CONSTRUCTION PRODUCTS EUROPE

Position Paper
Industrial Accelerator Act (IAA)

06 November 2026

Our key messages

1. **Create demand, not administrative complexity**. Use public procurement and public support to create predictable demand for low-carbon European production, without adding compliance burdens.

2. **Use the Construction Products Regulation (CPR) as the only product framework**. Use the CPR alone to define, declare and verify product characteristics. Reject parallel methodologies, labels and verification systems.

3. **Preserve affordability**. Safeguard housing and infrastructure from higher costs, supply shortages and delays through proportionate rules and realistic phase-in periods.

4. **Recognise integrated European supply chains**. Reward European value creation through workable origin rules that reflect integrated supply chains and respect reciprocal procurement commitments.

5. **Maintain technology and material neutrality**. Reward verified performance, not preferred materials or technologies. Preserve fair competition, innovation and designers' choice.

Our key messages

The European construction products industry supports the objective of the proposed Industrial Accelerator Act (IAA), COM (2026) 100, to strengthen European manufacturing under the Clean Industrial Deal. We call on the European Parliament and the Council to make the IAA a driver of investment in low-carbon European production, not an additional layer of product regulation. Public procurement and public support must create predictable demand while safeguarding the EU Single Market, security of supply and affordability.

Construction products are essential to delivering this ambition. Our industry enables the energy transition through buildings, infrastructure and renovation. Public purchasing decisions influence investment throughout these value chains.

The IAA must reflect how construction markets operate. Requirements that restrict product availability, duplicate compliance obligations or increase construction costs would undermine both industrial investment and the delivery of urgently needed homes and infrastructure. Decarbonisation and competitiveness must advance together.

We therefore urge co-legislators to embed the following five priorities in the IAA and its implementation.

Create demand, not administrative complexity

The IAA should create a dependable European lead market for high-performing, low-carbon construction products. Manufacturers need a credible, long-term demand signal to invest in decarbonisation, innovation and European production capacity. Public procurement and public support should provide that signal. Procurement criteria beyond price should reward verified performance and reductions in the whole-life environmental impact of buildings.

Co-legislators should make these measures workable for manufacturers, including SMEs, and contracting authorities. Requirements must be clear, proportionate and enforceable, drawing on existing product information and compliance arrangements rather than creating additional reporting and verification systems. Practical guidance and harmonised, risk-based enforcement should support consistent implementation across the EU Single Market.

CONSTRUCTION PRODUCTS EUROPE AISBL
Avenue Louise 54 Box P03 - 1050 Brussels, Belgium
Enterprise number: 0465.221.205 – EU Transparency Register: 48010783162-91
RPM Bruxelles - BNP Paribas Fortis BE04 0017 1257 6931
+32(0)472 47 72 23 - info@construction-products.eu - www.construction-products.eu

Use the CPR as the only product framework

For construction products, the CPR must remain the sole framework for defining, declaring and verifying product characteristics. Every EU policy requirement applying to an individual construction product must use CPR-defined characteristics. A separate IAA methodology, label or verification system would add costs, create legal uncertainty and risk fragmenting the Single Market. Environmental performance should be assessed at building level wherever practicable, so that procurers and designers can evaluate how products work together throughout a building's life cycle.

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Minimum carbon-performance and recycled-content thresholds must remain the responsibility of EU or national policymakers. Standards should determine how performance is declared and assessed, not set political ambition. We therefore call on the European Commission to issue standardisation requests under the CPR to establish horizontal definitions and assessment principles across all product groups, followed by product-group-specific definitions and assessment methods in harmonised technical specifications.

Manufacturers must be able to use the same data for communicating verified product-performance information, ensuring both CPR and IAA compliance. When implemented, the EU Digital Product Passport (EU DPP) should be the single pathway to convey such information, including carbon intensity and, where required, origin. Verification should rely on the CPR's Assessment and Verification of Constancy of Performance framework and established third-party arrangements. One framework, one digital pathway and existing verification systems will avoid duplicated reporting and support SME participation.

Preserve affordability

Europe's industrial transition must not come at the expense of affordable homes and infrastructure. Rigid origin rules, quotas or product criteria could constrain supply, increase construction costs and delay public works. The IAA must stimulate low-carbon investment without undermining product availability or security of supply.

