European Lime Association's Feedback on the Commission's Public Consultation on the Industrial Accelerator Act

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EuLA, the European Lime Association, represents European non-captive lime production through its 24 covered Member States (companies & national associations). Lime is one of the essential building blocks of modern industry. It is used in many essential processes, such as making construction buildings, producing iron and steel, treating contaminated land, purifying drinking water, making sugar and even cleaning gases from powers stations. Lime and its derivatives are also important additives for making paper, glass, and agricultural products.

EuLA welcomes the publication of the Industrial Accelerator Act (IAA) and acknowledges the European Commission's efforts to address structural barriers to industrial decarbonisation and competitiveness. The proposal contains several positive elements, notably the simplification of permitting procedures, the creation of industrial manufacturing acceleration areas, and the first steps toward lead markets for low-carbon industrial products.

The IAA marks an important step towards aligning industrial competitiveness and decarbonisation objectives. However, the current framework remains more effective at creating demand than at ensuring sustainable production conditions in Europe, particularly for hard-to-abate sectors facing a high share of unavoidable process emissions and high energy prices.

Summary of Key Messages

- The current framework does not yet sufficiently address the specific needs of hard-to-abate sectors with high process emissions, such as lime, for which carbon neutrality cannot be achieved without the implementation of CCUS technologies and coordinated CO_2 infrastructure
- The proposal risks creating demand for low-carbon products without ensuring that industrial production and investment conditions remain competitive in Europe, particularly in the context of high energy prices and global competition
- Greater legal and investment certainty is needed regarding delegated acts, low-carbon methodologies, procurement obligations and the implementation of "Made in EU" requirements.
- The scope of lead-market measures should evolve over time to better reflect interconnected industrial value chains and include enabling upstream materials critical for industrial decarbonisation

European Lime Association
c/o IMA-Europe Rue des Deux Eglises, 26 1000 Brussels, Belgium
Tel. +32 (0)2 210 44 10 info@eula.eu
EU Transparency Register: 780146710855-91
www.eula.eu

EuLA
European Lime Association

1. Structural gaps limiting effectiveness for hard-to-abate sectors

a) Explicit support for CCUS technologies

For the lime sector, 69% of emissions result from the calcination process itself and therefore cannot be addressed through electrification or fuel-switching alone. Deep decarbonisation requires the deployment of carbon capture, utilisation and storage (CCUS) technologies together with coordinated CO_2 transport and storage infrastructure. While the IAA acknowledges the role of industrial decarbonisation technologies, the current proposal:

- does not explicitly recognise the specific needs of process-emission sectors
- does not establish a sufficiently clear framework for CCUS deployment
- does not sufficiently address the coordinated development of CO_2 infrastructure across borders

In this context, EuLA supports the inclusion of a dedicated recital recognising the strategic importance of industrial carbon management technologies and CO_2 infrastructure for Europe's industrial competitiveness and decarbonisation objectives. The addition of a new recital (Recital 7a):

> *"As set out in the Communication from the Commission 'Towards an ambitious Industrial Carbon Management for the EU', industrial carbon management technologies are crucial technologies to enable the decarbonisation of energy-intensive industries, including sectors with hard-to-abate process emissions. The roll-out of CCUS technologies in the Union faces significant challenges including high upfront investment needs, long lead times, insufficient infrastructure and the need for coordinated development across borders. The timely deployment of such technologies and related CO_2 infrastructure is therefore necessary to enable industrial investment decisions while preserving resilient and competitive low-carbon manufacturing capacity in Europe."*

b) Pathways needed for scope expansion

The lead-market provisions included in the IAA constitute an important first step. However, their scope currently remains limited to steel, cement/concrete and aluminium, without adequately recognising the contribution of essential upstream materials such as lime. As a critical input for sectors covered by the IAA, lime should be considered as part of the value chain of existing lead markets, reflecting its indispensable role in the production of low-carbon steel, construction materials and other strategic industrial products. There can be no climate-neutral steel production without climate-neutral lime.

