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## FEICA position on the Industrial Accelerator Act

### Introduction

For the adhesives and sealants industry, the Industrial Accelerator Act (IAA) represents both an opportunity and a risk. As a mid-stream enabler, A&S are embedded across multiple strategic value chains. Measures that are not carefully calibrated risk creating disproportionate administrative burdens, fragmenting supply chains and weakening competitiveness—without delivering additional climate or security benefits.

#### FEICA Recommendation

- **Union origin requirements limited to EU production or formulation level**, without upstream traceability or bespoke documentation.
- **Proportionate use of the Customs Codes Regulation (EU) 952/2013** as the sole basis for determining Union origin.
- **Transparent and inclusive governance of demand-side measures**, based on robust assessment of impacts across sectors and value chains.

### Background

#### 1. Union origin requirements and public procurement

FEICA recognises the objective of using public procurement and support schemes to strengthen EU manufacturing. However, Union origin requirements must reflect the reality of complex industrial value chains, including downstream and specialty chemical products.

Union origin obligations that extend beyond the EU production or formulation stage would create disproportionate compliance burdens without improving resilience or decarbonisation outcomes. In particular, requirements for upstream raw-material or supply-chain traceability are not feasible for many chemical value chains and would significantly increase administrative complexity.

For example, a dual-use adhesive used both in battery packs for electric vehicles and in combustion-engine applications cannot be distinguished at production level. In such cases, the entire production would be subject to reporting requirements, despite only a fraction being used in public procurement.

#### 2. Assessment of Union origin – Customs Codes Regulation

The IAA refers to the Customs Codes Regulation (EU) 952/2013 as the legal basis for determining Union origin. FEICA supports this approach, provided it is applied proportionately.

The Customs Codes framework is a well-established, horizontal system. Creating parallel or bespoke origin regimes—through additional certificates, sector-specific methodologies or manual reporting—would undermine legal certainty and disproportionately affect SMEs. Origin assessment must therefore remain limited to the last substantial transformation / production stage in the EU, without extending to raw materials or upstream inputs.

### **3. Origin disclosure in public procurement and support schemes**

Origin disclosure already exists in many procurement and support-scheme contexts, typically on a case-by-case or request basis. FEICA does not oppose origin disclosure as such.

However, broad mandatory extensions of disclosure requirements would introduce manual, non-automated reporting obligations without clear added value. Administrative resources should be focused on investment, innovation and decarbonisation, not duplicative compliance processes.

### **4. Demand-side measures for the chemical industry**

The IAA foresees delegated acts to establish demand-side measures for chemical products to promote EU production and decarbonisation. FEICA recognises these objectives, but stresses that design and governance are decisive.

Demand-side measures can support competitiveness only if they are developed with:

- systematic assessment of differentiated impacts across sectors and value chains, including cost, competitiveness, availability of inputs and SME impacts;
- technology-neutral approaches that avoid shifting disproportionate costs downstream or constraining innovation.

Poorly calibrated measures risk weakening downstream value chains and undermining EU competitiveness. Impacts must therefore be assessed across different stages of the value chain and across sectors, as the effects of lower-carbon or origin-based requirements will differ significantly depending on the sector and the position of actors within the value chain.

### **5. Role of the Critical Chemicals Alliance (CCA)**

FEICA acknowledges the potential contribution of the Critical Chemicals Alliance (CCA) to strategic policy discussions. However, its policy relevance depends on balanced and inclusive governance.

Downstream users and specialty chemical sectors must be fully represented, and cost impacts across value chains must be properly assessed and shared fairly. Without this balance, policy outcomes risk being skewed and economically inefficient.

Output from the CCA should be assessed from the perspective of the entire value chain, in line with the Better Regulation guidelines.

## Conclusion

The Industrial Accelerator Act can play an important role in strengthening Europe's industrial competitiveness and accelerating decarbonisation. A well-designed IAA can strengthen Europe's industrial base. A poorly calibrated one risks undermining the value chains it seeks to support.

To succeed, the IAA must be proportionate, predictable and workable for complex industrial ecosystems.

FEICA therefore calls for:

- **Union origin requirements limited to EU production or formulation level**, without upstream traceability;
- **proportionate application of the Customs Codes Regulation**, without bespoke documentation regimes;
- **caution against broad extensions of origin disclosure obligations**;
- **demand-side measures designed with transparency**, stakeholder involvement and differentiated impact assessments across sectors and value chains;

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## About FEICA

FEICA is the Association of the European Adhesive & Sealant Industry. Adhesives and sealants (A&S) play a crucial role in many of the EU's strategic sectors and are essential enablers of countless everyday products. A&S enhance products' performance, durability and circularity. With the support of its members and national associations, FEICA voices the interests of the industry in Europe, where 85% of adhesive and sealant companies are SMEs. The association provides regulatory guidance, helps members navigate compliance requirements, and promotes sustainable practices. FEICA fosters collaboration with industry stakeholders to address shared challenges and to create a mutually beneficial economic and legislative environment.

FEICA is registered in the **EU Transparency Register** with ID no. **51642763262-89**

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