EUnited
European Engineering Industries Association

POSITION PAPER
6 October 2026

European Commission proposal for an Industrial Accelerator Act

EUnited represents manufacturers of municipal equipment, cleaning machinery and vehicle wash systems, including specialised vehicles such as road sweepers, refuse collection vehicles, and winter maintenance equipment. Our sectors produce specialised equipment essential for waste management, urban sanitation, street cleaning and other public services delivered by local authorities throughout Europe.

A significant share of municipal vehicles placed on the European market are type-approved as N-category vehicles and are frequently purchased through public procurement procedures. As a result, manufacturers represented by EUnited are likely to be affected by the origin, low-carbon content and compliance requirements introduced under the Industrial Accelerator Act, despite not currently being recognised among the strategic sectors listed in Annex I. This creates a particular need to ensure that the Act provides legal certainty, proportionate obligations and equal access to relevant industrial support measures.

The Industrial Accelerator Act is intended to strengthen the EU's manufacturing base by accelerating permitting and channelling public demand toward EU-made, low-carbon products — an objective EUnited supports in principle. For our sectors, however, the final text should focus on delivering this objective in a targeted and proportionate way, while preserving legal certainty for economic operators, realistic compliance timelines grounded in actual EU supply capacity, and a level playing field between sectors formally labelled "strategic" and those, like ours, that could reasonably be considered strategic as well, given their role in sustaining essential public services across Europe.

On this basis, EUnited puts forward the following recommendations to the co-legislators:

- **Refinement of scope.** Thoroughly clarify and deepen product and sector definitions prior to advancing to the Delegated Acts phase.
- **Clear and workable compliance methodologies.** Clarify, via Article 16(3), how origin requirements apply to specialised vehicles assembled across multiple manufacturers (chassis, body, battery), with standardised supplier declarations to avoid duplicate compliance assessment.
- **Flexibility in content requirements**. Establish a single, horizontal derogation scheme across all Member States granting temporary exemptions from mandatory "Made in EU" content shares where raw material or battery-component scarcity, or verified price surges, make compliance unachievable.
- **Aligning obligations with access to acceleration measures.** Broaden the scope of strategic sectors eligible for benefits under the Accelerator Act or update the classification terminology to prevent key industries from being excluded.

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Refinement of the scope

The scope of the Union-origin and low-carbon requirements under Annex II and III of the IAA remains largely undefined for EUnited's sectors. The wording "any product the performance of which depends mainly on" steel or aluminium could, depending on interpretation, capture anything from a truck chassis to a cleaning machine's metal housing, while the absence of a published list of CN/NACE codes leaves manufacturers unable to confirm today whether their products fall within scope at all.

For complex technology products, performance typically depends on multiple materials and components simultaneously, with no objective basis for identifying which one "mainly" drives it — applied as currently drafted, this provision risks inconsistent interpretation across Member States and arbitrary outcomes in public tenders.

EUnited therefore calls for modifying the text to include a clearer, more precise reference to the product and sector definitions governing this scope. In particular, it is not clear whether every superstructure or piece of mounted equipment — such as sweeping units, refuse-collection bodies or snow-clearing attachments — would be assessed separately against the Union-origin and low-carbon content requirements, or as part of the complete motor vehicle to which they are fitted; this distinction can materially change which components fall within scope and how compliance is calculated. Should such clarification not be secured at that stage, an exhaustive list of the relevant CN/NACE codes must, as a fallback, be mandatorily included in the subsequent Delegated Acts, adopted without delay and in close consultation with affected industries, so that manufacturers of municipal equipment have the legal certainty and lead time needed to adapt their supply chains before these requirements take effect.

Clear and workable compliance methodologies

If specialised municipal vehicles remain within the scope of the Union-origin and low-carbon requirements, the Regulation must ensure that these requirements can be applied in a clear, consistent and workable manner.

These vehicles often combine an N-category chassis with a body, superstructure and specialised equipment manufactured or integrated by different economic operators. The Regulation and its implementing acts should clarify how the requirements apply where the chassis, body, superstructure and specialised equipment are produced or integrated by different manufacturers. In particular, they should identify which manufacturer is responsible for demonstrating compliance for the completed vehicle, and how customer-supplied chassis, demountable systems and separately supplied attachments are to be treated.

