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Position Paper
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EPS industry position on the Industrial Accelerator Act

Introduction

EUMEPS welcomes the objectives of the Industrial Accelerator Act (IAA) to strengthen Europe's industrial resilience, support decarbonisation, and enhance the competitiveness of clean technologies and sustainable construction products within the European Union. The European expanded polystyrene (EPS) insulation industry supports measures that reinforce European manufacturing capacity while ensuring technological and material neutrality, regulatory coherence, and practical implementation across existing legislative frameworks.
As a key contributor to energy-efficient buildings and the decarbonisation objectives established under the Energy Performance of Buildings Directive (EPBD), the EPS industry believes the IAA must align closely with existing EU construction product legislation and avoid creating unnecessary complexity or overlapping requirements.

Inclusion of Insulation Materials Under Annex II

Building insulation products should be included within the scope of the IAA under Annex II, given their essential contribution to energy efficiency, emissions reduction, and the delivery of EU climate objectives. However, the legislation should avoid prescribing specific content thresholds for insulation products.
For EPS insulation, manufacturing of the final insulation product takes place entirely within the European Union, even though the raw material, expandable polystyrene (PS), may originate from outside the EU. Importantly, when expandable PS is converted into the final insulation product, 100% of the material used derives from the same batch and the same origin. Consequently, for "Made in EU" criteria, there is no practical or technical justification for introducing partial percentage-based content calculations. The final manufacturing transformation itself should constitute the determining criterion.
This approach differs from low-carbon assessments, where environmental performance should instead be evaluated through scientifically established methodologies based on Global Warming Potential (GWP) calculations under the Construction Products Regulation (CPR).

Focus on Raw Material Rather Than Final Product Composition

The IAA criteria should focus exclusively on the primary raw material used in production, namely expandable polystyrene (PS), rather than on the final insulation product or additives incorporated during manufacturing.

The polymer content represents the essential basis for assessing origin, sustainability, and industrial value creation. **Additives should not be considered when determining compliance with "Made in EU" or low-carbon criteria.** Applying requirements to additives would create

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disproportionate complexity without contributing meaningfully to decarbonisation or industrial resilience objectives.
Accordingly, the IAA should apply solely to the raw material used for production and should not take additives into account.

Support for "Made in EU" and Low-Carbon Criteria

EUMEPS supports the introduction of "Made in EU" and low-carbon criteria, provided that the legislation recognises the mass balance credit method for renewable feedstock sourcing within existing industrial value chains.
Mass balance methodologies constitute a critical enabler for the green transformation of existing chemical and construction product value chains. Excluding these recognised accounting approaches would risk slowing industrial decarbonisation and undermining investments already being made in renewable and circular feedstock systems across Europe.
Furthermore, "Made in EU" should apply strictly to production within the EU-27 Member States to ensure legal clarity and consistency in implementation.

Sustainable and Low-Carbon Labelling

EUMEPS does not oppose the introduction of sustainability labelling for construction products. However, such measures must remain technologically neutral and fully aligned with existing EU legislation, particularly the CPR framework.

In this regard, the ongoing European Chemicals Agency strategy concerning flame retardants (FRs) must be appropriately reflected in the IAA framework. Flame retardants should not be categorically excluded from sustainability labelling schemes. Assessments should remain science-based, proportionate, and aligned with existing chemical safety evaluations.

Low-carbon labelling should rely on already established methodologies, specifically Global Warming Potential (GWP) calculations under CPR principles, and should apply equally to all insulation materials. The CPR already provides a material-neutral framework for assessing construction products, and all IAA-related measures affecting construction products should therefore be implemented consistently through the CPR framework.

Alignment Between IAA, EPBD and CPR

The IAA should acknowledge that low-carbon construction products are already increasingly demanded through the implementation of the EPBD and the broader development of embodied carbon principles within EU building policy.

To ensure regulatory consistency and investment certainty, the IAA should support the implementation of the EPBD and remain fully aligned with both the EPBD and the CPR. Fragmented or overlapping requirements would create unnecessary burdens for manufacturers and contracting authorities while reducing regulatory predictability across the construction ecosystem.

A coherent and harmonised framework across the IAA, EPBD, and CPR is therefore essential.

Practicality and Proportionality of Procurement Requirements

The design of the IAA should ensure that any new procurement requirements remain practical, proportionate, and administratively manageable for both contracting authorities and companies already operating under extensive EU regulatory obligations.

Additional reporting, verification, or certification requirements should avoid duplicating existing obligations under the CPR, EPBD, or other established EU legislation. Policymakers should prioritise streamlined implementation mechanisms that facilitate compliance while preserving competitiveness and innovation capacity within the European construction products industry.

Conclusion

EUMEPS supports the objectives of the Industrial Accelerator Act as an instrument to strengthen European industrial competitiveness and accelerate the transition toward a low-carbon economy. To achieve these goals effectively, the Act should:

- Include insulation materials within Annex II without imposing unnecessary content thresholds;
- Focus assessment criteria on the primary raw material, expandable polystyrene (PS), rather than additives or secondary product components;
- Recognise mass balance methodologies for construction products as an enabler of industrial decarbonisation;
- Define “Made in EU” strictly within the EU-27;
- Ensure sustainable and low-carbon labelling remains material-neutral and based on the CPR;
- Reflect ongoing ECHA evaluations regarding flame retardants;
- Maintain full coherence between the IAA, EPBD, and CPR frameworks;
- Ensure procurement obligations remain practical and proportionate.

Such an approach would support Europe’s decarbonisation ambitions while preserving industrial competitiveness, regulatory coherence, and technological neutrality across the construction products sector.

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About EUMEPS

EUMEPS, the unified European voice of the Expanded Polystyrene (EPS) industry, is the premier advocate for EPS solutions. Representing every link of the EPS value chain, from large companies to SMEs, we are committed to fulfilling European environmental objectives. Through our 23 national associations and numerous recycling initiatives, we strive to elevate the circularity of our industry.

As a contributor to making Europe climate-neutral and resource-efficient, we showcase EPS as a smart choice in packaging and insulation. Stand by us in building a more resilient and sustainable tomorrow. www.eumeps.eu