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ERRIN's amendment proposals for Industrial Accelerator Act regulation

The European Regions Research and Innovation Network ([ERRIN](#)) is a Brussels-based network bringing together 130 regional organisations from 28 European countries. ERRIN works to strengthen the regional and local dimension of EU research and innovation policy and supports the development of place-based innovation ecosystems across Europe.

These amendment proposals have been co-developed with ERRIN members and build on the network's contribution to the European Commission's public consultation on the Industrial Accelerator Act ([here](#)). They reflect the expertise and practical experience of regional and local innovation ecosystems in supporting industrial transformation, innovation deployment and regional competitiveness.

ERRIN welcomes the European Commission's proposal for an Industrial Accelerator Act as an important step towards strengthening Europe's industrial competitiveness, resilience and decarbonisation. In particular, ERRIN supports the ambition to strengthen strategic manufacturing capacity and establish **Industrial Manufacturing Acceleration Areas** as vehicles for industrial deployment.

The proposed amendments aim to strengthen the **territorial dimension** of the Regulation by ensuring that Industrial Manufacturing Acceleration Areas build on existing regional industrial capabilities, innovation ecosystems and place-based strategies. They also seek to reinforce synergies with existing ecosystem initiatives, strengthen **multi-level governance** and improve coordination with EU research, innovation and investment instruments to maximise the impact of industrial acceleration measures. Finally, the amendments tackle the Union Origin criteria with an aim of ensuring that Europe retains the manufacturing capacity of its next generation of industry.

The amendments complement the objectives of the Commission proposal and are intended to support an effective implementation of the Regulation by **reinforcing regional innovation ecosystems as key enablers of Europe's industrial competitiveness, resilience and decarbonisation**.

Amendment proposals

IAA regulation recital number/articles	Commission's proposal	Proposal for amendments	Justification
Recital (4)	The challenges posed by the need for industrial decarbonisation and for a resilient industrial production are complex and transcend national borders. Fragmented national measures aimed at tackling those challenges risk undermining the functioning of the internal market. Measures adopted by individual Member States could lead to divergent requirements imposed on market operators, inconsistent procurement practices and divergent permit-granting procedures across Member States. Such measures could create obstacles to cross-border trade within the Union and distortions on the internal market, undermining investor confidence, increasing costs, and redirecting investment flows within the Union. It is therefore necessary to establish harmonised measures to ensure the proper functioning of the internal market.	The challenges posed by the need for industrial decarbonisation and for a resilient industrial production are complex and transcend national borders. Fragmented national measures aimed at tackling those challenges risk undermining the functioning of the internal market. Measures adopted by individual Member States could lead to divergent requirements imposed on market operators, inconsistent procurement practices and divergent permit-granting procedures across Member States. Such measures could create obstacles to cross-border trade within the Union and distortions on the internal market, undermining investor confidence, increasing costs, and redirecting investment flows within the Union. It is therefore necessary to establish harmonised measures to ensure the proper functioning of the internal market. The effective implementation of this Regulation should also rely on appropriate multi-level governance arrangements involving national, regional and local authorities. Regional authorities should be appropriately	Industrial regions and regional authorities play a key role in strengthening European industrial resilience by mobilising ecosystems, facilitating cooperation across value chains and supporting investment. Their involvement in industrial governance can help ensure that strategic priorities are aligned with territorial capacities and existing industrial strengths. The IAA should build on the experience and networks developed through European sectoral initiatives involving regional authorities, such as the Automotive Regions Alliance (ARA), the European Clean Hydrogen Alliance (ECH2A), the European Semiconductor Regions Alliance (ESRA) and the European Chemical Regions Alliance (ECA).

		involved in the identification of strategic industrial priorities and interregional value chains, as well as in the designation of industrial manufacturing acceleration areas, taking into account their role in fostering industrial ecosystems and facilitating investment.	
Recital (16 new)		(x) Small and medium-sized enterprises (SMEs) are key contributors to the Union's industrial ecosystems, innovation capacity and competitiveness, in particular in regions with strong industrial value chains. Their effective participation in the industrial transformation should be ensured with measures under this Regulations, together with other relevant Union policies, considering their specific needs and capacities. Administrative procedures and regulatory requirements should be designed in a proportionate manner to enable SMEs to innovate, scale up and contribute to strengthening the Union's industrial resilience and strategic autonomy.	SMEs are key contributors to European industrial ecosystems and value chains, but their capacity to participate in industrial transformation initiatives remains more limited compared with larger industrial actors. While European and national funding instruments have successfully mobilised significant industrial investments, further attention is needed to facilitate SME access to opportunities created under the IAA. Regional authorities, due to their proximity to industrial ecosystems, are well placed to support SME integration and strengthen their contribution to Europe's industrial resilience, innovation

