

September 21st, 2026

Helsinki Uusimaa Region's amendment proposals for Industrial Accelerator Act regulation

The Helsinki-Uusimaa Region is a joint authority for Helsinki-Uusimaa with 26 member municipalities. We are one of the 18 regional councils in Finland that are mandated in law, receiving our funding mainly from our member municipalities. Our region is home to approximately one-third of Finland's population. The Helsinki Uusimaa region generates 39 % of Finland's GDP and half of Finland's R&D expenditure. In addition, the region generates one-third of the value added of Finland's industrial sector and nearly half of the value added of Finland's chemical industry.

The strengths of Helsinki-Uusimaa Region are based on a highly skilled industrial workforce, strong innovation ecosystems and close cooperation between businesses, research organizations, educational institutions and the public sector. At the same time, Russia's war of aggression against Ukraine, slower economic growth in Europe and weakening global trade have had a significant impact on the region's export-oriented economy and employment. Nevertheless, Helsinki-Uusimaa offers considerable potential to support Europe's industrial transformation and strengthen industrial value creation.

At the same time, significant territorial disparities exist within the region. For example, areas just outside the capital metropolitan area possess substantial industrial land reserves, port infrastructure and development potential that are not reflected in regional averages.

Helsinki Uusimaa Region underlines the objectives of the Industrial Accelerator Act regulation and strengthening Europe's industrial base in strategic sectors is essential for the Union's long-term competitiveness, strategic autonomy and economic security. To ensure that these objectives – increasing the share of manufacturing to 20% of EU GDP by 2035 and creating 150,000 new jobs – can be achieved realistically the proposal requires however some further refinement.

Amendment proposals

IAA regulation recital number / articles	Commission's proposal	EP's proposal	Helsinki Uusimaa Region's proposal for amendments	Helsinki Uusimaa Region's justification
Recital (4)	The challenges posed by the need for industrial decarbonisation and for a resilient industrial production are complex and transcend national borders. Fragmented national measures aimed at tackling those challenges risk undermining the functioning of the internal market. Measures adopted by individual Member States could lead to divergent requirements imposed on market operators, inconsistent procurement practices and divergent permit-granting procedures across Member States. Such measures could create obstacles to cross-border trade within the Union and distortions on the internal market, undermining investor confidence, increasing costs, and redirecting investment flows within the Union. It is therefore necessary to establish harmonised measures to ensure the proper functioning of the internal market.		The challenges posed by the need for industrial decarbonisation and for a resilient industrial production are complex and transcend national borders. Fragmented national measures aimed at tackling those challenges risk undermining the functioning of the internal market. Measures adopted by individual Member States could lead to divergent requirements imposed on market operators, inconsistent procurement practices and divergent permit-granting procedures across Member States. Such measures could create obstacles to cross-border trade within the Union and distortions on the internal market, undermining investor confidence, increasing costs, and redirecting investment flows within the Union. It is therefore necessary to establish	Industrial regions and local and regional authorities play a key role in strengthening European industrial resilience by mobilising ecosystems, facilitating cooperation across value chains and supporting investment. Their involvement in industrial governance can help ensure that strategic priorities are aligned with territorial capacities and existing industrial strengths. The IAA should build on the experience and networks developed through European sectoral initiatives involving regional authorities, such as the Automotive Regions Alliance (ARA), the European Clean Hydrogen Alliance (ECH2A), the European Semiconductor Regions Alliance (ESRA) and the European Chemical Regions Alliance (ECA).

			harmonised measures to ensure the proper functioning of the internal market. The effective implementation of this Regulation should also rely on appropriate multi-level governance arrangements involving national, regional and local authorities. Local and Regional authorities should be appropriately involved in the identification of strategic industrial priorities and interregional value chains, as well as in the designation of industrial manufacturing acceleration areas, taking into account their role in fostering industrial ecosystems, being responsible for regional and local planning and facilitating investment.	
Recital (16 new)			(x) Small and medium-sized enterprises (SMEs) are key contributors to the Union's industrial ecosystems, innovation capacity and competitiveness, in particular in regions with strong industrial value chains. Their effective participation in the industrial	SMEs are key contributors to European industrial ecosystems and value chains, but their capacity to participate in industrial transformation initiatives remains more limited compared with larger industrial actors. While European and national funding instruments

