unpredictability, complexity and, at times, excessive length of national permit-granting procedures undermine the cost-effectiveness of investments necessary for the development of industrial activities. Therefore,	AT (Drafting suggestions): [...]

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and in order to ensure and speed up the effective implementation of industrial manufacturing activities, Member States should apply streamlined and digitalised permit-granting processes. ~~A competent~~***An*** authority should coordinate all permit granting processes and ~~issue a comprehensive decision~~***ensure that all relevant decisions are adopted*** within the applicable time limit. ***The permit-granting procedure in this Regulation refers to any administrative authorisations required for the completion of a project that are issued by Member States' competent authorities, such as any prerequisites needed to obtain the grid connection permit. As such, any non-administrative authorisation (i.e. grid connection permit) issued by the system operator's are not covered.***	An authority should coordinate all permit granting processes and ~~issue a comprehensive decision~~ **facilitate** that all relevant decisions are adopted within the applicable time limit. AT (Comments): Enlignment with Art 5 (2) (where also *faciltiate* is used). *Ensure* is too strong. The explanations conerning grid connections are difficult to understand. BE (Drafting suggestions):

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	The unpredictability, complexity and, at times, excessive length of national permit-granting procedures undermine the cost-effectiveness of investments necessary for the development of industrial activities. Therefore, and in order to ensure and speed up the effective implementation of industrial manufacturing activities, Member States should apply streamlined and digitalised permit-granting processes. ~~A competent~~***An*** authority should coordinate **where necessary** all permit granting processes **for substantively related permits at the appropriate administrative level** and ~~issue a comprehensive decision~~***~~ensure~~ facilitate that all relevant decisions are adopted*** within the applicable time limit. ***The permit-granting procedure in this Regulation refers to any administrative authorisations required for the completion of a project that are issued by Member States' competent authorities, such as any prerequisites needed to obtain the grid connection permit. As such, any non-administrative authorisation (i.e. grid connection permit) issued by the system operator's are not covered.*** BE (Comments): Align with the text proposed by the Presidency for article 5.2: 'facilitate' instead of 'ensure'. Belgium refers to its comments and text proposals on articles 5.1 and 5.2. DE (Drafting suggestions): The unpredictability, complexity and, at times, excessive length of national permit-granting procedures undermine the cost-effectiveness of investments

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	necessary for the development of industrial activities. Therefore, and in order to ensure and speed up the effective implementation of industrial manufacturing activities, Member States should apply streamlined and digitalised permit-granting processes. ~~**A competent*An* authority should coordinate all permit granting processes and issue a comprehensive decision*ensure that all relevant decisions are adopted* within the applicable time limit.**~~ ***The permit-granting procedure in this Regulation refers to any administrative authorisations required for the completion of a project that are issued by Member States' competent authorities, such as any prerequisites needed to obtain the grid connection permit. As such, any non-administrative authorisation (i.e. grid connection permit) issued by the system operator's are not covered.*** DE (Comments): We reject the idea of a "coordinating authority," as outlined in the new proposal. It should remain the responsibility of the competent authority to ensure that the decision is adopted within the applicable time limit. ES (Drafting suggestions): 10) The unpredictability, complexity and, at times, excessive length of national permit-granting procedures undermine the cost-effectiveness of investments necessary for the development of industrial activities. Therefore, and in order to ensure and speed up the effective implementation of industrial manufacturing activities, Member States should apply streamlined and digitalised permit-granting processes, **without undermining EU's climate and environmental objectives**. ~~A competent~~***An*** authority should coordinate all permit granting processes and ~~issue a comprehensive decision~~***ensure that all relevant decisions are adopted*** within the applicable time limit. ***The***

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	permit-granting procedure in this Regulation refers to any administrative authorisations required for the completion of a project that are issued by Member States' competent authorities, such as any prerequisites needed to obtain the grid connection permit. As such, any non-administrative authorisation (i.e. grid connection permit) issued by the system operator's are not covered. ES (Comments): PRES CY and PRES IE should clarify whether the prerequisites for obtaining the grid connection permit are included, as these are considered administrative permits. However, the grid connection permit itself is not included, since it is not regarded as an administrative permit. PRES CY and PRES IE should also explain why the grid connection permit is not considered an administrative permit. FR (Drafting suggestions): (10) The unpredictability, complexity and, at times, excessive length of national permit-granting procedures undermine the cost-effectiveness of investments necessary for the development of industrial activities. Therefore, and in order to ensure and speed up the effective implementation of industrial manufacturing activities, Member States ~~should~~ **may** apply streamlined and digitalised permit-granting processes, **at relevant administrative level**. ~~An authority should~~ **Points of contact may** coordinate **and be a communication interface between the project promoters and the administration. Such points of contact shall not affect the allocation of decision making powers under national law, unless Member States**

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	decide otherwise. ~~all permit granting processes and ensure that all relevant decisions are adopted within the applicable time limit~~. ~~The permit-granting procedure in this Regulation refers to any administrative authorisations required for the completion of a project that are issued by Member States' competent authorities, such as any prerequisites needed to obtain the grid connection permit.~~ As such, any non-administrative authorisation (i.e. grid connection permit) issued by the system operator's are not covered. FR (Comments): FR : French authorities are in favour of a harmonisation regarding permit-granting procedures; as such, the points of contact should be the same as those referred to in the RSEA (environment omnibus). NL (Drafting suggestions): ***The permit-granting procedure in this Regulation refers to any administrative authorisations required for the completion of a project that are issued by Member States' competent authorities, such as any prerequisites needed to obtain the grid connection permit. As such, any non-administrative*** **authorisation or agreement (i.e. needed for grid connection ~~permit~~) issued by ore closed with the system operator's are not conversed** NL (Comments): The term "permit" implies a decision by a national authority , while a grid connection is requested from the grid operator, which is not a national authority.

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	RO (Drafting suggestions): The unpredictability, complexity and, at times, excessive length of national permit-granting procedures undermine the cost-effectiveness of investments necessary for the development of industrial activities. Therefore, and in order to ensure and speed up the effective implementation of industrial manufacturing activities, Member States should apply streamlined and digitalised permit-granting processes. ~~A competent~~*An* authority should coordinate all permit granting processes and ~~issue a comprehensive decision~~*ensure that all relevant decisions are adopted* within the applicable time limit. *The permit-granting procedure in this Regulation refers to any administrative authorisations required for the completion of a project that are issued by Member States' competent authorities, such as any prerequisites needed to obtain the grid connection permit. As such, any non-administrative authorisation (i.e. grid connection permit) issued by the system operator's are not covered.* **Member States should ensure that competent permitting authorities cooperate closely with transmission and distribution system operators in order to avoid unnecessary delays related to grid connection.** RO (Comments): For electro-intensive industries, permitting and grid connection are inseparable. SE (Drafting suggestions): (10) The unpredictability, complexity and, at times, excessive length of national permit-granting procedures undermine the cost-effectiveness of

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	investments necessary for the development of industrial activities. Therefore, and in order to ensure and speed up the effective implementation of industrial manufacturing activities, Member States should apply streamlined and digitalised permit-granting processes. ~~A competent~~***An*** authority **or authorities** should coordinate **and facilitate** all permit granting processes and ~~issue a comprehensive decision~~***ensure that all relevant decisions are adopted*** within the applicable time limit. ***The permit-granting procedure in this Regulation refers to any administrative authorisations required for the completion of a project that are issued by Member States' competent authorities, such as any prerequisites needed to obtain the grid connection permit. As such, any non-administrative authorisation (i.e. grid connection permit) issued by the system operator's are not covered.*** SE (Comments): To align with suggested new wording under Article 5.2.
	NL (Drafting suggestions): **(10 a) To prevent scattered permitting rules and procedures, the permitting rules in the IAA are complementary to already existing rulings on permitting. Any implementing acts regarding other regulations that also serve the IAA, shall be deemed sufficient.** NL (Comments): We need to prevent that the same obligation is implemented several times and leads to scattering of permitting procedures. Therefore, we need to acknowledge member states that already have forms of digitalization and single points of contact.

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(10a) Digitalisation is a key tool to speed up procedures and to increase efficiency for all parties involved. It allows a faster handling of applications by the relevant authorities, and it allows project promoters to have quick access to clear information on process steps and requirements from the outset, therefore ensuring transparency and monitoring. However, digitalisation of permit-granting procedures is lagging behind, as it is often scattered among permit-granting procedures and steps across different competent authorities and in most Member States there is no unified digital process. Member States should set up a digital single portal that will serve as a single access point for all the steps of the permit-granting procedures for industrial manufacturing projects. It would contribute to more uniform digitalisation, accountability and transparency across different permitting authorities in Member States and ultimately speed up permit-granting procedures. It is also intended to simplify the process by allowing applicants to file their application in a single portal that can automatically route the applications to the competent authority. The portal should present features allowing authorities and applicants to check the status of the application and where delays are, as well as check compliance with applicable permitting deadlines. In addition, it should enable the interoperable and automated data exchange between authorities and re-use of data already held by public authorities, in line with the once-only principle.	AT (Comments): Align the wording with Art 4 (2). BE (Drafting suggestions): ***(10a) Digitalisation is a key tool to speed up procedures and to increase efficiency for all parties involved. It allows a faster handling of applications by the relevant authorities, and it allows project promoters to have quick access to clear information on process steps and requirements from the outset, therefore ensuring transparency and monitoring.***

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	However, digitalisation of permit-granting procedures is lagging behind, as it is often scattered among permit-granting procedures and steps across different competent authorities and in most Member States there is no unified digital process. Member States should set up a digital single access portal or digital single access portals if necessary for reasons of compliance with the constitutional division of powers and administrative organisation of the member state, that will serve as a single access point or points for all the steps of the permit-granting procedures for industrial manufacturing projects. It would contribute to more uniform digitalisation, accountability and transparency across different permitting authorities in Member States and ultimately speed up permit-granting procedures. It is also intended to simplify the process by obliging ~~allowing~~ applicants to file their application in a single portal that can automatically route the applications to the competent authority. The portal should present features allowing authorities and applicants to check the status of the application and where delays are, as well as check compliance with applicable permitting deadlines. In addition, it should enable the interoperable and automated data exchange between authorities and re-use of data already held by public authorities, in line with the once-only principle BE (Comments): See comment on article 4(1) EE (Drafting suggestions): ***Digitalisation is a key tool to speed up procedures and to increase efficiency for all parties involved. It allows a faster handling of***

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	applications by the relevant authorities, and it allows project promoters to have quick access to clear information on process steps and requirements from the outset, therefore ensuring transparency and monitoring. However, digitalisation of permit-granting procedures is lagging behind, as it is often scattered among permit-granting procedures and steps across different competent authorities and in most Member States there is no unified digital process. Member States **that have not yet established a fully digitalised and transparent permit-granting process** ***should set up a digital single portal that will serve as a single access point for all the steps of the permit-granting procedures for industrial manufacturing projects.*** **Where existing digital systems in a Member State already provide equivalent functionalities, Member States should be able to continue using those systems.** ***It would contribute to more uniform digitalisation, accountability and transparency across different permitting authorities in Member States and ultimately speed up permit-granting procedures. It is also intended to simplify the process by allowing applicants to file their application in a single portal that can automatically route the applications to the competent authority. The portal should present features allowing authorities and applicants to check the status of the application and where delays are, as well as check compliance with applicable permitting deadlines. In addition, it should enable the interoperable and automated data exchange between authorities and re-use of data already held by public authorities, in line with the once-only principle.*** EE (Comments): Provisions on permitting in the IAA should be more flexible, taking into account Member States who already have in place a streamlined fully digital permitting system. The IAA should not add unjustified additional administrative burdens or break an existing well-functioning digitalised

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	system. In Estonia, the so-called sequence of necessary permits is not regulated—that is, a developer has the choice of when and what to apply for—so it is possible to apply for all necessary permits at once, even today. Furthermore, various digital registries are already in place today for applying for all permits, and the data submitted during the permit process varies depending on the specific subject matter of the permit. Estonia does not consider it justified to redesign its entire digital infrastructure to this extent, as the objective of the provision is already being met in Estonia through other means. Therefore, establishing a separate single portal would be disproportionate to the objective pursued. We underline that this matter is important for Estonia as it could potentially put a disproportionate and unnecessary amount of burden on Estonia's digital permitting system. As a result, it would not make the permitting process in Estonia simpler, but instead it would force us to redesign and change our existing system without any actual need or practical improvement, at a very high cost. FR (Drafting suggestions): (10a) Digitalisation is a key tool to speed up procedures and to increase efficiency for all parties involved. It allows a faster handling of applications by the relevant authorities, and it allows project promoters to have quick access to clear information on process steps and requirements from the outset, therefore ensuring transparency and monitoring. However, digitalisation of permit-granting procedures is lagging behind, as it is often scattered among permit-granting procedures and steps across different competent authorities and in most Member States there is no unified digital process. Member States ~~should~~ **may** set up a digital single portal that will serve as a single access point for all the steps of the permit-granting procedures for industrial manufacturing projects. It would contribute to more uniform digitalisation, accountability and transparency across different

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	permitting authorities in Member States and ultimately speed up permit-granting procedures. It is also intended to simplify the process by allowing applicants to file their application in a single portal that can automatically route the applications to the competent authority. The portal ~~should~~ **may** present features allowing authorities and applicants to check the status of the application and where delays are, as well as check compliance with applicable permitting deadlines. In addition, it ~~should~~ **may** enable the interoperable and automated data exchange between authorities and re-use of data already held by public authorities, in line with the once-only principle. FR (Comments): FR : French authorities support the simplification of procedures through digitalisation. These digitalisation efforts, which are complex and costly, should nevertheless be left to the discretion of Member States. NL (Drafting suggestions): (**10b~~a~~**) Digitalisation is a key tool to speed up procedures and to increase efficiency for all parties involved. It allows a faster handling of applications by the relevant authorities, and it allows project promoters to have quick access to clear information on process steps and requirements from the outset, therefore ensuring transparency and monitoring. However, digitalisation of permit-granting procedures **is not following an equal pace in member states** ~~is lagging behind~~, as it is often scattered among permit-granting procedures and steps across different competent authorities and in most Member States there is no unified digital process. Member States should**, if not already available,** set up a digital single portal that will serve as a single access point for all the steps of the permit-granting procedures for industrial manufacturing projects. It would contribute to more uniform

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	digitalisation, accountability and transparency across different permitting authorities in Member States and ultimately speed up permit-granting procedures. It is also intended to simplify the process by allowing applicants to file their application in a single portal that can automatically route the applications to the competent authority. The portal should present features allowing authorities and applicants to check the status of the application and where delays are, as well as check compliance with applicable permitting deadlines. In addition, it should enable the interoperable and automated data exchange between authorities and re-use of data already held by public authorities, in line with the once-only principle. RO (Drafting suggestions): Add: ***"including SME-friendly digital functionalities, clear guidance and the application of the once-only principle."*** RO (Comments): The Digital Single Access Point should become a practical simplification tool for businesses. Its design should facilitate reuse of information already available to public authorities and minimise administrative burden SE (Drafting suggestions): ***(10a) Digitalisation is a key tool to speed up procedures and to increase efficiency for all parties involved. It allows a faster handling of applications by the relevant authorities, and it allows project promoters to have quick access to clear information on process steps and requirements from the outset, therefore ensuring transparency and monitoring. However, digitalisation of permit-granting procedures is lagging behind, as***

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	it is often scattered among permit-granting procedures and steps across different competent authorities and in most Member States there is no unified digital process. Member States should set up a digital single portal that will serve as a single access point for all the steps of the permit-granting procedures for industrial manufacturing projects. It would contribute to more uniform digitalisation, accountability and transparency across different permitting authorities in Member States and ultimately speed up permit-granting procedures. It is also intended to simplify the process by allowing applicants to file their application in a single portal that can ~~automatically~~ route the applications to the competent authority. The portal should present features allowing authorities and applicants to check the status of the application and where delays are, as well as check compliance with applicable permitting deadlines. In addition, it should enable the interoperable and automated data exchange between authorities and re-use of data already held by public authorities, in line with the once-only principle. SE (Comments): Remove "automatically" to align with new text in Article 4(2), which does not refer to automatic routing of permit applications to the relevant authority.
(11) The implementation of ***digital*** single access points should be based on ***the core functionalities of*** the European Business Wallets established pursuant to [Proposal for a Regulation on the establishment of European Business Wallets[1]], as they provide a secure, standardised, and interoperable platform for businesses to interact with public sector bodies. This should enable the efficient and effective submission of applications, while ensuring a high level of data protection, cybersecurity, and integrity of information. The European Business Wallets will also enable the streamlining of	BE (Comments): Belgium has scrutiny reservation on the linking of the single access points to the European Business Wallets. The regulation on the European Business Wallets is still under negotiation. EE

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investments that were made and the avoidance of unnecessary duplications, allowing for the optimisation of resources and the reduction of administrative burdens for businesses. The implementation of ***digital*** single access points should also, to the extent possible, use existing Union digital infrastructures, catalogues and building blocks, including those developed under the Once-Only Technical System and its implementing acts. This would promote complementarity, interoperability and the efficient use of public resources, while avoiding duplication of existing digital solutions. 1 Proposal for a Regulation of the European Parliament and of the Council on the establishment of European Business Wallets (COM/2025/838 final).	(Drafting suggestions): The implementation of ***digital*** single access points ~~should~~**may, where appropriate,** be based on ***the core functionalities of*** the European Business Wallets established pursuant to [Proposal for a Regulation on the establishment of European Business Wallets[1]], as they provide a secure, standardised, and interoperable platform for businesses to interact with public sector bodies. This should enable the efficient and effective submission of applications, while ensuring a high level of data protection, cybersecurity, and integrity of information. The European Business Wallets will also enable the streamlining of investments that were made and the avoidance of unnecessary duplications, allowing for the optimisation of resources and the reduction of administrative burdens for businesses. The implementation of ***digital*** single access points should also, to the extent possible, use existing Union digital infrastructures, catalogues and building blocks, including those developed under the Once-Only Technical System and its implementing acts. This would promote complementarity, interoperability and the efficient use of public resources, while avoiding duplication of existing digital solutions. 1 Proposal for a Regulation of the European Parliament and of the Council on the establishment of European Business Wallets (COM/2025/838 final). EE (Comments): The use of European Business Wallets (EBWs) should be voluntary, in line with the EBW general approach that states that Member States must allow certain companies that have procured EBWs to use its functionalities. It is not the case that public authorities should use them themselves. FR

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	(Drafting suggestions): (11) The implementation of digital single access points ~~should~~ **may** be based on the core functionalities of the European Business Wallets established pursuant to [Proposal for a Regulation on the establishment of European Business Wallets[1]], as they provide a secure, standardised, and interoperable platform for businesses to interact with public sector bodies. This should enable the efficient and effective submission of applications, while ensuring a high level of data protection, cybersecurity, and integrity of information. The European Business Wallets will also enable the streamlining of investments that were made and the avoidance of unnecessary duplications, allowing for the optimisation of resources and the reduction of administrative burdens for businesses. The implementation of digital single access points ~~should~~ **may** also, to the extent possible, use existing Union digital infrastructures, catalogues and building blocks, including those developed under the Once-Only Technical System and its implementing acts. This ~~would~~ **could** promote complementarity, interoperability and the efficient use of public resources, while avoiding duplication of existing digital solutions. 1 Proposal for a Regulation of the European Parliament and of the Council on the establishment of European Business Wallets (COM/2025/838 final). FR (Comments): FR : French authorities support the simplification of procedures through digitalisation. These digitalisation efforts, which are complex and costly, should nevertheless be left to the discretion of Member States.

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	RO (Comments): Project developers operating across multiple regulatory frameworks should benefit from a unified digital permitting pathway. SE (Drafting suggestions): (11) The implementation of **a** ***digital*** single access point~~s~~ should be based on ***the core functionalities of*** the European Business Wallets established pursuant to [Proposal for a Regulation on the establishment of European Business Wallets1], as they provide a secure, standardised, and interoperable platform for businesses to interact with public sector bodies. This should enable the efficient and effective submission of applications, while ensuring a high level of data protection, cybersecurity, and integrity of information. The European Business Wallets will also enable the streamlining of investments that were made and the avoidance of unnecessary duplications, allowing for the optimisation of resources and the reduction of administrative burdens for businesses. The implementation of **a** ***digital*** single access point~~s~~ should also, to the extent possible, use existing Union digital infrastructures, catalogues and building blocks, including those developed under the Once-Only Technical System and its implementing acts. This would promote complementarity, interoperability and the efficient use of public resources, while avoiding duplication of existing digital solutions. SE (Comments):

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	To align with the new wording in Article 4 which has changed from plural to singular.
(12) In order to ensure streamlined and simplified permit-granting procedures, a single application covering all necessary permits should be provided for all industrial manufacturing projects except for the manufacturing sector under the C12 code. ***Project promoters would not be precluded from using existing permit-granting procedures. Moreover,*** it should not apply where specific permit-granting or licensing procedures or requirements are established in Union harmonisation legislation for industrial manufacturing projects, such as pursuant to Regulations (EU) 2024/1735[2] and (EU) 2024/1252[3] of the European Parliament and of the Council. Sectorial Union legislation governing medicines and medical devices has recently undergone or is undergoing further streamlining of harmonised rules and timelines for authorisations and certifications, with options to speed up the process if necessary. Those rules should therefore not be considered permit-granting procedures within the context of this initiative. 2 Regulation (EU) 2024/1735 of the European Parliament and of the Council of 13 June 2024 on establishing a framework of measures for strengthening Europe's net-zero technology manufacturing ecosystem and amending Regulation (EU) 2018/1724 (OJ L, 2024/1735, 28.6.2024, ELI: http://data.europa.eu/eli/reg/2024/1735/oj). 3 Regulation (EU) 2024/1252 of the European Parliament and of the Council of 11 April 2024 establishing a framework for ensuring a secure and sustainable supply of critical raw materials and amending Regulations (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1724 and (EU) 2019/1020 (OJ L, 2024/1252, 3.5.2024, ELI: http://data.europa.eu/eli/reg/2024/1252/oj).	AT (Comments): We assume this recital and the "**it**" (in the 3rd sentence) refers to Art 5 (single application) and not to Art 4 (SAP) which is still applicable in cases, where other sectoral acts (ie. Reg. 2024/1735) apply. Clarification could make sense. BE (Drafting suggestions): In order to ensure streamlined and simplified permit-granting procedures, a single application covering **substantively related** ~~all necessary~~ permits **at the appropriate administrative level** should be provided for all industrial manufacturing projects except for the manufacturing sector under the C12 code. ~~***Project promoters would not be precluded from using existing permit-granting procedures.***~~ ***Moreover,*** it should not apply where specific permit-granting or licensing procedures or requirements are established in Union harmonisation legislation for industrial manufacturing projects, such as pursuant to Regulations (EU) 2024/1735[2] and (EU) 2024/1252[3] of the European Parliament and of the Council. Sectorial Union legislation governing medicines and medical devices has recently undergone or is undergoing further streamlining of harmonised rules and timelines for authorisations and certifications, with options to speed up the process if necessary. Those rules should therefore not be considered permit-granting procedures within the context of this initiative.

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	BE (Comments): BE does not agree with '*Project promoters would not be precluded from using existing permit-granting procedures'.* Belgium also does not agree with a single application for all permits. Belgium refers to its comments and text proposals on article 5.1. CZ (Drafting suggestions): (12) In order to ensure streamlined and simplified permit-granting procedures, a ~~single~~ application covering all necessary permits should be provided for all industrial manufacturing projects except for the manufacturing sector under the C12 code. ***Project promoters would not be precluded from using existing permit-granting procedures. Moreover,*** it should not apply where specific permit-granting or licensing procedures or requirements are established in Union harmonisation legislation for industrial manufacturing projects, such as pursuant to Regulations (EU) 2024/1735[2] and (EU) 2024/1252[3] of the European Parliament and of the Council. Sectorial Union legislation governing medicines and medical devices has recently undergone or is undergoing further streamlining of harmonised rules and timelines for authorisations and certifications, with options to speed up the process if necessary. Those rules should therefore not be considered permit-granting procedures within the context of this initiative. CZ

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	(Comments): We suggest removing the word „single“ in the first sentence when referring to the application. DE (Drafting suggestions): (12) In order to ensure streamlined ~~and simplified~~ permit-granting procedures, requirements must be made to ensure that application documents are complete within a specified time frame. ~~a single application covering all necessary permits should be provided for all industrial manufacturing projects except for the manufacturing sector under the C12 code.~~ ***~~Project promoters would not be precluded from using existing permit-granting procedures. Moreover,~~*** ~~it~~ This should not apply where specific permit-granting or licensing procedures or requirements are established in Union harmonisation legislation for industrial manufacturing projects, such as pursuant to Regulations (EU) 2024/1735[2] and (EU) 2024/1252[3] of the European Parliament and of the Council. Sectorial Union legislation governing medicines and medical devices has recently undergone or is undergoing further streamlining of harmonised rules and timelines for authorisations and certifications, with options to speed up the process if necessary. Those rules should therefore not be considered permit-granting procedures within the context of this initiative. 2 Regulation (EU) 2024/1735 of the European Parliament and of the Council of 13 June 2024 on establishing a framework of measures for strengthening Europe’s net-zero technology manufacturing ecosystem and amending Regulation (EU) 2018/1724 (OJ L, 2024/1735, 28.6.2024, ELI: http://data.europa.eu/eli/reg/2024/1735/oj).

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	3 Regulation (EU) 2024/1252 of the European Parliament and of the Council of 11 April 2024 establishing a framework for ensuring a secure and sustainable supply of critical raw materials and amending Regulations (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1724 and (EU) 2019/1020 (OJ L, 2024/1252, 3.5.2024, ELI: http://data.europa.eu/eli/reg/2024/1252/oj). DE (Comments): Alignment with required amendments to Article 5 EE (Drafting suggestions): In order to ensure streamlined and simplified permit-granting procedures, a single application covering all necessary permits should be provided for all industrial manufacturing projects except for the manufacturing sector under the C12 code~~. ***Project promoters would not be precluded from using existing permit-granting procedures.***~~, **or Member States should ensure that all relevant permits required for such projects can be applied for at the same time, reflecting the diversity of national administrative and digital permitting arrangements already in place.** ***Moreover***, it should not apply where specific permit-granting or licensing procedures or requirements are established in Union harmonisation legislation for industrial manufacturing projects, such as pursuant to Regulations (EU) 2024/1735[2] and (EU) 2024/1252[3] of the European Parliament and of the Council. Sectorial Union legislation governing medicines and medical devices has recently undergone or is undergoing further streamlining of harmonised rules and timelines for authorisations and certifications, with options to speed up the process if necessary. Those rules should therefore not be considered permit-granting procedures within the context of this initiative.

	2 Regulation (EU) 2024/1735 of the European Parliament and of the Council of 13 June 2024 on establishing a framework of measures for strengthening Europe's net-zero technology manufacturing ecosystem and amending Regulation (EU) 2018/1724 (OJ L, 2024/1735, 28.6.2024, ELI: http://data.europa.eu/eli/reg/2024/1735/oj). 3 Regulation (EU) 2024/1252 of the European Parliament and of the Council of 11 April 2024 establishing a framework for ensuring a secure and sustainable supply of critical raw materials and amending Regulations (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1724 and (EU) 2019/1020 (OJ L, 2024/1252, 3.5.2024, ELI: http://data.europa.eu/eli/reg/2024/1252/oj). EE (Comments): Provisions on permitting in the IAA should be more flexible, considering Member States who already have in place a streamlined fully digital permitting system. In Estonia, the so-called sequence of necessary permits is not regulated—that is, a developer has the choice of when and what to apply for—so it is possible to apply for all necessary permits at once, even today. Member States should not be required to create new systems when the overall aims, in this case streamlining national permitting-granting processes, can be achieved with existing systems. Moreover, the requirement for Member States to maintain two parallel permit-granting systems is not consistent with the objective of streamlining and simplification, therefore this should be removed. Instead, national advances in digital permitting systems should be taken into account. FR (Drafting suggestions): (12) ~~**In order to ensure streamlined and simplified permit-granting procedures, a single application covering all necessary permits should be**~~

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	~~**provided for all industrial manufacturing projects except for the manufacturing sector under the C12 code. Project promoters would not be precluded from using existing permit-granting procedures. Moreover, it should not apply where specific permit-granting or licensing procedures or requirements are established in Union harmonisation legislation for industrial manufacturing projects, such as pursuant to Regulations (EU) 2024/1735[2] and (EU) 2024/1252[3] of the European Parliament and of the Council.**~~ Sectorial Union legislation governing medicines and medical devices has recently undergone or is undergoing further streamlining of harmonised rules and timelines for authorisations and certifications, with options to speed up the process if necessary. Those rules should therefore not be considered permit-granting procedures within the context of this initiative. 2 Regulation (EU) 2024/1735 of the European Parliament and of the Council of 13 June 2024 on establishing a framework of measures for strengthening Europe's net-zero technology manufacturing ecosystem and amending Regulation (EU) 2018/1724 (OJ L, 2024/1735, 28.6.2024, ELI: http://data.europa.eu/eli/reg/2024/1735/oj). 3 Regulation (EU) 2024/1252 of the European Parliament and of the Council of 11 April 2024 establishing a framework for ensuring a secure and sustainable supply of critical raw materials and amending Regulations (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1724 and (EU) 2019/1020 (OJ L, 2024/1252, 3.5.2024, ELI: http://data.europa.eu/eli/reg/2024/1252/oj). FR (Comments): FR : French authorities point out that the competences for permit-granting procedures may vary from administrative levels. Some procedures for

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	authorizing the siting of industrial projects remain into the scope of national sovereignty, particularly with regard to urban permit-granting procedures. They cannot be incorporated into this single permit-granting procedure. Furthermore, the choice of the permit-granting procedure cannot be let to the project promoter. Otherwise, it would add complexity to the process. French authorities advocate for a single harmonized framework for permit granting procedures within the RSEA to avoid the multiplication of procedures and instruction cases which is counter productive for simplification purposes. SE (Drafting suggestions): In order to ensure streamlined and simplified permit-granting procedures, ~~a single~~ application**s** covering all necessary permits should be provided for all industrial manufacturing projects except for the manufacturing sector under the C12 code. ***Project promoters would not be precluded from using existing permit-granting procedures. Moreover,*** it should not apply where specific permit-granting or licensing procedures or requirements are established in Union harmonisation legislation for industrial manufacturing projects, such as pursuant to Regulations (EU) 2024/1735[2] and (EU) 2024/1252[3] of the European Parliament and of the Council. Sectorial Union legislation governing medicines and medical devices has recently undergone or is undergoing further streamlining of harmonised rules and timelines for authorisations and certifications, with options to speed up the process if necessary. Those rules should therefore not be considered permit-granting procedures within the context of this initiative. SE (Comments):

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	The permitting process often involves multiple applications submitted to different competent authorities. Replacing "a single application" with "applications" better reflects national permitting systems while maintaining a coordinated permit-granting procedure.
[…]	
(14) Regulation (EU) 2024/1735 sets out provisions that streamline administrative and permit-granting processes for net-zero technology manufacturing projects. Some specific components in the supply chain of net-zero technologies are produced through energy-intensive production processes. Energy-intensive industry decarbonisation projects fall within the scope of Regulation (EU) 2024/1735 ***only*** where the relevant facilities produce components that are part of the supply chain of a net-zero technology. ~~However~~***Furthermore***, ***the definition of*** energy-intensive ~~facilities that do not produce components that are used in net-zero technologies are currently excluded from the scope of~~***industry decarbonisation projects, as laid down in*** Regulation (EU) 2024/1735 ***is not comprehensive***. This creates ~~the~~***a*** risk of uneven conditions ~~of~~ between energy-intensive industries and slows down decarbonisation efforts. All energy-intensive ***industry*** decarbonisation projects should therefore be subject to the same permit-granting processes.	AT (Drafting suggestions): **Therefore**, ***the definition of*** energy-intensive ~~facilities that do not produce components that are used in net-zero technologies are currently excluded from the scope of~~***industry decarbonisation projects, as laid down in*** Regulation (EU) 2024/1735 ***is not comprehensive*** AT (Comments):