			capacity and strategic autonomy.
Recital (45)	To promote sustainable integration of investments by foreign entities to the internal market and the development of skills in emerging strategic sectors, and to ensure meaningful social contribution at the place of the investment, such investments should employ a proportion of Union workers and should provide appropriate training and capacity-building measures, involving education and training providers, as well as social partners. The foreign investor should ensure that the thresholds established in this Regulation are fulfilled across all categories of workforce, including the operational, technical, supervisory, and managerial positions.	To promote sustainable integration of investments by foreign entities to the internal market and the development of skills in emerging strategic sectors, and to ensure meaningful social contribution at the place of the investment, such investments should employ a proportion of Union workers and should provide appropriate training and capacity-building measures, involving education and training providers, as well as social partners. Regions and their investment agencies represent a relevant level to facilitate the integration of such investments into regional industrial ecosystems. The foreign investor should ensure that the thresholds established in this Regulation are fulfilled across all categories of workforce, including the operational, technical, supervisory, and managerial positions.	Regional development and investment agencies should be formally recognised as implementing partners within the IAA framework, in coordination with national authorities, to facilitate the integration of foreign investment projects into regional industrial ecosystems by connecting investors with local companies, talent pools, research centres, and innovation actors. This role should be acknowledged and reinforced to go beyond purely administrative facilitation and contribute actively to strengthening European value chains, technological capacity, and industrial ecosystems.
Recital (53)	Clustering industrial activity can contribute substantially to achieving the objectives of this Regulation and to strengthening certain strategic sectors in the internal market. It is therefore appropriate to promote the development of industrial manufacturing acceleration areas.	Clustering industrial activity can contribute substantially to achieving the objectives of this Regulation and to strengthening certain strategic sectors in the internal market. It is therefore appropriate to promote the development of industrial manufacturing acceleration areas. Such areas should be limited in	The designation of Industrial Manufacturing Acceleration Areas should be carried out in close cooperation with regional authorities, given their responsibilities for regional industrial development. This will help ensure that Acceleration

	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. 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.	geographical scope in order to foster industrial symbiosis. When designating the areas, Member States should, in close 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. Industrial Manufacturing Acceleration Areas should be implemented through appropriate multi-level governance arrangements involving national, regional and local authorities together with industry, research organisations, higher education institutions, vocational education and training providers and other relevant innovation ecosystem actors. Such governance arrangements should support coordinated planning, stakeholder engagement and effective implementation of industrial acceleration measures. 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	Areas build on existing regional capabilities and ecosystem initiatives, maximise stakeholder ownership and strengthen implementation. Furthermore, aligning Industrial Manufacturing Acceleration Areas with existing initiatives such as Regional Innovation Valleys, Hydrogen Valleys and other place-based ecosystem initiatives supported under Union programmes will build on existing investments and governance structures, strengthen synergies across initiatives and avoid fragmentation of Europe's industrial and innovation ecosystems. Industrial Manufacturing Acceleration Areas will be most effective when implemented through multi-level governance involving all relevant public and private stakeholders. Bringing together national, regional and local authorities with industry, research organisations, higher education institutions,
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		Union initiatives such as Net-Zero Acceleration Valleys, Regional Innovation Valleys, Hydrogen Valleys and other place-based ecosystem initiatives supported under Union programmes.	vocational education and training providers and other innovation actors will improve coordination, facilitate stakeholder engagement and ensure that Acceleration Areas build on existing regional ecosystems and deliver sustainable industrial transformation.
Recital (54)	The industrial acceleration measures within the acceleration areas should seek appropriate synergies with other Union initiatives, including strategic projects recognised in Union legislation, Net-Zero Acceleration Valleys and Union funding opportunities, in order to align the strategic priorities in the internal market and benefit industrial installations vital for the strategic autonomy and competitiveness of the Union.	The industrial acceleration measures within the acceleration areas should seek appropriate synergies with other Union initiatives, including strategic projects recognised in Union legislation, Net-Zero Acceleration Valleys and Union funding opportunities, including the European Competitiveness Fund under Regulation (EU) XXXX/[XX], Horizon Europe (FP10) under Regulation (EU) XXXX/[XX], in order to align the strategic priorities in the internal market and benefit industrial installations vital for the strategic autonomy and competitiveness of the Union. To strengthen European industrial value chains and avoid fragmentation, the European Commission should facilitate cooperation between Industrial Manufacturing Acceleration Areas across Member States. Such	Accelerating industrial deployment requires not only regulatory simplification but also coordinated investment. Explicitly referring to Horizon Europe (FP10) and the European Competitiveness Fund will help ensure better alignment between research, innovation, demonstration and industrial scale-up. The European added value of Industrial Manufacturing Acceleration Areas lies in their ability to operate as interconnected nodes within European value chains. Facilitating cooperation between Acceleration Areas will support joint innovation, coordinated investment and stronger

