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NOTE

From:	General Secretariat of the Council
To:	Delegations
Subject:	Regulation for Industrial Accelerator Act - European Commission replies to MS questions : Chapters I, II

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Grouped MS questions and Commission Replies

Chapter I – General provisions

Questions	Replies
SUBJECT-MATTER AND SCOPE (Article 1)	
Could the Commission explain the rationale for the selection of products and sectors covered under each chapter of the proposal?	Chapter II covers industrial manufacturing as defined under NACE Code C (excluding C12), as it aims to streamline permit-granting conditions for this sector, in line with the Regulation's objective of supporting the Union's manufacturing capacity, decarbonisation and re-industrialisation, including promoting quality jobs. Chapter III is limited to a small number of strategic upstream sectors where vulnerabilities and spillovers are most acute. Taken together, these sectors (steel, cement, aluminium, some net-zero technologies and automotive components) account for around 15% of EU manufacturing production, but play a disproportionate enabling role in supporting downstream value chains. Their importance therefore lies less in their aggregate size than in their central role as upstream suppliers and enablers of downstream value chains, including construction, mobility, energy systems and defence. Chapter IV is limited to four emerging strategic sectors, where the Commission identified an urgent need to maximise the added value of foreign direct investments and to ensure their supply security. Identifying sectors that share similar investment patterns and challenges, particularly in terms of their contribution to the internal market, enables the setting of appropriate conditions and thresholds. Chapter V focuses on strategic sectors as defined in Annex I of the Regulation. When establishing industrial acceleration areas, Member States must consider at least one of these sectors. However, they have discretion to determine the number of sectors covered by each area, whether to include additional sectors, and the geographical scope of the designated areas.

INDUSTRIALISATION OBJECTIVE (Article 2)	
What is the reasoning/methodology behind the industrialisation objective? It is stated in recital 3 that the share of manufacturing in total GDP has declined from 17.4% to 14.3% between 2000 and 2024 (i.e. in 24 years). Is it therefore realistic to expect an increase to 20% in 9 years? What are the consequences if the objective is not reached? How does a generic industry target of 20% contribute to targeted and strategic industry policy? Part of the decline of industrial contribution is due to an economic shift to a more service-oriented economy; how is this general economic tendency accounted for in setting a generic target? This is an indicative target without penalties. We fail to understand the purpose of this target.	According to the impact assessment, manufacturing's share of the EU economy declined from 17.4% to 14.3% between 2000 and 2024. While this trend partly reflects the structural expansion of the services sector, the Industrial Accelerator Act's impact assessment recognises that manufacturing is critical to the EU's economic security and resilience in an increasingly tense geopolitical context. It makes clear that such decline is neither inevitable nor acceptable. This objective is supported by the range of measures set out in the Regulation, i.e. those on permit-granting procedures, lead markets, foreign direct investment, and industrial manufacturing acceleration areas. Article 2 establishes an overarching industrialisation objective for the Union, while Article 1 and the subsequent chapters operationalise this objective by focusing on selected strategic sectors. As noted in the explanatory memorandum, these sectors account for only around 15% of EU manufacturing output but play a disproportionately important upstream role for downstream ecosystems such as construction, mobility, energy, space, and defence. The industrialisation objective also serves as a benchmark against which the Commission can assess, over time, whether the IAA effectively contributes to the EU's long-term objectives of resilience, economic security, growth and jobs and decarbonisation.
Proposal seeks to ensure that the Union has adequate manufacturing capacity by 2035 (article 2). However, the tools that are proposed (for example public procurement and public interventions, articles 11-12§) seem to be in force permanently. What is the underlying idea in proposing permanent instruments?	The explanatory memorandum presents the measures as targeted and time-bound interventions, and the proposal includes both an evaluation and a review clause to assess whether such provisions should be amended or repealed. It requires the Commission to pay particular attention to the persistence of the circumstances that have justified the adoption of the Regulation.
How does a generic industry target stimulate cost efficient industry policy?	Cost efficiency stems from the design of the underlying policy measures rather than from the overall objective itself. The impact assessment systematically compares policy options and selects a narrower preferred approach on grounds of proportionality, efficiency, and coherence. In addition, the proposal incorporates derogations to address cost, supply, and competition concerns.