			transformation should be ensured with measures under this Regulations, together with other relevant Union policies, considering their specific needs and capacities. Administrative procedures and regulatory requirements should be designed in a proportionate manner to enable SMEs to innovate, scale up and contribute to strengthening the Union's industrial resilience and strategic autonomy.	have successfully mobilised significant industrial investments, further attention is needed to facilitate SME access to opportunities created under the IAA. Regional authorities, due to their proximity to industrial ecosystems, are well placed to support SME integration and strengthen their contribution to Europe's industrial resilience, innovation capacity and strategic autonomy.
Recital (45)	To promote sustainable integration of investments by foreign entities to the internal market and the development of skills in emerging strategic sectors, and to ensure meaningful social contribution at the place of the investment, such investments should employ a proportion of Union workers and should provide appropriate training and capacity-building measures, involving education and training providers, as well as social partners. The foreign investor should ensure that the thresholds established in this Regulation are fulfilled across all categories of workforce, including the operational,		To promote sustainable integration of investments by foreign entities to the internal market and the development of skills in emerging strategic sectors, and to ensure meaningful social contribution at the place of the investment, such investments should employ a proportion of Union workers and should provide appropriate training and capacity-building measures, involving education and training providers, as well as social partners. Regions and their investment agencies represent a relevant level to	Regional development and investment agencies should be formally recognised as implementing partners within the IAA framework, in coordination with national authorities, to facilitate the integration of foreign investment projects into regional industrial ecosystems by connecting investors with local companies, talent pools, research centres, and innovation actors. This role should be acknowledged and reinforced to go beyond purely administrative facilitation and contribute actively to

	technical, supervisory, and managerial positions.		facilitate the integration of such investments into regional industrial ecosystems. The foreign investor should ensure that the thresholds established in this Regulation are fulfilled across all categories of workforce, including the operational, technical, supervisory, and managerial positions.	strengthening European value chains, technological capacity, and industrial ecosystems.
Recital (53)	Clustering industrial activity can contribute substantially to achieving the objectives of this Regulation and to strengthening certain strategic sectors in the internal market. It is therefore appropriate to promote the development of industrial manufacturing acceleration areas. Such areas should be limited in geographical scope in order to foster industrial symbiosis. When designating the areas, Member States should, in cooperation with regional authorities where appropriate, take into account industrial production (in particular for certain strategic sectors) and their regions' general level of development, with a focus on		Clustering industrial activity can contribute substantially to achieving the objectives of this Regulation and to strengthening certain strategic sectors in the internal market. It is therefore appropriate to promote the development of industrial manufacturing acceleration areas. Such areas should be limited in geographical scope in order to foster industrial symbiosis. When designating the areas, Member States should, in close cooperation with regional authorities where appropriate , take into account industrial production (in particular for certain strategic sectors) and their regions' general level of	The designation of Industrial Manufacturing Acceleration Areas should be carried out in close cooperation with regional authorities, given their responsibilities for regional industrial development. This will help ensure that Acceleration Areas build on existing regional capabilities and ecosystem initiatives, maximise stakeholder ownership and strengthen implementation.

	the less developed regions and those in transition. Furthermore, in order to strengthen the resilience, strategic autonomy and competitiveness of the Union's industrial base, the designation of industrial manufacturing acceleration areas should align with strategic projects and other Union initiatives such as Net-Zero Acceleration Valleys.		development, with a focus on the less developed regions and those in transition. Furthermore, in order to strengthen the resilience, strategic autonomy and competitiveness of the Union's industrial base, the designation of industrial manufacturing acceleration areas should align with strategic projects and other Union initiatives such as Net-Zero Acceleration Valleys. When designating the areas, Member States should, in close cooperation with regional and local authorities, take into account industrial production, existing industrial capabilities, innovation assets, infrastructure, energy connections, ecosystem maturity, decarbonization potential and the strategic importance of the area for the Union's competitiveness and resilience. The designation should not be based primarily on cohesion-policy	Regional averages and cohesion-policy classifications do not sufficiently reflect the industrial potential or investment needs within large and economically diverse regions. Industrial acceleration areas should primarily be selected based on their capacity to rapidly enable strategically important investments and strengthen European industrial competitiveness.
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			classifications or regional GDP averages.	
Recital (57)	Where industrial manufacturing acceleration areas are set up, their designation should correspond to the potential to access or organise education and training opportunities to ensure the availability of skilled labour.		Where industrial manufacturing acceleration areas are set up, their designation should correspond to the potential to access or organise education and training opportunities developed in cooperation with regional and local authorities, higher education institutions, vocational education and training providers, research organisations and industry to ensure the availability of skilled labour.	Skills development requires coordinated action across education, research and industry. The amendment reflects the role of regions in bringing together relevant actors to develop the skilled workforce needed for industrial transformation.
Article 5. Permit-granting procedure	1. Member States shall establish a single permit-granting procedure based on a single application covering all permits required for industrial manufacturing projects. 2. Member States shall designate a competent authority to coordinate the permit granting procedure referred to in paragraph 1 in order to ensure the adoption and issue of a comprehensive decision within the applicable time limit.	2. Member States shall establish or designate one or more competent authorities as single points of contact at the relevant administrative level to coordinate the permit granting procedure referred to in paragraph 1 in order to ensure the adoption and issue of a	Deleted OR Member States shall implement the requirements concerning a single access point and coordinated permitting procedures primarily through existing national administrative systems where possible, while ensuring a single digital entry point for project promoters,	The objective should be to simplify the applicant's process without creating unnecessary new administrative structures. Existing authorities and national systems should be used wherever possible, while ensuring that the applicant experiences the process as a