		cooperation should support joint innovation projects, shared research and technology infrastructures, coordinated investment pipelines and industrial value-chain partnerships, building on existing regional innovation ecosystems and relevant Union initiatives.	industrial value chains across Member States.
Recital (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.	Where industrial manufacturing acceleration areas are set up, their designation should correspond to the potential to access or organise education and training opportunities developed in cooperation with regional authorities, higher education institutions, vocational education and training providers, research organisations and industry to ensure the availability of skilled labour.	Skills development requires coordinated action across education, research and industry. The amendment reflects the role of regions in bringing together relevant actors to develop the skilled workforce needed for industrial transformation.
Article 25 (2) (b) Designating national industrial manufacturing acceleration areas	(b) the potential of the industrial manufacturing acceleration area to support the deployment of production capacity in the strategic sectors listed in Annex I, to strengthen Union value chains and the Union's innovation potential to accelerate sustainable manufacturing industrial activities, including decarbonisation and circular business practices, and to foster the functioning of the internal market, in alignment with strategic projects and other initiatives, including as Net Zero	(b) the potential of the industrial manufacturing acceleration area to support the deployment of production capacity in the strategic sectors listed in Annex I, to strengthen Union value chains and the Union's innovation potential to accelerate sustainable manufacturing industrial activities, including decarbonisation and circular business practices, and to foster the functioning of the internal market, in alignment with strategic projects and other initiatives, including as Net Zero Acceleration Valleys, Hydrogen Valleys and Regional	Existing ecosystem initiatives such as Regional Innovation Valleys and Hydrogen Valleys already support strategic industrial value chains. Recognising them alongside Net-Zero Acceleration Valleys will strengthen complementarities between initiatives and facilitate cross-sectoral and cross-regional cooperation.

	Acceleration Valleys, carried out pursuant to other Union legislation	Innovation Valleys , carried out pursuant to other Union legislation	
Article 25 (2) (d) Designating national industrial manufacturing acceleration areas	(d) the Member State's regions' level of development, including least developed areas, regions in transition, and those undergoing industrial transformation.	(d) the Member State's regions' level of development, including least developed areas, regions in transition, and those undergoing industrial transformation, taking into account existing regional industrial capabilities, innovation assets and ecosystem maturity	Regional development alone is not sufficient to identify suitable Acceleration Areas. Existing industrial capabilities, innovation assets and ecosystem maturity should also be considered to ensure that areas build on proven regional strengths and can deliver industrial acceleration effectively.
Article 25 (3) (new e) Designating national industrial manufacturing acceleration areas		(x) ensure the effective involvement of regional authorities and relevant regional innovation ecosystem actors in throughout the designation process.	Regional authorities play a central role in coordinating industrial ecosystems and mobilising regional stakeholders. Their systematic involvement in the designation process will improve ownership, coherence and implementation of Industrial Manufacturing Acceleration Areas.
Article 26 Enabling conditions		(x) facilitate cooperation with existing regional innovation ecosystems, industrial clusters and innovation infrastructures supporting the scale-up of manufacturing projects.	Industrial Manufacturing Acceleration Areas should not operate in isolation. Facilitating cooperation with existing regional innovation ecosystems, industrial clusters and innovation infrastructures will support technology uptake, SME