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	The correct word would be "**Therefore**" (not *furthermore* or *however*) ES (Comments): We understand that the definition of energy-intensive decarbonization projects is not comprehensive as it does not cover the whole industry. However, in terms of permitting procedures, the decision needs to be comprehensive in order to align the permitting rules in CRMA, NZIA and IAA. RO (Comments): The amendment correctly identifies that the definition of energy-intensive industry decarbonisation projects under Regulation (EU) 2024/1735 is not comprehensive. However, the IAA should go further by ensuring alignment between the IAA and the NZIA on CCS provisions. Carbon capture and storage can only contribute effectively to industrial decarbonisation if CO_2 capture, transport and storage infrastructure are developed in a coordinated manner across the full value chain. The CCS value chain approach should be reflected explicitly to avoid bottlenecks and ensure investment certainty (see

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	also Article 3(18) of Regulation (EU) 2024/1735 on net-zero strategic projects).
[…]	
(53) Clustering industrial ***manufacturing*** activity can contribute substantially to achieving the objectives of this Regulation and to strengthening certain strategic sectors in the internal market***. A harmonised framework for the designation of industrial manufacturing acceleration areas should ensure that project promoters benefit from comparable enabling conditions irrespective of the Member State in which they invest, thereby strengthening the internal market as a driver of industrial growth. The designation of at least one industrial manufacturing acceleration area in every Member State is intended to stimulate and concentrate manufacturing activity across the Union, raising the share of industrial manufacturing in the Union economy while preserving a level playing field between Member States***. It is therefore appropriate to promote the development of industrial manufacturing acceleration areas. Such areas should be limited in geographical scope in order to foster industrial symbiosis. When designating the areas, Member States should, in cooperation with regional authorities where appropriate, take into account industrial production (in particular for certain strategic sectors) and their regions' general level of development, with a focus on the less developed regions and those in transition. ***To facilitate the identification of manufacturing areas, Member States should consider prioritising locations outside Natura 2000 sites and outside areas designated under national protection schemes for nature and biodiversity conservation, as well as other areas identified on the basis of sensitivity maps and outside protected areas as referred to in Article 6 of Directive 2000/60/EC.*** Furthermore, in	BE (Drafting suggestions):

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order to strengthen the resilience, strategic autonomy and competitiveness of the Union's industrial base, the designation of industrial manufacturing acceleration areas should align with strategic projects and other Union initiatives such as Net-Zero Acceleration Valleys.	*. To facilitate the identification of manufacturing areas, Member States* ***shall*** *~~should consider~~ prioritis**~~e~~ing** locations outside Natura 2000 sites and outside areas designated under national protection schemes for nature and biodiversity conservation, as well as other areas identified on the basis of sensitivity maps and outside protected areas as referred to in Article 6 of Directive 2000/60/EC.* BE (Comments):

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	We ask to keep this text in article 25 OR to reinforce the wording here ES (Drafting suggestions): 53) Clustering industrial *manufacturing* a […] *in Article 6 of Directive 2000/60/EC.* Furthermore, in order to strengthen the resilience, strategic autonomy**, circularity** and competitiveness of the Union's industrial base, the

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	designation of industrial manufacturing acceleration areas should align with strategic projects and other Union initiatives such as Net-Zero Acceleration Valleys. ES (Comments): We propose to add circularity to increase the Union's industrial base. FR (Drafting suggestions): (53) Clustering industrial manufacturing activity can contribute substantially to achieving the objectives of this Regulation and to strengthening certain strategic sectors in the internal market. A harmonised framework for the designation of industrial manufacturing acceleration areas should ensure that project promoters benefit from comparable enabling conditions irrespective of the Member State in which they invest, thereby strengthening the internal market as a driver of industrial growth. The designation of at least one industrial manufacturing acceleration area in every Member State is intended to stimulate and concentrate manufacturing activity across the Union, raising the share of industrial manufacturing in the Union economy while preserving a level playing field between Member States. It is therefore appropriate to promote the development of industrial manufacturing acceleration areas. Such areas should be limited in geographical scope in order to foster industrial symbiosis. When designating the areas, Member States should, in cooperation with regional authorities where appropriate, take into account industrial production (in particular for certain strategic sectors) and their regions' general level of development, with a focus on the less developed regions and those in transition. To facilitate the identification of manufacturing areas, Member States should consider prioritising locations outside Natura 2000 sites and outside areas designated under national

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	protection schemes for nature and biodiversity conservation, as well as other areas identified on the basis of sensitivity maps and outside protected areas as referred to in Article 6 of Directive 2000/60/EC, **except for artificial and built surfaces located in those areas such as brownfield sites.** . Furthermore, in order to strengthen the resilience, strategic autonomy and competitiveness of the Union's industrial base, the designation of industrial manufacturing acceleration areas should align with strategic projects and other Union initiatives such as Net-Zero Acceleration Valleys. FR (Comments): FR : French authorities welcome the initiative to establish industrial acceleration zones and their integration with existing European frameworks (notably the Net-Zero Acceleration Valleys). It emphasises that these zones must not merely be a label but must offer meaningful measures to streamline and speed up the permitting process, and will propose several amendments to this effect. NL (Drafting suggestions): (53) Clustering industrial manufacturing activity can **through the positive spillovers of scale, labor and resource pooling** contribute substantially to achieving the objectives of this Regulation and to strengthening certain strategic sectors in the internal market. A harmonised framework for the designation of industrial manufacturing acceleration áreas **with sustainability potential** should ensure that project promoters benefit from comparable enabling conditions irrespective of the Member State in which they invest, thereby strengthening the internal market as a driver of industrial growth. The **possibility to designate** ~~designation~~ of at least one industrial

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	manufacturing acceleration area in every Member State is intended to stimulate and concentrate manufacturing activity across the Union, raising the share of industrial manufacturing in the Union economy while preserving a level playing field between Member States. ~~It is therefore appropriate to promote the development of industrial manufacturing acceleration areas. Such areas should be limited in geographical scope in order to foster industrial symbiosis.~~ When designating the areas, Member States should, in cooperation with regional authorities where appropriate, take into account industrial production (in particular for certain strategic sectors) and their regions' general level of development, with a focus on the less developed regions and those in transition. To facilitate the identification of manufacturing areas, Member States should consider prioritising locations outside Natura 2000 sites and outside areas designated under national protection schemes for nature and biodiversity conservation, as well as other areas identified on the basis of sensitivity maps and outside protected areas as referred to in Article 6 of Directive 2000/60/EC. Furthermore, in order to strengthen the resilience, strategic autonomy and competitiveness of the Union's industrial base, the designation of industrial manufacturing acceleration areas should align with strategic projects and other Union initiatives such as Net-Zero Acceleration Valleys. PT (Comments): The term 'certain strategic sectors' is overly vague and should be further specified to ensure legal certainty and predictability. RO (Drafting suggestions):

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	Clustering industrial *manufacturing* activity can contribute substantially to achieving the objectives of this Regulation and to strengthening certain strategic sectors in the internal market. *A harmonised framework for the designation of industrial manufacturing acceleration areas should ensure that project promoters benefit from comparable enabling conditions irrespective of the Member State in which they invest, thereby strengthening the internal market as a driver of industrial growth. The designation of at least one industrial manufacturing acceleration area in every Member State is intended to stimulate and concentrate manufacturing activity across the Union, raising the share of industrial manufacturing in the Union economy while preserving a level playing field between Member States*. It is therefore appropriate to promote the development of industrial manufacturing acceleration áreas **and should preferably build upon existing industrial ecosystems and brownfield industrial sites benefiting from existing transport, electricity, gas and water infrastructure.** Such areas should be limited in geographical scope in order to foster industrial symbiosis. When designating the areas, Member States should, in cooperation with regional authorities where appropriate, take into account industrial production (in particular for certain strategic sectors) and their regions' general level of development, with a focus on the less developed regions and those in transition. *To facilitate the identification of manufacturing areas, Member States should consider prioritising locations outside Natura 2000 sites and outside areas designated under national protection schemes for nature and biodiversity conservation, as well as other areas identified on the basis of sensitivity maps and outside protected areas as referred to in Article 6 of Directive 2000/60/EC.* Furthermore, in order to strengthen the resilience, strategic autonomy and competitiveness of the Union's industrial base, the designation of industrial manufacturing acceleration areas should align with strategic projects and other Union initiatives such as Net-Zero Acceleration Valleys

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	RO (Comments): Romania supports prioritising decarbonisation projects implemented on existing industrial brownfield sites, as this approach directly contributes to the Union's objectives of strengthening industrial competitiveness, accelerating decarbonisation and ensuring the efficient use of resources. Existing industrial platforms significantly reduce implementation costs, as they already benefit from essential infrastructure, including electricity and gas networks, transport connections, water supply and other industrial utilities, thereby limiting the need for additional investments. Furthermore, the reuse of brownfield sites enables faster project deployment by avoiding the development of new industrial areas and reducing preparatory procedures. This approach also minimises land take, limits impacts on biodiversity and environmentally sensitive areas, and is fully consistent with the Union's objectives on sustainable land use. At the same time, making full use of existing industrial assets strengthens European industrial resilience, preserves strategic value chains and skilled employment, and ensures a more efficient use of both public and private investment. This is particularly relevant for Romania, which has a strong industrial base and numerous existing industrial platforms with significant potential for modernisation and decarbonisation, including in strategic sectors such as aluminium production, where existing energy and transport infrastructure can substantially reduce investment costs and accelerate the deployment of low-carbon technologies. SE (Drafting suggestions): 53) Clustering industrial ***manufacturing*** activity can contribute substantially to achieving the objectives of this Regulation and to strengthening certain strategic sectors in the internal market***. ~~A harmonised~~***

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	~~***framework for the designation of industrial manufacturing acceleration areas should ensure that project promoters benefit from comparable enabling conditions irrespective of the Member State in which they invest, thereby strengthening the internal market as a driver of industrial growth. The designation of at least one industrial manufacturing acceleration area in every Member State is intended to stimulate and concentrate manufacturing activity across the Union, raising the share of industrial manufacturing in the Union economy while preserving a level playing field between Member States***~~. It is therefore appropriate to promote the development of industrial manufacturing acceleration areas, **on a voluntary basis**. Such areas should be limited in geographical scope in order to foster industrial symbiosis. When designating the areas, Member States should, in cooperation with regional authorities where appropriate, take into account industrial production (in particular for certain strategic sectors) and their regions' general level of development, with a focus on the less developed regions and those in transition. ***To facilitate the identification of manufacturing areas, Member States should consider prioritising locations outside Natura 2000 sites, areas of importance for Indigenous Peoples' use of their traditional lands and outside areas designated under national protection schemes for nature and biodiversity conservation, as well as other areas identified on the basis of sensitivity maps and outside protected areas as referred to in Article 6 of Directive 2000/60/EC.*** Furthermore, in order to strengthen the resilience, strategic autonomy and competitiveness of the Union's industrial base, the designation of industrial manufacturing acceleration areas should align with strategic projects and other Union initiatives such as Net-Zero Acceleration Valleys. SE (Comments):

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	It is of critical importance to ensure a healthy competitive situation among firms within and between Member States. If companies in acceleration areas are given advantages that are not available to other companies within the same industry this risks creating unequal competition. The designation of areas should remain voluntary for Member States. Member States and geographical areas have different conditions for industrial development. Flexibility is therefore required to enable the necessary degree of coordination between the local, regional and national levels. It is important to add that in the identification of manufacturing areas member States should prioritize locations outside areas of importance to Indigenous Peoples' traditional land use. SI (Comments): Taking into account that many delegations have called for the designation of such areas to be of voluntary nature, we believe that this should also be reflected both in recitals as well as appropriate Articles in chapter V.
	NL (Drafting suggestions): **(53 a) Cross border clustering aggregates all the above mentioned advantages of scale, finance potential, cooperation, mitigating shared burdens and allocating scarce resources. It is therefore a vital instrument in EU efforts to speed up industrial decarbonization and strengthening resilience, while also preventing growing differences between member states and distorting the level playing field.**

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	The IAA should therefore present the possibility of designating Cross Border Industrial Zones'. NL (Comments): There is a need to diversify in the kind of acceleration areas, especially when they are located in one member state or when there is cooperation between member states. Cross border cooperation has more advantages regarding scale, but also for the internal market.
[…]	
(57) Where industrial manufacturing acceleration areas are set up, their designation should correspond to the potential to access or organise education and training opportunities to ensure the availability of skilled labour***, which is essential for developing manufacturing activity in line with the objectives of this Regulation***. ***Member States should therefore, where appropriate, exchange information on the skills needed in those areas, on potential shortages of such skills and on best practices applied therein, within the framework of the Industrial Forum expert group established pursuant to the Commission Communication on a New Industrial Strategy for Europe[4]. Furthermore, Member States should also ensure synergies with, and promote the benefits provided under, the Pact for Skills established pursuant to the Commission Communication on a European Skills Agenda[5] for sustainable competitiveness, social fairness and resilience for entities established in the acceleration areas, paying particular attention to the Large-Scale Skills Partnerships and Regional Skills Partnerships set up thereunder. .***	

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4 ***Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions a New Industrial Strategy for Europe (COM/2020/102 final)*** 5 ***Communication from the Commission to the European Parliament, the Council, the European Parliament, the European Economic and Social Committee and the Committee of the Regions, European Skills Agenda for sustainable competitiveness, social fairness and resilience ((COM(2020) 274 final).***	
(58) To promote the development of industrial manufacturing acceleration areas and to expedite the permit-granting procedures necessary for industrial activities within those areas, Member States should establish ***and issue*** an aggregated baseline permit reflecting the specific characteristics of each identified industrial acceleration area and tailored to the industrial manufacturing sector or sectors to be deployed therein. That aggregated baseline permit issued by public authorities should cover the permits commonly required for ~~such~~ activities within the area ***as well as cross-sectoral permits that a project developer must obtain irrespective of the specific sector. These may include, without being limited to, authorisations relating to building and construction, zoning and land-use planning and pre-conditions for business establishment such as depollution requirements. As the baseline permit will necessarily follow Member States' respective permit-granting procedures, its scope and content may vary from one Member State to another. The aggregated baseline permit cannot include~~~~, excluding those~~ permits that are installation specific, such as those required under Directive 2010/75/EU of the European Parliament and of the Council[6] and the grid connection permit. Consequently, project promoters	FI (Drafting suggestions): These may include, without being limited to, authorisations relating to building and construction, ~~zoning and land-use planning~~ and pre-conditions for business establishment such as depollution requirements. FI (Comments): The regulation should not include binding obligations concerning land use planning. FR (Drafting suggestions): (58) To promote the development of industrial manufacturing acceleration areas and to expedite the permit-granting procedures necessary for industrial activities within those areas, Member States should establish and issue an aggregated baseline permit reflecting the specific characteristics of each

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should be required to obtain additional permits only for activities not covered by the aggregated baseline permit as well as environmental assessments where required. In case of activities potentially affecting Union and nationally protected sites, relevant permits should be granted only after having ensured that the activities are compatible with the conservation objectives of these sites. Such approach should significantly accelerate permit-granting procedures and reduce the administrative burden associated with them whilst maintaining high level of environmental standards. 6 Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control) (OJ L 334, 17.12.2010, p. 17, ELI: http://data.europa.eu/eli/dir/2010/75/oj).	identified industrial acceleration area and tailored to the industrial manufacturing sector or sectors to be deployed therein. That aggregated baseline permit issued by public authorities should cover the permits commonly required for -activities within the area as well as cross-sectoral permits that a project developer must obtain irrespective of the specific sector. These may include, without being limited to, authorisations relating pre-conditions for business establishment such as depollution requirements, **or environmental assessments as referred in chapter I and II of RSEA**. As the baseline permit will necessarily follow Member States' respective permit-granting procedures, its scope and content may vary from one Member State to another. The aggregated baseline permit cannot include~~,~~ permits that are installation specific, such as those required under Directive 2010/75/EU of the European Parliament and of the Council[6] and the grid connection permit. Consequently, project promoters should be required to obtain additional permits only for activities not covered by the aggregated baseline permit as well as environmental assessments where required. In case of activities potentially affecting Union and nationally protected sites, ~~relevant~~ **individual** permits should be granted only after having ensured that the activities are compatible with the conservation objectives of these sites. Such approach should significantly accelerate permit-granting procedures and reduce the administrative burden associated with them whilst maintaining high level of environmental standards. 6 Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control) (OJ L 334, 17.12.2010, p. 17, ELI: http://data.europa.eu/eli/dir/2010/75/oj). FR (Comments):

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	FR : French authorities support the aim of this amendment but propose to explicitly exclude urban planning from the scope of this consolidated permit because : - The application of land-use law (processing of urban planning permits, compliance with urban planning documents) falls under the decentralized authority of local governments in France. Incorporating these powers into a single, comprehensive permit would directly conflict with our constitutional principle of local governments' autonomy. - The text contains a legal inconsistency, because on the one hand, it excludes "installation-specific permits" from the aggregated permit, and on the other hand, it appears to include the urban planning component—including building permits—within it. However, a building permit is by nature a specific authorization for construction, which must be excluded from the aggregated permit since it requires an analysis of final architectural plans, the actual footprint, height dimensions, and safety access configurations specific to each building. LT (Comments): Recital 58 explains what is meant by an 'aggregated baseline permit'. However, this term is not defined in Article 3, which contains the definitions used in the Regulation. Instead, Article 3(4) defines the 'permit-granting procedure' and lists different types of permits. However, it is not clear which of these permits are included in the 'baseline permit'. We suggest defining at least the minimum scope of permits covered by the baseline permit, so that all Member States have the same understanding of this concept. Recital 58 also states that the IPPC permit and the environmental assessment are excluded. However, this is not reflected in Article 3(4). In addition, Article 4(1) requires a single application for permits, making it unclear what

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	the purpose of the 'aggregated baseline permit' is. It is also unclear how the proposed approach ensures that the environmental assessment and the IPPC permit remain separate, as described in Recital 58. NL (Drafting suggestions): ***…The aggregated baseline permit cannot include***~~, excluding those~~ permits that are installation specific, such as those required under Directive 2010/75/EU of the European Parliament and of the Council[6] and the grid connection permit.**or agreement….** RO (Drafting suggestions): To promote the development of industrial manufacturing acceleration areas and to expedite the permit-granting procedures necessary for industrial activities within those areas, Member States should establish ***and issue*** an aggregated baseline permit reflecting the specific characteristics of each identified industrial acceleration area and tailored to the industrial manufacturing sector or sectors to be deployed therein.**The preparation of the aggregated baseline permit should avoid duplication of environmental assessments already carried out at area level.** RO (Comments): Avoid duplication. Maintain legal certainty.

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[…]	
(61) The Commission should evaluate this Regulation based on the information provided by Member States. Pursuant to paragraph 22 of the Interinstitutional Agreement on Better Law-Making of 13 April 2016, such evaluation should be based on the five criteria of efficiency, effectiveness, relevance, coherence and Union value added. ***The evaluation of this Regulation should consider progress made in achieving its objectives and, in particular, its contribution to the functioning of the internal market, as well as the resilience, economic security and decarbonisation of industrial production, and related costs and impacts.*** It should also ***assess how effectively the measures streamlining permit-granting procedures have accelerated the permit-granting procedures and reduced administrative burden for project promoters. The evaluation should*** serve as the basis for impact assessments of possible further measures.	BE (Comments): Suggestion to add “level playing field”. EE (Drafting suggestions): The Commission should evaluate this Regulation based on the information provided by Member States. Pursuant to paragraph 22 of the Interinstitutional Agreement on Better Law-Making of 13 April 2016, such evaluation should be based on the five criteria of efficiency, effectiveness, relevance, coherence and Union value added. ***The evaluation of this Regulation should consider progress made in achieving its objectives and, in particular, its contribution to the functioning of the internal market, as well as the resilience, economic security and decarbonisation of industrial production, and related costs and impacts. It should also assess how effectively the measures streamlining permit-granting procedures have accelerated the permit-granting procedures and reduced administrative burden for project promoters,*** **as well as the administrative and financial costs incurred by Member States in implementing this Regulation and the impact on SMEs.** ***The evaluation should*** serve as the basis for impact assessments of possible further measures. **The reporting requirements for the evaluation should be proportionate.** EE (Comments):

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	The evaluation should also assess the administrative and financial costs incurred by Member States in implementing this Regulation, as well as the impact on SMEs. Without these criteria, a positive outcome for project promoters may mask disproportionate costs for Member States or limited benefits for smaller businesses. The reporting requirements for the evaluation should also be proportionate. EL (Comments): We propose to make a reference to carbon leakage and affordability of energy.
[…]	
CHAPTER I **GENERAL PROVISIONS**	

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Article 1 **Subject matter and scope**	BE (Drafting suggestions): Article 1, **Subject matter, scope <u>and industrialisation objective</u>** BE (Comments): Belgium pleas to reinclude the term "industrialisation objective" in article 1, and if posible also in the title. RO (Comments): RO welcomes the removal of the fixed percentage figure as a standalone provision, which increases flexibility. RO reiterates that the evaluation under Article 28 must include a dedicated indicator measuring SME contributions to the industrialisation objective, to ensure the target is not achieved exclusively through consolidation of large operators. RO also requests clarification on how the industrial decarbonisation objective will be correlated with energy competitiveness, access to network infrastructure and availability of production capacity in the EU — a concern that remains fully valid in relation to the compromise text
1. This Regulation aims ~~at improving~~***to improve*** the functioning of the internal market ***and ensure a level playing field*** by establishing a ***harmonised*** framework to support the development, competitiveness and resilience of the Union's manufacturing sector, with a focus on selected strategic sectors, while contributing to the Union's climate objective, economic security***, the attractiveness of investment conditions in the Union***	EL (Drafting suggestions): **….** resilience of the Union's manufacturing sector, **<u>and prevent carbon leakage,</u>…**

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and the creation, retention of, and transition into high-quality jobs***, while avoiding unnecessary administrative burden***.	while contributing to the Union's climate objective, **including energy affordability,…** EL (Comments): **Regarding article 1**, on subject matter and scope, we should discuss the possibility of adding a reference on carbon leakage prevention, and also a reference on the affordability of energy in para 1 IT (Comments): . RO (Drafting suggestions): This Regulation aims ~~at improving~~*to improve* the functioning of the internal market *and ensure a level playing field* by establishing a *harmonised* framework to support the development, competitiveness, **including by facilitating access to competitive low-carbon energy,** and resilience of the Union's manufacturing sector, with a focus on selected strategic sectors, while contributing to the Union's climate objective, economic security*, the attractiveness of investment conditions in the Union* and the creation, retention of, and transition into high-quality jobs*, ~~while avoiding unnecessary administrative burden.~~* ***while contributing to reducing unnecessary administrative burden for businesses, including SMEs."*** RO (Comments): The objectives of the Regulation are appropriately framed. The addition of 'level playing field', 'harmonised framework', and 'attractiveness of investment conditions' are welcomed. These provisions should be read in

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	conjunction with the principle of technology neutrality to ensure that all decarbonisation pathways, including CCS, low-carbon hydrogen, electrification, and process optimisation, can compete on equal terms across Member States. For addition of ***including by facilitating access to competitive low-carbon energy,*** Competitiveness cannot be separated from energy costs. Besides accelerating industrial investment, the Regulation should explicitly support administrative simplification, in line with Better Regulation objectives and the Competitiveness Compass. SE (Drafting suggestions): This Regulation aims ~~at improving~~***to improve*** the functioning of the internal market ***and ensure uniform conditions between Member States ~~a level playing field~~*** by establishing a ***harmonised*** framework to support the development, competitiveness and resilience of the Union's manufacturing sector, with a focus on selected strategic sectors, while contributing to the Union's climate objective, economic security***, the attractiveness of investment conditions in the Union*** and the creation, retention of, and transition into high-quality jobs***, while avoiding unnecessary administrative burden***. SE (Comments): SE proposes the wording "uniform conditions between Member States" to be more precise in what the IAA achieves within the internal market, while the term "level playing field" may imply an equalisation of underlying economic

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	and industrial conditions between Member States, which is beyond the scope of the Regulation.
2. To achieve the general objective referred to in paragraph 1, this Regulation lays down measures aiming to	
(a) speed-up permit-granting procedures for industrial manufacturing projects, including energy-intensive industry decarbonisation projects;	BE (Drafting suggestions): (a) streamline/facilitate permit-granting procedures for industrial manufacturing projects, including energy-intensive industry decarbonisation projects BE (Comments): The effect of the provisions in chapter II will relate more to the streamlining/facilitating of the permit granding procedures than to speeding them up. NL (Drafting suggestions): (a) speed-up permit-granting procedures for industrial manufacturing projects, including energy-intensive industry decarbonisation projects **by adressing procedural and legal bottlenecks**; NL (Comments):

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	Harmonizing standards in permitting is important, still there are also legal bottlenecks stemming from legislations that present bottlenecks in permitting procedures for decarbonisation projects.
(b) create lead ~~market~~***markets*** for certain products in strategic sectors, by laying down Union origin requirements, low-carbon requirements, or both, in the context of public procurement, ***auctions and*** public support schemes;	IT (Drafting suggestions): (b) create lead markets for certain products in strategic sectors, by laying down Union origin requirements, low-carbon requirements, **and, for chemicals and plastics, requirements relating to the use of sustainable carbon sources, or any combination thereof**, ~~ot both,~~ in the context of public procurement, auctions and public support schemes; IT (Comments): 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. NL (Drafting suggestions):

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	create lead ~~market~~***markets*** for certain products in strategic sectors, by laying down Union origin requirements, low-carbon requirements, or both, in**, but not exclusively,** the context of public procurement, ***auctions and*** public support schemes; NL (Comments): The Netherlands keeps urging the need to present the possibility to broaden the scope for market creation to private markets, somewhere in the future. This addition does not present any immediate obligations, but gives industries the necessary clarity that the scope Will eventually be broadened through the entire sector.
(c) ~~set~~***establish a Union framework setting*** conditions ~~on~~***for the development of*** foreign direct investments in emerging strategic sectors;	DK (Drafting suggestions): ~~set~~***establish a Union framework setting*** conditions ~~on~~***for the development of*** foreign direct investments in **selected** ~~**emerging**~~ strategic sectors ***where particular concern is warranted***; DK (Comments): To avoid misunderstandings regarding the use of "emerging". Could be confused as meaning nascent technologies, which is not the case for e.g. raw materials. ES (Drafting suggestions): establish a Union framework setting conditions for the development of foreign direct investments in ~~**emerging**~~ **scaling** strategic sectors;

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	ES (Comments): We propose the inclusion of scaling strategic sectors that could not qualify as 'emerging', e.g. wind power technologies. NL (Drafting suggestions): ~~se~~***te establish a Union ~~framework~~ mechanism setting*** conditions ~~on~~***for the development of*** foreign direct investments in ~~emerging~~ high risk strategic sectors; NL (Comments): **The term "framework" may create confusion, as the Union has already established a framework for the screening of foreign direct investments. To ensure legal clarity and consistency, this Regulation should instead establish a mechanism setting conditions for certain foreign direct investments, rather than creating a new Union framework. Furthermore, the reference to "emerging strategic sectors" is overly broad. The scope should instead focus on high-risk strategic sectors or strategic value chains identified on the basis of objective risk assessments, ensuring that the mechanism remains targeted and proportionate.**
(d) ~~designate~~***set common conditions for the development of*** industrial manufacturing acceleration areas by Member States ~~for the purposes of boosting industrial activities~~.	BE (Drafting suggestions):

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	.... this regulation lays down measures aiming to **promote the clustering of industrial activities, with a view to accelerating the development of strategic sectors and strengthening their competitiveness within the internal market**.' BE (Comments): This text suggestion reflects the objective of chapter V. NL (Drafting suggestions): ~~designate~~***set common conditions for the development of*** **(cross-border)** industrial manufacturing acceleration areas by Member States ~~for the purposes of boosting industrial activities~~.
	LU (Drafting suggestions): **(e) set appropiate financial support scheme**] LU (Comments): The full achievement of the objectives of the Industrial Accelerator Act will require an evolution of the European State aid framework, in order to also enable existing industrial players that do not fall within the SME category to benefit from tailored support for increasing their production capacities. By way of example, large industrial enterprises can currently benefit from investment aid only under regional aid schemes (less developeed areas) and only insofar as the investment relates to a new economic activity. NL (Drafting suggestions):

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	<u>(e) Set appropriate financial schemes;</u> NL (Comments): WIthout financial backing, the IAA will not function. Therefore, it is necessary to connect the IAA with the ECF from the start and align their goals.
This Regulation contributes to the shared objective of the Union and Member States of increasing the manufacturing sector's share of the Union's GDP by 2035.	BE (Drafting suggestions): ***This Regulation contributes to the shared <u>industrialisation</u> objective of the Union and Member States of increasing the manufacturing sector's share of the Union's GDP by 2035.*** BE (Comments): Belgium pleas to reinclude the term "industrialisation objective" in article 1, and if possible also in the title. IT (Drafting suggestions): ~~***This Regulation contributes to the shared objective of the Union and Member States of increasing the manufacturing sector's share of the Union's GDP by 2035.***~~ IT (Comments): We would prefer the previous formulation that indicates in article 2, the objective of 20% of increase in the manufacturing share of the Union's GDP by 2035. In this way the EU and the Member States are giving a clear signal of commitment to the manufacturing industry.

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	PL (Comments): Poland notes the removal of Article 2, which contained a percentage-based target for industrialization. This target was purely declaratory and political in nature. Poland supports the new wording of the IAA's objective contained in Article 1. Nevertheless, the lack of any performance indicators in the IAA remains a problem, which may make it difficult over the next few years to determine whether the regulation actually contributes to achieving the overarching goal of strengthening the competitiveness and resilience of industry. SE (Drafting suggestions): This Regulation contributes to the shared objective of the Union and Member States of ~~***increasing the manufacturing sector's share of the Union's GDP by 2035***~~ ***strengthening the competitiveness and resilience of the Union's manufacturing industry and overall economic security"*** SE (Comments): We welcome the Presidency's proposal to remove the percentage target. The reference to the manufacturing sector's share of the Union's GDP should however be removed altogether. The manufacturing industry's share of the Union's GDP is a blunt instrument for measuring economic strength, given that an increasing share of value creation originates from the services industry. Such an objective risks hindering necessary structural transformation and create an inefficient resource allocation.

