To:

Mr Stéphane Séjourné, Executive Vice-President for Prosperity and Industrial Strategy
Ms Teresa Ribera, Executive Vice-President for Clean, Just and Competitive Transition
Mr Wopke Hoekstra, Commissioner for Climate, Net Zero and Clean Growth
Mr Maroš Šefčovič, Commissioner for Trade and Economic Security, Interinstitutional Relations and Transparency

Mr Valdis Dombrovskis, Commissioner for Economy and Productivity, Implementation and Simplification

31 October 2025

Call for comprehensive lead market measures in the Industrial Accelerator Act

Dear Executive Vice-Presidents and Commissioners,

We, the undersigned organisations and business representatives across manufacturing sectors, think tanks, and civil society, underline the critical importance of ambitious lead market measures in unlocking the European clean industrial project pipeline. While we welcome the Commission's efforts to establish lead markets for clean products made in the EU/EEA, we are concerned that the measures currently under discussion will not be sufficient to stimulate credible demand.

Creating lead markets for clean industrial products is one of the <u>core priorities under the Clean Industrial Deal</u>. Member States including <u>France</u>, <u>Germany and Italy have called for stronger EU action</u> to accelerate their development, and the <u>European Commission's 2026 Work Programme</u> confirms that advancing European lead markets - particularly through private demand - is a key priority for the Union's industrial and innovation agenda.

We therefore urge the Commission to ensure that the upcoming Industrial Accelerator Act sets out a robust lead market strategy, with clear and predictable demand-side measures that go beyond voluntary action. This is essential for Europe to secure investment and safeguard its competitiveness and sovereignty.

Europe's basic industries are the backbone of its economy and society. They provide the essential materials for construction, energy, transport and manufacturing, and underpin Europe's economic security. Without a strong domestic industrial base, the EU cannot sustain its critical infrastructure, or respond to geopolitical shocks. Strengthening this industrial base is therefore not only an economic imperative, but also a matter of sovereignty, strategic autonomy, and resilience.

Decarbonisation is central to this goal: by investing in clean production, Europe can secure its competitiveness, reduce its dependence on external suppliers, and build a more resilient economy. The technologies already exist, and Europe has a significant pipeline of clean industrial projects. At the same time, companies must align their strategies with Europe's climate and industrial objectives. What is still missing for these efforts to scale is the market framework that creates a reliable business case for investment.

The EU has built substantial supply-side foundations through carbon pricing, innovation funding and infrastructure support. Yet these alone are not enough. Without predictable demand for low-carbon products made in the EU/EEA, projects will continue to stall and Europe risks losing ground to international competitors.

The Industrial Accelerator Act is the opportunity to close this gap. To succeed, the act must set out a holistic lead market strategy that provides long-term certainty, accommodates the diversity of industrial sectors and ensures Europe's value chains remain competitive globally.

In particular, we highlight that:

- **Voluntary labels** are useful first steps and transparency tools, but they do not provide the long-term certainty and level playing field needed to unlock private investment
- **Financial support** is essential to kick-start projects, but on their own do not create stable markets.
- **Voluntary demand commitments** are positive but insufficient to drive systemic value chain wide market shifts.
- **Voluntary green public procurement** can play an important catalytic role but cannot create sufficient demand across all sectors, and risks leading to market fragmentation.

We therefore call on the Commission to make a comprehensive lead market strategy a central pillar of the Industrial Accelerator Act - one that recognises the diversity of products and sectors and provides measures tailored to their different decarbonisation pathways. Policy measures should aim for scalable impact while ensuring cost-effectiveness, feasibility and competitiveness across the value chain.

In particular, the Act should include explicit provisions for:

- **EU-wide, harmonised, and performance-based product standards** to avoid fragmentation of the internal market and ensure fair competition.
- Mandatory green public procurement with clear, minimum content quotas for low-carbon materials and products made in the EU/EEA, while also considering non-price criteria for resilience and sustainability.
- The creation of durable, predictable private demand by combining gradual demand-side mandates with EU and national financial de-risking instruments and incentives to facilitate long-term offtake agreements.

A truly comprehensive and differentiated strategy is essential to give Europe's clean industrial projects the certainty they need to scale while also safeguarding jobs, competitiveness, and sovereignty in the global transition to a net-zero economy.

Supporting organisations





































































JUST **⊘** SHIFT

































List of signatories

Action Aid Denmark GravitHy

Advario Public Affairs Hydnum Steel

Airborne Wind Europe Hydro

Bellona Europa Hydrogen Europe

Bond Beter Leefmilieu Institute for Climate Economics (I4CE)

Carbon Balance Initiative Institute of Circular Economy

Carbon Gap Just Shift

Cefic (European Chemical Industry Council) Meststoffen Nederland (Dutch Fertilizer

Clean Air Task Force Confederation)

Cleantech for Europe Mission Possible Partnership

Clear Corporate Finance Negative Emissions Platform

CLG Europe NGO Shipbreaking Platform

Climate Strategy & Partners Northern Lights

Demand Creation coalition Recycling Europe

Deutscher Naturschutzring Sustainable Energy Finance Association

E3G Scottish Carbon Capture & Storage

ECCO

Energy Storage Europe

EPICO KlimaInnovation

Germanwatch

ECOS Tech for Net Zero

Energie Nederland Transport & Environment

Vätgas Sverige

VNO - NCW

Yara International

ESWET (European Suppliers of Waste-to-Energy Technology)

Youth and Environment Europe

European Lime Association Zero Emissions Platform (ZEP)

France Hydrogène Zero Waste Alliance Ireland