

Position of CEI-Bois on the Industrial Accelerator Act (IAA)

In the current context of high energy costs, geopolitical instability and increasing global competition, measures supporting Europe's industrial base are both timely and necessary. Nevertheless, such actions should strengthen the competitiveness and resilience of Europe's entire industrial base, avoiding a selective or "cherry-picking" approach, particularly as the economic relevance of sectors varies significantly across Member States.

In this context, CEI-Bois, representing the European woodworking industries value chain requests the European Commission to reconsider its approach to the Industrial Accelerator Act (IAA) because it has the potential to create unintended market distortions by favouring a limited number of sectors and materials, while overlooking industries that are already producing low-carbon and renewable materials in Europe that are for example clustered in the Bioeconomy Strategy, and that are themselves exposed to high energy costs. The IAA should avoid creating unfair competition between the industrial sectors covered by the IAA and the EU Bioeconomy and should instead ensure a level playing field for all European manufacturing industries contributing to climate neutrality, strategic autonomy and industrial resilience.

The European woodworking industries play a central role in both the European economy and the climate transition. **Wood, one of the leading materials recognised in the Bioeconomy Strategy, is currently the only renewable structural material available at scale in Europe.** It stores carbon, supports circularity, enables resource efficiency and contributes to the substitution of fossil- and energy-intensive materials.

Around 85% of EU wood demand is already supplied by European forests operating under some of the world's highest sustainability standards, supporting millions of jobs across rural and industrial regions.

In light of the above, CEI-Bois calls for consistency between the public procurement approach under the IAA and that under the Bioeconomy Strategy. Public procurement should be designed around performance-based sustainability criteria that allow all solutions to compete fairly on the basis of their overall environmental contribution.

The current proposal introduces low-carbon and Union origin requirements for a limited number of materials, namely steel, concrete and aluminium, but it remains entirely unclear how these materials will compete with those covered under the Bioeconomy Strategy. While CEI-Bois supports the objective of promoting lower-emission products, a truly sustainable procurement framework should not focus exclusively on carbon intensity while overlooking the broader environmental benefits of materials throughout their lifecycle.



Public procurement rules should therefore be rewritten to enable contracting authorities to assess and compare construction materials based on substantiated and verifiable environmental, technical and economic criteria, including renewability, carbon storage and substitution effects.

This would ensure technology inclusivity, foster innovation across all industrial sectors and recognise the strategic role of renewable and bio-based materials within the Bioeconomy Strategy, such as wood, in supporting Europe's climate neutrality, competitiveness and industrial resilience objectives.

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