We urge co-legislators to include explicit affordability and supply safeguards in the IAA and the Public Procurement Act. Requirements should be proportionate and phased in on realistic timelines. Their effects on SMEs, material availability, construction costs and affordable housing should be monitored regularly, with corrective action where requirements adversely affect supply or prices.

Recognise integrated European supply chains

"Made in EU" and local-content provisions should reward genuine European value creation and strengthen industrial capacity. Well-designed rules can support products manufactured under robust environmental, safety and social standards and avoid reinforcing dependence on high-emission imports. They must reflect the reality of integrated construction-product supply chains.

Origin criteria should capture value created across extraction, processing, manufacturing, testing and recycling, not only the final processing step. Co-legislators should require clear, verifiable and enforceable criteria that avoid disproportionate burdens on manufacturers and contracting authorities.

The final framework should provide legal certainty for products from the European Economic Area (EEA) and countries covered by reciprocal public-procurement commitments with the EU. For other closely integrated partners, transparent criteria and proportionate transitional arrangements should prevent abrupt disruption while preserving incentives to strengthen European manufacturing capacity.

Maintain technology and material neutrality

The IAA must maintain a level playing field across materials and technologies. Products serving the same function can use different materials and manufacturing processes, giving designers solutions suited to different building types and project needs. Procurement and public-support criteria should reward verified performance, not favour specific product families or technologies. This is essential to preserve competition, innovation and designers' choice.

We call for the IAA's scope to be organised around coherent product families and to remain neutral across technologies and materials as far as possible. Before including a construction-product family, the European Commission should consult manufacturers and every sector concerned on coverage, applicable criteria, data availability and verification arrangements. Inclusion must be based on requirements that are technically meaningful, proportionate and enforceable.

Our recommendations to the co-legislators

We call on the European Parliament and the Council to secure the following in the IAA:

- **Create demand, not administrative complexity.** Create predictable demand through public procurement and public support. Require proportionate, Single Market-compatible criteria, practical Commission guidance and harmonised, risk-based enforcement, without adding reporting or verification burdens.
- **Use the CPR as the only product framework.** Require CPR-defined characteristics for all measures applying to individual construction products and prioritise building-level environmental assessment wherever practicable. Mandate CPR standardisation on low-carbon performance and recycled content, using horizontal principles and product-specific definitions and assessment methods. Reserve thresholds for EU or national policymakers. Use the existing CPR and third-party verification arrangements, conveyed through the EU DPP when implemented.
- **Preserve affordability.** Include explicit safeguards for material availability, construction costs and affordable housing. Provide realistic phase-in periods, monitor effects on SMEs and construction delivery, and require corrective action where supply or prices are adversely affected.
- **Recognise integrated European supply chains.** Adopt clear, verifiable and proportionate "Made in EU" and local-content criteria that reward value creation throughout the supply chain. Recognise EEA products and reciprocal procurement commitments. Provide transparent transitional arrangements for closely integrated partners while safeguarding supply and affordability.
- **Maintain technology and material neutrality.** Reward verified performance, and reserve fair competition, innovation and designers' choice. Define scope by coherent product families and require consultation with every sector concerned on coverage, criteria, data availability and verification before inclusion.

A clear route to implementation. The IAA should set political objectives and thresholds; the CPR should provide the framework for defining, declaring and verifying the construction-product characteristics used to meet them. We urge co-legislators to preserve this division of roles and deliver an Act that advances European industrial investment and decarbonisation while protecting competition, integrated supply chains and affordable construction.

Founded in 1988, Construction Products Europe is a Brussels-based international non-profit making association. The association is made up of national and European associations that represent Small and Medium-size Enterprises and world-leading companies. Construction Products Europe aims to promote the European construction industry, to share information on EU legislation and standardisation and to provide input in all European construction-related initiatives.

CONSTRUCTION PRODUCTS EUROPE - AISBL
Boulevard du Souverain 68/1 – 1170 Brussels, Belgium – Enterprise number: 0465.221.205
EU Transparency Register: 48010783162-91 RPM Bruxelles - BNP Paribas Fortis BE04 0017 1257 6931
www.construction-products.eu – info@construction-products.eu