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Article 2 ~~**Industrialisation objective**~~	IT (Drafting suggestions): Article 2 **Industrialisation objective**
~~The Union and Member States shall seek to ensure that by 2035 the manufacturing industry of the Union accounts for at least 20% of the Union's gross domestic product.~~	FR (Drafting suggestions): **The Union and Member States shall seek to ensure that by 2035 the manufacturing industry of the Union accounts for at least 20% of the Union's gross domestic product.** FR (Comments): The French authorities regret the proposed deletion of Article 2. While the Commission's proposal, in its current form, does not appear capable of delivering the outcomes necessary to achieve this objective, the French authorities consider the reindustrialisation of the Union to be a key strategic objective, both for economic competitiveness and for the resilience of value chains and the Union's economic security. In this regard, maintaining an explicit reference to this objective in the legislative provisions is essential to ensure the overall coherence of the text and to guide the interpretation and implementation of the Regulation's operational provisions. IT (Drafting suggestions):

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	The Union and Member States shall seek to ensure that by 2035 the manufacturing industry of the Union accounts for at least 20% of the Union's gross domestic product. IT (Comments): Italy welcomes the industrialisation objective as it represents one of the key instruments for promoting European industrial base. Therefore we would prefer the previous formulation that indicates the objective of 20% giving a clear signal of the commitment of the EU and the Member States to the manufacturing industry. In this context, it is noted that the Italian manufacturing sector constitutes a strategic pillar of the national economy and an essential component of the European production system. LV (Drafting suggestions): The Union and Member States shall seek to ensure, in a manner that takes into account national starting points and industrial capacities, that by 2035 the manufacturing industry of the Union accounts for at least 20% of the Union's gross domestic product. […] LV (Comments):

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	Latvia supports the objective but stresses that its achievement will differ significantly across Member States due to structural differences in industrial capacity.
Article 3 **Definitions**	
For the purposes of this Regulation, the following definitions apply:	
	RO (Drafting suggestions): Add: *"References to SMEs shall be understood in accordance with Commission Recommendation 2003/361/EC, unless otherwise provided by Union law."* RO (Comments): A uniform reference to the EU definition of SMEs ensures consistent implementation across Member States and facilitates the application of SME-specific provisions where relevant
(1) 'industrial manufacturing project' means the construction, conversion or extension of an industrial site intended for carrying out an economic activity classified under NACE Code C (Manufacturing), with the exception of NACE Code C12;	BE (Comments): BE has scrutiny reservation on the application of NACE.

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	BG (Comments): "Industrial production project", as defined by the NACE classification, refers to activities falling under Section C (Manufacturing) and does not include projects involving the extraction of raw materials or subsoil resources. Under the same classification, mining and quarrying are classified separately and therefore fall outside the scope of this proposed Regulation. We therefore propose extending the scope of the Regulation to include the mining and quarrying of critical raw materials, in line with Regulation 2024/1252 on critical raw materials. PL (Drafting suggestions): 1) 'industrial manufacturing project' means the construction, conversion or extension of an industrial site intended for carrying out an economic activity classified under NACE Code C (Manufacturing), with the exception of NACE Code C12, **including directly ancillary energy, hydrogen, storage, charging, digital, control or utility infrastructure located within the industrial site or within an industrial manufacturing acceleration area and functionally and technically necessary for such manufacturing activities; this shall not qualify transmission, distribution or other regulated network infrastructure as industrial production projects.** PL (Comments): This amendment by PL would make it possible to include, in industrial production projects, infrastructure directly related to production and decarbonization on the premises of the facility or within an acceleration

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	zone—such as energy storage, on-site hydrogen facilities, charging infrastructure for industrial fleets, control systems, and network infrastructure. Furthermore, the provision proposed by PL excludes regulated transmission, distribution, or other grid infrastructure from being treated as a standard industrial production project under the IAA. Elements related to grid infrastructure should be treated separately, especially since ongoing work on the Permitting Directive as part of the Network Package already addresses this issue. SE (Drafting suggestions): (1) 'industrial manufacturing project' means the construction, conversion or extension of an industrial site intended for carrying out an economic activity classified under NACE Code C (Manufacturing), with the exception of NACE Code C12, **and NACE Code E38.2.1 (Treatment and disposal of non-hazardous waste);** SE (Comments): The recycling industry should be included in Annex I and in the definition of "industrial manufacturing projects". The recycling industries have grown into a large and strategic sector within the EU (from both a competitiveness and resilience perspective) and constitute an "industry", even though they have traditionally been classified under NACE Code E. The following should be added in Annex I: 4. Recycling technologies, as classified under NACE Code E38.2.1; SK (Drafting suggestions):

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	We request a more precise interpretation or amendment of the definition. SK (Comments): Under the current wording, any activity within the manufacturing sector that requires a permit would be classified as such a project. In practice, this would mean that even minor structural modifications would fall under this definition as long as a building permit is required, which we consider disproportionate.would mean that even minor structural modifications.
(2) 'energy- intensive industries' means the industries listed in point 1 of Annex I;	EL (Comments): 3(2) on the second definition of "energy-intensive industries" listed in the Annex I, and in general for Annex I we have a scrutiny reservation. We would like to particularly ask the Commission why the sector C16-Manufacture of wood is not included.
	IT (Drafting suggestions): 'energy-intensive industry decarbonisation projects' means the construction or conversion of the commercial facility of an energy-intensive business as defined in Article 17(1), point (a), of Council Directive 2003/96/EC7 in the energy- intensive industries listed in point 1 of Annex I to this Regulation that reduce emission rates of CO2 -eq of industrial processes significantly and permanently to an extent which is technically feasible. **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."** IT

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	(Comments): .It appears that the Art. 3 (3) is missing from the template. 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. RO (Comments): RO supports inserting a definition of "small and medium-sized enterprise" aligned with Commission Recommendation 2003/361/EC in Article 3, given that SMEs are referenced in Articles 16, 25, 26 and 28 without a definitional basis in the Regulation. SE (Drafting suggestions): (3) 'energy'energy-intensive industry decarbonisation projects' means **energy-intensive industry decarbonisation projects as defined in Article 3 (17) of Regulation 2024/1735** the construction or conversion of the commercial facility of an energy-intensive business as defined in Article 17(1), point (a), of Council Directive 2003/96/EC7 in the energy- intensive industries listed in point 1 of Annex I to this Regulation that reduce emission rates of CO2 -eq of industrial processes significantly and permanently to an extent which is technically feasible;

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	REVISION OF NZIA ARTICLE 3(17): 'energy-intensive industry decarbonisation projects' means the construction or conversion of the **a** commercial facility **intended for carrying out an economic activity classified under NACE Codes C17, C19, C20, C22, C23 and C24** ~~of an energy-intensive business as defined in Article 17(1), point (a), of the Directive 2003/96/EC in the steel, aluminium, non-ferrous metals, chemicals, cement, lime, glass, ceramics, fertilisers, as well as pulp and paper sectors that are part of the supply chain of a net-zero technology~~ and that are to reduce emission rates of CO2-eq of industrial processes significantly and permanently to an extent which is technically feasible; SE (Comments): Note, definition of Article 3(3) is related to chapter II but is missing from the template. Therefore see two amendments from SE in this cell, both for IAA Article 3(3) and NZIA Article 3(17) The definition of these projects should be addressed within the revision of the NZIA to avoid the two incoherent definitions of the same type of project within the IAA and NZIA, which would increase legal complexity for both companies and authorities. Having two incoherent definitions in two Regulations also increases the risk of incoherent application among the different SPOCs in MS. For NZIA Article 3(17), reference to the same NACE Codes as in IAA Annex I, point 1, to ensure same coverage as in the IAA definition in Article 3(3). Our understanding is that the NACE Codes cover the sectors explicitly mentioned in NZIA Article 3(17).

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	The reference to Directive 2003/96/EC implies that a company undertaking a decarbonisation project in energy-intensive industry must have energy costs amounting to at least 3% of its production value. This is too narrow, and risks excluding important decarbonisation projects from companies with high value added. Using Directive 2003/96/EC to determine whether an individual facility meets the Directive's criteria is also complex. The reference to the Directive should be deleted, as in SE proposal. Alternatively, it should be replaced with a simpler definition such as a facility's annual energy consumption in MW.
(4) 'permit-granting procedure' means a process ***at the appropriate administrative level within each Member State*** that covers all relevant permits to build, expand, convert and operate industrial manufacturing projects, including building, chemical and grid connection permits as defined in Article 1 of [the Proposal for a Directive amending Directives (EU) 2018/2001, (EU) 2019/944, (EU) 2024/1788 as regards acceleration of permit-granting procedures[8]], and environmental assessments and authorisations where required, and encompassing all applications and procedures from the acknowledgement that the application is complete to the notification of the ~~comprehensive decision on the~~ outcome of the procedure; 8 Proposal for a Directive of the European Parliament and of the Council amending Directives (EU) 2018/2001, (EU) 2019/944, (EU) 2024/1788 as regards acceleration of permit-granting procedures ((2025/0400 (COD)).	AT (Comments): The term "permit-granting procedure" is a neutral term. Therefore "**appropriate** adminstrative level" should not be used from a legal and linguistic point of view as it is not clear. BE (Drafting suggestions): 'permit-granting procedure' means a process ***at the appropriate administrative level*** **according to the constitutional provisions** ***within each Member State*** that covers all relevant permits to build, expand, convert and operate industrial manufacturing projects, including building, chemical and grid connection permits as defined in Article 1 of [the Proposal for a Directive amending Directives (EU) 2018/2001, (EU) 2019/944, (EU) 2024/1788 as regards acceleration of permit-granting procedures[8]], and ~~**environmental assessments**~~ and authorisations where required, and encompassing all applications and procedures from the acknowledgement that the application is complete to the notification of the ~~comprehensive~~

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	~~decision on the~~ outcome of the procedure **and excluding any administrative appeal or judicial review';** BE (Comments): Belgium recalls that the competence on permitting in Belgium is constitutionally distributed to different entities of the Belgian State. Obligations on environmental permitting are distributed to each of the three Belgian Regions and the federal state. The same applies to other matters than environmental matters. In addition specialized expert authorities are established to process permit applications and take decisions. There must be room for member states to designate more than one appropriate administrative level so Member States can determine which administrative level is most suitable for certain permits and which other administrative level is most suitable for other permits. Screening, scoping and the preparation of environmental assessments must be excluded from the IAA permit granting process because environmental assessments are tackled in the upcoming regulation on speeding up environmental assessments (Omnibus VIII Environment). The reference to environmental assessments must be deleted from the definition of 'permit granting procedure'. Belgium agrees to delete 'the comprehensive decision' in the definition of permit granting procedure as well as the definition of comprehensive decision. Belgium requests to add the phrase '*excluding any administrative appeal or judicial review'* to acknowledge that administrative appeals or judicial reviews are not part of the permit granting procedure.

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	DE (Drafting suggestions): (4) 'permit-granting procedure' means a process *at the appropriate administrative level within each Member State* that covers all relevant permits to build, expand, convert and operate industrial manufacturing projects, including building **and**~~,~~ chemical **permits** and ~~**grid connection permits as defined in Article 1 of [the Proposal for a Directive amending Directives (EU) 2018/2001, (EU) 2019/944, (EU) 2024/1788 as regards acceleration of permit-granting procedures[8]], and**~~ environmental assessments and authorisations where required, and encompassing all applications and procedures from the acknowledgement that the application is complete to the notification of the ~~comprehensive decision on the~~ outcome of the procedure; DE (Comments): Grid connection permits should not be part of this enumeration as grid connections procedures are no authorisation procedures in DE but the system operator´s decision. It therefore does not fit in this context. DK (Drafting suggestions): (4) 'permit-granting procedure' means a process ***at the appropriate administrative level within each Member State*** that covers all relevant permits to build, expand, convert and operate industrial manufacturing projects, including building, chemical **and grid connection permits** as defined in Article 1 of [the Proposal for a Directive amending Directives

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	(EU) 2018/2001, **(EU) 2019/944,** (EU) 2024/1788 as regards acceleration of permit-granting procedures[8]], and environmental assessments and authorisations where required, and encompassing all applications and procedures from the acknowledgement that the application is complete to the notification of the comprehensive decision on the outcome of the procedure; DK (Comments): DK finds it essential to delete "grid connection permits". Grid connection procedures are already governed by sector-specific Union electricity legislation, including Directive (EU) 2019/944 and related network codes, and involve complex assessments related to grid capacity, system security and technical standards. The proposed deletion would improve legal clarity and avoid overlapping permitting frameworks. As it is drafted it may create legal uncertainty regarding the treatment of grid connection procedures. NL (Drafting suggestions): permit-granting procedure' means a process ***at the appropriate administrative level within each Member State*** that covers all relevant permits to build, expand, convert and operate industrial manufacturing projects, including building, and chemical ~~and grid connection~~ permits ~~as defined in Article 1 of [the Proposal for a Directive amending Directives (EU) 2018/2001, (EU) 2019/944, (EU) 2024/1788 as regards acceleration of permit-granting procedures~~[8]], and environmental assessments and authorisations where required, and encompassing all applications and

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	procedures from the acknowledgement that the application is complete to the notification of the ~~comprehensive decision on the~~ outcome of the procedure; NL (Comments): Grid connections are the responsibility of grid operators. PL (Drafting suggestions): permit-granting procedure' means a process ***at the appropriate administrative level within each Member State*** that covers all relevant permits to build, expand, convert and operate industrial manufacturing projects, including building, chemical ~~**and grid connection as defined in Article 1 of [the Proposal for a Directive amending Directives (EU) 2018/2001, (EU) 2019/944, (EU) 2024/1788 as regards acceleration of permit-granting procedures53],**~~ and environmental assessments and authorisations where required, and encompassing all applications and procedures from the acknowledgement that the application is complete to the notification of the ~~comprehensive decision on the~~ outcome of the procedure; PL (Comments): Grid connections are installation specific (as noted in article 27(1)) and should not be a part of the general framework on ensuring faster permits for acceleration areas. Ensuring grid access relies on specific and thorough analysis of the needs of an industrial site, including its accompanying infrastructure (such as BESS). Moreover, grid connection conditions do not have an administrative character and should not be considered as a "permit". They are a set of technical

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	conditions issued by the network system operator and are a basis for a grid connection agreement between the operator and the investor. Integrating the grid connection into a unified permitting procedure raises concerns as grid connection requests are processed by network operators, and public authorities are not a party to this procedure. It should also be emphasized that creating separate legal regimes regarding grid connections is not appropriate, as operators should review applications on the basis of existing energy market regulations, including the principle of equal treatment and non-discrimination, e.g. Electricity Regulation 2019/943, article 3(q). SE (Drafting suggestions): (4) 'permit-granting procedure' means a process ***at the appropriate administrative levels within each Member State*** that covers all relevant permits to build, expand, convert and operate industrial manufacturing projects, including building, chemical and grid connection permits as defined in Article 1 of [the Proposal for a Directive amending Directives (EU) 2018/2001, (EU) 2019/944, (EU) 2024/1788 as regards acceleration of permit-granting procedures[8]], and environmental assessments and authorisations where required, and encompassing all applications and procedures from the acknowledgement that the applications ~~is~~ **are** complete to the notification of the ~~comprehensive decision on the~~ outcome of the procedure, **excluding spatial planning**; SE (Comments): For some Member States, more than one appropriate administrative level may be applicable. Hence, the wording should be levels (in plural).

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	Moreover, it should be explicitly mentioned that spatial planning is excluded by the definition given that this is a Member State competence.
	CZ (Drafting suggestions): ***4a. 'permit for industrial manufacturing project' means any permit listed in Annex Ia;*** CZ (Comments): We propose a list of permits for industrial manufacturing projects to clarify the use of the term. The Annex would list permits referring to the relevant provisions of each Member State's national law. This list should include only public-law permits for a project under national law. Therefore, such permits under this definition in the Annex would **not** include operating permits, permits for chemical substances, environmental impact assessments (EIA), grid connection, etc.; see our comment on Article 5.
(5) ~~'comprehensive decision' means the decision or set of decisions taken by a Member State authority or authorities, that determines whether or not a project promoter is authorised to build, expand, convert and operate an industrial manufacturing project;~~	AT (Comments): We welcome the deletion. BE (Comments): Belgium agrees with the deletion of this definition. ES (Drafting suggestions):

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	We suggest returning to the text proposed by the Commission. ES (Comments): We oppose the deletion of the "comprehensive decision" concept. It is a key element to ensure alignment between the permitting procedures of the CRMA, NZIA and IAA. Its removal would generate inconsistencies for energy-intensive decarbonisation projects already benefiting from the streamlined procedure under Chapter II, Section II of the NZIA, creating legal uncertainty and undermining the coherence of the EU framework for industrial decarbonisation. LV (Comments): Latvia considers that the concept of "comprehensive decision" requires clarification. It should be clearly specified whether it refers to a single administrative act or a coordinated set of decisions issued by multiple authorities. This is essential to ensure legal certainty and compatibility with national administrative systems where competences are divided.]
	ES (Drafting suggestions): (24) 'main specific components' means the main specific components as listed in the Annex to Commission Implementing Regulation 2025/1178[38] **and any amendments to the document.**

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	ES (Comments): It is suggested that reference be made to possible updates or revisions to the list se main specific components as listed in the Annex to Commission Implementing Regulation 2025/1178.
[…]	
CHAPTER II **ENABLING CONDITIONS FOR INDUSTRIAL PRODUCTION AND DECARBONISATION**	EE (Comments): Estonia stresses that legislation aimed at streamlining the Union's permitting procedures should be based on uniform fundamental principles to ensure their consistency and implementation across Member States. Estonia advocates for consolidating provisions regarding the simplification of procedures for construction and environmental permits for industrial manufacturing projects as well as strategic projects in other legal acts in various sectors, as well as other potential permit procedures related to such projects, into a single European Union legal act to ensure legal clarity and avoid contradictions and fragmentation.
	NL (Drafting suggestions): **Article 3** **Overarching principles on permitting** **The IAA complements, if necessary, existing legislation on permitting of existing implementation procedures across member states.** NL

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	(Comments): Proposal to implement a new article acknowlediging that existing efforts on permitting that align with the IAA should be deemed sufficient and should not be crossed by the efforts proposed in the IAA. IAA should only propose additional measures. Member states should maintain the possibillity to assess to what extent the measures can be implemented in the most appropriate manner to prevent delay.

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Article 4 ***Digital* single access ~~points~~*point***	BE (Drafting suggestions): **Digital single access ~~points~~pointS** BE (Comments): BE proposes to keep 'points' (in plural). See comments and text proposals on art 4.1 for justification. FR (Drafting suggestions): *Article 4* Digital single access ***points*** FR (Comments): FR: Within the environmental omnibus package negotiations, French authorities have suggested to amend the regulation on speeding-up environmental assessments (RSEA) of the environmental omnibus package in order to make the RSEA a reference text for accelerated permitting procedures. The aim is to harmonize existing sectoral procedures and derogations, as their multiplication create bureaucratic complexity and legal uncertainty for project developers and administrative instructors. In this regard, with respect to the "single points of contact", French authorities propose to bring together all provisions across the various sectoral legislations concerning this matter into a single and unified provision within the RSEA of the omnibus environment package.

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	With regard to the use of the EBW, a request for flexibility has also been put forward by the Czech Republic, Estonia, Lithuania, Belgium, Germany, Denmark and Sweden. PL (Comments): Poland requests that the European Commission ensure that the burden on Member States is minimized, by providing a common interface (landing page) and technical support, while Member States would be responsible for back-office operations. This is a prerequisite, given that in many countries, including Poland, launching a single point of contact requires building the necessary digital infrastructure practically from scratch. SI (Comments): Slovenia reiterates its reservations regarding the responsibilities of the Digital single access point that go beyond simply providing information to investors.
1. Member States shall set up ***or make available through existing structures a digital*** ~~a~~ single access point ~~at national level~~ for the submission by project promoters of the single application ***within the permit-granting procedure*** for industrial manufacturing projects referred to in Article 5(1).	AT (Comments): Why was “access points” changed into singlular. Does this preempt to have more than one access points (i.e. one per region)? BE

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	(Drafting suggestions): Member States shall set up ***or make available through existing structures*** ~~***a digital***~~ single access point**s** ~~s~~ **at the appropriate administrative levels** ~~at national level~~ for the submission by project promoters of the single application ***within the permit-granting procedure*** for industrial manufacturing projects referred to in Article 5(1). BE (Comments): BE strongly supports the use of digital systems to support the permitting process. Belgium supports digital single access points in the format of digital portals for submission of permit applications, provided that Member States retain flexibility in their organization and designation in line with their constitutional and administrative structures and internal division of powers. Competence on permitting is by the Belgian constitution dispersed among the federal state and each of the 3 Belgian regions, which are autonomous legal entities. For Belgium this entails that the IAA must allow for the establishment of several digital single access points. Belgium rejects the obligation to set up such portals at the national level. CZ (Drafting suggestions):

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	Member States shall set up ***or make available through existing structures a digital*** ~~a~~ single access point ~~at national level~~ for the submission by project promoters of the ~~single~~ application ***within the permit-granting procedure*** for industrial manufacturing projects referred to in Article 5(1). CZ (Comments): The compromise text now stipulates that the digital single access point for submitting a single application will include a timeline for each individual industrial manufacturing project, covering all necessary permits required under national law. The digital single access point may be an existing digital system, such as the Citizen Portal in the Czech Republic, or a newly created platform, provided it meets the same requirements. Under national legal frameworks, permit-granting procedures and individual administrative acts are often interlinked in terms of both substance and timing and may follow one another sequentially. Some permits can be issued only after environmental assessments have been conducted or after other statutory conditions have been met, while operating permits generally follow only after the permits necessary for the project's implementation have been granted. In light of this, the digital single access point cannot be required to maintain a binding or complete schedule of all necessary permits on its own. Given the above, the concept of a "single application" is entirely inappropriate and unfeasible. As noted above, the project permit may also involve certain types of permits relating solely to the structure use, as well as permits related to property rights under private law. Such acts cannot be consolidated into a single permit-granting mechanism, as this would be fundamentally economically disadvantageous for the builder. At the same time, we consider the concept of a single application to be difficult to implement, particularly if it were to

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	include permits related to the structure use, operating permits, or, where applicable, private-law titles. DE (Drafting suggestions): Member States shall set up ***or make available through existing structures a digital*** ~~a~~ single access point ~~at national level~~ for the submission by project promoters of the single application ***within the permit-granting procedure*** for industrial manufacturing projects ~~**referred to in Article 5(1).**~~ DE (Comments): Decisions should remain with the licensing authorities—as also explained by the European Commission. We welcome the name change to "digital single access point." The deletion (of "referred to in Article 5 (1)") is a consequential amendment resulting from the deletion of Article 5, paragraph 1; see below. Duplicate structures and unnecessary bureaucracy should be avoided. Businesses need clarity. Once the Single Digital Access Point is established, the creation and use of SPOCs within the framework of the NZIA should no longer be mandatory (Added in Art. 34). However, the central points of contact within the framework of the NZIA may continue to be maintained on a voluntary basis. FR (Drafting suggestions): 1. Member States ~~shall~~ **may** set up or make available through existing structures ~~a~~ digital single access **points at relevant appropriate administrative national, regional or local levels** for the submission by

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	project promoters of ~~the single~~ application**s** within the permit-granting **for the permit-granting process, as referred to article 3 of the regulation on speeding-up environmental assessments (RSEA).** FR (Comments): FR : French authorities wish the establishment of this access points to be optional, and for it to be set up at the appropriate level for the exchange of information about permit-granting procedures. These procedures may, in fact, fall within the responsibility of both central government and local authorities. Austria, Germany, the Czech Republic and Sweden are also in favour of the role of the contact points being limited to coordination, and of them having no decision-making powers. LV (Drafting suggestions): Member States shall set up a single access point at national level for the submission by project promoters of the single application, *which may build on existing national structures and contact points,* […] LV (Comments): Latvia supports the one-stop-shop approach but stresses the need to build on existing national systems (e.g. LIAA) and ensure interoperability with national solutions to avoid duplication and additional administrative burden.]

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	SE (Drafting suggestions): 1. Member States shall set up ***or make available through existing structures a digital*** ~~a~~ single access point ~~at national level~~ for the submission by project promoters of ~~the single~~ application**s** ***within the permit-granting procedure*** for industrial manufacturing projects**.** ~~referred to in Article 5(1).~~ SE (Comments): All companies should be able to take advantage of the opportunities offered by digitalisation with reduced and simplified data submission, regardless of whether they use the single permit-granting procedure in Article 5 or choose to submit in stages. This is also in line with the proposed alteration in recital (10a). SE suggests making Article 4 independent of Article 5. In addition, the permitting process often involves multiple applications submitted to different competent authorities. Replacing "a single application" with "applications" better reflects national permitting systems while maintaining a coordinated permit-granting procedure. SI (Comments): Slovenia shares the view that a single application for all necessary permits, licences and authorisation is not feasible and does not take into account the sequential nature of the procedures for obtaining various permits (construction/operation), since not all data is available at the start of the project. The provisions remain unclear as to which permits would be

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	included in this "single application" and what would be the level of digitization.
	CZ (Drafting suggestions): ***1a. The applicant shall refer in the application to the relevant provisions of this regulation under which they apply.*** CZ (Comments): We would like to suggest adding a requirement for the applicant to label the application in such a way that it is clear that it is an application under this regulation. In this case, it is a project for the decarbonization of energy-intensive industrial sectors. A similar requirement is already included in certain other European Union legal acts, such as the GIA, and may contribute to the clear identification of the relevant application scheme
2. The ***digital*** single access ~~points~~***point*** shall ~~automatically attribute~~***route*** the permit applications to the relevant authority, inform the applicant about all steps of the permit-granting procedure, the status of the procedure and of the decisions of the relevant authorities, and enable the applicant to check compliance with applicable deadlines. To that effect the ***digital*** single access ~~points~~***point*** shall use ***the core functionalities of*** the European Business Wallets established pursuant to [Proposal for a Regulation on the establishment of European Business Wallets]~~.~~***, and enable:***	AT (Drafting suggestions): [...] route the permit applications to the relevant [**competent**] authority. AT (Comments): We welcome the addition of "digital". It is unclear who "the relevant authority" is. We assume that it is not the "coordinating authority" but the "comptent authority" (which should be made clear).

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	However in cases Art 5 does not apply, the *Single Points of Contancts* under the NZIA would be *inter alia* the "relevant authority". This should be made clear as well. BE (Drafting suggestions): ~~The~~ **A** ***digital*** single access ~~points~~***point*** shall ~~automatically attribute~~***route*** the permit applications to the relevant authority, inform the applicant about all steps of the permit-granting procedure the status of the procedure and of the decisions of the relevant authorities, and enable the applicant to check compliance with applicable deadlines. To that effect ~~***the***~~ ***a digital*** single access ~~points~~***point*** shall use ***the core functionalities of*** the European Business Wallets established pursuant to [Proposal for a Regulation on the establishment of European Business Wallets]~~.~~***, and enable:*** BE (Comments): Belgium has scrutiny reservation on the linking of the single access points to the European Business Wallets. The regulation on the European Business Wallets is still under negotiation. The establishment of several digital single access points should be allowed. It follows that paragraph 2 should be addressed to each point that will be established. CZ (Drafting suggestions):

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	2. The ***digital*** single access ~~points~~***point*** shall ~~automatically attribute~~***route*** the permit applications to the relevant authority, inform the applicant about all steps of the permit-granting procedure, the status of the procedure and of the decisions of the relevant authorities~~, and enable the applicant to check compliance with applicable deadlines~~. To that effect the ***digital*** single access ~~points~~***point*** shall use ***the core functionalities of*** the European Business Wallets established pursuant to [Proposal for a Regulation on the establishment of European Business Wallets]~~.~~***, and enable:*** CZ (Comments): We suggest removing the following part in the first sentence: „and enable the applicant to check compliance with applicable deadlines". See the comments on Articles 4 and 4(1) – a digital single access point for submitting a single application. DE (Drafting suggestions): 2. The *digital* single access ~~points~~*point* shall ~~automatically attribute~~*route* the permit applications to the relevant authority, inform the applicant about all steps of the permit-granting procedure, the status of the procedure and of the decisions of the relevant authorities, and enable the applicant to check compliance with applicable deadlines. **The single digital access point shall ensure full accessibility to companies not using the European Business Wallet.** To that effect the *digital* single access ~~points~~*point* shall use *the core functionalities of* the European Business Wallets established pursuant to [Proposal for a Regulation on the establishment of European Business Wallets]~~.~~*, and enable:*

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	DE (Comments): Member States also need realistic implementation deadlines. According to the Proposal on the European Business Wallet (EBW), public sector bodies must accept the EBW only after a transition period. Member states can only be required to accept the EBW after the transition period set out in the Proposal for the EBW. Since the proposal on the EBW does not oblige economic operators to use the EBW, we understand that the use of the EBW is not a precondition for the use of the access point. Member states may also offer different ways to use the access point. DK (Drafting suggestions): The ***digital*** single access ~~points~~***point*** shall ~~automatically attribute~~***route*** the permit applications to the relevant authority, inform the applicant about all steps of the permit-granting procedure, the status of the procedure and of the decisions of the relevant authorities, and enable the applicant to check compliance with applicable deadlines. To that effect the ***digital*** single access ~~points~~***point*** shall **enable the** use ***the core functionalities of*** the European Business Wallets established pursuant to [Proposal for a Regulation on the establishment of European Business Wallets]~~.~~***, and enable:*** DK (Comments):

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	We support the use of European Business Wallet, to the extent possible. To that end, we welcome the amendments made in this paragraph as it is important to streamline language in accordance with the European Business Wallet regulation. We do, however, see the need for a minor adjustment in order to fully take into account the general approach on the EBW proposal, where article 16 regarding the obligations for public authorities is worded: *"... Member States shall take appropriate organisational and technical measures that enable the use of the core functionalities of European Business Wallets."* The proposed wording is suggested to reflect the obligations set forward in the European Business Wallets regulation as Member States shall enable rather than use the core functionalities in the Business Wallets. EE (Drafting suggestions): The ***digital*** single access ~~points~~***point*** shall ~~automatically attribute~~***~~route~~***<u>**direct**</u> the <u>**applicant**</u> ~~permit applications~~ to the relevant authority, inform the applicant about all steps of the permit-granting procedure, the status of the procedure and of the decisions of the relevant authorities, and enable the applicant to check compliance with applicable deadlines. To that effect the ***digital*** single access ~~points~~***point*** ~~shall~~<u>**may**</u> use ***the core functionalities of*** the European Business Wallets established pursuant to [Proposal for a Regulation on the establishment of European Business Wallets]~~.~~***, and enable:*** EE (Comments):

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	The digital single access point should be able to direct the applicant to a fully digital application service, where the applicant can proceed with the next steps listed in the paragraph. The use of European Business Wallets (EBWs) should be voluntary, in line with the EBW general approach that states that Member States must allow certain companies that have procured EBWs to use its functionalities. It is not the case that public authorities should use them themselves. EL (Comments): Taking into account that European Business Wallets is still a proposal, as already discussed, we have a general scrutiny reservation regarding this part of the permit-granting procedure and we would like to ask if the Commission has considered contingency plans to use other already existing platforms. In para 2 it is proposed that "the ***digital*** single access point~~s~~ shall ~~**automatically attribute**~~ ***route*** the permit applications to the relevant authority [...]" The "automated function of the single access point, without human intervention" (as described in the explanatory Presidency note) means that all relevant permitting authorities (for example the Regional authorities, the Ministry of Environment, the Ministry of Development, the Ministry of Rural development and food, to name a few) should have access to, and their information systems interoperate with European Business Wallets? Moreover, the permitting authority rely also to other public authorities in order to issue the permit, for example the Fire service, the Urban planning authority of the relevant Municipality. Are these authorities obliged to have access to European Business Wallets? FR

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	(Drafting suggestions): 2. **<u>If such</u>** ~~The~~ digital single access **<u>points are set up, they</u>** shall route the permit applications to the relevant authority, inform the applicant about all steps of the permit-granting procedure, the status of the procedure and of the decisions of the relevant authorities, and enable the applicant to check compliance with applicable deadlines. To that effect the digital single access **<u>points</u>** ~~shall~~ **<u>may</u>** use the core functionalities of the European Business Wallets established pursuant to [Proposal for a Regulation on the establishment of European Business Wallets]., and enable: FR (Comments): FR: In practice, the implementation of a single interoperable system for all data and procedures seems to be complex and very costly. It shall be let to the discretion of each Member State. With regard to the use of the EBW, a request for flexibility has also been put forward by the Czech Republic, Estonia, Lithuania, Belgium, Germany, Denmark and Sweden. LT (Drafting suggestions): The ***digital*** single access ~~points~~***point*** shall ~~automatically attribute~~***route*** the permit applications to the relevant **<u>competent</u>** authority, inform the applicant about all steps of the permit-granting procedure, the status of the procedure and of the decisions of the relevant **<u>competent</u>** authorities, and enable the applicant to check compliance with applicable deadlines. To that effect the ***digital*** single access ~~points~~***point*** shall use ***the core functionalities of*** the