Are there any consequences to not reaching the target? How do the targets relate to the climate goals for 2030 and 2040?	The proposal does not provide for sanctions in the event of failure to meet the 20% objective; however, progress towards this objective will be taken into account in the context of regulatory monitoring, evaluation, and the review clause. As regards the link to climate objectives, the impact assessment provides further details, showing that by continuing current trends, Europe runs the risk of meeting the climate targets by reducing industrial output, instead of improving the production methods.
Will member states be required to translate this target into a national target of sorts? Are there specific guidelines for individual sectors or Member States regarding the allocation of the 20%-target?	No. As set out in Article 2, the Union and the Member States shall seek to ensure that, by 2035, manufacturing accounts for at least 20% of Union GDP. This is a Union-wide objective and does not require Member States to translate it into national targets. The proposal does not allocate the objective across individual sectors or Member States. Accordingly, no specific guidelines are envisaged at this stage.
What analysis underpins the industrial policy target of increasing the EU's manufacturing share of GDP to 20% by 2035?	The explanatory memorandum and the impact assessment highlight the decline in manufacturing's share of GDP, comparatively lower investment levels than in other regions, high energy costs, overcapacity pressures, supply-chain vulnerabilities, and the central role of manufacturing in supporting decarbonisation and resilience – which support the introduction of such an objective.
Which sectors are included in the designated target of a 20% manufacturing share in EU GDP? Does it include all manufacturing sectors, including defence?	Article 2 refers to 'the manufacturing industry of the Union', while Article 3 defines industrial manufacturing projects by reference to NACE Code C (Manufacturing), excluding C12 (manufacture of tobacco products). The target is therefore framed across the manufacturing sector as a whole, with the exception of tobacco products, rather than being limited to the sectors directly covered by the IAA measures. As such, it extends beyond energy-intensive industries, automotive, and net-zero technologies.
DEFINITIONS (Article 3)	
What is the relation between the term „industrial manufacturing project" (Art. 3 para 1) and the term „energy-intensive industry decarbonisation projects" (Art. 3 para 3)? Can there be projects which fall under both definitions? If so, which provisions apply to such projects? Art. 4, 5 and 6? What is the relation between the terms *„energy-intensive industry decarbonisation projects"* (Art. 3 para 3 IAA) and *„energy-intensive industry decarbonisation projects"* (Art. 3 para 17 NZIA). Is the latter a subset of the former?	The definition of energy-intensive decarbonisation projects under Article 3(17) of NZIA covers (i) certain energy-intensive industries (i.e. steel, aluminium, non-ferrous metals, chemicals, cement, lime, glass, ceramics, fertilisers, as well as the pulp and paper sectors) (ii) that must be part of the supply chain of a net-zero technology (iii) that are to reduce emission rates of CO2-eq of industrial processes significantly and permanently to an extent which is technically feasible. This definition creates an uneven playing field between energy-intensive decarbonisation projects, as it grants specific permitting provisions to a subset of energy-intensive decarbonisation projects, namely those that are part of the supply chain of a net-zero technology. The IAA definition seeks to address this imbalance. The IAA definition of energy-intensive decarbonisation projects under Article 3(3) covers (i) the energy-intensive industries listed in point 1 of Annex I of the IAA (ii) that are to reduce emission rates of CO2-eq of industrial processes significantly and permanently to an extent