Where battery-related requirements apply, the implementing rules should clarify how the origin of battery packs assembled in the EU using non-EU cells is determined, and how this is taken into account when assessing the completed vehicle. Final vehicle manufacturers should be able to rely on standardised evidence provided by the battery supplier, avoiding duplicate assessment and documentation.

EUnited therefore calls on the co-legislators to amend Article 16(3) to require the Commission to establish harmonised rules for specialised and multi-stage vehicles, including standardised supplier declarations that final vehicle manufacturers can rely upon, avoiding duplicate assessment of the same components. These implementing acts should be adopted sufficiently in advance of the application of the relevant requirements and should take due account of the sector's specific multi-stage production structure.

Flexibility in content requirements

Mandatory "Made in EU" content shares for steel, aluminium, vehicle components and battery materials are currently set as fixed thresholds, with no built-in mechanism to respond to raw material scarcity. As other industry associations have already flagged, low-carbon steel and aluminium are available today only in limited volumes, overall supply falls short of demand, and a meaningful increase is not expected in the short term — a scarcity that also drives price volatility, which is likely to intensify as the market adapts to CBAM and new trade measures on steel overcapacity.

The same constraint applies, arguably with even greater intensity, to battery components and critical raw materials such as lithium: EU-based extraction, processing and cell-manufacturing capacity remains limited relative to projected demand, and the requirement for specific battery components and a minimum share of EU-sourced lithium leaves little room for manoeuvre where compliant supply is simply not yet available at scale. In this context, there is a need for a sufficiently clear mechanism to address situations in which compliant materials or components are not available in the required quantity, quality or timeframe. For specialised and low-volume manufacturers, such as those in EUnited's sectors, the number of alternative suppliers may be particularly limited, making rapid supply-chain adjustments difficult or, in some cases, impossible. The burden is particularly acute for manufacturers that serve both the EU public procurement market and export markets outside the EU with the same product line: since non-EU buyers are not subject to the IAA's origin and content rules, EU-based producers would face a built-in cost disadvantage on their domestic output relative to the very export sales that keep their production lines viable, eroding the competitiveness these rules are meant to protect.

EUnited therefore calls for the establishment of a single, horizontal derogation scheme, applicable uniformly across all Member States, that would grant temporary exemptions from mandatory content shares for products demonstrably reliant on a raw material verified as scarce or subject to significant price surges. Such a scheme would avoid the legal uncertainty and market fragmentation that could result from divergent national approaches, with the Commission responsible for monitoring market conditions, certifying scarcity or price-surge events, and triggering or lifting the derogation in a timely and predictable manner.

Aligning obligations with access to acceleration measures

The current list of strategic sectors in Annex I — energy-intensive industries, automotive under NACE C29, and net-zero technologies under the NZIA — excludes the sectors EUnited represents, even though NACE C28 manufacturers of municipal equipment, cleaning machines and vehicle wash systems are subject to

the very same Union-origin and low-carbon content obligations under Annex II and III whenever they sell to public buyers.

This creates a structural imbalance: our members bear the compliance costs, documentation burden and supply-chain redesign the IAA demands, without access to the accelerated permitting procedures, "strategic project" status or dedicated Industrial Manufacturing Acceleration Areas reserved for Annex I sectors. If the obligations of the public procurement pillar apply to our industries, consistency requires that the benefits of the permitting pillar apply equally — a principle of reciprocity between burden and benefit that should underpin the Act as a whole.

Specialised municipal equipment is part of the European automotive and industrial value chain and is essential to the delivery of waste collection, street cleaning, sanitation, winter maintenance and other public services. Many municipal vehicles combine an N-category chassis with a specialised body or superstructure designed, integrated and manufactured by a NACE C28 producer. Limiting strategic eligibility to NACE C29 risks overlooking the European value created by the specialised manufacturer responsible for producing the final vehicle and adapting it to its public-service function.

EUnited therefore calls on the co-legislators to broaden the scope of strategic sectors eligible for acceleration benefits to explicitly include NACE C28 manufacturing activities relevant to municipal equipment, cleaning machinery and vehicle wash systems.

About us

EUnited is the European association representing manufacturers of municipal equipment, professional cleaning machines and vehicle wash systems. It brings together more than 60 member companies in 16 European countries.

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