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	European Business Wallets established pursuant to [Proposal for a Regulation on the establishment of European Business Wallets]~~.~~***, and enable:*** LT (Comments): The provision uses both 'relevant authority' and 'competent authority'. For consistency, we suggest using 'relevant competent authority' throughout the text. Applications are submitted to, and decisions are taken by, the competent authority. Since the competent authority may differ depending on the case, the qualifier 'relevant' should be retained. SE (Drafting suggestions): The ***digital*** single access ~~points~~***point*** shall ~~automatically attribute~~***route*** the permit applications to the relevant authority, inform the applicant about all steps of the permit-granting procedure, the status of the procedure and of the decisions of the relevant authorities, and enable the applicant to check compliance with applicable deadlines. To that effect the ***digital*** single access ~~points~~***point*** shall ~~use ***the core functionalities of*** the European Business Wallets established pursuant to [Proposal for a Regulation on the establishment of European Business Wallets]., ***and***~~ ***enable:*** SE (Comments): The reference to European Business Wallets (EBWs) in Article 4(2) may imply that EBWs alone are expected to provide the functionalities listed in that paragraph. These functionalities depend on a broader digital ecosystem, including national digital solutions, databases etc. To ensure consistency with the latest Council approach on the European Business Wallet proposal, Sweden suggests moving the reference to EBWs to Article 4(3), where it

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	could be included as an example of Union digital infrastructure that Member States may use, where applicable. SK (Drafting suggestions): New wording: "To that effect the ***digital*** single access ~~points~~***point*** shall use **the national digital systems. The *core functionalities of*** the European Business Wallets established pursuant to [Proposal for a Regulation on the establishment of European Business Wallets] **remain voluntary *and enable:*** SK (Comments): The EBW has not yet been approved, and even after its entry into force, Member States will still have one year for implementation. We request that Member States be allowed to use their own digital systems, and that cooperation with the EBW remains voluntary.
~~Through the use of European Business Wallets, the single access points shall enable:~~	
(a) interoperability and automated data exchange between competent authorities;	EL (Comments):

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	In para 2(a) we would like to clarify the level of "interoperability and automated data exchange" maybe with an example in the relevant recitals 10 – 11. PL (Comments): It is necessary to clarify the practical applications of the concepts of "interoperability" and "automated data exchange", in particular with regard to the expected level of integration of national systems and registers, as well as the degree of automation of data exchange between the competent authorities.
(b) re-use of data and documents already held by public authorities;	EL (Comments): In para 2(a) there is a reference on "re-use of data and documents already held by public authorities" we would like to clarify if this refers only to documents in electronic format. What about documentation that is already held in paper? We should specify it at least in the recitals. In addition, we would like to clarify if there is provision for technical assistance for the Member States, in order to cover the cost for the necessary adjustments in all existing information systems of the competent authorities that will have to interoperate with European Business Wallets? If yes, we should specify in the text the source of funding. PL (Comments):

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	The provision should not be limited solely to data and documents already held by public authorities. Its scope should also cover information obtained by other competent bodies (e.g. in the context of inspections, submitted reports or data), as well as data available in publicly accessible registers. Expanding the scope in this manner would further reduce administrative burdens and avoid unnecessary duplication of information submitted by applicants.
(c) a high level of cybersecurity, and integrity of information;	
(d) transparency and accountability of the permit-granting procedure.	
3. When ~~setting up the~~***providing the digital*** single access ~~points~~***point***, Member States shall, where appropriate, make use of existing Union digital infrastructure, catalogues and building blocks established by Union law.	BE (Drafting suggestions): When ~~setting up the~~***providing ~~the~~ a digital*** single access ~~points~~***point***, Member States shall, where appropriate, make use of existing Union digital infrastructure, catalogues and building blocks established by Union law. BE (Comments): Belgium supports digital single access points in the format of digital portals for submission of permit applications, provided that Member States retain flexibility in their organization and designation in line with their constitutional and administrative structures and internal division of powers. Since competence on permitting is by the Belgian constitution dispersed among the federal state and each of the 3 Belgian regions for Belgium this entails that IAA must allow for the establishment of several digital single

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	access points. It follows that paragraph 3 should be addressed to each point that will be established. EE (Drafting suggestions): When ~~setting up the~~***providing the digital*** single access ~~points~~***point***, Member States shall, where appropriate, make use of existing **Member State or** Union digital infrastructure, catalogues and building blocks established by **Member State or** Union law. EE (Comments): Estonia already has well-developed digital registries for sector-specific permits. We wish to make the most of the systems that have already been developed. FR (Drafting suggestions): 3. When providing the digital single access **points**, Member States ~~shall~~ **may**, where appropriate, **and in a time frame coherent with their national priorities**, make use of existing Union digital infrastructure, catalogues and building blocks established by Union law. FR (Comments): FR: French authorities wish that the use of the European Business Wallet shall take into account the national economic context of each Member State. PT

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	(Comments): 'where appropriate' should be clarified, and consider specifying the digital infrastructure. SE (Drafting suggestions): When ~~setting up the~~***providing the digital*** single access ~~points~~***point***, Member States ~~shall~~ **may use the core functionalities of European Business Wallets where applicable, and,** where appropriate, make use of existing Union digital infrastructure, catalogues and building blocks established by Union law, **and other national digital solutions.** SE (Comments): See comment on Article 4.2.
	ES (Drafting suggestions): **4. The digital single access point provided by Member states according to this Article may be used for projects for which rules to streamline the administrative and permit-granting processes are established in other Union legislative acts for specific industrial manufacturing sectors** IT (Drafting suggestions): **NEW PAR 4**

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	Company data accessed through the single access points shall not be shared with third parties without prior information to, and where applicable consent of, the company concerned. IT (Comments): The operation of single access points should ensure transparency and protection of business data. Companies should be informed of any intended use of their data and business data should not be shared with third parties without prior information and, where applicable, consent, in line with the Data Act. RO (Drafting suggestions): Add: *"Member States shall ensure that SMEs have access to practical guidance and user support for the use of the digital single access point."* RO (Comments): The effectiveness of digital permitting depends not only on digitalisation but also on accessibility. SMEs often require practical support to benefit fully from digital procedures.

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Article 5 **Permit-granting procedure**	CZ (Comments): At the same time, the Czech Republic points out that it is unclear exactly how the permit-granting procedure for projects falling under the scope of this regulation should be structured, that is, whether it should take the form of a single administrative proceeding conducted on the basis of a single application by a single administrative authority and leading to the issuance of a single administrative decision approving the project, or whether it should follow the (standard) approach, in which there are multiple such separate administrative proceedings, or procedures, and thus also multiple competent administrative authorities are involved. The Czech Republic points out that if the proposal truly aims at the submission of a single application, on the basis of which the entire permit-granting procedure will take place, that is, in particular, the environmental impact assessment pursuant to Directive 2011/92/EU (EIA) or Act No. 100/2001 Coll. (the Act on Environmental Impact Assessment), as well as the subsequent proceedings, in particular the building permit process, this would require fundamental changes in the national legislation. Procedural integration, consisting of merging the EIA process with permit-granting procedures, and thus also consolidating the supporting documentation on which they are based, was already part of the so-called "old" Building Act (Act No. 183/2006 Coll.), but was hardly ever utilized by developers. The so-called new Building Act (Act No. 283/2021 Coll.) therefore does not address this at all. The main reason is builders' concern about preparing project documentation in accordance with the Building Act at a stage when the EIA process has not yet taken place, as the conclusions of that process may fundamentally influence the nature of the project, and thus the project documentation, leading to unnecessary costs incurred in its preparation.

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	The Czech Republic therefore emphasizes the need for a clear definition of whether the proposal is aimed at a single application and a comprehensive decision, and draws attention to the practical problems that could arise when implementing this principle within the Czech legal and administrative framework. DE (Drafting suggestions): Article 5 ~~**Permit-granting procedure**~~ **Completeness of the application** DE (Comments): In discussions with representatives of the state enforcement authorities, it has become clear that the measures proposed in Article 5 would, for the most part, not lead to any acceleration of the process in Germany. Given that some Member States have multiple parallel permitting procedures for industrial projects for good reasons, we request that Article 5(1) and Article 5(2)—and in particular the requirement for a single application and the requirement for a single permit-granting procedure—be deleted. If deletion is not possible, we need at least some flexibility here. This is also required by the principle of subsidiarity. The heading is adjusted to reflect the content of the Article remaining after the deletions.
1. Member States shall establish a single permit-granting procedure based on a single application covering all permits required for industrial	AT (Drafting suggestions):

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manufacturing projects. ***The use of that single permit-granting procedure shall be at the discretion of the project promoter.***	Member States shall establish a **simplified** permit-granting procedure [...] AT (Comments): The term "**single** permit-grating procedure is confussing. We suggest "**simplified**" or "streamlined" permit-granting procedure (in line with recital 12). BE (Drafting suggestions): 1. Member States ~~shall~~ **may** establish a single permit-granting procedure **at the appropriate administrative level** based on a single application covering ~~all~~ **substantively related** permits required for industrial manufacturing projects. ~~***The use of that single permit-granting procedure shall be at the discretion of the project promoter.***~~ BE (Comments): Belgium opposes mandatory full integration (one application, one procedure, one decision), as this is incompatible with the Belgian division of powers. Belgium proposes that Member States be given the flexibility to apply the 'single application – single procedure' approach only to permits that are substantively related, are dealt with at the same administrative level, and can therefore be meaningfully coordinated.

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	Belgium also opposes the idea that the project developer himself can choose to use such a single procedure. Obliging member states to establish a single procedure to be used optionally by the promotor ('*at the discretion of the project promoter*') makes little sense. It complicates applying for a permit, might create confusion about which procedure would be legally the sound one and raises implementation costs for member states since among others all available procedures must be digitalized BG (Comments): The permit-granting proceedure for CCS and CCUS projects is complex and time consuming from both sides – Project promoter and admnistration, based on certain technical requirements. A single permit grant would be non-effective, better proposal would be coordinated administrative proceedure with highlighted priority CZ (Drafting suggestions):

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	1. Member States shall establish a single permit-granting procedure based on a ~~single~~ application covering ~~all~~ ***relevant*** permits required for industrial manufacturing projects. ***The use of that single permit-granting procedure shall be at the discretion of the project promoter.*** CZ (Comments): See the comment on Article 5 DE (Drafting suggestions): ~~Member States shall establish a single permit-granting procedure based on a single application covering all permits required for industrial manufacturing projects. ***The use of that single permit-granting procedure shall be at the discretion of the project promoter.***~~ DE (Comments): see above EE (Drafting suggestions): Member States shall establish a single permit-granting procedure based on a single application covering all permits required for industrial manufacturing projects **or ensure that all relevant permits can be applied for at the same time**. . ~~***The use of that single permit-granting procedure shall be at the discretion of the project promoter.***~~ EE (Comments):

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	Provisions on permitting in the IAA should be more flexible, taking into account Member States who already have in place a streamlined fully digital permitting system. The IAA should not add unjustified additional administrative burdens or break an existing well-functioning digitalised system. In Estonia, the so-called sequence of necessary permits is not regulated—that is, a developer has the choice of when and what to apply for—so it is possible to apply for all necessary permits at once, even today. Furthermore, various digital registries are already in place today for applying for all permits, and the data submitted during the permit process varies depending on the specific subject matter of the permit. Estonia does not consider it justified to redesign its entire digital infrastructure to this extent, as the objective of the provision is already being met in Estonia through other means. Likewise, there is no justification for requiring a Member State to implement and operate two parallel systems (the developer's choice). We underline that this matter is important to Estonia as it could potentially put a disproportionate and unnecessary amount of burden on Estonia's digital permitting system. As a result, it would not make the permitting process in Estonia simpler but instead it would force us to redesign and change our existing system without any actual need or practical improvement, at a very high cost. EL (Comments): The provisions of article 5 will require specific reforms in the national institutional framework. Making this procedure optional for project promoters will require competent authorities to operate two parallel permit-granting systems. We would kindly ask the Council Legal Service to comment on whether this proposal appears compatible with the principle of equal treatment.

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	FI (Comments): We understand the aim of this change is to make permitting procedure easier for applicants and to allow them to have the option to apply for all permits either at the same time or step-by-step. We support this aim, as permits are applied for at different stages of project development, so flexibility is essential especially for early-stage projects. It is crucial to allow step-by-step approach where e.g., one permit is conditional on the approval of another. However, we remain concerned about whether this amendment solves the above issue, and (a) whether the obligation for MS to uphold parallel permitting systems only creates additional complexity and (b) how the single permit-granting procedure will work in practise. We would welcome clarification that single digital access point could be used also for step-by-step permit-granting procedure (see in this regard also Art. 4(1) formulation). FR (Drafting suggestions): ~~**1. Member States shall establish a single permit-granting procedure based on a single application covering all permits required for industrial manufacturing projects. The use of that single permit-granting procedure shall be at the discretion of the project promoter.**~~ FR (Comments): FR : The French authorities point out that the competences for permit-granting procedures may vary from administrative levels. Some procedures for authorizing the siting of industrial projects remain into the scope of national

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	sovereignty, particularly with regard to urban permit-granting procedures. They cannot be incorporated into this single permit-granting procedure. Furthermore, the choice of the permit-granting procedure cannot be let to the project promoter. Otherwise, it would add complexity to the process. IT (Drafting suggestions): 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.** The use of that single permit-granting procedure shall be at the discretion of the project promoter. IT (Comments): Italy welcomes 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 explicit 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. LT (Comments):

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	The proposed amendment introduces uncertainty as to how economic operators should proceed in situations where a Member State has chosen to apply a single permit-granting procedure for all cases. It also raises questions regarding the necessity of requiring Member States to establish a permit-granting procedure based on a single application when its use would not be mandatory. To ensure legal coherence and clarify the intended scope, it would be advisable to specify that this flexibility applies where the applicant intends to obtain specific permits through separate procedural steps. RO (Drafting suggestions): 1. Member States shall establish a single permit-granting procedure based on a single application covering all permits required for industrial manufacturing projects. The use of that single permit-granting procedure shall be at the discretion of the project promoter. **The single permit-granting procedure should remain an enabling tool and should not prevent project promoters from relying on existing national procedures where these are faster or more appropriate for the project concerned.** RO (Comments): A single permit-granting procedure is particularly beneficial for complex projects requiring multiple permits and the involvement of several competent authorities. However, applying the same procedure to projects requiring only limited amendments or a small number of permits could unnecessarily increase administrative burden without delivering additional benefits. SE

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	(Drafting suggestions): 1. Member States shall establish a single permit-granting procedure based on ~~a single~~ application~~s~~ covering all permits required for industrial manufacturing projects. ***The use of that single permit-granting procedure shall be at the discretion of the project promoter.*** SE (Comments): The permitting process often involves multiple applications submitted to different competent authorities. Replacing "a single application" with "applications" better reflects national permitting systems while maintaining a coordinated permit-granting procedure. SI (Comments): Slovenia would like to reiterate that it is nuclear which permits are to be included in the single application and would request EC for clarifications. We believe that not all permit granting procedures can be merged into one procedure and application.
2. Member States shall designate a ~~competent~~***coordinating*** authority to ~~coordinate~~***facilitate timely decision-making in the context of*** the permit-granting procedure ~~referred to in paragraph 1 in order to ensure the adoption and issue of a comprehensive decision within the applicable time limit~~***by Member States' competent authorities in accordance with Union and national law***.	AT (Comments): AT questions the creation of the coordinating authority and its envisaged tasks. Also for MS with decentral administrations the designation of a single coordinating authority would lead to difficulties. It is therefore essential for AT that **more than one** coordinating authorities may be dessigneded (e.g.

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	one per region). In AT the regions (Länder) are mostly responsble for the permit granting procedures. BE (Drafting suggestions): Member States ~~shall~~ **may** designate a ~~competent~~ ***coordinating*** authority to ~~coordinate~~ ***facilitate timely decision-making in the context*** of the permit-granting procedure **for substantively related permits and at the appropriate administrative level** ~~referred to in paragraph 1. in order to ensure the adoption and issue of a comprehensive decision within the applicable time limit~~ ***by Member States' competent authorities in accordance with Union and national law***. BE (Comments): Belgium calls for flexibility for Member States to designate a coordinating authority in line with their institutional structure, including the possibility of multiple SPOCs depending on the stage of the procedure and the level of competence. Belgium proposes that the designation of a coordinating authority should be optional for Member States, so that Member States have the flexibility to deploy the coordinating authority only when deemed appropriate. It is essential that competent authorities can allocate their scarce resources (such as specialized coordinating staff) to projects and processes that truly require them, rather than being forced to spread them across all projects and processes.

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	Moreover coordinating different permit granting procedures on very specialized subjects asks for deeply specialized skills, procedurally and substantively. A coordinating authority would be an authority with staff and skills that have specialized expertise next level. Belgium supports the term 'facilitate' to describe the coordinating authority's role. The power to coordinate or facilitate is not equivalent to decision-making power. The coordinating authority's remit must be limited to permits that are substantively related and granted at the same administrative level. BG (Comments): The coordinating authority shell be enabled through efective measures to highlight the Project priority during the permit granting proceedure and to require deadlines compliance according with Union or national law when applicable for higher effectiveness. CZ (Drafting suggestions): Member States shall designate a ~~competent~~***coordinating*** authority to ~~coordinate~~***facilitate timely decision-making in the context of*** the permit-

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	granting procedure ~~referred to in paragraph 1 in order to ensure the adoption and issue of a comprehensive decision within the applicable time limit~~***by Member States' competent authorities in accordance with Union and national law*** ***and the streamlined procedure shall be coordinated with mandatory EIA/SEA and other national permitting processes*****.** CZ (Comments): Emphasizes the need to synchronize streamlined permitting with EIA/SEA and spatial planning processes. DE (Drafting suggestions): ~~Member States shall designate a competent~~***~~coordinating~~*** ~~authority to coordinate~~***~~facilitate timely decision-making in the context of~~*** ~~the permit-granting procedure referred to in paragraph 1 in order to ensure the adoption and issue of a comprehensive decision within the applicable time limit~~***~~by Member States' competent authorities in accordance with Union and national law~~***~~.~~ DE (Comments): We reject the idea of a "coordinating authority," as outlined in the new proposal. It should remain the responsibility of the competent authorities to verify the completeness of the documentation. FR (Drafting suggestions): 2. Member States ~~shall~~ **may** designate ~~a coordinating authority~~ **points of contact** to facilitate timely decision-making in the context of the permit

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	granting procedure by Member States' competent authorities in accordance with Union and national law. **Those points of contact are the same as those in [article 3] of the regulation on speeding up environmental assessments.** FR (Comments): FR : The French authorities wish to harmonise permit-granting procedures within the RSEA. With a view to simplification, it is essential to tackle the fragmentation of procedures. Consequently, strategic industrial projects must be able to benefit from the same points of contact as those defined in the RSEA. PT (Comments): The 'timely decision-making' should be clarified. The deadline for the overall coordination decision should be made explicit. SE (Drafting suggestions): 2. Member States shall **establish or** designate ~~a~~ **one or more authorities as single point of contact** ~~competent~~***coordinating*** ~~authority~~ to ~~coordinate~~***facilitate*** ***and coordinate*** ~~*timely decision-making in the context of*~~ the permit-granting procedure ~~referred to in paragraph 1 in order to ensure the adoption and issue of a comprehensive decision within the applicable time limit~~***by Member States' competent authorities in accordance with Union and national law***.

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	SE (Comments): Amendment to change name to single points of contact (SPOC) to align with NZIA and CRMA. In some Member States, it may be preferable to have more than one SPOC. Moreover, such an authority may not already exist and needs to be established. The suggested altered wording to establish or designate one or more authorities is used in the CRMA Article 9(1) and the NZIA Article 6(1). Further, the SPOC should facilitate and coordinate the permit-granting procedure, in line with NZIA Article 6(1) and CRMA Article 9(3). In total, the suggested amendments will increase comparability and align the responsibilities that are already established in other sectoral legislations, i.e. the NZIA and CRMA.
	SE (Drafting suggestions): **2a. Where a project is complex and requires several permits, the single contact point may offer the project promoter using the single permit granting procedure referred to in paragraph 1 an initial dialogue to define the scope and facilitate the permit granting procedure.** SE (Comments): SE considers that the use of a pre-application dialogue would facilitate the guidance on permits, e.g. which permits are applicable in a certain procedure. In this way, uncertainties can be removed and procedures accelerated. The experience from the SPOC for CRMA/NZIA is that an early dialogue with projects promoters is needed to identify the relevant permits and thus

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	the scope of the single permit granting procedure, because each procedure will require a different set of applications. The experience from the CRMA/NZIA SPOC is also that an early dialogue can minimise the need for additional requests once applications are submitted.
3. No later than 45 days from the receipt of the application for a permit for industrial manufacturing projects, the ~~competent~~***coordinating*** authority ***referred to in paragraph 2*** shall either acknowledge that the application is complete or request any missing information needed to process the application ***via the digital single access point***.	AT (Comments): We are sceptical that the confirmation of completeness should be done by the coordinating authority**.** It creates an **additional administrative layer**, which **might no**t necessarily make procedures **more efficient.** In our view, it would make more sense if the competent authority - which has to be involved in this process anyways - should be responsible for the confirmation of the completeness. BG (Comments): To define calendar or working days CZ (Comments): The Czech Republic requests clarification of the term "permit for industrial manufacturing project", as the terms listed in Article 3 define only the "permit-granting procedure" in the sense of various types of permits and administrative acts issued for comprehensive permits for the construction, conversion, extension, and operation of industrial manufacturing projects. We therefore recommend specifying and amending the term, preferably by referring to the relevant provisions of each Member State's national law.

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	Furthermore, we note that the proposed deadlines could be accepted only if they applied exclusively to public-law project permits as understood under the legal system of the Czech Republic (in the Czech Republic, a "building permit" under the Building Act), and not other permits, such as operating permits, permits for chemical substances, environmental impact assessments (EIA), grid connection, etc.; see our comment on Article 5. DE (Drafting suggestions): No later than 45 days from the receipt of the application for a permit for industrial manufacturing projects, the **competent**~~***coordinating***~~ authority ~~***referred to in paragraph 2***~~ shall either acknowledge that the application is complete or request any missing information needed to process the application ***via the digital single access point***. DE (Comments): The deletion (of "referred to inparagraph 2") is a consequential amendment resulting from the deletion of Article 5, paragraph 2; see above. We reject the idea of a "coordinating authority," as outlined in the new proposal. It should remain the responsibility of the competent authorities to verify the completeness of the documentation. DK (Drafting suggestions): No later than 45 days from the receipt of the application for a permit for industrial manufacturing projects, the ~~competent~~***coordinating*** authority ***referred to in paragraph 2*** shall either acknowledge that the application is

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	complete or request any missing information needed to process the application ***via the digital single access point***. **The request for missing information shall be accompanied by a date for when the additional information is due.** DK (Comments): DK welcomes the alignment of permit-granting procedures with existing Union legislation. To ensure consistency with Regulation (EU) 2024/1735 (NZIA) and facilitate efficient case handling, Denmark invites the Presidency to consider introducing a deadline for applicants to respond to requests for additional information. It could also be considered to gradate the deadlines in case of complex cases since the scope of the proposal covers very large construction projects and smaller projects as well as established installations and greenfield projects. EE (Drafting suggestions): No later than 45 days from the receipt of the application for a permit for industrial manufacturing projects, the ~~competent~~***coordinating*** authority ***referred to in paragraph 2*** shall either acknowledge that the application is complete or request any missing information needed to process the application ***via the digital single access point,*** **if the acknowledge stage for a specific permit exists**. EE (Comments): In Estonia, there is no separate stage for assessing the completeness of the building permit application process. Therefore, we propose that the creation of such a stage not be mandatory.

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	FI (Comments): We think the **competent** authority should be the one conducting any assessment of the substance of the application, including the completeness assessment. The competence to carry out substantive assessments lies within competent authorities. We suggest clarifying that after the 45 day deadline the processes under national legislation are applicable. FR (Drafting suggestions): ~~**3. No later than 45 days from the receipt of the application for a permit for industrial manufacturing projects, the competentcoordinating authority referred to in paragraph 2 shall either acknowledge that the application is complete or request any missing information needed to process the application via the digital single access point.**~~ **3. The duration of environmental assessments shall be pursued according to article 7 of the [RSEA].** FR (Comments): FR: France reiterates its opposition to the imposition of time limits on procedures, and in particular time limits for the preliminary definition of the scope of application. Such measures are counterproductive to the objective of speeding up the process and contravene the principle of subsidiarity. They must be left to the

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	discretion of Member States, in accordance with their competent bodies and the distribution of respective competences. They create legal uncertainty for project developers, increase procedural complexity for the competent authorities and the risk of litigation, and make the applicable regulations less clear. Slovenia, Finland and Sweden are also in opposition to the imposition of time limits on procedures. LU (Drafting suggestions): 3. No later than 45 days business from the receipt of the application for a permit for industrial manufacturing projects, the ~~competent~~***coordinating*** authority ***referred to in paragraph 2*** shall either acknowledge that the application is complete or request any missing information needed to process the application ***via the digital single access point***. LU (Comments): Specify in all provisions that we understand “business days” when refering to a days-period. PL (Drafting suggestions): 3. No later than 45 days from the receipt of the application for a permit for industrial manufacturing projects, **or no later than 90 days for projects requiring an environmental impact assessment, an industrial emissions permit, a major-accident prevention assessment, a grid connection assessment or a critical infrastructure or cybersecurity assessment,** the

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	~~competent~~***coordinating*** authority ***referred to in paragraph 2*** shall either acknowledge that the application is complete or request any missing information needed to process the application ***via the digital single access point***. PL (Comments): Member States' organisational flexibility should be preserved and a single rigid institutional model should be avoided. One procedure and one application should not mean the automatic centralisation of all assessments or the limitation of the possibility of carrying out the required environmental, technical, connection and safety assessments. Deadlines and procedural requirements must be realistic and authorities and operators retain the possibility to request the necessary information if necessary for the safety of the installation, energy system or critical infrastructure. SE (Drafting suggestions): 3. No later than 45 days from the receipt of the application for a permit for industrial manufacturing projects, the ~~competent~~***~~coordinating~~*** ~~authority~~ ***single point of contact*** ***referred to in paragraph 2*** shall either acknowledge that the application is complete or request any missing information needed to process the application ***via the digital single access point***. SI

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	(Comments): Slovenia believes that the wording of para.3 is unacceptable to administrative authorities as it would prolong the procedures and lead to a rise of negative decisions.
	PL (Drafting suggestions): 3a. Paragraph 3 shall not prevent the competent authority, other competent authorities or network operators involved in the procedure from requesting additional information where such information is necessary for environmental assessment, industrial emissions permitting, chemical safety, prevention of major accidents, water protection, critical infrastructure protection, cybersecurity, or for assessing the technical feasibility, secure operation and capacity availability of electricity, gas, hydrogen, carbon dioxide or heat networks. Any such request shall be reasoned, proportionate and limited to the information necessary for the relevant assessment. 3b. This Article shall not affect the right and obligation of transmission system operators, distribution system operators or other regulated network operators to assess, refuse, condition or sequence connection requests on the basis of technical feasibility, system security, capacity availability, network development plans or other applicable sector-specific requirements.
Where, after the submission of any missing information, the application is still deemed to be incomplete, the ~~competent~~***coordinating*** authority ***referred to in paragraph 2*** may, within 30 days of the submission of the requested missing information, make a second request for any information still missing. The ~~competent~~***coordinating*** authority ***referred to in paragraph 2*** shall not request information in areas not covered in the first request for additional	DE (Drafting suggestions): Where, after the submission of any missing information, the application is still deemed to be incomplete, the **competent** ~~***coordinating***~~ authority ~~***referred to in paragraph 2***~~ may, within 30 days of the submission of the requested missing information, make a second request for any information still missing. The **competent** ~~***coordinating***~~ authority ~~***referred to in***~~

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information and shall request further information only as necessary to cover the missing information.	~~***paragraph 2***~~ shall not request information in areas not covered in the first request for additional information and shall request further information only as necessary to cover the missing information. **Where national time limits are more ambitious than those set out in this paragraph, those national time limits shall apply. Member States may additionally further limit the number of requests for missing information by competent authorities** DE (Comments): We reject the idea of a "coordinating authority," as outlined in the new proposal. It should remain the responsibility of the competent authorities to verify the completeness of the documentation. DK (Drafting suggestions): Where, after the submission of any missing information, the application is still deemed to be incomplete, the ~~competent~~***coordinating*** authority ***referred to in paragraph 2*** may, within 30 days of the submission of the requested missing information, make a ~~second~~ **another** request for any information still missing. **The requests for missing information shall be accompanied by a date for when the additional information is due.** The ~~competent~~***coordinating*** authority ***referred to in paragraph 2*** shall not request information in areas not covered in the first request for additional information and shall request further information only as necessary to cover the missing information. DK (Comments):

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	DK: Does this second subparagraph mean that it is not possible to request necessary information a third time, even if the information provided upon request is insufficient? DK seeks clarification on whether the intention is to prevent any further requests for information beyond the second request. FI (Comments): We still consider this paragraph does not leave enough freedom for the authority to request additional information in situations where the application continues to be incomplete after the first 45 days. We consider the authorities should be allowed to ask for more information if not doing so would lead to denial of the application. FR (Drafting suggestions): ~~**Where, after the submission of any missing information, the application is still deemed to be incomplete, the coordinating authority points of contact referred to in paragraph 2 may, within 30 days of the submission of the requested missing information, make a second request for any information still missing. The coordinating authority referred to in paragraph 2 shall not request information in areas not covered in the first request for additional information and shall request further information only as necessary to cover the missing information.**~~ FR (Comments):

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	FR : The reference to article 7 of the RSEA already covers all necessary time limits. LU (Drafting suggestions): Where, after the submission of any missing information, the application is still deemed to be incomplete, the ~~competent~~***coordinating*** authority ***referred to in paragraph 2*** may, within 30 days business of the submission of the requested missing information, make a second request for any information still missing. The ~~competent~~***coordinating*** authority ***referred to in paragraph 2*** shall not request information in areas not covered in the first request for additional information and shall request further information only as necessary to cover the missing information PT (Comments): Are applicants not subject to deadlines? SE (Drafting suggestions): Where, after the submission of any missing information, the application is still deemed to be incomplete, the ~~competent~~***~~coordinating~~*** ~~authority~~ ***single point of contact*** ***referred to in paragraph 2*** may, within 30 days of the submission of the requested missing information, make a second request for any information still missing. **While striving to communicate all requirements for the applicant at the start of a permit-granting procedure, t**he ~~competent~~***~~coordinating~~*** ~~authority~~ ***single point of contact referred to in paragraph 2*** shall **endeavour to** ~~not request information in areas not covered in the first request for additional information and shall~~

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	request further information only as necessary to cover the missing information. **Member States may delegate to the competent authorities to acknowledge that the application is complete or request any missing information.** SE (Comments): An applicant's submission of information in response to a first request for additional information may raise new questions, and a need for a second request for additional information. If the single point of contact is prohibited to request additional information, applications will be rejected as they cannot be approved on insufficient information whatever the reason. SE notes that there are provisions in the current revision of the Grids Package where authorities are allowed to ask for more information, if not doing so would lead to rejection of the application. Member States shall be able to delegate to the competent authority to make the assessment of whether the application is complete or if there is a need for requests of further information. The assessment is complex and the competent authority may in many cases be the most suited to make this assessment.
	SE (Drafting suggestions): **3a. No later than two months from the date of the receipt of the application, the single point of contact shall draw up, in close cooperation with other authorities concerned, a detailed non-binding schedule for the permit-granting process.**

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	SE (Comments): New paragraph with requirement to produce a non-binding schedule for the permit-granting procedure for each project. The paragraph is based on the corresponding provision in CRMA (Article 11(7)) and NZIA (Article 9(11)). The proposal also covers the period before the application is deemed complete, to provide the project promoter with an understanding of the schedule for requests and submission of missing information.
4. The provisions of this Article shall not apply where rules to streamline the administrative and permit-granting processes are established in other Union legislative acts for specific industrial manufacturing sectors.	EL (Comments): In para 4, we should discuss the possibility of adding to the operative part a specific reference to the "other Union legislative acts", in order to specify the scope of the provisions. We recall the reply of the Commission in the wp meeting of 21.06.2026, and we believe that it will be beneficial to mention the most relevant legislation (for example NZIA, CRMA) in the text choosing a dynamic reference. In recital 12 the reference to "Sectoral Union legislation governing medicines and medical devices..," can be further specified. ES (Drafting suggestions): 4. The provisions of this Article shall not apply where rules to streamline the administrative and permit-granting processes are established in other Union legislative acts for specific industrial manufacturing sectors. **(New) The digital single access point provided by Member states according to this Article may be used for energy-intensive decarbonization projects for which rules to streamline the administrative**

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	and permit-granting processes are established in other Union legislative acts. ES (Comments): The goal is to permit projects handled under the CRMA and NZIA to access the digital single access point. SE (Drafting suggestions): 4. The provisions of this Article shall not apply where rules to streamline the administrative and permit-granting processes are established in other Union legislative acts for specific industrial manufacturing sectors. **The single points of contact in other Unions legslisative acts and the single point of contact in Article 5.2 should be considered equivalent and may therefore be the same competent authority or function.** SE (Comments): Many MS have already designated SPOC:s for NZIA/CRMA and it would therefore be beneficial to clarify that these can be extended to also apply to the projects within IAA. The relationship to the environmental omnibus needs to be clarified in a better way. SI (Comments): The scope of provisions is nuclear. Slovenia believes that the legislation should aim to harmonize and consolidate provisions regarding the simplification of procedures in various sectoral acts into a single act in order to ensure legal clarity and avoid complexity for both project developers as well as administrations.