	which is technically feasible. As such, energy-intensive decarbonisation projects as defined under the NZIA can be considered a subset of energy-intensive decarbonisation projects as defined under the IAA and a project can fall under both. As per Article 5(4), Article 6 applies to energy-intensive decarbonisation projects.
The IAA expands the enabling conditions for decarbonisation of Net zero industry manufacturing projects under the NZIA to decarbonisation of energy intensive industries included in annex I (art 3.3 and 6.1 IAA). Why are enabling conditions not expanded to decarbonisation projects in general?	The proposal seeks to ensure that all energy intensive decarbonisation projects benefit from the same permitting provisions.
Art 3(1) What does 'industrial site' mean? Is it a land plot? Is it an industrial plant (including machines)?	Industrial site means the geographical location of the installation and the facility. The installation is the stationary technical unit linked to one or more sectoral activities and any other directly associated activities on the same site
Art 3(1) Does this proposal establish a permit obligation for each project at a site where an economic activity NACE C is located, or does this proposal only specify the applicable permit granting procedure for projects at such site that are subject to a permit obligation under other EU legislation (eg IED or EIA directive) or national legislation?	This proposal specifies the applicable procedure for projects at such site that are subject to a permit obligation derived from EU and national law.
Article 17(1)(a) of Directive 2003/96 is a criterion that is too complex to determine whether an investment in a specific commercial facility of an energy-intensive business listed in Annex I constitutes a decarbonisation project. Why has Article 17(1)(a) of Directive 2003/96/EC been chosen as the criterion (leaving aside the fact that it is already mentioned in the NZIA)? Why is the energy-intensive nature of a specific undertaking not determined by a simpler criterion, such as whether or not it exceeds an annal energy consumption expressed in megawatts? Why is not every investment aimed at reducing CO2 considered a decarbonisation project?	Co-legislators agreed on these definitions, and for reasons of coherence, we have referred to this as the chosen approach.
Article 3(23) defines a "pure electric vehicle". Why did the Commission choose to introduce this definition over using the definition of "zero-emission vehicle" that was proposed as part of the proposal to review the CO2 emission standards for cars & vans? Throughout the IAA proposal we now have parts that refer to "pure electric vehicles" and other parts that refer to "zero-emission vehicles" which is confusing and inconsistent.	The proposal relies on the definition of 'pure electric vehicle'. This reflects its broader scope, as it introduces Union-origin requirements not only for zero-emission vehicles (i.e. BEVs and FCEVs), but also for vehicles that fall outside the zero-emission definition, such as PHEVs. In this context, a simple reference to the 'zero-emission vehicle' definition under the CO_2 standards framework would not have been sufficient to capture all vehicles within the scope of the proposal.

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	Having said that, the text still contains the reference to "zero-emission vehicles". This is because the original Article 5 and 5b, of Proposal for a Regulation of 16 December 2025 on CO2 emission performance standards for light duty vehicles, which introduce the Made-in-EU requirements into the CO2 standards Regulation are, in accordance with the logic of the CO2 regulation, inevitably referred to "zero-emission vehicles". The same goes for the Union origin requirements in the Clean Corporate Vehicles proposal (also refer to "zero-emission vehicles"). Hence the IAA uses the term in the context of Made in EU requirements linked to these proposals.
The IAA PGP includes chemical permits. Which EU legislation on chemical permits is involved?	The inclusion of certain permits, such as chemical permits, is not necessarily based on specific Union legislation, although in some cases it may be. Their coverage within the IAA PGP may also stem from national or regional legal requirements rather than directly from EU law.
The IAA PGP covers 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 ('Permitting Directive'). The 'Permitting Directive' in itself establishes an authorisation procedure for grid connections (article 2 of the Permitting directive, among others replacing art 8 of the Electricity Directive). Does this entail that the permit for grid connection for an industrial manufacturing project in scope of the IAA must be issued via the PGP under the IAA (article 5) and not via the PGP under the Permitting Directive (art 8a of the Electricity Directive)?	The 'Permitting Directive' introduces in the Renewable Energy Directive (RED) a definition for "procedure for grid connection permits". This covers the procedure for connection to the grid of assets falling within the scope of the RED and should be understood as the process leading to the decision of the grid operator whether and when to connect the asset but not granting the physical grid access itself.
Article 3: To what extend has the definitions in regulation (EU) 2023/1804 regarding alternative fuels infrastructure been taken into account when making the definitions in the current regulation?	The impact assessment lists AFIR as part of the broader policy landscape, in particular given its role in shaping charging and refuelling infrastructure for clean mobility. AFIR was taken into account as part of the overall policy context and the interplay between legislative instruments, even though it has not been directly used as a source for the core definitions in Article 3 of the IAA.
request the EC to explain why the provisions of the Act only apply to the construction of new manufacturing facilities and not the use of existing capacities such as for example existing but abandoned industrial buildings?	The Act is not limited to the construction of *new* manufacturing facilities. Its scope covers industrial manufacturing projects, defined as the construction, conversion, or extension of an industrial site intended for a manufacturing activity falling under NACE Section C (manufacturing), with the exception of C12 (manufacture of tobacco products). This means that the reuse of existing industrial sites, including abandoned industrial buildings, may fall within the scope where the intended activity qualifies as a manufacturing activity. In other words, the determining factor is not whether the building is new or existing, but whether the project concerns a manufacturing activity under NACE Section C.

