



# The view of the European Precast Concrete sector on the proposed Industrial Accelerator Act

Position paper

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*Product-level information is essential, but any product-level environmental limits should not replace whole-life assessment of buildings and infrastructure, and always reflect the function delivered*

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The proposed Industrial Accelerator Act represents an important opportunity to **accelerate the decarbonisation of the construction sector** through the **strategic use of public procurement**. By **creating demand** for lower-carbon construction solutions, public procurement can stimulate innovation, support complementary decarbonisation strategies and accelerate market uptake while preserving the affordability of the housing, buildings and infrastructure that Europe urgently needs.

The **European precast concrete industry supports this objective** provided that the appropriate level for the **assessment of the environmental performance** is set at **construction work** level and the individual product are always considered together with the function they deliver.

The environmental performance of a construction work results from the **combined effects** of product selection, structural design, material efficiency, durability, fire safety, construction methods, transport, maintenance, repair, adaptability and end-of-life scenarios. Consequently, selecting a product with a lower environmental indicator in isolation does not necessarily result in a construction work with lower overall environmental impacts.

Harmonised and verified environmental information for construction products is therefore essential. **Environmental Product Declarations** based on EN 15804 and the environmental information declared under the **Construction Products Regulation** should provide the **reliable input data required for whole-life assessment** and informed procurement decisions.

Where assessment at construction works level is not yet feasible, a product-level approach may be considered, but only under strict conditions. Products must be compared on the basis of an equivalent functional unit reflecting the same intended use, technical performance, service life and applicable regulatory requirements.

Such an approach must therefore consider, as relevant, structural capacity, robustness, durability, fire performance, thermal and acoustic performance, exposure conditions, maintenance and replacement needs. Limits based only on mass, volume or a declared environmental value per tonne or cubic metre would not allow a fair comparison between products delivering different functions or levels of performance.

**Product-level assessment should consequently remain a carefully defined intermediate or complementary approach**, rather than a substitute for whole-life assessment. It must not lead to generic product limits that disregard the contribution of the product to the performance and environmental optimisation of the completed construction work.

The precast concrete industry recognises public procurement as a key instrument for accelerating the deployment of lower-carbon construction solutions. Demand-side measures should be accompanied by targeted support for product innovation, industrial synergies and manufacturing scale-up, enabling the construction value chain to reduce emissions while maintaining competitiveness, affordability and security of supply.

### **The Industrial Accelerator Act should therefore:**

- Require harmonised, verified and comparable environmental information for construction products, consistent with EN 15804 and the Construction Products Regulation.
- Define low-carbon construction primarily at the level of the completed construction work, taking account of its environmental performance over the full life cycle.
- Use product environmental information as input to construction works-level assessment rather than as a standalone compliance criterion.
- Permit product-level assessment only where products are compared on the basis of an equivalent and clearly defined functional unit, including the same intended use, performance requirements and reference service life.
- Avoid rigid or generic product-level thresholds that disregard design optimisation, durability, safety, local conditions and the function delivered by the product.
- Ensure coherence with the Construction Products Regulation and the Energy Performance of Buildings Directive while preserving technology neutrality, affordability, innovation and security of supply.

### **We believe this approach would:**

- Deliver genuine decarbonisation by focusing on the environmental performance of completed buildings and infrastructure rather than isolated product indicators.
- Encourage manufacturers to optimise concrete composition, binder and reinforcement solutions while meeting the required technical performance.
- Reward structural efficiency, material savings, durability, adaptability, reuse, recyclability and reduced maintenance and replacement needs.
- Support improvements in manufacturing processes, logistics, energy use and resource efficiency throughout the precast value chain.
- Facilitate the wider uptake of industrialised off-site construction, which can integrate design, production and material-efficiency measures simultaneously.
- Allow environmental ambitions to reflect differences in material availability, technical solutions, local building codes, infrastructure needs and market conditions across Europe.

### **The precast concrete industry is ready to cooperate**

The European precast concrete industry is ready to work with the European Commission, the European Parliament, Member States and other construction-sector stakeholders to develop workable criteria for low-carbon public procurement.

These criteria should be scientifically robust, based on harmonised information and capable of rewarding solutions that provide the required function with the lowest whole-life environmental impact. Product-level assessment may contribute to this objective, provided that it is strictly based on equivalent functional units and does not replace the assessment of the completed construction work.