Beyond the immediate recognition of upstream materials within existing value chains, the IAA should provide a clear pathway for extending low-carbon market mechanisms to additional industrial materials and enabling sectors. A harmonised low-carbon classification and labelling framework will also be essential to provide market transparency, comparability and investment certainty across industrial sectors.

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c) Concrete de-risking and funding instruments required

Finally, while the proposal correctly identifies high energy prices and investment uncertainty as key barriers to industrial competitiveness, the operational framework remains incomplete. The IAA currently lacks concrete investment de-risking instruments, sufficient alignment with Carbon Contracts for Difference (CCfDs) and State aid frameworks, and measures ensuring that demand creation is matched by viable industrial production conditions in Europe. There is a need to ensure that tools to support competitiveness are implemented consistently across the European Union, in order to avoid any distortion of competition among Member States. Recent discussions on the EU ETS and the proposed reform of the Market Stability Reserve further demonstrate that carbon price stability alone is not sufficient to unlock large-scale industrial decarbonisation investments.

2. Legal certainty and implementation

The effectiveness of the IAA will depend heavily on implementation and regulatory coherence.
The extensive reliance on delegated acts creates uncertainty regarding future obligations, methodologies and product scope, potentially affecting investment planning and financing decisions for long-lead industrial projects. Greater clarity is therefore needed regarding stakeholder and Member State involvement, implementation timelines, and consistency across delegated acts.

EuLA supports the objective of strengthening European industrial value chains. However, greater clarity is needed regarding the legal robustness and practical implementation of “Made in EU” requirements in procurement and public support schemes. The cumulative effect of overlapping procurement obligations across multiple legislative instruments also risks creating significant administrative complexity for contracting authorities and companies. Simplification and coherence across legislative instruments should therefore remain a priority.

In addition, the future scope of low-carbon criteria under Article 10(2), including the potential extension to additional ETS sectors and products, should be clarified. Greater consistency will also be needed between the IAA and related initiatives, including the Net-Zero Industry Act, the Ecodesign for Sustainable Products Regulation, industrial carbon management initiatives and future public procurement frameworks.

3. Ensuring competitiveness alongside demand creation

The IAA aims to create demand for low-carbon products through procurement and public support measures. However, there is a growing risk that demand for low-carbon products increases while production conditions in Europe remain insufficiently competitive. This is particularly relevant for energy-intensive industries facing:

- persistently high electricity and gas prices
- long investment cycles
- increasing regulatory complexity

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The proposal should therefore more explicitly address the link between demand-side measures and industrial competitiveness. Without adequate investment conditions, there is a risk that industrial production and associated investments relocate outside the EU despite increased European demand for low-carbon products. The framework should also remain sufficiently open to recognise additional strategic value chains and enabling materials beyond the sectors currently covered.

4. Key recommendations

EuLA therefore encourages the Commission and co-legislators to:

- Strengthen the IAA framework for sectors with unavoidable process emissions
- Explicitly recognise CCUS and CO_2 infrastructure as strategic enablers of industrial competitiveness and decarbonisation
- Ensure coherence between lead-market measures and industrial production conditions in Europe
- Ensure a level playing field within the European Union through the consistent and harmonized implementation of measures to support industrial competitiveness across Member States.
- Provide greater legal certainty regarding delegated acts and low-carbon methodologies
- Establish a clearer pathway for extending demand-side measures to broader industrial value chains and enabling materials
- Improve alignment between the IAA and related EU industrial, climate and procurement legislation

A successful IAA framework should ensure that Europe's climate ambitions are matched by the conditions necessary to maintain competitive industrial production and investment in the EU.

Micah Ton
EuLA Climate & Energy Adviser
m.ton@ima-europe.eu
+32 499 84 43 57

Rodolphe Nicolle
EuLA Secretary General
rodolphe.nicolle@EuLA.eu
+32 495 79 05 09