OTHER	
The transition of supply chains toward European sources is a complex, multi-year process – in many cases requiring five to ten years of planning, investment, and technological adaptation. What are your views on the feasibility of the deadlines set out in the proposal?	The timelines set out in the proposal, including the different dates of entry into force, reflect expected ability to ramp up European production capacity, based on existing project pipelines, and the need for adjustments across relevant supply chains. They have been calibrated on a sector-by-sector and product-by-product basis to ensure sufficient time for supply chains to adapt and undertake the necessary (decarbonisation) investments, while also providing incentives to increase production. For instance, the low-carbon requirements for energy-intensive materials enter into force after the made in EU requirements for clean tech to create market signal for low-carbon investments.

Chapter II – Enabling conditions for industrial production and decarbonisation

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MS question	Commission reply
SINGLE ACCES POINT (Article 4)	
To what extent does the introduction of a "communicative" SAP actually simplify the interaction between project promoters and authorities, and **does it cover only the initial submission of documents or the entire permitting process**? Furthermore, does the proposal **require a single SAP per Member State**, **or can multiple** authorities act as SAPs (e.g. at regional or district level) as long as there is one clear contact point per area? why does the IAA proposal introduce a new concept – the single access point – that differs from the concept of the single point of contact as included in NZIA, CRMA, …, although both concepts seem to serve the same purpose? Do both concepts serve the same purpose and what are the differences and similarities? Is the single access point under article 4 IAA a single point of contact according to the proposal for a regulation on speeding-up environmental assessments (art 3 (2))? Is the single point of contact exclusively digital? Has an impact assessment been conducted to evaluate the budgetary impacts on Member States? Would defining a single point of contact at the national level not be counterproductive with regard to the objective of accelerating procedures? Why does the regulation not allow for the definition of different contact points depending on the specific procedures for different types of projects? Does the European Commission intend to give Member States flexibility in defining the single access points? How does this provision align with the single points of contact introduced by the Net-Zero Industry Act (NZIA) and the Critical Raw Materials Act (CRM Act)?	The Single Access Point (SAP) refers to a digital portal or interface, primarily enabled by the European Business Wallets Regulation, designed to facilitate interactions between project promoters and the relevant authorities. Recital 11 specifies that European Business Wallets provide a secure, standardised, and interoperable platform for businesses to interact with public sector bodies. The Explanatory Memorandum further specifies that Chapter II sets out provisions that ensure streamlined, efficient and digital permit-granting procedures. The SAP is not a designated authority itself and therefore does not require any authority to assume the role of SAP. The SAP refers to harmonised digital solutions to ease the administrative burden and to enable companies and public sector bodies to interact in a secure and user-friendly way. Accordingly, the SAP should not be understood as comparable to the concept of a "single point of contact" as provided for, for example, under the NZIA or the proposal for speeding-up environmental assessments. The SAP is the digital entry point through which applications and information are submitted and exchanged; it does not, as such, replace or predetermine the competent authority responsible for coordinating the permit-granting process or issuing the comprehensive decision. The SAP applies to all industrial manufacturing projects as defined in Article 3(1), not only projects in the sectors mentioned in Annex I. The digitalisation of permitting provisions under the IAA establishes a framework based on the automated exchange of structured data, rather than PDF documents. The Impact Assessment finds that digitalising permitting procedures across Member States could generate efficiency savings of up to EUR 1.3 billion per year