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	PL (Drafting suggestions): 5. For the purposes of permit-granting procedures under this Article, the modernisation, retrofit or conversion of existing industrial installations shall be treated on an equal footing with new industrial manufacturing projects. PL (Comments): This clarification is essential to avoid discrimination against existing industrial assets. For some companies, accelerated decarbonisation depends on upgrading large, complex installations already in operation. Equal treatment ensures that the IAA supports cost-effective and rapid emission reductions, in line with EU climate objectives.

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Article 6 ***Permit-granting procedure for* energy-intensive industry decarbonisation projects**	FR (Comments): FR : French authorities would like to thank the Presidency for changing the title of this article, which clarifies its scope. Nevertheless, France reiterates its reservations regarding the expansion of the scope of projects subject to the rules applicable to strategic industrial projects defined by the NZIA, which seems to undermine the objective of prioritizing specific projects. RO (Drafting suggestions): Add new paragraph: "Member States shall ensure that permitting procedures for energy-intensive industry decarbonisation projects are coordinated with grid connection procedures and infrastructure development planning." RO (Comments): Without electricity there is no decarbonisation.
	RO (Comments): RO requests that Article 6 explicitly address the situation of energy-intensive SMEs participating as suppliers or sub-contractors in decarbonisation project value chains, ensuring

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1. ***Member States shall apply the streamlined administrative and permit-granting processes set out in*** Chapter II, Section II, of Regulation (EU) 2024/1735 ~~shall apply to all~~***to*** energy-intensive industry decarbonisation projects ***as defined in Article 3, point (3) of this Regulation***.	BE (Comments): Belgium has scrutiny reservation. Belgium considers that we should move away from an approach that regulates the authorisation procedure on a sector-by-sector basis through sector-specific legislation DE (Comments): We generally support expanding the scope of the NZIA to include energy-intensive industry decarbonization projects under the IAA, but we still need to assess the exact implications of this expansion. ES (Drafting suggestions): **(deleted, include this provision in article 34)** or Member States shall apply the streamlined administrative and permit-granting processes set out in Chapter II, Section II ***and Section III***, of Regulation (EU) 2024/1735 ~~to~~ energy-intensive industry decarbonisation projects as defined in Article 3, point (3) of this Regulation. ES (Comments):

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	We propose that this article is deleted and this provision is included as an amendment to NZIA in article 34. This would improve clarity in the application of NZIA, as cross-checking another regulation would not be needed to understand the full scope of NZIA. In any case, we propose that all energy-intensive industry decarbonisation projects may be declared strategic under NZIA, without the need to prove a link with net-zero technology value chains. In practice, several Member states are already declaring energy-intensive industry decarbonisation projects as strategic under NZIA without a clear link with net-zero technological value chains. This is creating legal uncertainty and an uneven playing field. FR (Drafting suggestions): ~~1. Member States shall apply the streamlined administrative and permit-granting processes set out in Chapter II, Section II, of Regulation (EU) 2024/1735 shall apply to allto energy-intensive industry decarbonisation projects as defined in Article 3, point (3) of this Regulation.~~ **The permit-granting procedures for energy-intensive industry decarbonisation projects, as defined in Article 3, point (3) of this Regulation, shall fall within the scope of chapter I and II of the Regulation on Speeding Up Environmental Assessments [RSEA].** FR (Comments):

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	FR: Instead of applying the NZIA permit granting procedure, it is proposed to apply the RSEA permit granting procedure.
2. ~~All~~ Energy-intensive industry decarbonisation projects ***as defined in Article 3, point (3) of this Regulation*** shall be considered strategic projects contributing to resilience and decarbonisation or resource efficiency for the purposes of [Article 14 of Proposal for a Regulation on speeding-up environmental assessment]. ***/***Points 1, 2 and 3 of the Annex***/*** in that Regulation shall apply.	BE (Comments): Belgium has scrutiny reservation. FR (Drafting suggestions): 2. Energy-intensive industry decarbonisation projects as defined in Article 3, point (3) of this Regulation shall be considered strategic projects contributing to resilience and decarbonisation or resource efficiency for the purposes of [Article 14 of Proposal for a Regulation on speeding-up environmental assessment]. ***/*~~**Points 1, 2 and 3 of the Annex**~~ **Toolbox for strategic sectors or categories***/* in that Regulation shall apply **3. In article 14 of [Proposal for a Regulation on speeding-up environmental assessment], the (k) is added :** **"(k) energy-intensive industry decarbonisation projects as defined in Regulation [IAA]."** FR (Comments): FR : Addition of provisions for coordination with the RSEA. LV

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	(Drafting suggestions): All energy-intensive industry decarbonisation projects shall be considered strategic projects […], *taking into account the diversity* of Member States' industrial structures. LV (Comments): Latvia supports the prioritisation of energy-intensive industry decarbonisation projects. However, the practical relevance for Latvia is limited, as only cement production falls within the scope. Latvia therefore invites consideration of a more flexible approach allowing inclusion of other nationally significant sectors (e.g. wood processing and glass industry), in order to better reflect Member States' industrial structures. RO (Drafting suggestions): Member States shall ensure that the permitting timeline for energy-intensive industry decarbonisation projects is aligned, to the extent possible, with the timeline for the availability of necessary electricity grid capacity and related energy infrastructure. RO (Comments): Permitting alone cannot unlock investment if the project does not have effective access to energy and grid capacity.
	NL (Drafting suggestions):

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	3.The changes or extensions of industrial manufacturing projects that result in a structural reduction of nitrogen emissions, compared to the existing project, shall not require an assessment of nitrogen emissions in an assessment that may be carried out to comply with Article 6.3 of the Council Directive 92/43/EEC. NL (Comments): The Netherlands underlines the importance of nature preservation and restauration and the goals that are, primarily, set out in the Birds- and Habitats directives. In the meantime, the Netherlands also has a major industrial base that needs to be decarbonized and has to transition to clean production processes. By transitioning to clean industrial production processes, the burden on nature, climate and public health will decrease immensely. However, at this moment, a peculiar judicial situation emerges. The regulations that were intended to stimulate the strengthening of nature and climate are now bringing a halt to realization of projects that improve the state of nature and climate across the EU. During the permitting procedures for industrial decarbonization projects, the amount of nitrogen emissions are examined (following article 6(3) from the Birds- and habitat directive). In December 2024, the Dutch Supreme Court extended this article with the principle of additionality: with every new project (even projects that substantially reduce nitrogen), a permit can only be granted if the activity does not reduce available space to maintain or restore nature, nor to prevent deterioration of nature's current condition. Practically, this means that even though a project reduces nitrogen emissions with, for example, 85%, the permit will be declined due to the 15% of emissions that remains after realization of the project (see add on for examples and impact).

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	Ultimate consequence: nitrogen emitting installations keep emitting and the state of nature keeps deteriorating. The expected amount of losses in investments in the industry due to this deadlock is estimated at 8 billion euros in the period between 2024 and 2030. This cannot be the intended consequence of the Birds- and Habitats directives. This problem relates in particular to densely populated areas within the Union, where, in the tension between nature and the economy, it is of great importance that rules are coherent. A solution solution therefore contributes to a level european playing field.Therefore, the Netherlands proposes a targeted measure to speed up permitting for industrial decarbonization projects.
[…]	

CHAPTER V **INDUSTRIAL MANUFACTURING ACCELERATION AREAS**	BE (Comments): We welcome the efforts of simplification made in the text. However, we have a general concern regarding the added value of the proposals, the text, lack of clarity regarding the impact, definitions and terminology, scope, … The IAA must comply with the principle of subsidiarity. This implies that the IAA must respect the constitutional and institutional realities and internal divisions of competence of the Member States and their administrative organisation. Particular attention should be paid to strictly limiting the administrative burden for Member States and regions. This could be achieved by avoiding the creation of new instruments or obligations whose added value has not been demonstrated. Importance of good coherence with other existing and ongoing legislative initiatives. Coherence with State aid rules should also be ensured (GBER, regional aid guidelines). DE (Comments): Processes should be accelerated on a horizontal basis, while adhering to relevant environmental standards, not just for individual industries, regions, or sectors. The interaction between NZIA Valleys and Industrial Acceleration Areas is not yet clear. The connections and benefits for the NZIA Valleys need to be presented more clearly here. A low-threshold option should be provided to allow NZIA Valleys to also become Acceleration Areas. The exact details would still need to be discussed. LU

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	(Comments): **General observation: Please note that these are our preliminary comments (scrutiny reservation). Our internal coordination is currently ongoing.** NL (Comments): The Netherlands still sees a large potential in the industrial manufacturing acceleration areas. We also believe the current suggestions are not the significant changes needed to achieve this. The Netherlands emphasizes the value of clustering industrial capacity and stimulating cross border cooperation between clusters. This rides on two important preconditions: 1) incentivizing clustering within member states; 2) incentivizing cross border cooperation. We believe the IAA can play a vital role in stimulating these tracks. We are still working on two follow up elaborations for this specific chapter: - The legal consequences of designating areas; for example the aggregation of permitting to cluster level instead of Project level. We see potential in the base line permit to establish a common denominator, while also preserving the need for separate permitting for extraordinary activities in the clusters, that need separate permits. - The embedding of cross border manufacturing areas. We hope to present this during the summer and are happy to have an Exchange on this topic with the Commission and the Irish Presidency.

Article 25 **~~Designating national~~*Designation of* industrial manufacturing acceleration areas**	BE (Comments): Belgium remains open to discuss the proposal on Industrial Acceleration Areas but considers that it **lacks the level of clarity, precision and legal certainty**. Key elements of the framework remain unclear or under-specified, including: o the objective and scope of the areas (new industrial development versus transformation of existing industry); o the expected concrete benefits for companies; o the designation criteria and their operational applicability; o the interaction with existing EU and national frameworks, notably permitting systems, State aid rules, NZIA and CRMA; o the practical functioning and legal effects of proposed instruments such as the baseline permit; o the implications for administrative burden, environmental procedures and institutional competences. DK (Comments): Denmark notes that the recent compromise significantly reduces the operational structure of Article 25 on industrial manufacturing acceleration areas. While Denmark supports flexibility for Member States, it is essential that Article 25 retains sufficient substantive content to ensure legal and practical coherence with Article 27 on aggregated baseline permits. Without a sufficiently defined area-level framework, the intended simplification of

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	permitting procedures risks becoming fragmented and less effective in practice. The effectiveness of the aggregated baseline permit depends on a sufficiently robust prior area designation framework that ensures environmental and infrastructural baseline conditions are properly assessed at area level. A sufficiently structured Article 25 is also important to ensure predictability for project developers and to avoid reintroducing fragmentation at project level. FR (Comments): FR: French authorities propose to give greater weight to environmental criteria when identifying industrial accelerator areas and to clarify their legal status (are they fully-fledged program plans and/or can they be incorporated into other program plans). The framework applicable to industrial accelerator areas should be aligned with that of the renewable acceleration areas under the RED III Directive, particularly regarding the exclusion of projects likely to have a transboundary impact. Regading public participation, French authorities point out that this aspect is underdeveloped and that the draft directive should incorporate the provisions of Article 15d of the RED III Directive. Specific criteria for designating acceleration zones will need to be determined by the Member States to take into account the specific characteristics of each country's industrial landscape and territory.

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	French authorities wish to reintroduce the reference to Natura 2000 sites, which was removed from the Presidency's compromise text. France wishes to emphasise that industrial and port areas are often wetlands designated as Natura 2000 sites. However, there are brownfield sites at these locations – which are already contamined – that could be used for industrial development, rather than using natural areas.
1. Member States shall designate at least one industrial manufacturing acceleration area on their territory by [OP please insert date: ~~12~~***24*** months following the entry into force of this Regulation] to cluster industrial manufacturing projects ~~in one or several~~***with the objective to enhance the functioning*** of the ***single market, increase production capacity and security of supply of*** strategic sectors listed in Annex I***, in alignment with strategic projects and other initiatives, including net zero Acceleration Valleys***. ***Member States may cooperate to designate cross-border industrial manufacturing acceleration areas.***	AT (Drafting suggestions): Member States **may** designate [...] AT (Comments): **"May" instead of "shall"**. Like most MS, AT is for a voluntary approach based on a binding statement from the federal regions (Länder). We question the added value ot the acceratation areas (in terms of administrative burden vs. benefits for the project promoters). And it should be made clear (at least in the recitals) that **IMAA are open for all sectors under NACE C** and not only to the sectors in Annex 1 (as confirmed by COM in the WP of 21 May). BE (Drafting suggestions): Member States **may** ~~shall~~ designate ~~at least~~ one industrial manufacturing acceleration area on their territory ~~by [OP please insert date: 12***24*** months following the entry into force of this Regulation]~~ to cluster industrial manufacturing projects ~~in one or several~~*with the objective to enhance the functioning* of the *single market, increase production capacity and security*

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	of supply of strategic sectors listed in Annex I*, in alignment with strategic projects and other initiatives, including net zero Acceleration Valleys. Member States may cooperate to designate cross-border industrial manufacturing acceleration areas* *Proposal for a sandbox approach (if retained point 2 to 5 to radically simplify):* **In those areas, Member States can develop pilot policies approaches to enhance coordination and test support and simplification mechanisms to accelerate industrial manufacturing projets.** BE (Comments): Unless there is a clear, demonstrated added value compared to existing national and regional frameworks, Belgium considers that the designation of Industrial Acceleration Areas should be left to Member States **on a voluntary basis**. In line with the principle of subsidiarity, it is up to the Member States to determine whether the designation of (a) industrial manufacturing acceleration area(s) for the sectors mentioned in the annex fits their industrial policy. Since the designation of the areas should be flexible, modifications or redefinements or discontinuations should be possible. **BE ask that the designation of the área is optional.** **This is for us a red line.** Belgium **is open to consider a sandbox type approach** for IAAs, allowing Member States and regions to test coordination and simplification

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	mechanisms without creating new binding obligations or undermining environmental and health protection rules. Need to clarify the scope of the areas. BG (Comments): As sgugested in the comments for art. 3 (1) to be included in the definitions NACE section B or defied critical raw materials accordin Regulation 2024/1252. CRM is the basis of the production value chain CZ (Drafting suggestions): 1. Member States ~~shall~~ ***may*** designate at least one industrial manufacturing acceleration area on their territory ~~by [OP please insert date: 12***24*** months following the entry into force of this Regulation]~~ to cluster industrial manufacturing projects ~~in one or several~~***with the objective to enhance the functioning*** of the ***single market, increase production capacity and security of supply of*** strategic sectors listed in Annex I***, in alignment with strategic projects and other initiatives, including net zero Acceleration Valleys. Member States may cooperate to designate cross-border industrial manufacturing acceleration areas including availability of stable low-emission energy sources.*** CZ (Comments): Designation of acceleration area(s) under the IAA will require the adoption of an appropriate national legal framework governing the relevant procedural

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	arrangements, followed by the designation process itself, including the necessary assessments (where required). This is a time-consuming process and should only be used in those Member States where this instrument genuinely makes sense in the broader context of their permitting framework – that is, where the designation of acceleration area(s) under the IAA would bring benefits that justify the time and administrative resources invested. We therefore propose that the relevant provisions remain optional, thereby ensuring the necessary flexibility for Member States to decide whether, and if so when, to designate acceleration area(s). The amendment at the end of the paragraph strengthens energy security and operational feasibility of zones. DE (Drafting suggestions): Member States ~~**shall**~~ **<u>may</u>** designate at least one industrial manufacturing acceleration area on their territory by [OP please insert date: ~~12~~***24*** months following the entry into force of this Regulation] to cluster industrial manufacturing projects ~~in one or several~~***with the objective to enhance the functioning*** of the ***single market, increase production capacity and security of supply of*** strategic sectors listed in Annex I***, in alignment with strategic projects and other initiatives, including net zero Acceleration Valleys***. ***Member States may cooperate to designate cross-border industrial manufacturing acceleration areas.*** DE (Comments): We continue to oppose the IAA's requirement for Acceleration Areas.

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	Member States should decide themselves whether or not to establish acceleration areas (subsidiarity principle). We therefore ask that 'shall' is changed to 'may'. We wonder how the designation of the industrial manufacturing acceleration would work in practice ? Will there be an requirements how the designations be made ? Will it affect regional planning or urban development plans ? EE (Drafting suggestions): Member States ~~shall~~**may** designate at least one industrial manufacturing acceleration area on their territory by [OP please insert date: ~~12~~***24*** months following the entry into force of this Regulation] to cluster industrial manufacturing projects ~~in one or several~~***with the objective to enhance the functioning*** of the ***single market, increase production capacity and security of supply of*** strategic sectors listed in Annex I***, in alignment with strategic projects and other initiatives, including net zero Acceleration Valleys***. ***Member States may cooperate to designate cross-border industrial manufacturing acceleration areas.*** EE (Comments): We do not support the mandatory designation of national industrial manufacturing acceleration areas. There is no practical need in Estonia to establish such areas separately as, for example, the Ida-Viru Investment Agency (IVIA) has been established in Ida-Viru County to develop industrial areas. Estonia is also establishing an industrial fast track, which does not focus on geographical definitions, but allows for the support of significant projects across Estonia and is therefore more flexible than designating a specific geographical priority development area.

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	FI (Comments): We call for **voluntary** designation of industrial manufacturing acceleration areas. FR (Drafting suggestions): 1. Member States shall designate at least one industrial manufacturing acceleration area on their territory by [OP please insert date: ~~12~~24 months following the entry into force of this Regulation] to cluster industrial manufacturing projects with the objective to enhance the functioning of the single market, increase production capacity and security of supply of strategic sectors listed in Annex I, in alignment with strategic projects and other initiatives, including net zero Acceleration Valleys, **and to strengthen the Union's innovation potential to accelerate sustainable manufacturing industrial activities, including decarbonisation and circular business practices**. Member States may cooperate to designate cross-border industrial manufacturing acceleration areas. FR (Comments): FR : France would like to thank the Presidency for streamlining the wording of Article 25, as well as for extending the deadline for the establishment of IMAAs. French authorities wish to include a reference to strengthening the Union's innovation potential to accelerate sustainable manufacturing industrial

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	activities and circular economy practices, as referred in the former article 25 (2 b). IT (Drafting suggestions): 1. Member States ~~shall~~ **may** designate at least one industrial manufacturing acceleration area on their territory by [OP please insert date: *24* months following the entry into force of this Regulation] to cluster industrial manufacturing projects with the objective to enhance the functioning of the single market, increase production capacity and security of supply of strategic sectors listed in Annex I, in alignment with strategic projects and other initiatives, including net zero Acceleration Valleys. Member States may cooperate to designate cross-border industrial manufacturing acceleration areas. IT (Comments): As declared in the joint statement by Italy, France and Germany sent to the European Commission on the 3rd of February 2026, the general approach regarding Acceleration areas or paralleling procedures should be that they remain voluntary, and add flexibility rather than new obligations. The amendment is also consistent with the position expressed by the majority of Member States, both in the first round of written comments and during the dedicated Working Party held on 29 June 2026. LT (Comments):

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	Although the recital has been amended to clarify that Natura 2000 areas should be avoided when designating industrial acceleration areas, we consider that the same requirement should also be retained in Article 25. This is because the binding provisions of the Regulation are contained in its Articles, while the recitals serve only as interpretative guidance. LU (Drafting suggestions): 1. Member States may decide to designate industrial manufacturing acceleration area on their territory by [OP please insert date: ~~12~~***24*** months following the entry into force of this Regulation] to facilitate industrial manufacturing projects ~~in one or several~~***with the objective to enhance the functioning*** of the ***single market, increase production capacity and security of supply of*** strategic sectors listed in Annex I***, in alignment with strategic projects and other initiatives, including net zero Acceleration Valleys***. ***Member States may cooperate to designate cross-border industrial manufacturing acceleration areas.*** LU (Comments): Leave it optional to Member States to designate such an industrial manufacturing acceleration area The word “cluster” is too restrictive. We should allow others indrustrial activities than only the strategic ones but that could be complemenatry to them. NL (Drafting suggestions):

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	Member States **can** ~~shall~~ designate ~~at least one~~ industrial manufacturing acceleration area**s** on their territory by [OP please insert date: **24 months** following the entry into force of this Regulation] to cluster industrial manufacturing projects ~~in one or several~~ **with the objective to enhance the functioning** of the **single market, increase production capacity and security of supply of** strategic sectors listed in Annex I, **in alignment with strategic projects and other initiatives, including net zero Acceleration Valleys . The scope should also cover critical raw materials projects, as a separate category covering extraction, processing, refining and recycling of critical raw materials, in accordance with Regulation (EU) 2024/1252 (Critical Raw Materials Act). Member States may cooperate to designate cross-border industrial manufacturing acceleration areas.** NL (Comments): The Netherlands welcomes the possibility to designate cross border industrial areas. Still, the obligation to designate these areas is not proportionate and should be changed into a possibility to designate. A possibility aligns with the current clustering of industrial activities and is therefore more proportionate. Critical raw materials are indispensable for the EU economy and underpin industrial production in a wide range of strategic sectors. In view of the objective of reducing strategic dependencies and strengthening the resilience of Union supply chains, it is necessary to also include critical raw materials within the scope of this Chapter. PT (Drafting suggestions):

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	Member States shall designate at least one industrial manufacturing acceleration area on their territory by [OP please insert date: 24 months following the entry into force of this Regulation] to cluster industrial manufacturing projects with the objective to enhance the functioning of the single market, **strenghten industrial value chains and the Union's innovation potential to accelerate sustainable manufacturing industrial activities, including decarbonisation, resource efficiency and circular business practices, and** increase production capacity and security of supply of strategic sectors listed in Annex I, in alignment with strategic projects and other initiatives, including net zero Acceleration Valleys. Member States may cooperate to designate cross-border industrial manufacturing acceleration areas. PT (Comments): The proposed wording was previously provided for Article 25(2)(b) – which has been partially moved to Article 25(1). We understand that decarbonisation, circularity and, additionally, resource efficiency, are key aspects to be considered when Member States designate industrial acceleration areas, with a view to promoting sustainable industrial development activities. RO (Drafting suggestions): Member States shall designate at least one industrial manufacturing acceleration area on their territory by [OP please insert date: ~~12~~*24* months following the entry into force of this Regulation] to cluster industrial manufacturing projects ~~in one or several~~*with the objective to enhance the functioning* of the *single market, increase production capacity and security of supply of* strategic sectors listed in Annex I*, in alignment with strategic*

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	projects and other initiatives, including net zero Acceleration Valleys. Member States may cooperate to designate cross-border industrial manufacturing acceleration areas. **Industrial manufacturing acceleration areas should also support the transformation and decarbonisation of existing industrial platforms, not only the deployment of new manufacturing capacity** RO (Comments): Strengthening EU competitiveness requires not only the deployment of new manufacturing capacity, but also the preservation, transformation and modernisation of existing industrial platforms. SE (Drafting suggestions): Member States ~~shall~~ **may** designate at least one industrial manufacturing acceleration area on their territory by [OP please insert date: ~~12~~***24*** months following the entry into force of this Regulation] to cluster industrial manufacturing projects ~~in one or several~~***with the objective to ~~enhance the functioning~~*** ~~of the~~ ***~~single market,~~ increase production capacity and security of supply of*** strategic sectors listed in Annex I***, in alignment with strategic projects and other initiatives, including net zero Acceleration Valleys***. **Industrial manufacturing acceleration areas shall have a clearly defined scope.** ***Member States may cooperate to designate cross-border industrial manufacturing acceleration areas.*** SE (Comments): Flexibility is required to accommodate for the necessary level of coordination between local, national and regional level. It is necessary to recognize that

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	Member States and geographical areas have varying conditions for industrial development. The proposal to designate "industrial manufacturing acceleration areas" with a common set of requirements may, in practice, influence how Member States organise their land use and planning processes. This could risk leading to an indirect harmonisation of spatial planning, which would raise concerns in relation to the principle of subsidiarity. SE therefore considers that the initiative should be designed in a manner that fully respects Member States' competences in the field of spatial planning. In this context, SE welcomes efforts to ensure that the designation of such areas remains voluntary for Member States, as this provides important flexibility. The reference to the single market should be removed. SE cannot see how acceleration areas contribute to the functioning of the single market; rather, we see a risk for distortion of competition between companies in the same industrial sector, as companies within acceleration areas receive advantages that their competitors do not benefit from. The added wording on a clearly defined scope has been moved from Article 25(1a)(a), with the deletion of 'geographical'. We are sceptical of the use of specific geographical areas granted particular advantages as a means of improving conditions for industry. Measures aimed at accelerating industrial investments should, to the greatest extent possible, be technology-neutral, generally applicable, and based on the simplification of regulatory frameworks and permitting procedures that benefit the entire business sector. The Commission's proposal risks leading to investments being steered and located in a way that is suboptimal from a market perspective. Such an approach may result in distortions of competition between companies

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	operating within, or choosing to locate in, these areas and those located outside them. SI (Drafting suggestions): Member States ~~shall~~**may** 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 listed in Annex I. SI (Comments): Provision to designate at least one industrial manufacturing acceleration area shouldn't be obligatory. This should also be reflected in the corresponding recitals. SK (Drafting suggestions): Member States ~~shall~~ **may** designate at least one industrial manufacturing acceleration area on their territory… SK (Comments): We propose changing the obligation to designate IMAAs to an option ("may"). The rationale appears redundant for industrialized countries like Slovakia, which can utilize existing national instruments (strategic industrial parks). In other words, this issue can be addressed more effectively by

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	Member States (breach of the subsidiarity principle). We agree with a 24 months period.
	BE (Comments): Add a § on the objectives and expected benefits for companies. Could the Commission further clarify the **rationale underpinning this proposal**, considering its stated objective of strengthening EU value chains, and specify the **expected benefits for companies** located within these areas?
~~3~~ ***1a***. When designating industrial manufacturing acceleration areas, Member States shall:	DE (Comments): Scrutiny Reservation LU (Drafting suggestions): When designating industrial manufacturing acceleration areas, Member States shall, **if relevant**: SE (Drafting suggestions): When designating industrial manufacturing acceleration areas, Member States ~~shall~~ **may**: SE (Comments): Replacing “shall” with “may” allows Member States to take these considerations into account while preserving the necessary flexibility to

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	balance different land-use interests in accordance with national planning systems. The criteria proposed for the designation of industrial manufacturing acceleration areas constitute industrial and regional policy considerations rather than most sutiable land-use criteria. This risks conflicting with the Member States' exclusive competence for spatial planning and their established national systems for assessing the suitability of land use and site location.
(a) define a clear geographic scope for the acceleration area ***taking account of the Member States' regions' levels of development, including least developed areas, regions in transition, and those undergoing industrial transformation***;	BE (Comments): The criteria and methodological aspects to design such áreas should be explained. Could the Commission clarify its expectations regarding the **nature and scope of the industrial acceleration areas** (in terms of size, number, whether they are meant to focus on individual industrial sites or broader zones, specific sectors, and types of companies)? In particular, is the objective primarily to support the creation of new industrial sites or to facilitate the development and transformation of existing ones? What **safeguards** are envisaged to avoid the risk of **intra-EU distortions**, notably between designated and non-designated territories, or between regions following different implementation approaches ES (Drafting suggestions):

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	We suggest returning to the text proposed by the Commission: ***(a) define a clear geographic scope for the acceleration area*** ES (Comments): The proposed addition of detailed objectives and explicit alignment with Net Zero Acceleration Valleys creates unnecessary overlap with the NZIA and significantly reduces Member States' flexibility. Designating industrial acceleration areas becomes more complex and legally uncertain. We prefer the simpler, broader original Commission wording. FI (Comments): The regulation concerning acceleration areas must not include binding obligations concerning land use planning. We wonder whether this obligation is consistent with this approach. In Finland, the municipalities have discretion over their land use. PT (Drafting suggestions): (a) define a clear geographic scope for the acceleration area, **contributing to promoting industrial symbiosis and** taking account of the Member States' regions' levels of development, including least developed areas, regions in transition, and those undergoing industrial transformation; PT (Comments):

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	When designating industrial production acceleration zones, Member States should define a clear geographical scope that takes into account the potential for industrial symbioses, in order to promote the efficient use of resources. SE (Drafting suggestions): ~~define a clear geographic scope for the acceleration area~~ ***take account of the Member States' regions' levels of development, including least developed areas, regions in transition, and those undergoing industrial transformation***; SE (Comments): More suitable in revised version in Article 25.1.
	NL (Drafting suggestions): **(b) the strategic relevance and competitive output and potential of the IMAA for the security of the Union's supply for the strategic sectors listed in Annex I;** **(c) the potential of the IMAA for the green transition and long-term benefits to the Union's industrial base, including the potential to strengthen Union value chains, the Union's innovation potential, decarbonisation and circular Business practices, in alignment with other projects and initiatives such as Net-Zero Acceleration Valleys, carried out pursuant to other Union legislation;** **(e) the extent to which the designation and the related permit-granting obligations under article 27 build upon, and avoid duplicating, designation and permitting procedures already available under other Union legislation;**

