

EUBA Position Paper

Industrial Accelerator Act (IAA)

September 2026

Introduction

The European Bioeconomy Alliance ([EUBA](#)) sectors bring together 29 million professionals who grow, produce, use, refine and transform bio-based renewable feedstock into food, feed, bio-based chemicals, bio-based manufacturing materials, biofuels, and bioenergy. Many of these products can successfully be deployed across sectors and industries, with equal or better performance than fossil-based competitors.

The bioeconomy can thus drive forward the transition away from a fossil-based society and should therefore be considered a core pillar of the EU's industrial policy. Investments and innovation in the EU bioeconomy have shown their potential.

For further information, please see the [EUBA best-practice case studies](#).

Upscaling bioeconomy through the IAA

EUBA strongly welcomes the recognition of the bioeconomy as a catalyst for sustainable bio-based solutions for industrial production in the Proposal for an Industrial Accelerator Act. Especially positive is the identification of lead markets, such as bio-based plastics and polymers, bio-based chemicals and biobased construction products, as well as lead technologies that can support the EU's strategic autonomy and the decarbonisation of certain industrial sectors. Bio-based products can be instrumental in strengthening the EU's strategic value chains. However, EUBA members believe the IAA should go further.

To remain competitive, the EU must support targeted investments, new value chains, employment and industrial capacities whilst also supporting

Policy suggestion 1: include other bio-based products beyond the chemical industry in Article 16 by extending the scope to all manufacturing industries under NACE section C:

*“The Commission is empowered to adopt delegated acts in accordance with Article 30 to supplement this Regulation by laying down Union-level demand-side measures for **bio-based** products from the chemical ~~industry~~ and **manufacturing industries** in order to promote the following activities:”*

In points (a) and (b), include the production, sales, and use of **articles** as an addition to “substances and mixtures” in order to include manufactured objects in the scope.

Policy suggestion 2: provide an additional consideration in Article 16 (1):

(d) The beneficial impact of setting such measures for the overall competitiveness of the EU agriculture and food, as well as the forest value chains.

research and development. This includes creating market demand for bio-based materials, bio-based chemicals, and biofuels, among others. These products, outlets, co-products, and by-products have a huge potential to create new scalable markets for farmers, forest managers and owners, processors and new markets for industries.

Demand-side measures under Article 16 should therefore explicitly cover bio-based products from a wider range of industrial bioeconomy sectors, including processing industries that transform renewable agricultural and forest feedstock into bio-based materials, bio-based ingredients, bio-based chemicals, biofuels, bioenergy, and other bio-based solutions.

In this respect, Chapter III of the IAA should be used to introduce pull-measures for bio-based materials, bio-based chemicals, and bio-based products and introduce bio-based targets in public procurement, public support schemes and relevant product frameworks. Such measures would help create lead markets for sustainable bio-based materials, renewable

carbon solutions and bio-based products capable of replacing fossil-based inputs.

EUBA welcomes the provisions in the IAA to ensure that bio-based manufacturing sectors are adequately recognised within its strategic framework, including where relevant through the sectors listed in Annex I and through access to industrial manufacturing acceleration areas. Excluding other scalable and already operational bio-based value chains from the most impactful instruments of the Regulation would create a structural inconsistency between the IAA's bioeconomy objectives and its implementation tools.

Real impact depends on meaningful actions and consistent implementation. To safeguard the resilience and competitiveness of the EU bioeconomy, we must transform commitments into practical, measurable actions that enable every sector to reach its full potential by introducing demand-side measures (e.g. minimum content requirements, bio-based targets in public procurement, recognition of bio-based industries as strategic sectors, etc.).

In summary, the IAA should not only accelerate industrial projects. It should also create the market conditions needed for Europe's existing bio-based value chains to scale, compete and deliver on the EU's climate, competitiveness and strategic autonomy objectives.

Members of the European Bioeconomy Alliance