Where in the proposal's articles is the obligation that the portal has to be digital? Article 4 speaks only of a single point of access. Considering the specific functionalities mentioned in article 4(2), could the Commission elaborate on how single access points are envisaged to support automated data exchange in practice, in particular whether this involves document exchange (e.g. PDFs) or automated exchange of structured data, and what this implies for implementation requirements? Art 4: Does the single Point of Access apply to all manufacturing projects or only to the strategic technologies that are defined under ANNEX I? How is the interplay between the single access point in the IAA and the single points of contact in sectoral legislation like NZIA and CRMA? Is the single point of access pilotage office? What shall be the tasks of the single access point? What is the difference between the structure of single national access points included in Article 4 of IAA and single points of contact laid down in NZIA in Article 6?	for the public sector, for procedures with a volume of at least 100,000 transactions. In addition, the cost savings from implementing a digitally integrated permit granting process could reach savings up to EUR 240 million for the manufacturing sector, for an average of 5 permitting procedures.
The Commission states that Member States are free to use existing structures (e.g. those under NZIA), while emphasizing the importance of well-coordinated permitting decisions and the need, even in decentralized countries, for a clear single point of contact. Why, then, does the text specify so explicitly that this contact point must be at national level and responsible for dispatching to the competent authorities, instead of simply aligning with or reusing the wording from NZIA?	Single access points under Article 4 refer to a digital interface. See reply above.
DIGITAL INFRASTRUCTURE (Article 4)	
We note that the wording in Article 4(2) of the proposed Industrial Accelerator Act, requires single access points to use European Business Wallets (EBW). However, considering the most recent developments in the EBW negotiations pointing towards a more flexible approach to the use of EBWs by public authorities, the wording needs to be adjusted to reflect recent changes in the compromise text, ensuring sufficient flexibility for Member States in the implementation. In any case, it will be important for the IAA to adhere to the final language of the EBW regulation. We ask the Commission to explain in detail how and why the mandatory use of EWBs in the context of the single access points is preferred and justified over existing solutions? How will this contribute to streamlining?	The European Business Wallets Regulation proposal mandates that all public sector bodies must technically and legally accept the Business Wallets. In light of this, it would be inefficient and redundant for the IAA to build a new, separate infrastructure for the single access points. Instead, the IAA should build on the technical infrastructure that the Business Wallets will provide, ensuring a coherent and interoperable approach to digital permitting. This will enable the reuse of investments and avoid duplication of efforts. The use of the Business Wallets for the single access points can ensure a fully digital permitting process that eliminates manual verification and paper-based

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	gaps. This will not only reduce burdens for businesses but also increase the speed and efficiency of the permitting process for the public sector. All relevant documentation and data can be exchanged electronically, reducing errors and enabling time tracking and monitoring of the permitting process. At the same time, the article does not prohibit the use of other digital tools for G2G interactions between competent authorities. In fact, the OOTS can be used as a complementary system to verify the validity of licenses or certifications already within public sector databases.
please clarify: existing Union digital infrastructure, catalogues and building blocks established by Union law.	In this context, "existing Union digital infrastructure, catalogues and building blocks established under Union law" refers to EU-level digital systems and reusable components that have already been developed to support cross-border public services and administrative cooperation. This typically includes: (i) digital infrastructure: large-scale EU systems that enable data exchange or service delivery across Member States, such as platforms for secure communication, identity verification, or document exchange. (ii) Catalogues: structured repositories or registries that list and describe available datasets, services, or standards—making them discoverable and reusable. (iii) Building blocks are open and reusable digital solution. It can take the shape of a framework, a standard, a software, or a software as a service (SaaS), or any combination thereof. They are endorsed by the Commission and ensure that digital services will be fully compatible with others on the market. These include: eDelivery, eDSignature, eID, eInvoicing, the Once-Only technical system (OOTS) and EUDI.
PERMIT-GRANTING PROCEDURE (Article 5)	
The PGP IAA scheme (Article 5.1-5.3) is not applicable if a permitting procedure has been established in sector-specific legislation for a specific manufacturing sector under NACE C (art 5.4). Does this entail that specific permitting procedure EU legislation will be developed at the level of the subdivisions within NACE Code C? Such approach would	Article 5(4) provides that the provisions under Article 5 will not apply where rules on permit-granting procedures have been established for a specific manufacturing sector. It does not say that specific permitting procedure will have to be developed at the level of the subdivisions.