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	NL (Comments): We need to emphasize the strategic need of clusters, the potential for sustainable competitiveness and long term benefits for the EU's industrial base. This way, we make clear that the IAA stimulates long term competitiveness, while stimulating the green transition. Furthermore, duplicating regulatory pressure needs to be prevented and coordination with other efforts should explicitly be possible.
~~(a)~~***(b)*** ***consider*** the infrastructural ***and supply chain*** needs of the acceleration area***, with particular attention to the feasibility of connecting the industrial manufacturing acceleration area with sufficient low carbon energy supply for the industrial manufacturing activities foreseen***;	BE (Comments): Connection to rail infrastructure could also be taken into consideration DE (Drafting suggestions):)***(b)*** ***consider*** the infrastructural ***and supply chain*** needs of the acceleration area***, with particular attention to the feasibility of connecting the industrial manufacturing acceleration area with sufficient low carbon energy supply for the industrial manufacturing activities foreseen, where appropriate***; DE (Comments): Member States need flexibility when designating industrial manufacturing acceleration areas. ES (Drafting suggestions):

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	(b) consider the infrastructural and supply chain needs of the acceleration area, with particular attention to the feasibility of connecting the industrial manufacturing acceleration area with ***Renewable Acceleration Areas, as defined in the Renewables Energy Directive*** ~~***sufficient low carbon energy supply for the industrial manufacturing activities foreseen***~~. ES (Comments): Low energy supply can be a confusing concept as it not defined in EU law. In order to ensure consistency amongst EU legislation, we propose to connect industrial manufacturing acceleration areas with a concept that already exists as Renewable Acceleration Areas already defined in RED III. LV (Drafting suggestions): ***(b) consider*** the infrastructural ***and supply chain*** needs of the acceleration area***, with particular attention to the feasibility of connecting the industrial manufacturing acceleration area with sufficient home-grown energy supply for the industrial manufacturing activities foreseen***; LV (Comments): Prefer to use term “home-grown energy” as it is used in energy policy. NL (Drafting suggestions): ~~(b)~~ **(e)** ***consider*** the infrastructural ***and supply chain*** needs of the acceleration area***, with particular attention to the feasibility of connecting***

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	the industrial manufacturing acceleration area with sufficient low carbon energy supply for the industrial manufacturing activities foreseen; PT (Drafting suggestions): (b) consider the infrastructural and supply chain needs of the acceleration area, with particular attention to the feasibility of connecting the industrial manufacturing acceleration area with sufficient low carbon energy supply for the industrial manufacturing activities foreseen, **the essential materials, particularly critical raw-materials and secondary materials, necessary for manufacturing activities, and envisioning shared infrastructures that promote resource efficiency and circular economy**;" PT (Comments): We understand that the reference to "essential materials, particularly secondary materials", previously included in the in Article 25(4)(c) – which has been partially moved to Article 25(1a)(b), should be maintained, in this Article, given its strategic importance. In addition to secondary raw materials, we considered that the Article should specifically refer to critical raw materials, providing that Member States, when designating industrial production acceleration zones, should take into account the needs and availability of critical raw materials for production activities. On the other hand, when designating industrial production acceleration areas, Member States should take into account infrastructure needs providing for *shared infrastructure that promotes resource efficiency* and the circular economy. The supply and demand of secondary raw materials remain insufficient, both in quantity and quality, making the markets for these materials insufficiently competitive and unattractive. The creation of a single market for secondary

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	raw materials and waste is one of the objectives of the future Circular Economy Act. It is therefore highly important to ensure alignment and complementarity between these two Acts. In this way, the stable supply of high-quality secondary raw materials ensured by the single market could meet the desired demand from the industries covered by this Regulation. RO (Comments): Romania considers that, when designating industrial manufacturing acceleration areas, Member States should ensure early coordination with the relevant competent authorities, in particular where such areas concern value chains linked to critical raw materials, petroleum products, basic metals or other activities subject to specific permitting, licensing, concession or authorisation requirements under applicable Union or national law.
~~(b)~~***(c)*** prioritise locations where the deployment of a specific sector or sectors of industrial manufacturing projects is not expected to have a significant environmental ***and climate*** impact;	ES (Drafting suggestions): We suggest returning to the text proposed by the Commission: ***(b) prioritise locations where the deployment of a specific sector or sectors of industrial manufacturing projects is not expected to have a significant environmental ~~and climate~~ impact*** ES (Comments):

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	We strongly oppose removing the explicit exclusion of Natura 2000 sites from Article 25(3). Replacing it with a general reference to climate impact significantly weakens the environmental safeguards. The original Commission text, which required prioritising locations outside Natura 2000 and other protected areas, was clearer and more protective. We request returning to the original wording. LV (Comments): Please, elaborate how can we map the climate impact? NL (Drafting suggestions): ~~*(c)*~~ **(f)** prioritise locations where the deployment of a specific sector or sectors of industrial manufacturing projects is not expected to have a significant environmental ***and climate*** impact; SE (Drafting suggestions): ~~(b)~~***(c)*** prioritise locations where the deployment of a specific sector or sectors of industrial manufacturing projects is not expected to have a significant environmental ~~***and climate***~~ impact, **including cultural heritage as factor, and taking into account climate risks.**; SE (Comments): The reference to climate impact, which is global, should be removed. SE suggests to use the wording regarding climate risks from (d).

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	Addition to clarify that these aspects are also covered, as clarified here: Environmental Impact Assessment (EIA) - Environment - European Commission
~~(c) prioritise locations outside Natura 2000 sites and outside areas designated under national protection schemes for nature and biodiversity conservation, as well as other areas identified on the basis of sensitivity maps and outside protected areas as referred to in Article 6 of Directive 2000/60/EC;~~	BE (Drafting suggestions): **prioritise locations outside Natura 2000 sites and outside areas designated under national protection schemes for nature and biodiversity conservation, as well as other areas identified on the basis of sensitivity maps and outside protected areas as referred to in Article 6 of Directive 2000/60/EC;** BE (Comments): We suggest to keep the text here OR to reinforce the wording in recital (53) DK (Drafting suggestions): prioritise locations outside Natura 2000 sites and outside areas designated under national protection schemes for nature and biodiversity conservation, as well as other areas identified on the basis of sensitivity maps and outside protected areas as referred to in Article 6 of Directive 2000/60/EC; DK (Comments): Denmark notes that the deletion of the previous prioritisation criterion related to Natura 2000 sites and other protected areas reduces the clarity of the environmental screening framework underpinning Article 25.

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	While Denmark supports flexibility for Member States in spatial planning decisions, it is important to maintain a clear reference to environmental sensitivity considerations to ensure coherence with Union environmental law and to provide legal predictability for both authorities and project developers. This does not alter existing Natura 2000 obligations under EU law, but reduces implementation risks and potential downstream conflicts in project-level permitting. In line with the general policy approach that acceleration areas should primarily be located in areas with lower environmental sensitivity. This is also important to ensure that the aggregated baseline permit under Article 27 is based on sufficiently robust and consistent area-level assessments. ES (Drafting suggestions): We suggest returning to the text proposed by the Commission: ***(c) prioritise locations outside Natura 2000 sites and outside areas designated under national protection schemes for nature and biodiversity conservation, as well as other areas identified on the basis of sensitivity maps and outside protected areas as referred to in Article 6 of Directive 2000/60/EC;*** ES (Comments):

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	We strongly oppose removing the explicit exclusion of Natura 2000 sites from Article 25(3). Replacing it with a general reference to climate impact significantly weakens the environmental safeguards. The original Commission text, which required prioritising locations outside Natura 2000 and other protected areas, was clearer and more protective. We request returning to the original wording. FR (Drafting suggestions): **(c) exclude Natura 2000 sites and areas designated under national protection schemes for nature and biodiversity conservation as well as other areas identified on the basis of sensitivity maps and outside protected areas as referred to in Article 6 of Directive 2000/60/EC, except for artificial and built surfaces located in those areas such as brownfield sites.** FR (Comments): FR : French authorities wish to reintroduce the reference to Natura 2000 sites, which was removed from the Presidency's compromise text. France wishes to emphasise that industrial and port areas are often wetlands designated as Natura 2000 sites. However, there are brownfield sites at these locations – which are already polluted – that could be used for industrial development, rather than using natural areas. SE (Drafting suggestions):

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	(c) prioritise locations outside Natura 2000 sites, areas of importance for Indigenous Peoples' use of their traditional lands and outside areas designated under national protection schemes for nature and biodiversity conservation, as well as other areas identified on the basis of sensitivity maps and outside protected areas as referred to in Article 6 of Directive 2000/60/EC; SE (Comments): SE does not support the proposed deletion in favour of an addition in recital 53. SE considers it reasonable for Member States to prioritise locating industrial acceleration areas outside Natura 2000 sites or nationally protected areas, and that this should be set out in an operational provision. It is important to add that in the identification of manufacturing areas member States should prioritize locations outside areas of importance to Indigenous Peoples' traditional land use. See the underlined addition in the paragraph. SK (Drafting suggestions): We respectfully disagree with the removal of the provision in question. SK (Comments): Removing this provision will lead to uncontrolled environmental damage, particularly in the areas designated at the European level as the most valuable from an environmental protection perspective. We insist on retaining the original wording of the provision in question.

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~~(d) take into account climate risks in the areas designated;~~***[moved to point (c)]***	SK (Drafting suggestions): We respectfully disagree with the removal of the provision in question. SK (Comments): We insist on retaining the original wording of the provision in question. We reject any circumvention of the principles upon which the EIA Directive is based.
~~(e)~~***(d)*** prioritise artificial and built surfaces, industrial sites~~,~~ and brownfield sites, as well as already identified strategic projects pursuant to other Union legislation ***with a particular focus on projects that would have cross-border benefits beyond the Member State concerned***.	NL (Drafting suggestions): ~~***(d)***~~ **(g)** prioritise artificial and built surfaces, industrial sites~~,~~ and brownfield sites, as well as already identified strategic projects pursuant to other Union legislation ***with a particular focus on projects that would have cross-border benefits beyond the Member State concerned***.
	FR (Drafting suggestions): **(f) Any other relevant criteria related to specific characteristics of each Member State's industrial base and territory.** FR (Comments): FR: Specific criteria for designating growth zones should also be open for Member States to determine, in order to take into account the specific characteristics of each country's industrial base and territory. IT

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	(Drafting suggestions): (e) **Ensure that projects designated as strategic may benefit from accelerated authorization, permitting and approval procedures irrespective of their location within the designated areas, where they contribute to the objectives pursued by this Act.** IT (Comments): The effectiveness of the measure would be enhanced by enabling projects of recognized strategic relevance to benefit from accelerated procedures regardless of their geographical location. While designated areas remain central to the implementation of the framework, limiting procedural advantages exclusively to projects located within such areas may exclude investments that make an equally significant contribution to the Regulation's objectives. A broader, criteria-based approach would support the timely deployment of strategic investments and maximize the impact of the measure.
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 listed in Annex I;~~	
(b) ~~the potential of the industrial manufacturing acceleration area to support the deployment of production capacity in the strategic sectors listed~~	

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~~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;~~***[partly moved to Art. 25(1)]***	
(c) ~~the number of SMEs and SMCs that would benefit from the provisions of this Chapter within the industrial acceleration area;~~	EL (Comments): We should maintain the enabling condition on the number of SMEs and SMCs benefiting from the provisions of Chapter V.
(d) ~~the Member State's regions' level of development, including least developed areas, regions in transition, and those undergoing industrial transformation.~~***[moved to Article 25(1a)(a)]***	
3. ~~When designating industrial manufacturing acceleration areas, Member States shall:~~***[moved to Article 25(1a)]***	
(a) ~~define a clear geographic scope for the acceleration area;~~***[moved to Article 25(1a)(a)]***	
(b) ~~prioritise locations where the deployment of a specific sector or sectors of industrial manufacturing projects is not expected to have a significant environmental impact;~~***[moved to Article 25(1a)(d)]***	PL (Comments):

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	There is no specific reference to the previous paragraph 3b regarding the selection of areas where an industrial project will not have a significant impact on the environment.
(c) ~~prioritise locations outside Natura 2000 sites and outside areas designated under national protection schemes for nature and biodiversity conservation, as well as other areas identified on the basis of sensitivity maps and outside protected areas as referred to in Article 6 of Directive 2000/60/EC;~~	LU (Comments): The deletion is problematic from a simplification perspective. The very purpose of industrial acceleration areas is to facilitate and streamline permitting procedures in locations where projects are unlikely to face significant environmental constraints. Allowing acceleration areas to include Natura 2000 sites, nationally protected areas, or other ecologically sensitive locations runs counter to this objective. It is likely to increase legal uncertainty, create a higher risk of litigation, and trigger more complex assessment requirements and mitigation measures. A clear exclusion of such areas would provide greater legal certainty for both authorities and developers, facilitate faster permitting, and reduce administrative burdens. It would also ensure greater alignment with RED, whose acceleration areas are built on the same logic. Maintaining comparable approaches across the RED and the IAA would make the regulatory framework easier to understand and apply and thereby supporting the broader objective of simplification and effective acceleration. PL (Comments): As for points 25.3 (b) (c) we see the need to encourage actions that will not impact the environment or biodiversity conservation. It is a missed opportunity for the legislator to draw the attention to these elements. These

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	two paragraphs on prioritisation of choices with lower environmental impact should be preserved. SK (Drafting suggestions): We respectfully disagree with the removal of the provision in question. SK (Comments): Removing this provision will lead to uncontrolled environmental damage, particularly in the areas defined at the European level as the most valuable from an environmental protection perspective. We insist on retaining the original wording of the provision in question. We reject any circumvention of the principles upon which the EIA Directive is based.
(d) ~~take into account climate risks in the areas designated;~~***[partially moved to Article 25(1a)(c)]***	SK (Drafting suggestions): We respectfully disagree with the removal of the provision in question. SK (Comments): Removing this provision will lead to uncontrolled environmental damage, particularly in the areas defined at the European level as the most valuable from an environmental protection perspective. We insist on retaining the original wording of the provision in question. We reject any circumvention of the principles upon which the EIA Directive is based.

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(e) ~~prioritise artificial and built surfaces, industrial sites, and brownfield sites, as well as already identified strategic projects pursuant to other Union legislation.~~***[moved to Article 25(1a)(d)]***	SK (Drafting suggestions): We respectfully disagree with the removal of the provision in question. SK (Comments): Removing this provision will lead to uncontrolled environmental damage, particularly in the areas defined at the European level as the most valuable from an environmental protection perspective. We insist on retaining the original wording of the provision in question.
4. ~~When designating industrial manufacturing acceleration areas, Member States shall take into account, as relevant, the following considerations:~~	
(a) ~~the infrastructural needs of the acceleration area;~~***[moved to Article 25(1a)(b)]***	
(b) ~~the financing needs of manufacturing industry located in the acceleration area and the possibility to support that industry, where applicable, in accordance with applicable State aid rules;~~	
(c) ~~the supply chain needs within the acceleration area and the essential materials, particularly secondary materials, necessary for manufacturing activities;~~***[moved to Article 25(1a)(b)]***	

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(d) ~~the feasibility of connecting the acceleration area with sufficient low-carbon energy supply for the acceleration of industrial manufacturing activity;~~***[moved to Article 25(1a)(b)]***	
(e) ~~skill needs, the shortages and employment trends and support measures to achieve the adequate reskilling and upskilling of the local workforce;~~	RO (Comments): Romania notes that the latest compromise text no longer explicitly refers, at the stage of designating industrial manufacturing acceleration areas, to skills needs, labour shortages, employment trends and workforce development measures. While these aspects are addressed later in the Regulation, notably in Article 26, Romania considers that the availability of a suitably skilled workforce is a key enabling condition and a determining factor for the successful development and long-term sustainability of industrial manufacturing acceleration areas. Romania therefore encourages maintaining an explicit link between the designation of industrial manufacturing acceleration areas and the assessment of labour market needs, skills shortages and workforce development capacities.
(f) ~~the need, as relevant, for depollution of the acceleration area to facilitate the commencement of new industrial activities;~~	
(g) ~~research and innovation needs for accelerating the manufacturing industrial activity in the area;~~	

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(h) ~~relevant location-specific information made publicly available by industry, including corporate climate transition plans, related targets and actions, investment needs, and required enabling policy frameworks.~~	
5. Before their adoption, the plans or programmes on the designation of the industrial manufacturing acceleration areas shall be subject to ~~an~~ environmental assessment ~~pursuant to Directive 2001/42/EC of the European Parliament and of the Council[9], and, if they are likely to have a significant impact on Natura 2000 sites, to the appropriate assessment pursuant to Article 6(3) of Council Directive 92/43/EEC[10] and, where~~***in accordance with the*** applicable~~, to the relevant assessment to comply with Article 4(7) of Directive 2000/60/EC of the European Parliament and of the Council[11]~~ ***Union legislation***. 9 ~~Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment (OJ L 197, 21.7.2001, p. 30, ELI: http://data.europa.eu/eli/dir/2001/42/oj).~~ 10 ~~Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (OJ L 206, 22.7.1992, p. 7, ELI: http://data.europa.eu/eli/dir/1992/43/oj).~~ 11 ~~Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy (OJ L 327, 22.12.2000, p. 1, ELI: http://data.europa.eu/eli/dir/2000/60/oj).~~	BE (Drafting suggestions): ~~**Before their adoption, the plans or programmes on the designation of the industrial manufacturing acceleration areas shall be subject to an environmental assessment in accordance with the aplicable Union legislation**~~ BE (Comments): We ask to suppress this § because - the request to adopt plans or programmes is not mentioned elswhere in the text, the content is not defined - BE is against the obligation to elaborate new plan sor programmes, where no funding is associated to the process (in contradiction with the wilingness of the EC to rationalise programmes). Measures can be taken without a process of elaborating a plan. - The text only indicate that the aplicable legislation Will apply, so no added value BG (Comments): The environmental assessment procedure shall provision reasonable deadlines FR

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	(Comments): FR : reserve on the deletion. Why has the presidency proposed to delete the reference to the applicable legislation ? SK (Drafting suggestions): We agree with new wording in this provision with one exemption. We would like to unequivocally maintain the wording that refers to an environmental assessment within the meaning of the EIA Directive.
6. Member States shall inform the Commission of the designation of an industrial manufacturing acceleration area, within 30 days from the adoption of the relevant decision.	LU (Drafting suggestions): 6. Member States shall inform the Commission of the designation of an industrial manufacturing acceleration area, within 30 days **business** from the adoption of the relevant decision. NL (Drafting suggestions): 6. Member States shall inform the Commission of the designation of an industrial manufacturing acceleration **with an area transition plan to inform the Commission on the possible interventions needed from member states and the Commission as soon as possible based on the assessments begin conducted in article 26;** ~~within 30 days from the adoption of the relevant decision.~~ NL (Comments):

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	Need to prevent that designating an areas is only an exercise on paper, due to their strategic carácter, investment, financing, energy and other urgent needs, have to be identified and discussed how to be addressed. PT (Comments): Consider specifying how this information is to be transmitted.
	BE (Drafting suggestions): **7. Member States may modify, disconstinue ou designate new areas at any time, taking into account the gained experiences, industrial needs and context changes.** BE (Comments): Belgium supports the **inclusion of evaluation and flexibility mechanisms** allowing Member States to modify, reduce, redefine, or discontinue designated areas, based on evolving industrial needs. Add a new § on flexibility mechanisms. ES (Drafting suggestions): **7. Net Zero Acceleration Valleys may be designated as industrial manufacturing acceleration areas without the need to carry any of the assessments referred to in paragraph 5 that have been completed for its designation as a Net Zero Acceleration Valley.** ES (Comments):

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	NZAVs should be easily transformed into IMAAs, taking into account all assessments carried out for its designation. However, new obligations arise when NZAVs are designated as IMAAs (Article 26). FR (Drafting suggestions): **7. Member States shall ensure public participation regarding the plans designating industrial acceleration areas referred to, in accordance with Article 6 of Directive 2001/42/EC, including identifying the public affected or likely to be affected.** **8. Member States shall promote public acceptance of Industrial manufacturing projects by means of direct and indirect participation of local communities in those projects.** **9. Member States shall assure enforcement of Article 7 of Directive 2011/91/EU regarding transboundary projects located in industrial acceleration areas.** FR (Comments): FR : §7 et 8 Regading public participation, the draft directive should incorporate the provisions of Article 15d of the RED III Directive.

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	FR : §9 The framework applicable to industrial accelerator areas has to be aligned with the exclusion of projects likely to have a transboundary impact.
Article 26 **Enabling conditions**	NL (Comments): This article mainly provides enabling conditions that are mainly competences for the member states. The Netherlands proposes a prioritizing to finance Access (numbers in the articles should be changed accordingly) RO (Comments): To reinforce alignment with the NZIA framework, Member States should be encouraged to facilitate coordination between industrial acceleration areas and CO_2 emitters, with a view to supporting the roll-out of CO_2 transport and storage infrastructure. Such coordination should include mechanisms to secure adequate emitter commitments, thereby ensuring the commercial viability of storage projects. This approach would strengthen the link between the IAA's support for low-carbon industrial activities and the Union's storage infrastructure objectives under NZIA.
	ES (Comments): The European Commission shall facilitate financing to the development of the industrial acceleration areas through the European Competitiveness Fund and explore the potential involvement of the European Investment Bank (EIB) to facilitate preferential financing for projects of Annex I and consider the

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	flexibilitation of State Aid Regulations for industrial investments in strategic sectors.
Where appropriate for the long-term development and effective operation of industrial activities within the industrial manufacturing acceleration areas, Member States shall take the following measures~~, where appropriate, to facilitate the development of industrial manufacturing acceleration areas~~:	DE (Drafting suggestions): ***Where appropriate for the long-term development and effective operation of industrial activities within the industrial manufacturing acceleration areas,*** Member States ~~**shall**~~ **may** take the following measures~~, where appropriate, to facilitate the development of industrial manufacturing acceleration areas~~: DE (Comments): Member States should have some leeway in applying these framework conditions. The word "shall" should be replaced with "may" here. SE (Drafting suggestions): ***Where appropriate for the long-term development and effective operation of industrial activities within the industrial manufacturing acceleration areas,*** Member States ~~shall~~ **may** take the following measures~~, where appropriate, to facilitate the development of industrial manufacturing acceleration areas~~: SE (Comments): Reflecting the suggested voluntary nature of industrial manufacturing acceleration areas.

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(a) facilitate ***access to*** financing of projects in the acceleration areas by ensuring coordination between authorities and streamlining internal procedures, in synergy with Union programmes and in accordance with existing State aid rules where applicable, taking into account the participation of SMEs and SMCs;	BE (Drafting suggestions): (a) facilitate *access to* financing of projects **and infrastructures** in the acceleration areas by ensuring coordination between authorities and streamlining internal procedures, in synergy with Union programmes and in accordance with existing State aid rules where applicable, taking into account the participation of SMEs and SMCs;
	NL (Drafting suggestions): **(b) ensure without prejudice to Articles 107 and 108 TFEU, that IMAAs and the strategic sectors clustered therin are duly acknowledged and prioritised within the Clean transition and Industrial Decarbonisation window of the European Competiveness fund established by Regulation (EU) XXXX/XX, with the purpose to optimising the use of available Union funds and prioritising the Development and transition of the areas concerned;** **(c) support the acknowledgement of IMAAs, and of the industrial manufacturing projects located therin, as strategic projects for decarbonisation for the purposes of relevant Union decarbonisation financing instruments, including the Industrial Decarbonisation Bank, with a view to attracting financing for the conversión of manufacturing to low-carbon production;** NL (Comments): The enabling conditions in this article are mainly member state focused, to make sure there are substantive advantages, there is also need for advantages on a EU level.

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(b) promote research and innovation investments***, including investments in technology testing and demonstration facilities,*** to accelerate the innovative potential and Union's competitiveness and technology leadership in the acceleration areas;	AT (Comments): AT welcomes the inclusion of "*investment in technology testing and demonstration facilities*" in letter b. PT (Drafting suggestions): (b) promote research and innovation investments, including investments in technology testing and demonstration facilities, to accelerate the innovative potential and Union's competitiveness and technology leadership in the acceleration areas **and aimed at advancing resource efficiency and the development of circular industrial processes**; PT (Comments): In our understanding it is relevant to strengthen the importance of investment in technological innovation that promotes circularity and resource efficiency.
(c) conduct~~, and review at least every three years,~~ a comprehensive analysis of the ***immediate and long-term*** energy needs of each acceleration area and ~~identifying~~ the required energy infrastructure capacity for the proper functioning and development of industrial manufacturing projects ~~located~~ in the acceleration area***, in line with Union's decarbonisation pathway, and review the analysis, when appropriate***.	DK (Drafting suggestions): conduct~~, and review at least every three years,~~ a comprehensive analysis of the ***immediate and long-term*** energy needs of each acceleration area **including an assessment of both potable and non-potable water resources available for industrial use, where relevant, in line with Union environmental law and industrial water efficiency considerations,** and ~~identifying~~ the required energy infrastructure capacity for the proper functioning and development of industrial manufacturing projects ~~located~~ in

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	the acceleration area***, in line with Union's decarbonisation pathway, and review the analysis, when appropriate***. DK (Comments): Ensures that infrastructure planning for acceleration areas includes a more comprehensive assessment of water availability, including potential use of non-potable water resources for industrial purposes. This is intended as a planning-level clarification and does not modify existing obligations under the Water Framework Directive or permitting requirements. EL (Drafting suggestions): … comprehensive analysis of the ***immediate and long-term*** energy needs**, and cost of energy,** of each acceleration area and… … in the acceleration area**, promoting energy affordability,** ***in line with Union's decarbonisation pathway, and review the analysis, when appropriate.*** EL (Comments): As to article 26 [enabling conditions] and in line with our comment regarding a possible reference to energy affordability as part of achieving the climate objectives, we see scope in adding a relevant reference in the list of enabling conditions. LT (Comments): For drafting clarity, we suggest defining the relevant timeframe explicitly — e.g., an immediate five-year period from establishment or a long-term period

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	of ten to fifteen years—to ensure coherent interpretation across the Regulation.
~~Such analysis shall be conducted, at least, when designating the industrial acceleration area and for the milestones of years 2030, 2040 and 2050, ensuring alignment with the Union's decarbonisation pathway;~~	
(d) ensure that the network development plans prepared by transmission system operators pursuant to Article 51 of Directive (EU) 2019/944 of the European Parliament and of the Council[12] and distribution system operators pursuant to Article 32 of Directive (EU) 2019/944 take due account of the analysis prepared pursuant to point (c) of this paragraph, considering the potential of anticipatory investments to accommodate future system needs; 12 Directive (EU) 2019/944 of the European Parliament and of the Council of 5 June 2019 on common rules for the internal market for electricity and amending Directive 2012/27/EU (OJ L 158, 14.6.2019, p. 125, ELI: http://data.europa.eu/eli/dir/2019/944/oj).	DK (Drafting suggestions): (d) ensure that the network development plans prepared by transmission system operators pursuant to Article 51 of Directive (EU) 2019/944 of the European Parliament and of the Council[47] and distribution system operators pursuant to Article 32 of Directive (EU) 2019/944 take due account of the analysis prepared pursuant to point © of this paragraph, considering the potential of anticipatory investments to accommodate future system needs, **in accordance with existing Union electricity market legislation and national regulatory approval frameworks;** DK (Comments): Existing electricity market legislation, including Regulation (EU) 2019/943 Article 18, establishes important principles regarding cost-efficiency, proportionality and consumer protection. Clarification is therefor needed to ensure consistency between the IAA and existing electricity market regulation and to avoid regulatory uncertainty

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	regarding, among other things, cost recovery and approval of anticipatory investments. NL (Drafting suggestions): (d) ensure that the network development plans prepared by transmission system operators pursuant to Article 51 of Directive (EU) 2019/944 of the European Parliament and of the Council[12] and distribution system operators pursuant to Article 32 of Directive (EU) 2019/944 **and prioritize infrastructural projects if** ~~take due account of~~ the analysis prepared pursuant to point (~~c~~ **e**) of this paragraph **shows an urgent need to address this, also** considering the potential of anticipatory investments to accommodate future system needs;
(e) ~~exchange information on relevant supply chains, identify potential bottlenecks, and strengthen coordination between acceleration areas on critical raw materials issues within the framework of the European Critical Raw Materials Board established by Article 35 of Regulation (EU) 2024/1252;~~	PT (Drafting suggestions): (e) **exchange information on relevant supply chains, identify potential bottlenecks, including those related to access to secondary raw materials, and strengthen coordination between acceleration areas on critical raw materials issues within the framework of the European Critical Raw Materials Board established by Article 35 of Regulation (EU) 2024/1252;** PT (Comments): We believe that exchanging information, identifying bottlenecks and strengthening coordination on critical raw materials issues are of high

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	importance for the development and operation of industrial activities within the industrial manufacturing acceleration areas and therefore Article 26(e) should not be deleted. Also we propose to add a reference to secondary raw materials to reinforce the circular economy and the importance of ensuring access to secondary raw materials.
(f) ~~promote entities in the acceleration areas and facilitate their participation, where relevant, in the joint purchasing mechanism established by Article 25 of Regulation (EU) 2024/1252, including by providing guidance, support, and information to ensure effective engagement;~~	NL (Drafting suggestions): **(f) promote entities in the IMAAs and facilitate thei participation, where relevant, in the joint purchasing mechanism established by article 25 of Regulation (EU) 2024/1252, including by providing guidance, support, and information to ensure effective engagement.** NL (Comments): IMAAs can be an important entity in pooling and coordinating the use of scarce resources and capital.
(g) support the development and availability of a highly skilled workforce and provide appropriate training and apprenticeship opportunities, thereby contributing to high-quality employment within those acceleration areas;	PT (Drafting suggestions): support the development and availability of a highly skilled workforce, and provide appropriate training and apprenticeship opportunities, **reduce barriers to entry into regulated professions and take measures to promote faster recognition of qualifications,** thereby contributing to high-quality employment within those acceleration areas; PT (Comments):

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	Around a third of workers in the EU are in jobs that do not match their skills, resulting in their labour potential being underutilised. Despite the need to maintain quality standards and comply with European legislation, excessive regulation and complex recognition procedures hinder access to professions and limit mobility, exacerbating the skills mismatch and labour shortages in the EU. RO (Drafting suggestions): (g) support the development and availability of a highly skilled workforce and provide appropriate training ~~and~~, **apprenticeship and other work-based learning** opportunities**, including practical training delivered in cooperation with employers,** thereby contributing to high-quality employment within those acceleration areas; RO (Comments): Romania supports explicit recognition of work-based learning, apprenticeships and other forms of practical training as key instruments for addressing skills shortages in strategic industrial sectors
(h) ~~exchange information on the necessary skills, potential shortages of those skills and best practices applied in the acceleration areas within the framework of the Industrial Forum expert group established by COM/2020/102[13];~~ 13 ~~Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions a New Industrial Strategy for Europe (COM/2020/102 final).~~	ES (Drafting suggestions): We suggest returning to the text proposed by the Commission: ***exchange information on the necessary skills, potential shortages of those skills and best practices applied in the acceleration areas within the***

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	framework of the Industrial Forum expert group established by COM/2020/102[13]; ***13 Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions a New Industrial Strategy for Europe (COM/2020/102 final).*** ES (Comments): Information on skills may be useful to identify potential shortages at EU level and launch education programmes to resolve the mismatch.
(i) ~~ensure synergies and promote the benefits provided under the Pact for Skills[14] or entities established in the acceleration areas, with particular attention to Large Scale Skill Partnerships and Regional Skills Partnerships included therein.~~ 14 ~~Communication from the Commission to the European Parliament, the Council, the European Parliament, the European Economic and Social Committee and the Committee of the Regions, European Skills Agenda for sustainable competitiveness, social fairness and resilience ((COM(2020) 274 final).~~	
	ES (Drafting suggestions): ***(j) promote competitiveness of energy prices in industrial manufacturing acceleration areas, in line with CISAF.*** ES

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	(Comments): We propose adding this action, as it would have a significant impact of competitiveness of industrial projects in these areas.

