



ROYAL NORWEGIAN MINISTRY OF  
TRADE, INDUSTRY AND FISHERIES

*The Minister of Trade and Industry*

Mr Stéphane Séjourné  
Executive Vice-President for Prosperity and Industrial Strategy  
European Commission

Your ref

Our ref  
26/3410

Date  
19 June 2026

Dear Executive Vice-President Stéphane Séjourné,

As a longstanding partner to the EU and member of the Single Market through the EEA agreement, Norway is following closely the European Commission's work on industrial competitiveness and decarbonisation. Norwegian industry is fully integrated in European value chains as a stable and important supplier and reliable business partner. What is good for European industry, is often beneficial also to Norwegian industry, and vice-versa.

With this letter, I would like to share some reflections from the Norwegian Government on the Commission's proposal for an Industrial Accelerator Act (IAA), on the following points:

- ✓ Permitting and acceleration areas
- ✓ 'Union origin' requirements in public procurement
- ✓ 'Low-carbon content' requirements in public procurement
- ✓ Amendments to the Net-zero Industry Act

*General remarks*

Even though energy-intensive industries in Norway are founded on access to renewable hydropower and have a low emission intensity compared to European and global standards, they still represent a large part of remaining Norwegian emissions. The Norwegian Government therefore shares the ambitions of the European Commission to improve framework conditions in a way that will allow energy-intensive industries to decarbonise while maintaining their competitiveness.

In the current geopolitical context, and as a member of the Single Market, Norway also sees the need to reduce vulnerabilities in European strategic value chains and create a more resilient and integrated Single market.

The Industrial Accelerator Act (IAA) can be part of the solution.

However, the proposal is complex and contains new and detailed rules on specific sectors, products and materials. Given the interlinkage with existing and upcoming legislation and expected amount of secondary legislation, the Norwegian Government shares its concerns that the IAA will be counterproductive towards the EU's – and Norway's – simplification ambitions and agenda. Several topics are addressed concurrently in different legislative instruments (e.g. more than 80 sectoral legal instruments contain provisions on public procurement). This poses challenges for both industry, public administrations and implementing bodies, and underlines the need for consolidated guidance and clear interfaces between regulations.

The proposal is expected to increase financial and administrative costs in both the public and private sector. For this reason, Norway urges the Commission and co-legislators to strike the right balance and adopt provisions that allow also for SMEs and local and regional authorities to implement or monitor compliance with the provisions, without disproportionate delays, costs and administrative burden.

Furthermore, European industries are deeply interconnected. We therefore urge the Commission to ensure that the measures designed to benefit one sector, do not introduce new barriers for another. In particular, it is important to balance the potential of domestic European net-zero industries, with the need to ensure cost-effective renewable energy production in Europe. The latter should, in our opinion, also be a priority.

#### *Permitting and acceleration areas*

- We welcome efforts to simplify regulation and reduce administrative burden on companies through **more efficient and digital permit-granting processes**.
- Legislation to streamline procedures for assessment and authorization **should, however, not adversely affect environmental standards nor public consultations**. Time limits should be flexible enough to ensure the quality of environmental impact assessments, meaningful participatory processes and well-informed decision-making. For instance, the IAA should allow competent authorities to request additional information necessary at any stage of the permit-granting procedure (cf. Article 5). Strict limitations could force authorities to reject projects simply due to insufficient information.
- **Aligning permitting regulations** in the IAA with different sectoral legislation in existing EU regulation, such as the CRMA, NZIA, RED, would help businesses and

administrations navigate the regulatory landscape and speed up national implementation of the IAA. **Using harmonised terminology and definitions** would further reduce interpretative challenges and strengthen predictability. For example, the definition of “the permit-granting procedure” in Article 3 (4) should be aligned with RED III by including “all relevant *administrative* permits”, thereby clarifying that it applies to permits issued by a competent authority only. Harmonising definitions could also be a way to reduce the uncertainty created by the multiple references in this proposal to other legislative proposals, not yet adopted.<sup>1</sup>

- The Norwegian Government is positive facilitating private investment in decarbonising technologies. However, the decisions to invest in new or expanding existing industrial sites should primarily be guided by market factors. The obligation to establish new acceleration areas also **risks coming at the expense of other more viable projects**. Attention should be given to industrial clusters and approaches that facilitate synergies and circularity.