be a continuation of the multiplication of different and activity specific permit granting procedure legislations and increase complexity and implementation costs.	
Should Article 5 be understood as requiring a single comprehensive formal decision at national level, or can the requirement be fulfilled through a coordinated sequence of separate national decisions?	The definition refers to 'a decision or set of decisions taken by a Member State authority or authorities'. The comprehensive decisions can therefore consist of a single joint decision or a combination of individual decisions to be delivered.
With regard to the competent authority, must this authority have its own decision-making powers, or can it function solely as a coordinator between several independent authorities? Is the competent authority mentioned in article 5.2 a SPOC for the entire permit granting procedure as mentioned in art 3.2 of the proposal for speeding up environmental assessments?	Under Article 5, the only role expressly provided for is that of coordination. If Member States consider that a competent authority with decision-making powers is the most appropriate arrangement, this is possible; however, it is not required by the proposal for a Regulation. The competent authority may therefore also function solely as a coordinator between the relevant independent authorities. The single point of contact (SPOC) under the proposal on accelerating environmental assessments may be designated as the competent authority referred to in Article 5(2) IAA, if decided by the Member State. However, the coordinated permitting process under Article 5(2) IAA covers all permits, extending beyond the environmental permits addressed in the proposal on accelerating environmental assessments.
Art 5.3. What would happen if the competent authority does not give a feedback within 45 days? Would this automatically imply that the documents are complete or can the competent authority ask for additional documents after the 45-day limit?	Member States shall determine, within 45 days, whether additional information is required. Where such information is necessary, they shall issue a second request for completion of the application within 30 days.
Art 5(2): to which "*applicable time limit"* the COM is referring to in the permit-granting process for industrial manufacturing projects?	The applicable time limits are those, if any, that have been established by Member States in their national systems.
we are wondering whether there is a drafting mistake in Art. 5 para 4 and the provision should read "*The provisions of Art. 4 and the provisions of this Article shall not apply…*"?	No. The text does not limit the use of the single access point. Such digitalisation requirements should be applied to all industrial manufacturing projects and are intended to complement existing digitalisation provisions in sector-specific permit-granting frameworks.

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We would welcome the Commission's assessment of the potential risks associated with merging all permit applications into a single procedure, rather than allowing the operators to submit different applications at the times they consider appropriate based on the project's planning stage.	The primary objective of the measure is to streamline the permit-granting procedure through the use of a single application. This approach helps identify duplications in information requests and simplifies the overall process.
does this proposal not pose a problem with regard to the administrative structures of the Member States, particularly considering that urban planning/planning permissions – which fall outside the competence of the European Union – are processed by local authorities? From the perspective of subsidiarity, how does the Commission justify the introduction of provisions affecting national administrative procedures, given that industrial policy is primarily a coordinating competence? Has a legal assessment been carried out in this regard Can the European Commission justify the compliance of its proposal with the principle of subsidiarity?	The proposal does not require changes that would affect the administrative structures of Member States. It therefore does not interfere with national or local arrangements, including the processing of urban planning and planning permissions. The aim of the provisions is to streamline existing procedures through digitalisation and simplification, with a view to reduce administrative burden.
Under Chapter II of the IAA, two separate approaches to industrial manufacturing projects appear to be proposed; those who will engage with a single access point under Article 4 of the IAA, and energy-intensive industry decarbonisation projects (specified in Article 6) will engage with the single point of contact process as set up under NZIA. Clarification is required on these points as to whether different processes will apply to different industry types and how this will operate at concurrently national level. Can this be simplified? The proposed enabling conditions for industrial manufacturing projects under IAA (art 4, 5 and 6) differ from the adopted enabling conditions for net zero industries manufacturing projects under chapter II of NZIA. What is the justification for this different treatment?	The different approaches reflect distinct starting points regarding these projects. For industrial manufacturing projects, the IAA introduces horizontal, *de minimis* provisions aimed at streamlining relevant procedures. By contrast, for energy-intensive decarbonisation projects, the proposal seeks to address the unlevel playing field created by the current provisions under the NZIA (see above). These differences give rise to distinct, yet complementary, approaches.
RELATION TO NZIA	