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Article 27 **Permit-granting procedures in acceleration areas**	BE (Comments): More information is needed on this article, notably the interaction with existing permitting systems, the practical funtioning and legal effects of the baseline permit, the implications for administrative burden, environmental procedures. + link with articles 4 & 5. CZ (Comments): The Czech Republic can support the concept of an aggregated baseline permit on the condition that it corresponds to a public-law permit for a project under national law. At the same time, we would like to note that the introduction of such a mechanism may require significant and time-consuming legislative changes in the Member States. FR (Comments): French authorities would add the following proposals to enhance the practical effectiveness of the aggregated baseline permit, in particular to provide legal certainty regarding the criteria for derogations concerning protected species by incorporating the following presumptions : i) the absence of a satisfactory alternative to species protection and ii) an overriding reason of major public interest when the zone permit is issued. Given that industrial zones are already heavily urbanised, they must be recognised as better location alternative than natural areas that have never been subject to industrial activity. Some flexibilities should also apply to the baseline permit within the industrial acceleration area by allowing this permit to be issued after the

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	granting of individual permits specific to each installation, in order to encompass any existing installations. LT (Drafting suggestions): **Permit-granting procedures <u>in industrial manufacturing</u> acceleration areas** LT (Comments): In order to maintain consistent terminology throughout the act, it may be advisable to apply the full term “industrial manufacturing acceleration area” across all relevant sections. NL (Comments): As stated in our general remarks accompanying the chapter, we see the need to deepen the article on permitting in the areas, also embedding cross border cooperation. We believe we need to deepen the execution of permitting in the the geographic clusters. We see for example potential in transforming the baseline permit in to a cluster permit, combining the basic activities in the cluster, therfore diminishing the amount of permits needed. Furthermore, we made adjustments stimulating the assumption that if single permits have already been given out covering the activities, additional permits Will not be necessary. We could consider the cluster as being 1 strategic Project with a fitting permitting regime. We are still researching what this might look like and whether it can designed in a fashion that diminishes regulatory pressure, while also preserving the condition it does not negatively affect environment and climate.

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1. For each designated industrial manufacturing acceleration area, Member States shall prepare and issue an aggregated baseline permit authorising industrial activities located within that area. This aggregated baseline permit shall cover the permits and administrative authorisations required for the industrial manufacturing projects located within the acceleration area, excluding those permits that are installation specific.	AT (Comments): AT's regions are very sceptical towards the concept of aggretated baseline permits. AT questions if the concept is **proportionate (in terms of administrative burden)** to the indented purpose (**or** if there is only a limited benefit to the project promoters). Furthermore, **problems in distinguishing** between baseline and project specific permits might make the **concept even more complex.** This article should in any case make clear that it is for the MS to decide what falls under the aggregated baseline permit and what is installation specific**.** BE (Drafting suggestions): For each designated industrial manufacturing acceleration area, Member States **may** ~~shall~~ prepare and issue an aggregated baseline permit authorising industrial activities located within that area. This aggregated baseline permit shall cover the permits and administrative authorisations required for the industrial manufacturing projects located within the acceleration area, excluding those permits that are installation specific. BE (Comments): We ask to make the baseline permit **an optional** solution, so MS can accomodate to their particular context and existing practices. CZ (Drafting suggestions):

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	1. For each designated industrial manufacturing acceleration area, Member States shall prepare and issue an aggregated baseline permit authorising industrial activities located within that area. This aggregated baseline permit shall cover the permits and administrative authorisations required for the industrial manufacturing projects located within the acceleration area, excluding those permits that are installation ***or structure*** specific. CZ (Comments): It would be appropriate to add the words "or structure" to the second sentence of paragraph 1 to make it clear that this does not refer solely to installations (since national regulations cover both structures and installations). DE (Drafting suggestions): For each designated industrial manufacturing acceleration area, Member States ~~shall~~ **may** prepare and issue an aggregated baseline permit authorising industrial activities located within that area. This aggregated baseline permit shall cover the permits and administrative authorisations required for the industrial manufacturing projects located within the acceleration area, excluding those permits that are installation specific. DE (Comments): The "baseline permit" should be voluntary. We ask the Commission to provide a definition of the term "baseline permit" in Chapter I.

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	We still wonder about what a baseline permit should be and how it is different to a designation of NZIA Valleys (particularly what else would be required of NZIA Valleys that have already undertaken a strategic environmental asssment and that are now seeking to become an IAA Acceleration area without changing the already foreseen scope of manufacturing activities). EE (Drafting suggestions): For each designated industrial manufacturing acceleration area, Member States shall prepare and issue an aggregated baseline permit authorising industrial activities located within that area **within the limits allowed by EU and national laws with respect to local permits and authorizations.** This aggregated baseline permit shall cover **all objects under the specific permit** ~~the permits~~ and administrative authorisations required for the industrial manufacturing projects located within the acceleration area, excluding those permits that are installation specific. EE (Comments): The aggregated baseline permit should be more flexible to allow for specificities arising from EU and national laws, codes and authorizations. Estonia proposes that the purpose of the aggregated baseline permit be to allow a single permit for a given field to cover all activities or structures within that field at once. For example, a single building permit could be issued for all structures specified in a project at once. However, Estonia does not support the idea of consolidating permits from all different sectors into a single permit. In Estonia, a different competent authority is already in place for each type of permit, and functional digital environments and procedures have been established.

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	EL (Comments): With reference to article 27, we would like to clarify the level of harmonization that is aimed by the provision of the "aggregated baseline permit". FR (Drafting suggestions): 1. For each designated industrial manufacturing acceleration area, Member States shall prepare and issue an aggregated baseline permit authorising industrial activities located within that area. This aggregated baseline permit shall cover the permits and administrative authorisations required for the industrial manufacturing projects located within the acceleration area, excluding those permits that are installation specific **or individuals permits that have already been granted**. FR (Comments): FR : France points out that aggregated baseline permit must not call into question the individual permits already granted for projects currently in place in the area. LU (Drafting suggestions): 1. For each designated industrial manufacturing acceleration area, Member States may prepare and issue an aggregated baseline permit authorising industrial activities located within **designated industrial**

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	manufacturing acceleration area. This aggregated baseline permit may cover the permits and administrative authorisations required for the industrial manufacturing projects located within the acceleration area, excluding those permits that are installation specific. LU (Comments): We propose making the issuance of these aggregated baseline permits optional, so that Member States have flexibility regarding their issuance. LV (Drafting suggestions): […] aggregated baseline permit, *based on existing national permitting frameworks and without creating parallel or duplicative procedures,* […] LV (Comments): Latvia stresses that such procedures should avoid the creation of parallel or duplicative procedures; And they should be based on existing national permitting frameworks. RO (Drafting suggestions): For each designated industrial manufacturing acceleration area, Member States shall prepare and issue an aggregated baseline permit authorising industrial activities located within that area. This aggregated baseline permit shall cover the permits and administrative authorisations required for the industrial manufacturing projects located within the acceleration area, ~~**excluding those permits that are installation specific**~~ ***excluding***

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	installation-specific permits and any permits, approvals, licences, concessions, including licences granted under concession or administration regimes, petroleum agreements, or other agreements or authorisations required under specific regimes established by applicable Union or national law. ***The aggregated baseline permit shall not require duplication of assessments already completed during the designation of the acceleration área.*** RO (Comments): The proposed clarification aims to avoid any interpretation that the aggregated baseline permit could replace specific permits, licences, concessions, agreements or authorisations required under applicable Union or national law. These should remain subject to the relevant legal framework and to the assessment of the competent authorities. Reduces administrative burden while preserving environmental standards.

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	SE (Drafting suggestions): For each designated industrial manufacturing acceleration area, Member States ~~shall~~ **may** prepare and issue an aggregated baseline permit authorising industrial activities located within that area. **This aggregated baseline permit can be a set of induvidual permits and administrative authorisations.** The aggregated baseline permit shall cover the permits and administrative authorisations required for the industrial manufacturing projects located within the acceleration area, excluding those permits that are installation specific, **for example environmental permits.** SE (Comments): SE considers that the issuing of an aggregated baseline permit should be voluntary. Clarification of the aggregated baseline permit. SI (Comments): We would request for a clarification of the scope of the permits and approvals to covered by the aggregated permit in order to avoid legal uncertainty.
	FR (Drafting suggestions):

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	2. The granting of the aggregated baseline permit is presumed as being in the overriding public interest and serving public health and safety when balancing legal interests in individual cases for the purposes of Article 6(4) and Article 16(1), point (c), of Directive 92/43/EEC, Article 4(7) of Directive 2000/60/EC and Article 9(1), point (a), of Directive 2009/147/EC **3. In those industrial acceleration areas, when assessing whether satisfactory alternative solutions exist for the purposes of Article 6(4) and Article 16(1) of Directive 92/43/EEC, Article 4(7)(d) of Directive 2000/60/EC and Article 9(1) of Directive 2009/147/EC, the condition of the absence of satisfactory alternatives is presumed where:** **(a) for industrial projects for which permitting has already been granted, there are no satisfactory alternative solutions capable of achieving the same objective of the project, in terms of limiting land take, within a comparable timeframe;** **(b) for new industrial projects to be established in those areas, the absence of satisfactory alternative location solutions capable of achieving the same objective of limiting land development shall be fulfilled provided that the project's design, technology or other technical characteristics ensure that there is no significant adverse effects on the environment.**

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	4. For the reuse of brownfield sites located in an industrial acceleration zone, Member States may adapt measures deemed to avoid significant adverse effects, when carrying out the environmental impact assessment according to Article 5 and its Annex I(g) of Directive 2001/42/CE, and Article 5(3.b), Article 9(1.c) of Directive 2011/92/EU. FR (Comments): FR : [new paragraph] France welcomes the concept of a baseline permit and wishes to combine it with concrete measures to enhance its effectiveness in speeding up the industrial developments. In this regard, the baseline permit should provide legal certainty regarding the criteria for derogations concerning protected species,-based on the following presumptions: i) an overriding reason of major public interest. Projects known at the time of the IMAAs' designation, as well as future projects, are deemed to satisfy the condition of an overriding reason of major public interest. ii) the absence of a satisfactory alternative to species protection. This absence of an alternative is presumed for projects already in place. For

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	future projects, this presumption would be subject to demonstrating that these new projects will not have significant adverse environmental impacts. Given that these zones are already heavily urbanised, they must be recognised as an alternative to industrial development in natural areas that have never been subject to industrial activity. French authorities wish to promote the decontamination and reuse of brownfield sites in areas attractive to industry, bearing in mind that the decontamination of a brownfield site is in itself a measure to reduce environmental impacts that may justify an adaptation of the measures deemed to avoid significant adverse effects. This is a measure designed to encourage local authorities to plan for the establishment of industrial sites and to promote the prudent use of land.

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2. Before issuing the aggregated baseline permit ~~referred to in paragraph 1~~, Member States shall carry out all necessary ~~assessments, including relevant environmental~~ assessments, planning procedures and evaluations applicable at the level of the acceleration area. ~~Member States shall take into account the assessment carried out pursuant to Article 25(5).~~	DK (Drafting suggestions): Before issuing the aggregated baseline permit ~~referred to in paragraph 1~~, Member States shall carry out all necessary assessments, ~~including relevant environmental assessments~~, planning procedures and evaluations applicable at the level of the acceleration area. ~~Member States shall take into account the assessment carried out pursuant to Article 25(5)~~. **The aggregated baseline permit shall be used as a binding reference framework in subsequent project-level permitting procedures, ensuring that information and assessments already carried out at area level shall not be required to be duplicated at project level.** DK (Comments): DK appreciates the woording from the preample (58) "***These may include, without being limited to, authorisations relating to building and construction, zoning and land-use planning..***" because it indicates that MS will be entrusted with some room for editing the aggregated baseline permit, so it fits to national legislation. DK will like to see that point of view reflected in art. 27. The addition aims to reduce administrative burden and improve efficiency by ensuring that project-level assessments focus only on impacts beyond those already assessed at area level. ES (Drafting suggestions):

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	2. Before issuing the aggregated baseline permit, Member States shall carry out all necessary ***assessments, including relevant environmental*** assessments, planning procedures and evaluations applicable at the level of the acceleration area. ES (Comments): We consider the previous wording, which explicitly referred to the relevant environmental assessments, to be more appropriate. We also believe it is necessary to clarify the assessment procedure for industrial acceleration zones and the various facilities they will specifically house. FI (Comments): The regulation concerning acceleration areas and permit-granting procedures in acceleration areas must not include binding obligations concerning land use planning. Acceleration areas must not bind land use planning. LT (Drafting suggestions): Before issuing the aggregated baseline permit ~~referred to in paragraph 1~~, Member States shall carry out all necessary ~~assessments, including relevant environmental~~ assessments, planning procedures and evaluations applicable at the level of the **industrial manufacturing** acceleration area. ~~Member States shall take into account the assessment carried out pursuant to Article 25(5).~~ LT (Comments):

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	In order to maintain consistent terminology throughout the act, it may be advisable to apply the full term "industrial manufacturing acceleration area" across all relevant sections. LU (Comments): We understand Article 27(2)) to mean that a Strategic Environmental Assessment (SEA) may be required before the designation of anacceleration area. SK (Drafting suggestions): We would like to unequivocally maintain the original wording, which refers to an environmental assessment within the meaning of the EIA Directive.
3. Industrial manufacturing projects located within an industrial manufacturing acceleration area shall be required to obtain only those additional permits or authorisations that fall outside the scope of the aggregated baseline permit referred to in paragraph 1.	FR (Drafting suggestions): 3. Industrial manufacturing projects located within an industrial manufacturing acceleration area shall be required to obtain only those additional permits or authorisations that fall outside the scope of the aggregated baseline permit referred to in paragraph 1. **Those industrial manufacturing projects shall be exempt from the requirement to carry out a dedicated environmental impact assessment pursuant to Article 2(1) of Directive 2011/92/EU or an assessment of their implications for Natura 2000, provided that those projects comply with the rules and measures established in accordance with Article 25(5) and are not likely to have significant effects on the environment which were not identified during the environmental assessment of the plans**

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	designating industrial manufacturing acceleration areas referred to in Article 25. Member states shall carry out a screening process of the project to identify if any of these conditions are not met. Such a screening process shall also aim to identify if any of such industrial manufacturing projects falls within the scope of Article 7 of Directive 2011/92/EU due to unforeseen significant effects on the environment in another Member State or due to the request of a Member State which is likely to be significantly affected. **For the purpose of such a screening process, the developer of an industrial project applying for a permit in the zone shall provide information on the characteristics of the industrial manufacturing project, on its compliance with the rules and measures identified pursuant to Article 25, for the specific industrial manufacturing acceleration areas, on any additional measures adopted by the project developer, and on how those measures address environmental impact. The competent authority may request the project developer to provide additional available information.** FR (Comments): France asks to duplicate some provisions of RED III Directive, with regard to screening process at the stage of the project specific permit in acceleration areas This provision, which is also included in the Networks Package, is essential because it is impossible, at the time the zone is established, to identify all the projects that will be located there and to carry out a comprehensive assessment of their environmental impacts.

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	There is no objective reason not to not to apply the same measure in industrial manufacturing acceleration area: it is a key safeguard for environmental protection.
4. All industrial manufacturing projects located within an acceleration area shall be considered strategic projects contributing to resilience and decarbonisation or resource efficiency for the purposes of [Article 14 of Proposal for a Regulation on speeding-up environmental assessment]. **/**Points 1, 2 and 3 of the Annex**/** to that Regulation shall apply.	DE (Comments): Scrutiny Reserveration
CHAPTER VI **FINAL PROVISIONS**	EL (Comments): Regarding final provisions, we would like to discuss the possibility to add a new article on handling of confidential information, as we did in the NZIA Regulation article 47. LV (Comments): Latvia generally supports the final provisions set out in Chapter VI and underlines the importance of ensuring legal certainty, proportionality and coherence with existing Union legal frameworks. Particular attention should be paid to the practical implementation of the Regulation and the avoidance of unnecessary administrative burden.

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Article 28 **Evaluation**	LV (Comments): Latvia supports regular evaluation of the Regulation. At the same time, Latvia emphasises that such evaluation should take into account differences between Member States, including economic structure, industrial capacity and administrative resources, in order to ensure a balanced and evidence-based assessment.
By [OP: Please insert the date = two years after the date of entry into force of this Regulation], and every three years thereafter, the Commission shall carry out an evaluation of this Regulation ~~and of its contribution to the functioning of the internal market~~. The evaluation shall consider:	ES (Drafting suggestions): By [OP: Please insert the date = ~~**two**~~ **one** years after the date of entry into force of this Regulation], and every three years thereafter, the Commission shall carry out an evaluation of this Regulation. The evaluation shall consider: ES (Comments): An initial evaluation after two years, followed by subsequent evaluations every three years, appears insufficient to adequately capture the budgetary effects stemming from the implementation of the Regulation. In the field of public procurement, impacts on costs, tender prices and effective competition among economic operators may materialise immediately following the introduction of origin and low-emission requirements. RO (Comments):

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	The evaluation should assess not only the implementation of the measures, but also whether they have effectively addressed the underlying challenges identified in the impact assessment. The evaluation should also assess the impact of the Regulation on energy-intensive industries, given that these sectors were among the most affected by the energy crisis, high electricity prices and increasing international competitive pressures. As the Regulation aims to support the decarbonisation and competitiveness of the Union's manufacturing sector, it is important to assess whether its measures have effectively facilitated investments in industrial decarbonisation, preserved industrial production and employment, and reduced the risk of carbon leakage and industrial relocation outside the Union. Such an assessment would provide a more comprehensive evaluation of whether the Regulation has achieved its intended objectives and strengthened the resilience of Europe's industrial base. RO welcomes the addition of SMCs and consumers. RO requests that the evaluation explicitly include an indicator on SME participation as beneficiaries of Union origin and low-carbon requirements, to verify that the industrialisation objective is not achieved exclusively through the consolidation of large operators.
(a) ~~progress made in achieving~~***whether*** the objectives ***of this Regulation*** specified in Article 1 ***have been achieved, in particular its contribution to the functioning of the internal market, and to supporting the***~~, particularly on~~ resilience~~, economic security~~ and decarbonisation of ~~industrial production~~***the Union's manufacturing sector and the Union's economic security***;	BE (Drafting suggestions): progress made in achievingwhether the objectives of this Regulation specified in Article 1 have been achieved, in particular its contribution to the functioning of the internal market, the level playing field, the creation, retention of and transition into high-quality jobs and to supporting the, particularly on resilience, economic security and decarbonisation of

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	industrial productionthe Union's manufacturing sector and the Union's economic security; BE (Comments): Suggestion to add the reference to level playing field and the creation, retention of and transition into high-quality jobs. These aspects are also mentioned in article 1. EL (Drafting suggestions): … ***Union's manufacturing sector and the Union's economic security***, **preventing carbon leakage , and ensuring afordability of energy**; EL (Comments): In line with our comments on article 1, we should discuss the possibility of adding a reference on carbon leakage prevention, and also a reference on the affordability of energy. PL (Drafting suggestions): ~~progress made in achieving~~***whether*** the objectives ***of this Regulation*** specified in Article 1 ***have been achieved, in particular its contribution to the functioning and integrity of the internal market, and to supporting the***~~,~~ ~~particularly on~~ resilience~~, economic security~~ and decarbonisation of ~~industrial production~~***the Union's manufacturing sector and the Union's economic security***; PL (Comments):

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	PL request an additional provision that would also take into account evaluations from the perspective of the integrity of the single market. The legal base of the act remains within the harmonisation of the Single Market, and such perspective should be retained in the evaluation phase.
(b) progress made in achieving the ~~industrialisation~~ objective ~~pursuant to~~***referred to in*** Article ~~2, taking into account the challenges and opportunities in the internal market and global markets~~***1(2), second subparagraph***;	BE (Comments): Suggestion to merge (a) and (b), as the objectives in article 1 have also been regrouped (article 2 has been deleted). "the objectives in article 1" in principle also cover the objective in article 1(2), second subparagraph. EE (Drafting suggestions): progress made in achieving the ~~industrialisation~~ objective ~~pursuant to~~***referred to in*** Article ~~2, taking into account the challenges and opportunities in the internal market and global markets~~***1(2), second subparagraph***; **including current and forecasted production capacity of EU origin materials and components,** EE (Comments): An important part in measuring the progress is how the production capacity of EU origin products has responded to the IAA measures. Therefore, it should be taken into account for evaluation. FR (Drafting suggestions):

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	progress made in achieving the **industrialisation** objective referred to in Article ~~*1(2), second subparagraph*~~ **2**; FR (Comments): The French authorities regret the proposed deletion of Article 2. While the Commission's proposal, in its current form, does not appear capable of delivering the outcomes necessary to achieve this objective, the French authorities consider the reindustrialisation of the Union to be a key strategic objective, both for economic competitiveness and for the resilience of value chains and the Union's economic security. In this regard, maintaining an explicit reference to this objective in the legislative provisions is essential to ensure the overall coherence of the text and to guide the interpretation and implementation of the Regulation's operational provisions.
(c) the related administrative costs ***for public and private sectors***, economic impacts on downstream sectors, ~~small and medium enterprises and~~***SMEs, SMCs and consumers, as well as*** impacts on public budgets.	BE (Drafting suggestions): (c) the related administrative costs ***for public and private sectors***, economic impacts on downstream sectors, ~~small and medium enterprises and~~***including on SMEs, SMCs and on consumers, as well as*** impacts on public budgets. BE (Comments): Suggestion to add "including" to indicate that the economic impacts on downstream sectors can also include impacts on large companies. RO (Comments):

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	Romania considers that the evaluation should also take into account the administrative impact on competent authorities involved in permit-granting procedures, in order to ensure that streamlining measures do not create disproportionate administrative burdens for public administrations SE (Drafting suggestions): the related administrative **and compliance** costs ***for public and private sectors***, economic impacts on downstream sectors, ~~small and medium enterprises and~~***SMEs, SMCs and consumers, as well as*** impacts on public budgets. SE (Comments): Compliance costs, which arise from meeting regulatory requirements themselves, constitute one of the main burdens affecting businesses. Hence, they should also be part of the evaluation.
	ES (Drafting suggestions): **(New) (d) the impact of the measures laid down in Chapter III on public procurement markets, including: the degree of effective competition between economic operators; the impact on contract prices and public budgets; the availability of compliant products in the Union market;and the foreseeable evolution of those effects in the short, medium and long term.** ES (Comments):

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	While point (c) already refers in general terms to economic impacts and impacts on public budgets, this issue deserves particular attention in the context of Chapter III. The introduction of Union-origin and low-carbon requirements may have direct effects on contract prices, the number of available suppliers and the level of competition in procurement markets, which may in turn significantly affect public expenditure. Given the scale of public investment potentially affected by the Regulation, particularly in sectors such as infrastructure, transport and construction, the evaluation should specifically measure the budgetary consequences arising from the procurement obligations. RO (Drafting suggestions): **d) the effectiveness of the Regulation in reducing strategic dependencies on third countries for strategic industrial products, technologies and manufacturing value chains;** RO (Comments): The evaluation should assess the effectiveness of the Regulation in reducing strategic dependencies on third countries, as addressing such dependencies constitutes one of the main policy drivers underpinning the proposal. The Regulation was developed in response to vulnerabilities exposed by recent geopolitical developments, supply chain disruptions and the energy crisis, with the objective of strengthening the Union's economic security and industrial resilience. Assessing whether the Regulation has effectively contributed to reducing external dependencies and reinforcing strategic manufacturing value chains within the Union is therefore essential to determine whether it has achieved its intended objectives.

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	RO (Drafting suggestions): **e) the contribution of the Regulation to improving the security of supply of strategic industrial products within the Union** RO (Comments): Directly links the evaluation to one of the fundamental objectives of the Union's economic security policy.
	RO (Drafting suggestions): **f) the impact of the Regulation on the competitiveness, decarbonisation and long-term viability of energy-intensive industries, including its contribution to facilitating industrial investments and reducing the risk of carbon leakage and industrial relocation.**

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	g) the effectiveness of the Regulation in strengthening the resilience, diversification and security of the Union's strategic industrial value chains;

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	(h) availability of skilled labour and effectiveness of measures addressing skills shortages. RO (Comments): Energy-intensive industries are among the sectors most affected by high energy costs, increasing international competition and the significant investments required for industrial decarbonisation. As these industries are fundamental to the Union's strategic manufacturing value chains and economic security, the evaluation should assess whether the Regulation has effectively supported their competitiveness, facilitated decarbonisation investments and contributed to maintaining industrial production within the Union. This would also allow an assessment of whether the Regulation has reduced the risk of carbon leakage and industrial relocation, thereby supporting its broader objectives of strengthening the Union's industrial base and resilience. Without this criterion, it would not be possible to determine whether the Regulation has effectively achieved one of its fundamental objectives. The evaluation should also assess the effectiveness of the Regulation in

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	strengthening the resilience, diversification and security of the Union's strategic industrial value chains. Strengthening resilient and secure industrial value chains constitutes one of the core objectives underpinning the Regulation and one of the principal reasons for its adoption, in response to vulnerabilities exposed by geopolitical tensions, supply chain disruptions and the energy crisis. While the proposed evaluation criteria assess the implementation of the Regulation and certain economic and administrative impacts, they do not measure whether the Regulation has effectively reinforced the resilience of the Union's strategic industrial value chains. Without this criterion, the evaluation would not be able to demonstrate whether the Regulation has effectively achieved one of its fundamental objectives. Including this criterion would therefore ensure that the evaluation assesses not only the implementation of the measures, but also whether they have addressed the structural challenges that justified the adoption of the Regulation and contributed to strengthening the Union's economic security and industrial resilience Labour and skills availability will be a key determinant of the effectiveness of industrial acceleration areas and should therefore form part of the evaluation framework.

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Article 29 **Review**	DE (Comments): It must be clearly stated what the review should focus on. The proposed wording is too general. The reference to shipping and rail transport in Article 29 should be deleted. It should be explicitly stated that the review should also address the relevant annexes, including the low-carbon requirements and the creation of lead markets.
By [OP: Please insert the date three years after the date of entry into force this Regulation], the Commission shall assess the necessity of amending ***this Regulation, in particular*** Chapters III and IV~~. The Commission may submit a legislative proposal in order to repeal or amend this Regulation~~ ***thereof***. That review shall be carried out periodically every three years after the first review.	BE (Drafting suggestions): When carrying out its review, the Commission shall pay particular attention to **(a)** the effectiveness of this Regulation **in achieving the objectives specified in Article 1** **(b) [the progress made in achieving the industrialisation objective pursuant to Article 2,]** **(c) the related administrative costs, the economic impacts on downstream sectors and small and medium-sized enterprises, and the impacts on public budgets** **(d)** ~~and~~ **to** the persistence of the circumstances that have justified the adoption of this Regulation and **(e)** to the necessity to introduce Union origin requirements for products from certain sectors critical to the Union's economic security, notably the building of ships and of rail rolling stock**, provided that any extension to additional sectors is preceded by a thorough impact assessment.**

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	BE (Comments): BE: The review should be based on the conclusions of the evaluations. It must give equal weight to the three evaluation criteria, whilst ensuring that the review also takes due account of Article 28(c) (administrative burdens and the impact on SMEs and public budgets) is adequately addressed. Point (b) from the Belgian text suggestion could be merged with point (a) since article 2 has been deleted in the 1st presidency compromise proposal. BE: Sectors should only be added after thorough analysis. DE (Drafting suggestions): By [OP: Please insert the date three years after the date of entry into force this Regulation], the Commission shall assess the necessity of amending *this Regulation, in particular* Chapters III and IV **and related Annexes**~~. The Commission may submit a legislative proposal in order to repeal or amend this Regulation~~ *thereof*. That review shall be carried out periodically every three years after the first review **based on the outcome of the evaluation**. DE (Comments): It should be explicitly stated that the review should also address the relevant annexes, including the low-carbon requirements and the creation of lead markets. LV (Drafting suggestions):

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	[…] the Commission shall assess the necessity of amending […], *based on a thorough impact assessment and consultation with Member States,* […] LV (Comments): Latvia considers that any future amendments to the Regulation should be based on a thorough impact assessment and close consultation with Member States, in order to avoid unintended negative effects on investment, competitiveness and administrative burden.
/When carrying out its review, the Commission shall pay particular attention to the effectiveness of this Regulation and the persistence of the circumstances that have justified the adoption of this Regulation and to the necessity to introduce Union origin requirements for products from certain sectors critical to the Union's economic security, notably the building of ships and of rail rolling stock.**/**	DE (Drafting suggestions): **/**When carrying out its review, the Commission shall pay particular attention to the effectiveness of this Regulation and the persistence of the circumstances that have justified the adoption of this Regulation and to the necessity to introduce Union origin requirements for products from certain sectors critical to the Union's economic security, ~~**notably the building of ships and of rail rolling stock.**~~**/** DE (Comments): Union origin requirements should be limited to exceptional cases and it should be the result of the evaluation, which sectors should be included. EL (Comments):

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	On **article 29** we have a scrutiny reservation. Regarding the specific reference to building of ships, we want to note that during the recent COMPET meeting of 28/05/2026 GREECE stated that it is important to define the precise scope of the proposal and to include strategic sectors that can make a decisive contribution to the economic security and strategic autonomy of the EU, such as the shipbuilding industry and manufacturing of cables. ES (Drafting suggestions): When carrying out its review, the Commission shall pay particular attention to the effectiveness of this Regulation and the persistence of the circumstances that have justified the adoption of this Regulation and to the necessity to introduce Union origin requirements for products from certain sectors critical to the Union's economic security, notably the building of ships and of rail rolling stock. **(New)Particularly, concerning public procurement, the Commission shall assess whether the extension of the scope to additional industrial sectors has produced disproportionate impacts on competition, public procurement markets and public expenditure.** FR (Drafting suggestions): When carrying out its review, the Commission shall pay particular attention to the effectiveness of this Regulation and the persistence of the circumstances that have justified the adoption of this Regulation and to the necessity to introduce Union origin requirements for products from certain sectors critical to the Union's economic security**, notably** ~~the building of ships and of rail rolling stock~~ **those corresponding to the EU's critical technology areas for**

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	the EU's economic security identified in the Commission Recommendation (EU) 2023/2113 of 3 October 2023, or in any subsequent update thereof FR (Comments): The French authorities regret that the scope of the provision does not cover all of the critical technologies identified by the Commission as posing the most significant risks to the Union's economic security. They consider it necessary to align the scope of the European origin requirements with these technologies in order to ensure the coherence and effectiveness of the framework, while allowing for its future evolution. With regard to shipbuilding and railway rolling stock, postponing their inclusion until the review of the Regulation is considered too late. In the railway sector, the priority is to preserve existing industrial capabilities, while in the maritime sector, the objective is to position the Union in emerging markets and high value-added segments. These sectors should therefore be covered from the date of entry into force of the Regulation. IT (Drafting suggestions): When carrying out its review, the Commission shall pay particular attention to the effectiveness of this Regulation and the persistence of the circumstances that have justified the adoption of this Regulation and to the necessity to introduce Union origin requirements for products from certain sectors critical to the Union's economic security **also modifying Annex II**, notably the building of ships, of rail rolling stock, **underwater industry, dual use products (civil side).**

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Article 30 **Exercise of the delegation**	DE (Comments): We are generally critical of the amount of delegated acts, Member states should be more included in the decision making. Article 30 has to be adjusted according to the discussions in the other chapters. EE (Comments): Estonia is concerned about the extent of delegation of powers in this proposal. In general, we prefer implementing acts to delegated acts to ensure stronger involvement of Member States. EL (Comments): We have a scrutiny reservation. SI (Comments): Slovenia reiterates its position that the scope of the EC powers to adopt delegated acts should be clearly defined and their application limited.
1. The power to adopt delegated acts is conferred on the Commission subject to the conditions laid down in this Article.	AT (Comments): **AT: We do not support the broad empowerment of COM to adopt delegated acts under the IAA**. The delegations of power conferred on COM under the IAA are very far-reaching (cf. Art. 8[2], 9[2], 10[2], 16[1], 16[2], 24, as well as Art. 28e, 28f, 28g, 28h[1] and 28h[2] of the NZIA).

