

Bioenergy Europe's Contribution to the Industrial Accelerator Act Regulation Proposal

Bioenergy Europe welcomes the European Commission's initiative to establish an Industrial Accelerator Act to accelerate industrial decarbonization and strengthen EU manufacturing, particularly by reducing permitting delays and creating more predictable investment conditions.

It is of utmost importance that this implementation remains technologically neutral to reflect Europe's real energy needs, such as renewable heat and dispatchable low-carbon energy.

In the context of the proposal, we welcome the single-access-point approach for industrial manufacturing projects, especially for energy-intensive decarbonisation projects. In this context, it is essential to highlight that industrial decarbonisation is not only electrification, and that policy should explicitly recognise renewable heat as a key actor.

However, we believe that some elements of the proposal require more careful consideration, such as the definition of sustainable carbon sources.

We invite the European Commission to consider the following points:

- 1. The definition of sustainable carbon sources**
- 2. Recognising the role of bioenergy in Industrial Acceleration Areas**
- 3. Ensuring technological neutrality**

1. The definition of sustainable carbon sources

The definition of *sustainable carbon sources* provided in the draft is too broad:

*'biomass that complies with the sustainability criteria laid down in Article 29 of Directive (EU) 2018/2001, waste and **carbon from capturing carbon dioxide emissions,***

This definition appears to cover all carbon capture emission, both from biogenic and fossil sources. This hints at the misleading and dangerous impression that continuing fossil emissions is acceptable and that fossil carbon capture is equivalent to biogenic carbon.

Bioenergy Europe stresses that the priority must remain the **prevention and minimisation of fossil-emitting activities**, with carbon capture deployed only for emissions that cannot be avoided. To equate fossil carbon capture and biogenic carbon capture under the same sustainability umbrella would set a problematic precedent and blur the line between **fossil abatement** and **renewable carbon/removals pathways**.

Bioenergy Europe calls for a clearer distinction in the legal definition: only biogenic carbon streams (including biomass complying with RED sustainability criteria) should qualify as “sustainable carbon sources”, while fossil carbon capture, where necessary for hard-to-abate emissions, should not be labelled with terminology that places it on a par with biogenic carbon.

2. Recognising the role of bioenergy in Industrial Acceleration Areas

The Industrial Accelerator Act should explicitly recognise the strategic role of sustainable bioenergy in Industrial Acceleration Areas, particularly in industrial processes that require renewable, dispatchable heat.

While electrification will play an important role in industrial decarbonisation, many industrial applications require high-temperature process heat, flexibility and secure supply, which direct electrification alone cannot always provide. In this context, bioenergy can offer an immediately available and scalable solution to reduce emissions in energy-intensive industries.

In particular, bioenergy can contribute to the decarbonisation of industrial heat demand and the production of renewable carbon and biogenic CO₂ for carbon removals and circular industrial applications.

Bioenergy Europe calls on the European Commission to explicitly recognise sustainable bioenergy as a key enabler of industrial decarbonisation within Industrial Acceleration Areas.

3. Ensuring technological neutrality

Bioenergy Europe emphasizes that the effectiveness of the Industrial Accelerator Act relies on upholding a truly technology-neutral stance. Achieving climate neutrality in Europe needs a varied energy mix tailored to diverse industrial contexts, regional characteristics, and system requirements.

Policies supporting industrial decarbonisation should therefore recognise all sustainable and efficient renewable solutions, including bioenergy, renewable heat, carbon removals and circular bio-based value chains.

[Bioenergy Europe](#) is the voice of European bioenergy. It aims to develop a sustainable bioenergy market based on fair business conditions. Founded in 1990, Bioenergy Europe is a non-profit, Brussels-based international organisation bringing together associations and companies, as well as academia and research institutes from across Europe.