#### *Union origin requirements in public procurement*

- **European preference criteria** could have beneficial effects for the targeted industries. However, these criteria **should be used with caution and in limited scope**, i.e. only when required to address specific security and resilience concerns. This is due to their considerable side-effects on public budgets, public and private administrations, regulatory framework, and technological progress and innovation, also in other sectors of the economy.
- As the Single Market consists of the 30 Member States of the European Economic Area (EEA), **‘Union origin’ should systematically include production originating from - at least - all 30 EEA States**. Norwegian industry is an integrated part of European value chains and a stable and important provider to the EU, for example of critical raw materials such as aluminium and silicon. Disadvantaging content from EEA EFTA States could therefore jeopardise competitiveness, slow decarbonisation and decrease overall resilience in the Single Market.
- A broader geographical approach to ‘Union Origin’ (**“Europe with friends”**) could help restrain cost increases and reduce the risk of excluding technologies and assets that would be beneficial for European business and competitiveness.
- Norway also encourages the EU to **allow for a transition phase**, for building up the needed production capacity in Europe and ensuring continuous access to mature,

---

<sup>1</sup> Such as the Proposal for a Regulation on speeding-up environmental assessments (COM/2025/984), Proposal for a Directive on acceleration of permit-granting procedures (COM/2025/1007), the proposal for a new Cybersecurity Act 2 (COM/2026/11) etc.

secure and cost-efficient technology. This is especially important given that the targeted sectors in the IAA are capital-intensive and technologically complex.

#### *‘Low-carbon content’ requirements in public procurement*

- Norway supports the use of environmental criteria that are proportionate and effective in public procurement. Nevertheless, public procurement should be used as a policy tool only when adding value beyond what other instruments could achieve.
- With a view to contribute to long-term climate goals, Norway suggests a **gradual phasing-in of the low-carbon requirements** in order to reduce transition costs for stakeholders.
- To reduce the administrative costs from this measure, the **definition of low-carbon products** should be based on existing methodologies and documentation schemes, and the harmonisation of these, such as the CBAM, the Ecodesign for Sustainable Products Regulation (ESPR), the Construction Products Regulation (CPR) and the Digital Products Passport (DPP). A single classification system for “low-carbon” products could also simplify verification by the purchaser.
- The definition of «low-carbon» should encourage solutions needed for long-term climate goals, and not just incremental emission cuts. Future definitions for energy-intensive industries on low-carbon production should reflect actual production conditions with regards to location, including the real energy basis used in production, in order to avoid distortions and prevent methods that could undermine environmental integrity.
- The proposals on low-carbon and EU origin criteria for steel, aluminium and cement risk being distortive vis-à-vis other materials. We therefore encourage the Commission and co-legislators to **evaluate the impact on other low-carbon materials** and consider a higher degree of material-neutrality.

#### *Amendments to the Net-zero Industry Act*

- When amending the NZIA, we encourage the European Commission and co-legislators to **balance the need to promote and protect European net-zero industry, against the need to promote renewable energy production in Europe**.
- It is important to avoid modifications in requirements for renewable auctions that could lead to undersubscription, project delays, or unnecessary cost escalation. Auctions should **remain focused on delivering clean energy capacity at speed** and scale while keeping costs low. We encourage the Commission to make sure that new requirements (such as Union content) do not outpace the maturity and availability of European manufacturing capacity.

- We also encourage the Commission to describe more thoroughly both the scope and the consequences of introducing **new requirements for control systems** etc. for renewable auctions. This in order to avoid misunderstandings. The fact that these new requirements are connected to provisions in the proposal for a revised Cybersecurity Act (CSA2), that is not yet agreed on in the EU and could be modified accordingly, creates uncertainty and makes it hard to assess the actual content and effects of these amendments.

To summarize, Norway encourages the Commission and co-legislators in its work to ensure that the final version of the IAA has a net-positive impact, on both European competitiveness, resilience and decarbonisation. This is a complex task of importance for the functioning of the Single Market and European Economic Area, with all its 30 Member States.

I appreciate the opportunity to provide these comments, on behalf of the Norwegian Government, and look forward to continued dialogue on the proposal.

Yours sincerely



Cecilie Terese Myrseth