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	There are significant doubts as to whether these powers (especially if they are exercised in a cumulative manner) can still be considered "*non-essential elements*" within the meaning of Art. 290 TFEU; a request for a legal opinion of the CLS has already been submitted in this regard. In any event, AT takes the view that the MS should be granted comprehensive rights of co-determination and of consent. In this regard, AT notes that the adoption of implementing acts requires consultation of a committee composed of representatives of all MS. **AT would therefore favour the use of implementing acts over delegated acts!** BE (Comments): Belgium asks for implementing acts, instead of delegated acts, in the articles where delegated acts are foreseen in the initial Commission proposal. Articles 30, 31 should be adapted accordingly to reflect the conditions and procedures for implementing acts. ES (Comments): The delegation of powers on the Commission on a sine die basis to adopt delegated acts in key areas, such as the extension of the scope of the Regulation or the introduction of new requirements, appears disproportionate. Such an approach enables the Commission to alter essential elements of the instrument without effective legislative oversight, which is particularly problematic in areas with a significant economic impact and in the field of public procurement. Furthermore, the use of delegated acts does not appear appropriate for certain matters of an economic or budgetary nature, which would require a higher

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	degree of control and involvement of the Member States, making recourse to implementing acts more suitable. SK (Drafting suggestions): We request to exclude the possibility of using delegated acts for Articles 8, 9, and 16, and consequently, we demand their deletion from this text. SK (Comments): We do not agree with granting the Commission the power to intervene so fundamentally and immediately in such a crucial document. The industry primarily requires stability and legal certainty, which potential amendments via delegated acts fail to provide. Another issue is the setting of business strategies, which are planned several years in advance, making it impossible to change suppliers immediately based on amendments to the aforementioned Articles.
	CZ (Drafting suggestions): Add new para 2a: "**The Commission shall consult Member States prior to adopting a delegated act and provide a brief impact assessment.**" CZ (Comments): Justification: Ensures legal certainty and prevents expansion of regulatory burden via delegated acts. DE (Drafting suggestions):

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	2. The power to adopt delegated acts referred to in Articles 8, 9, 10, 16 and 24shall be conferred on the Commission for an indeterminate period of time from [OP please insert the date = the date of the entry into force of this Regulation]. DE (Comments): DA Art. 8–10: Call for Member States to have a say, particularly regarding Articles 8–10. DA Art. 16: The Delegated Act for the chemical industry (Art. 16(1)) is rejected—any potential expansion should be addressed during the revision. The DA to adapt the requirements of Chapter III (Art. 16(2)) should also be deleted. DA Art. 24 (FDI): Reject the Delegated Act to supplement the list of technologies under FDI.
[..]	FI (Comments): Have paragraphs (2), (3) and (6) been removed or are they under legal assessment (as they are marked with […] and not with ~~strikethrough~~)? We support the removal of paragraph (2) where the Commission would be granted the power to use delegated acts in relation to construction products. The CPR already has necessary means to use delegated acts and harmonise construction products. The Commision does not need extra powers under the IAA with construction products. Lower greenhouse gas emissions can be the outcome of the standardisation process done under the CPR Acquis process. The Commission must avoid overregulation and need for the future Omnibus.

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4. Before adopting a delegated act, the Commission shall consult experts designated by each Member State in accordance with the principles laid down in the Interinstitutional Agreement of 13 April 2016 on Better Law-Making.	CZ (Drafting suggestions): Before adopting a delegated act, the Commission shall consult experts designated by each Member State in accordance with the principles laid down in the Interinstitutional Agreement of 13 April 2016 on Better Law-Making. **The Commission will especially take into account possible new administrative obligations or financial burdens.** CZ (Comments): We would like to highlight the need to not interfere with the agenda of simplification, which delegated acts are prone to. PL (Drafting suggestions): 4. Before adopting a delegated act **affecting Union-origin requirements, equivalent Union-origin content or sectoral eligibility criteria**, the Commission shall consult **Member States and relevant stakeholders** ~~experts designated by each Member State~~ in accordance with the principles laid down in the Interinstitutional Agreement of 13 April 2016 on Better Law-Making, **and shall take into account objective data on the availability of Union-origin components, expected project delays, cost impacts, security of supply, system integration and the competitiveness of Union industry.** PL (Comments): Article 30 concerns delegated acts adopted pursuant to Articles 8, 9, 10, 16, and 24 of the IAA. The proposed amendment is intended to ensure that delegated acts amending origin criteria or sectoral criteria are preceded by an

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	assessment of their practical impact on costs, supply availability, delays, security of supply, and system integration. RO (Drafting suggestions): Add: ***"Before adopting delegated acts pursuant to this Regulation, the Commission shall assess their impact on SMEs in accordance with the Think Small First principle."*** RO (Comments): Delegated acts may substantially modify compliance obligations. Ex-ante assessment of SME impacts would strengthen predictability, proportionality and Better Regulation objectives
5. As soon as it adopts a delegated act, the Commission shall notify it simultaneously to the European Parliament and to the Council.	
	DE (Comments): In order to avoid further fragmentation, we call for the inclusion of a sunset clause whereby the provisions of the IAA regarding EU preference in public procurement are incorporated, with equivalent effect, into the reformed EU public procurement directive.
[…]	

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Article 31 **Committee procedure**	BE (Comments): Belgium asks for implementing acts, instead of delegated acts, in the articles where delegated acts are foreseen in the initial Commission proposal. Articles 30, 31 should be adapted accordingly to reflect the conditions and procedures for implementing acts. EL (Comments): We have a scrutiny reservation.
1. The Commission shall be assisted by a Committee. That Committee shall be a committee within the meaning of Regulation (EU) No 182/2011.	
2. Where reference is made to this paragraph, Article 4 of Regulation (EU) No 182/2011 shall apply.	
3. Where reference is made to this paragraph, Article 5 of Regulation (EU) No 182/2011 shall apply.	DE (Drafting suggestions): Where reference is made to this paragraph, Article 5 of Regulation (EU) No 182/2011 shall apply. **Where the committee delivers no opinion, the Commission shall not adopt the draft implementing act and the third subparagraph of Article 5(4) of Regulation (EU) No 182/2011 shall apply.** DE

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	(Comments): No-opinion clause, to strengthen the ability to exert influence, for example through a blocking minority of Member States, in particular Germany.
Article 32 **Penalties**	EL (Comments): Concerning article 32, we would like to ask the Commission to specify the exact cases envisaged for penalties under this Regulation – besides the concrete case of art. 22 on FDI monitoring.
Member States shall lay down rules on penalties applicable to infringements of the provisions of this Regulation and shall take all necessary measures to ensure that they are implemented. The penalties provided for shall be effective, proportionate and dissuasive. Member States shall, without delay, notify the Commission of those rules and measures and shall notify it, without delay, of any subsequent amendment affecting them.	AT (Comments): This Article should be clarified (the scope of the penelaties is still unclear). We further still consider the relationship between Art. 32 and Art. 11(4) to be unclear. Are contracting authorities and entities liable under Art. 32 in case a self-declaration proofs to be incorrect? During the meeting of the CWP on 27 April, COM stated that, in such situations, the existing public procurement rules and sanction mechanisms would continue to apply and that Art. 32 does not require the establishment of an additional sanctions framework. During the meeting of the CWP on 18 May, COM further explained that **no new sanctions system** has to be created and that there should be no duplication of sanction mechanisms. At the same time, COM stated that, where a self-declaration proves to be incorrect, for example because false information has been provided, Art. 32 would apply.

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	From AT's perspective, these explanations appear contradictory: One the one hand, COM explains that Art. 32 does not require the establishment of an additional sanctions framework and that the existing public procurement rules and sanction mechanisms would continue to apply. On the other hand, COM states that Art. 32 would apply in cases of incorrect self-declarations. The relationship between Art. 32 and Art. 11(4) therefore remains unclear. **AT would therefore welcome written clarification from COM.** AT would furthermore welcome clarification as to which existing sanction mechanisms COM was referring to in this context during the CWP on 27 April. BE (Drafting suggestions): Member States shall lay down rules on penalties applicable to infringements **of article 22§3 of this Regulation** and shall take all necessary measures to ensure that they are implemented. The penalties provided for shall be effective, proportionate and dissuasive. Member States shall, without delay, notify the Commission of those rules and measures and shall notify it, without delay, of any subsequent amendment affecting them. BE (Comments): Our Reading is that article 22§3 is the only article where penalties are mentioned. If this is correct, the reference should be added here. ES (Drafting suggestions):

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	Member States shall lay down rules on penalties applicable to infringements of the provisions of this Regulation and shall take all necessary measures to ensure that they are implemented. The penalties provided for shall be effective, proportionate and dissuasive. Member States shall, without delay, notify the Commission of those rules and measures and shall notify it, without delay, of any subsequent amendment affecting them. **For obligations arising in the context of public procurement procedures, compliance and review shall be ensured through the remedies and responsability mechanisms provided under public procurement legislation.** ES (Comments): In order to ensure a level-playing field, and acknowledging that penalties are a relevant tool to ensure effective implementation of this regulation, we would favour that the IAA defines, at least, general harmonised rules on penalties. Furthermore, from the perspective of public procurement, this provision raises significant concerns, as it does not specify the types of infringements and penalties, nor their link with the procurement procedures governed by Chapter III and Article 34 of the NZIA. In this respect, the wording of the provision is excessively general and gives rise to legal uncertainty, which is likely to hinder its effective implementation by the Member States, notwithstanding that such implementation will be subject to Commission oversight. In the field of public procurement, the review of legality falls within the competence of the procurement review bodies. How is this provision to be reconciled with the Remedies Directives in the field of public procurement? Similar issues have already arisen in the past in other Regulations, such as the

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	IPI and the Foreign Subsidies Regulation. In practice, contracting authorities cannot be expected to assume direct sanctioning responsibilities for the application of the Regulation within procurement procedures. In line with the Remedies Directives, the review of legality in such procedures should continue to be governed by the public procurement remedies system, rather than by a specific penalty regime established under this Regulation. It also remains unclear whether the penalties referred to in Article 32 are to be applied exclusively to economic operators or whether they could also extend to contracting authorities. The interaction between public procurement instruments and penalties under IAA should be clarified. IT (Drafting suggestions): Member States shall lay down rules on penalties applicable to infringements of the provisions of this Regulation and shall take all necessary measures to ensure that they are implemented. The penalties provided for shall be effective, proportionate and dissuasive. Member States shall, without delay, notify the Commission of those rules and measures and shall notify it, without delay, of any subsequent amendment affecting them. **The Commission shall assess, within an appropriate period following the application of this Regulation, the degree of consistency and convergence of the penalty regimes adopted by Member States. Where significant divergences are identified and are liable to undermine the effective and uniform application of this Regulation, including by creating risks of regulatory arbitrage or distortions of competition within the internal market, the Commission may issue recommendations or propose appropriate measures to promote greater consistency across the Union**. IT

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	(Comments): While the determination of penalties appropriately remains within the competence of Member States, excessive divergences in national sanctioning regimes may undermine the level playing field within the internal market. Significant differences in the severity or application of penalties could incentivise regulatory arbitrage and place operators established in jurisdictions with more stringent enforcement frameworks at a competitive disadvantage. A Commission assessment of the degree of convergence among national regimes would support the uniform application of the Regulation and contribute to ensuring fair and predictable conditions for businesses across the Union. LT (Comments): To ensure clearer implementation, it is advisable to specify the particular articles for which non-compliance must result in the establishment and application of penalties by Member States and their implementing authorities. LU (Drafting suggestions): **Based on the Commission guidelines**, Member States shall lay down rules on penalties applicable to infringements of the provisions of this Regulation and shall take all necessary measures to ensure that they are implemented. The penalties provided for shall be effective, proportionate and dissuasive. Member States shall, without delay, notify the Commission of those rules and measures and shall notify it, without delay, of any subsequent amendment affecting them. LU

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	(Comments): In ordre to avoid any descrepancies and inconcistencies among member States, the Commision shall provide clear guidelines in relation to this provisions. LV (Drafting suggestions): […] penalties […] shall be effective, proportionate and dissuasive, *while ensuring legal certainty and predictability for contracting authorities and economic operators,* […] LV (Comments): Latvia stresses that penalties must be clear, predictable and proportionate, particularly in the context of public procurement, in order to avoid additional legal uncertainty.] SI (Comments): Slovenia would request for clarification on the types of infringements and penalties that these penalties would apply to (listing the specific parts of the regulation), as well as the envisaged timeframe within which the penalties should be imposed at MS level. We would also call for a harmonised approach in defining the rules for imposition of such penalties.

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Article 33 **Amendments to Regulation (EU) 2018/1724**	
Annexes I and II to Regulation (EU) 2018/1724 are amended in accordance with Annex ~~V~~ ***IV*** to this Regulation.	BE (Comments): Support.

Article 35 **Amendments to Regulation (EU) 2024/3110**	CZ (Drafting suggestions): ~~Article 35~~ ~~**Amendments to Regulation (EU) 2024/3110**~~ EE (Drafting suggestions): ~~Article 35~~ ~~**Amendments to Regulation (EU) 2024/3110**~~ EE (Comments): Estonia shares the concerns raised by several other Member States regarding Article 35. Article 22(9) of Regulation (EU) 2024/3110 reflects a recently agreed compromise between the Member States on the conditions under which environmental sustainability labelling requirements may be introduced for construction products. Estonia considers that these conditions should not be removed through the IAA without a clear and specific justification. In particular, construction products are often intermediate products whose actual environmental performance may depend significantly on their intended use, design context or installation in a specific construction work. Removing the existing safeguards could therefore create a risk of misleading or overly simplified labelling, as well as additional administrative burden for manufacturers and contracting authorities. Therefore, Estonia would like Article 35 to be deleted. FI (Drafting suggestions): ~~Article 35~~ ~~**Amendments to Regulation (EU) 2024/3110**~~

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	FI (Comments): We suggest deleting this article because it changes article 22 (9) of CPR in a manner that is not acceptable. PL (Drafting suggestions): Removal of Article 35 ~~Article 35~~ ~~**Amendments to Regulation (EU) 2024/3110**~~ PL (Comments): Poland reiterates its request to delete Article 35 from the text of the IAA Regulation and the second sentence of Recital 79. The proposal currently presented by the European Commission to amend Article 22(9) by removing the aforementioned conditions constitutes a breach of the consensus reached during the legislative work on the drafting of Regulation 2024/3110 (CPR of 2024) The current discussion regarding the difficulties arising from Regulation 2024/3110 (hereinafter: CPR 2024) is premature, as this regulation has only been in effect since January 8, 2026. The proposal to amend it contradicts the compromise reached during the trilogue and accepted by the European Commission in 2024. The current restrictions set forth in Article 22(9) have been deemed necessary by many Member States. During the work on CPR 2024, it was recognized that labels regarding environmental sustainability are

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	important for consumer products and that potentially misleading labels should be avoided. The recital 79 should be adapted. It is necessary to point that data regarding a product's impact on climate change will be included in the declaration of performance and conformity. Therefore, professionals involved in the construction process (architects, engineers, and others) will have the knowledge and skills to assess which product, if used, will have a lower impact on climate change. This information will go far beyond a simple label and will include data on the effects of climate change – in general, fossil fuels, ozone depletion, and even toxic effects on humans. Furthermore, as indicated in Article 10 of the IAA, the recognition of a product as a "low-carbon" product will be based on Article 5(5) of the CPR 2024. This article empowers the EC to define threshold values or performance classes through delegated acts. Therefore, the role of Article 22(9) of the CPR 2024 is different. Article 22(9) is addressed to ordinary citizens who base their purchasing decisions, including those regarding construction products, on environmental labels. Therefore, the risk of the limitation of the possibility of establishing requirements for products not typically sold to ordinary consumers, indicated in Recital 79 of the IAA, does not exist. Introducing the proposed amendment will only result in duplication of the solutions adopted in Article 5(5). Moreover, the Commission has stated on several occasions that the delegated acts on low carbon criteria based on Ecodesign Regulation and CPR Regulation are in the process of elaborating. The Commission has not stated reasons justifying the change of the delegation of powers, nor delivered any

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	written answer/justification. Therefore, in our opinion, amending Article 22(9) of Regulation 2024/3110 is unjustified, and Article 35 should be deleted.
In Article 22(9) of Regulation (EU) 2024/3110, the first subparagraph is replaced by the following:	AT (Comments): AT questions the meaning of this article. CZ (Drafting suggestions): ~~In Article 22(9) of Regulation (EU) 2024/3110, the first subparagraph is replaced by the following~~ EE (Drafting suggestions): ~~In Article 22(9) of Regulation (EU) 2024/3110, the first subparagraph is replaced by the following:~~ FI (Drafting suggestions): ~~In Article 22(9) of Regulation (EU) 2024/3110, the first subparagraph is replaced by the following:~~ FR (Drafting suggestions): ~~In Article 22(9) of Regulation (EU) 2024/3110, the first subparagraph is replaced by the following:~~ **Regulation (EU) 2024/3110 is amended as follows:** IT

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	(Drafting suggestions): Add amendments to Regulation (EU) 2024/3110 as follows: **1. In Article 1, paragraph 3 is replaced by the following:** **"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, when the following condition is fulfilled:** **• The product does not have a significantly different overall environmental performance in its life-cycle depending on its installation at building level.** **The labelling shall be based on the performance of the product, as assessed through a life-cycle assessment (LCA) carried out according**

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	to the standardized methods recognised at Union level for the environmental footprint of products". **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."** IT (Comments): It is important to include a reference to the amendments of the 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.

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	PL (Drafting suggestions): Removal of Article 35 ~~In Article 22(9) of Regulation (EU) 2024/3110, 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.~~.'~~	CZ (Drafting suggestions): ~~'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.'~~ CZ (Comments): The Czech Republic notes that the proposed amendment to Article 22(9) of Regulation (EU) 2024/3110 fundamentally alters the regulation of construction products, as it enables the universal introduction of environmental labelling regardless of the product's nature. CZ recalls that the original wording of the Article distinguished between products intended for general consumers and specific structural components chosen by professionals. The Czech Republic emphasises that, in accordance with the professional division under paragraph 5 of the same Article and Czech legislation (Act No. 283/2021 Coll. and Decree No. 146/2024 Coll.), the design of load-bearing structures—such as reinforced concrete panels, columns, or asphalt and concrete mixes—falls fully within the competence of the designer and structural engineer.

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	CZ warns that introducing rigid environmental sustainability requirements for structural components could lead to a dangerous reduction in the quality and durability of buildings. For materials directly linked to execution technology, such as concrete and asphalt, even a minor change in the mix composition forced by decarbonisation quotas can fundamentally affect the workability, durability, and safety of structures. Environmental aspects cannot be prioritised over technical integrity and safety for elements ensuring mechanical resistance and stability. In selecting materials, experts rely on technical declarations of performance and Environmental Product Declaration (EPD) data, rather than simplified labels intended for the general public. The choice of a specific product remains the responsibility of the contractor and designer in relation to the project documentation requirements and must not be replaced by mandatory environmental labelling. The Czech Republic also points out that expanding the Commission's powers to introduce mandatory environmental labelling without a link to harmonised standards would lead to increased administrative burdens, market fragmentation, and rising costs for strategic infrastructure. Future regulation should therefore respect the original philosophy of the proposal and retain environmental labelling only for products commonly chosen by consumers, where the label serves an informational function without compromising the core technical standards of the built environment. *To ensure consistency with the deletion of Article 35 the corresponding Recital 79 should be deleted.* DE (Comments): The proposed amendment would modify Article 22(9) of Regulation (EU) 2024/3110 (the Construction Products Regulation – CPR) by removing the

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	two existing conditions for the introduction of environmental labels for construction products. It should be recalled that these conditions were considered essential by a large number of Member States, including Germany, during the negotiations on the revised CPR. While Recital 79 of the draft IAA argues that the existing restrictions – in particular the limitation to consumer products – may run counter to the objectives of the IAA, this aspect could arguably still be discussed. In practice, however, environmental labels are generally of greater relevance to consumer-facing products, which was also the rationale behind the original drafting. More importantly, the draft does not appear to address the second condition laid down in Article 22(9)(b) CPR. From the German perspective – a view shared by several other Member States – this provision is of particular importance because it reflects the specific nature of construction products as intermediate products. Their environmental performance often depends significantly on the way they are ultimately used or installed. The provision was therefore introduced during the Council negotiations in order to avoid potentially misleading environmental labels for products whose actual environmental performance can only be properly assessed in the context of their specific application. EE (Drafting suggestions): ~~'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..'~~

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	FI (Drafting suggestions): '~~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..~~' FI (Comments): The Article 22 of CPR is an outcome of long negotiations and must not be changed. It is necessary to have some restrictions for the use of delegated powers. Article 22 (9) must be kept as it is: 9. 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 when the following conditions are fulfilled: (a) the product is typically chosen or purchased by consumers; and (b) the product does not have a significantly different overall environmental performance over its life cycle depending on its installation. The labelling shall be based on the performance of the product, as assessed in accordance with Article 5(1) or Article 6(1), and shall provide consumer-friendly information understandable by non-experts. Environmental impacts are calculated according to standards to meet the levels set up by provisions with regard to construction works done by professional constructors. Environmental sustainable labelling has significance only in relation to consumer products. FR

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	(Drafting suggestions): 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, PL (Drafting suggestions): Removal of Article 35 ~~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.'.~~

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	FR (Drafting suggestions): **in Annex I, the following point 9 is added:** **'9. Origin and Union gross value added 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.** **In Annex X, the following point 7 is added:** **'7. Origin and Union gross value added'** FR (Comments): The ceramic industry strongly supports the re-introduction of "origin" in the basic requirements for construction works as well as essential characteristics under the CPR to promote the production of sustainable products made in Europe. Although the first and second drafts IAA introduced a provision amending the CPR to add the condition "origin" in the basic requirements for construction works and as a new essential characteristic, this proposal was deleted in the final IAA text adopted by the Commission. This provision would make origin marking mandatory only for those construction materials subject to a harmonised product standard requiring origin marking. It would not make

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	origin marking mandatory for all construction materials, only in cases where origin marking was foreseen by the EN standard (e.g., EN 14411 on ceramic tiles).
Article 36 **Entry into force and application**	
This Regulation shall enter into force ***and apply*** on the– day following that of its publication in the Official Journal of the European Union.	ES (Drafting suggestions): This Regulation shall enter into force **and apply** on the day following that of its publication in the Official Journal of the European Union. **However, the requirements set out in Annex II and Annex III, Part I, shall apply only to public procurement procedures initiated after the respective date of application of each relevant requirement laid down therein.** **For the purposes of this Regulation:** **(a) in open and restricted procedures, a public procurement procedure shall be deemed to have been initiated on the date of publication of the contract notice;** **(b) in negotiated procedures, a public procurement procedure shall be deemed to have been initiated on the date on which the invitation to participate is sent to economic operators.** **For reasons of legal certainty and consistent application of this Regulation, the Commission shall publish, no later than six months after the entry into force of this Regulation, a consolidated implementation calendar identifying the applicable dates for each sector, product category and relevant obligation.**

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	That calendar shall be indicative and shall not affect the legal effects of this Regulation, but shall facilitate its uniform interpretation and application by contracting authorities and economic operators throughout the Union. ES (Comments): It is essential to clarify expressly that the Regulation shall apply, in the field of public procurement, only to procedures initiated from the effective date of application of each specific requirement. For these purposes, the articles themselves, and not the annexes, should define when a public procurement procedure is deemed to have been initiated. In line with consolidated legal practice and Spanish legislation on public procurement, it should be established that: • in open and restricted procedures, the procedure shall be considered to have been initiated upon publication of the contract notice; • in negotiated procedures, upon invitation to participate being sent to the economic operators. The absence of this definition generates legal uncertainty, by leaving to national interpretations an essential element for determining the temporal applicability of the obligations.
Articles 4 and 5 shall apply from [OP: Please insert the date = [~~one~~***x***] year after the date of entry into force of this Regulation].	CZ (Drafting suggestions): Articles 4 and 5 shall apply from [OP: Please insert the date = [onex] ~~year~~ ***two years*** after the date of entry into force of this Regulation]. CZ

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	(Comments): The Czech Republic suggests that, given the scope of the necessary legislative and institutional changes, a timeframe of at least two years should be strongly considered. DE (Comments): We need realistic implementation timelines. If the single digital access points is suppoed to use the European Business Wallet, the timelines for its rollout should take the implementation timelines for the European Business Wallet into account. EL (Comments): We have a scrutiny reservation. We consider the initially proposed timeframe of one year too short for the requirements of art. 4 and 5 LV (Drafting suggestions): […] shall apply from […], *allowing sufficient time for Member States to adapt national systems and procedures,* […] LV (Comments): Latvia emphasises that sufficient time should be provided for Member States to adapt their national legal and administrative frameworks, in particular in areas such as permitting, public procurement and investment screening. SE

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	(Drafting suggestions): Articles 4 and 5 shall apply from [OP: Please insert the date = [~~one~~x] **3** year**s** after the date of entry into force of this Regulation]. SE (Comments): SE suggests an implementation period of 3 years, due to the complexity and the extensive scope of relevant processes. The implementation period should, as far as possible, be coordinated with the introduction of European Business Wallets, in light of the different national conditions of the Member States.
	SI (Drafting suggestions): **Chapter IV shall apply from [OP: Please insert the date = [six] months after the date of entry into force of this Regulation].** SI (Comments): The Commission will adopt implementing act 6 months after entry into force of this Regulation. Please see paragraph five of Article 18.]
This Regulation shall be binding in its entirety and directly applicable in the Member States in accordance with the Treaties.	
Done at Brussels,	

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For the European Parliament *The President*	
For the Council *The President*	
ANNEX I	EL (Comments): We have a scrutiny reservation on the scope of the IAA proposal. On the recent COMPET meeting of 28/05/2026 GREECE stated that it is important to define the precise scope of the proposal and to include strategic sectors that can make a decisive contribution to the economic security and strategic autonomy of the EU, such as the shipbuilding industry and manufacturing of cables. FR (Comments): French authorities warn that the selection of strategic industries in Annex 1 risks creating additional complexity due to the need for case-by-case management.There is already a list of strategic sectors in article 14 of the RSEA. IT (Comments): .
Strategic sectors for industrial manufacturing acceleration ~~areas~~	FI

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Partial Presidency compromise text – doc. 10817/26	Drafting suggestions and Comments
	(Comments): Finland emphasizes the importance of taking the entire battery value chain into account in the regulation. The list of strategic raw materials in the annexes should also include, among others, nickel and lithium. NL (Drafting suggestions): **Strategic sectors for industrial manufacturing acceleration ~~areas~~ and clean market creation** NL (Comments): We need to emphasize the IAA is meant to stimulate a transition through the entire industrial base. All energy-intensive industries need to decarbonize and become clean, the IAA can present generic instruments to achieve this. RO (Comments): RO supports maintaining Manufacture of Basic Metals (NACE C24) within the list of strategic energy-intensive sectors.
	ES (Comments): We propose considering the inclusion of circular industries, including the technologies and processes that enhance resource efficiency and support reuse, repair, remanufacturing, recycling, recovery and other forms of material valorisation within the strategic sectors set out in Annex I.

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Partial Presidency compromise text – doc. 10817/26	Drafting suggestions and Comments
1. Energy-intensive industries:	EL (Comments): We would like to ask the Commission why the sector C16-Manufacture of wood is not included.
(a) Manufacture of paper and paper products, as classified under NACE Code C17;	
(b) Manufacture of coke and refined petroleum products, as classified under NACE Code C19;	
(c) Manufacture of chemicals and chemical products, as classified under NACE Code C20;	
(d) Manufacture of rubber and plastic products, as classified under NACE Code C22;	
(e) Manufacture of other non-metallic minerals, as classified under NACE Code C23;	BG (Comments): Suggestion to include NACE Code B with reference to the CRM Act
(f) Manufacture of basic metals, as classified under NACE Code C24.	BG (Comments): Suggestion to include NACE Code B with reference to the CRM Act

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Partial Presidency compromise text – doc. 10817/26	Drafting suggestions and Comments
	PL (Drafting suggestions): (f) Manufacture of basic metals, as classified under NACE Code C24, **including activities directly related or ancillary to carrying out of such manufacturing activities.** PL (Comments): The clarification ensures that the scope of activities covered is aligned with the operational reality of industrial manufacturing, where core production processes are inseparable from ancillary and functionally linked activities (eg. scrap processing in steel production). It prevents artificial fragmentation of permitting by ensuring that all activities necessary for the performance of basic metals manufacturing are treated consistently. This enhances legal certainty and enables a more effective and comprehensive application of the aggregated permitting framework.
	FR (Drafting suggestions): **(g) Manufacture of sugar, as classified under NACE Code C10.8.1.** **(h) Manufacture of starches and starch products, as classified une NACE Code C10.6.2.** FR (Comments): French authorities point out those manufactures have to be counted as energy-intensive industries regarding decarbonation projects.

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	IT (Drafting suggestions): **(g) Manufacture of sustainable biofuels, renewable fuels of non-biological origin (RFNBOs), and the total or partial conversion of conventional refineries into biorefineries.** IT (Comments): 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. PL (Drafting suggestions): **(New)** **<u>(g) Mining of metal ores, as classified under NACE code B07.</u>** PL (Comments): In practice, industrial activity is not limited solely to the production stage, but also encompasses upstream stages that are technologically and functionally integrated and which determine the feasibility of carrying out industrial production. In the case of the steel sector, particularly in the context of the blast furnace–basic oxygen furnace (BF-BOF) route, this includes in particular the

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	extraction of metal ores and activities directly related to raw material preparation for subsequent industrial processes, classified under NACE code B07 – Mining of metal ores. Including NACE code B07 among the strategic sectors in Annex I would enable these activities to be covered by industrial acceleration areas, which is of key importance for their continued development within the European Union.
2. Automotive industry: Manufacture of motor vehicles, trailers and semi-trailers, as classified under NACE Code C29;	ES (Drafting suggestions): 2. **(a)**Automotive industry: Manufacture of motor vehicles, trailers and semi-trailers, as classified under NACE Code C29;
	ES (Drafting suggestions): **(b) shipbuilding industry: The building, repairing and maintenance of ships and floating structures, as classified under NACE Codes C30.11, C33.15.** **(c) rail rolling stock: The building, repairing and maintenance of rail rolling stock, as classified under NACE Codes C30.2.**
3. Net-zero technologies, as referred to in Article 4(1) of Regulation (EU) 2024/1735;	
	IT (Drafting suggestions): **4. European Maritime manufacturing Industry** IT

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	(Comments): The inclusion of the maritime manufacturing industry in **Annex I** of the IAA would align the Regulation with the objectives of the European Industrial Maritime Strategy by recognising shipbuilding as a strategic industrial ecosystem. This would enable the sector to benefit from Industrial Manufacturing Acceleration Areas, strengthening Europe's industrial resilience, supporting the decarbonisation of maritime transport and reinforcing the competitiveness of the European maritime manufacturing base. SE (Drafting suggestions): **4. Recycling technologies, as classified under NACE Code E38.2.1;** SE (Comments): The recycling industry should be included in Annex I and in the definition of "industrial manufacturing projects". The recycling industries have grown into a large and strategic sector within the EU (from both a competitiveness and resilience perspective) and constitute an "industry", even though they have traditionally been classified under NACE Code E. The following should be added in Annex I: 4. Recycling technologies, as classified under NACE Code E38.2.1;