			participation and the scale-up of manufacturing projects.
Article 34(5)(c), amending Article 26 of Regulation (EU) 2024/1735 (Net-Zero Industry Act)	(c) The following paragraph 2a is inserted: ‘2a. Where the auctions have net-zero technologies listed in Annex II as part of their subject-matter, Member States shall include the pre-qualification or award criteria laid down in Annex II.’ Criteria relating to specific main specific components shall only apply to the extent that those components are included in the final product.	(c) The following paragraph 2a is inserted: ‘2a. Where the auctions have net-zero technologies listed in Annex II as part of their subject-matter, Member States shall include the pre-qualification or award criteria laid down in Annex II.’ Criteria relating to specific main specific components shall only apply to the extent that those components are included in the final product.	If used for pre-qualification, compliance with the Union Origin criteria is mandatory. However, if used as an award criterion, its weighting may be reduced to as little as 5%, at the discretion of the Member State, with price still accounting for 70% of the total score. As a result, when used as an award criterion, its impact may become negligible compared to other criteria and therefore ineffective. Since the regulation leaves open whether it should be applied as a pre-qualification or an award criterion—and the impact differs significantly between these two options—it results in a framework that lacks clear and predictable rules, and generates legal uncertainty for the industry
Article 34(5)(g), amending Article 26 of Regulation (EU) 2024/1735 (Net-Zero Industry Act), replacing paragraph 7	(g) paragraph 7 is replaced by the following: ‘7. Paragraphs 1 to 5 shall apply to at least 40% of the volume auctioned per year per Member State or alternatively to at least 8 Gigawatt per year per Member State. Paragraph 1, points (a)(ii) and (iv), shall apply to	(g) paragraph 7 is replaced by the following: ‘7. Paragraphs 1 to 5 shall apply to at least 40% of the volume auctioned per year per technology per Member State or alternatively to at least 8 Gigawatt per year per technology per Member State. Paragraph 1, points (a)(ii) and (iv), shall	The 40% or the minimum 8GW threshold should apply individually to each technology. In the current proposal the application remains limited to a fraction of auctioned volumes (40%) or a minimum of 8 GW. As

	100% of the volume auctioned per Member State.’	apply to 100% of the volume auctioned per Member State.’	these thresholds are calculated on the basis of total auctioned volumes, there is a risk that Member States may concentrate local content requirements in a single technology, leading to their de facto exclusion from others. Moreover, this reduces regulatory predictability and creates legal uncertainty for the industry.
Article 34 (6) , inserting Article 28f into Regulation (EU) 2024/1735 (Net-Zero Industry Act)	3. “With respect to the Union origin requirements referred to in Article 26, content originating in third countries with which the Union has concluded an agreement establishing a free trade area or a customs union shall be deemed to be of Union origin.”	3. “With respect to the Union origin requirements referred to in Article 26, ~~content originating in third countries with which the Union has concluded an agreement establishing a free trade area or a customs union~~ manufacturing in the EU Member States or in the European Economic Area shall be deemed to be of Union origin.”	In the current framing, Union Origin content is applied to more than just products manufactured in the EU, to include also those produced in countries with free trade agreements or customs unions with the EU (Vietnam, India, Turkey, among others). These countries already have today an existing manufacturing base with much lower costs than in Europe. Furthermore, some of them, as Turkey or India, already have their own local content requirements for cleantech products. Therefore, current wording does not futureproof the cleantech

			supply chain in Europe, and removes any clear demand-side guarantees for European manufactured components.
Article 34 (8), introducing “Annex II– Union origin requirements for net-zero technologies” - Part II Auctions	(d) Onshore and offshore wind technologies: “For auctions published from [OP: Please insert the date = 1 year after entry into force of this Regulation] until [OP: Please insert the date = 3 years after entry into force of this Regulation], one main specific component of the wind turbine shall originate in the Union. For auctions published after [OP: Please insert the date = 3 years after entry into force of this Regulation], two main specific components of the wind turbine shall originate in the Union.”	(d) Onshore and offshore wind technologies: “For auctions published from [OP: Please insert the date = 1 year after entry into force of this Regulation] until [OP: Please insert the date = 3 years after entry into force of this Regulation], one main specific component of the wind turbine (including blades, nacelles, rotors, towers, generators and converters) shall originate in the Union. For auctions published after [OP: Please insert the date = 3 years after entry into force of this Regulation], two main specific components of the wind turbine shall originate in the Union.”	Current wording is too vague and does not establish any Union Origin manufacturing requirement for core technological components such as blades, nacelles, rotors, towers, generators or converters