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What is the reason for the slight differences **between Art. 6 para 2 IAA and Art. 9 para 14 NZIA (new)**? (Reference to Art. 14 vs. Art. 14 para 1; reference to Annexes vs. no reference to Annexes).	Clerical error: there is no difference in how the Commission intends to address strategic project considerations under the RSEA.
What rules (Art. 6 para 2 IIA or Art. 9 para 14 NZIA (new)) apply to projects which fall under both definitions (Art. 3 para 3 IIA and Art. 3 para 17 NZIA)?	As the IAA seeks to align both frameworks, the rules should be consistent and therefore apply equally under both definitions.
Can the Commission provide evidence that the creation of single points of contact under existing legislation (e.g. NZIA) has actually resulted in simplification and streamlining of permit-granting procedures? Has the European Commission conducted a review of experience to assess the effectiveness of the provisions introducing deadlines (NZIA, CRM Act, REDIII…)?	The proposal does not introduce new single points of contact or additional time limits. We refer to ongoing discussions as part of the Critical Raw Materials Board and Net Zero Industry Platform regarding the effectiveness of such measures in these specific legislations.
PERMITTING OMNIBUS	
How will the IAA be connected to the environmental omnibus?	Article 14, together with Annex I, of the proposed Regulation on speeding up environmental assessments establishes a "toolbox for strategic sectors or categories". This toolbox is intended to apply to strategic sectors defined in future Union legislation, such as the IAA, provided that the relevant projects contribute to resilience, decarbonisation, or resource efficiency. The IAA accordingly refers to Article 14 and Annex I in order to make use of this toolbox for energy-intensive decarbonisation projects and net-zero manufacturing projects.
LINK WITH OTHER PROPOSALS	
The IAA PGP also covers the environmental assessments whereas the IAA proposal does not cover the environmental assessment procedures. Which EU legislation is applicable to projects within scope of the IAA regarding the environmental assessment procedures? Can the Commission provide an overview, e.g. in a technical note, of all the recently adopted legislation with permits in their scope - particularly how their scopes interlink	A technical note to be soon delivered will address this.

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and/or overlap? This should include at least an overview of: CRMA, NZIA, CMA, REDs, Defence-Omnibus, Grids Package, IAA.	
ENERGY INTENSIVE DECARBONISATION PROJECTS (Article 6)	
Does that mean that member states have to set up central contact points for energy intensive industry decarbonization projects.	By virtue of Article 6(1) of the IAA, the single points of contact established under the Net-Zero Industry Act would serve as the relevant interface for all energy-intensive industry (EII) decarbonisation projects, not only those linked to the net-zero supply chain.
Regulation (EU) 2024/1735 Chapter II Art. 9 lays down different time-periods for permitting procedures for different NZIA-technologies. Which time periods will apply for energy intensive decarbonization projects?	The timelines for EII decarbonisation projects are set out in Article 9(2) of the NZIA, while for net-zero strategic projects, the timelines provided in Article 16(2) may apply.
Art 6(1): Please clarify that the COM is referring to Section II and not Section III.	The changes introduced by the IAA enable EII decarbonisation projects to benefit from Section II of the permitting provisions, to address the unlevel playing field between such projects (see reply above). However, certain projects may continue to fall under Section III, as initially foreseen under the Net-Zero Industry Act, which remains unchanged.
Is the COM considering the following hierarchy, but all of them are considered strategic regarding the environmental speeding-up process 1. Net-zero strategic projects. 2. Net zero technology manufacturing projects = energy-intensive industry decarbonization projects.	Both types of projects (net-zero strategic projects and energy-intensive industry decarbonisation projects) are considered strategic for the purposes of the proposed Regulation on speeding-up environmental assessments.
Do we understand correctly that there are **only approval time limits** concerning **energy-intensive industry decarbonization projects** (Art 6 - which refers to the NZIA provisions)? What specific time reductions for permitting procedures for all other industrial manufacturing projects does the EC expect?	Yes, the only time limits introduced under the IAA are those set out in Article 6. The proposal does not introduce specific time limits for permit-granting procedures for all industrial manufacturing projects; instead, provisions relating to such projects focus on streamlining and simplifying administrative processes.
To which permitting procedures should tacit approvals apply? And should it apply only to permits in strategic sectors? Is it correct that environment assessments are excluded from tacit approvals? When reading the provisions, for us this exemption is not clear? How does the exclusion for environment assessments arise in the text? And are MS that do not have a system of tacit approvals exempted (like laid down in Annex Point II)?	Tacit approval may apply at intermediate stages, meaning that final decisions must be explicit. It does not apply to environmental assessments or in Member States where the principle is not recognised. All such details are set out in Annex I of the proposal for a Regulation on speeding-up environmental assessments.

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