	3. No later than 45 days from the receipt of the application for a permit for industrial manufacturing projects, the competent authority shall either acknowledge that the application is complete or request any missing information needed to process the application. 4. Where, after the submission of any missing information, the application is still deemed to be incomplete, the application is still deemed to be incomplete, the competent authority may, within 30 days of the submission of the requested missing information, make a second request for any information still missing. The competent authority shall not request information in areas not covered in the first request for additional information and shall request further information only as necessary to cover the missing information.	comprehensive decision within the applicable time limit. Member States may designate the authority or authorities already established as single points of contact pursuant to Article 6 of Regulation (EU) 2024/1735.	clear responsibilities between competent authorities, coordinated parallel processing of permits and transparent processing deadlines.	genuinely coordinated one-stop procedure.
Article 11 (3) (c)	(c) their application would require a contracting authority or contracting	(c) their application would require a contracting authority or contracting	(c) their application would require a contracting authority or	Helsinki-Uusimaa Region does not support a permanent fixed

Public procurement	entity to acquire goods, services or works having disproportionate costs or would result in technical incompatibility in their operation and maintenance. Estimated cost differences exceeding 25%, based on objective and transparent data, may be presumed by contracting authorities and contracting entities to be disproportionate.	entity to acquire goods, services or works having disproportionate costs or would result in technical incompatibility in their operation and maintenance. Estimated cost differences exceeding 40% of total contract value, based on objective and transparent data, may be presumed by contracting authorities and contracting entities to be disproportionate until the adoption of the delegated act referred to in the second subparagraph. (ca) The Commission shall adopt, by [OP: Please insert the date = six months after the date of entry into force of this Regulation], a delegated act in accordance with Article 30 to specify and differentiate the cost differences referred to in Article 11(3)(c) by category of products covered by this Regulation.	contracting entity to acquire goods, services or works having disproportionate costs or would result in technical incompatibility in their operation and maintenance ~~Estimated cost differences exceeding 25%, based on objective and transparent data, may be presumed by contracting authorities and contracting entities to be disproportionate~~	cost-difference threshold of 25%, nor the Parliament's proposal to increase the threshold to 40%. Any higher price tolerance should be transitional and progressively reduced as production scales up and the market matures. Such an approach could lead to substantial additional costs for public authorities at a time of considerable fiscal pressure. In addition, although the proposed low-carbon and Union-of-origin requirements are understandable and supportable in principle, they may increase the administrative burden, particularly for regional and local contracting authorities.
Article 17(1)	This Chapter shall apply to foreign direct investments exceeding a value of EUR 100 million in the emerging strategic manufacturing sectors referred to in paragraph 2, where more than 40 % of the global	This Chapter shall apply to foreign direct investments made by a foreign investor or a foreign investor's subsidiary exceeding a value of EUR 50 million in the emerging strategic manufacturing sectors referred to in paragraph 2,	This Chapter shall apply to foreign direct investments exceeding a value of EUR 100 million in the emerging strategic manufacturing sectors referred to in paragraph 2. where more than 40 % of the global	Helsinki-Uusimaa Region supports safeguarding the Union's economic security but considers that foreign investment rules must remain proportionate, predictable and sufficiently flexible. Lowering

	manufacturing capacity is held by the third country of which the foreign investor is a national or undertaking.	where more than 40 % of the global manufacturing capacity is held by the third country of which the foreign investor is a national or undertaking.	manufacturing capacity is held by the third country of which the foreign investor is a national or undertaking.	the threshold from EUR 100 million to EUR 50 million while simultaneously requiring compliance with all six conditions could discourage strategically important investments and weaken Europe's ability to compete globally for industrial projects. The EUR 100 million threshold should be understood as a threshold for the application of the enhanced foreign direct investment requirements under this Chapter, not as a minimum investment size for industrial projects eligible to locate in or benefit from Industrial Manufacturing Acceleration Areas. Smaller industrial investments can be highly significant for regional economies and should remain fully eligible for the benefits of the IMAA framework.
Article 25 (2) Designating national industrial	Member States shall designate industrial manufacturing acceleration areas by decision, on the basis of the following elements:	1b. Industrial manufacturing projects in the sectors not listed in Annex I may be established within industrial manufacturing	Member States may designate industrial manufacturing acceleration areas by decision,	Helsinki-Uusimaa Region considers it important that Industrial Manufacturing Areas (IMAAAs) should not, as such,

manu- facturing acceleration areas		acceleration areas where they contribute to, or complement, the strategic industrial value chains within those sectors, provided they do not compromise the deployment of industrial manufacturing projects in strategic sectors listed in Annex I (ba) the contribution of the industrial manufacturing acceleration area to the decarbonisation of energy intensive industries and to the achievement of the Union's climate objectives set out in Regulation (EU) 2021/1119, including through the deployment or the enabling of low-carbon industrial processes.	on the basis of the following elements;	create a risk that geographically selective measures linked to them would distort competition between regions. It must be ensured that IMAAs do not create unnecessary disparities between companies located inside and outside the designated areas and undermine the efficient allocation of capital within the European Single Market. Designation criteria should ensure equal opportunities for all regions and are based primarily on industrial readiness, strategic value, infrastructure, energy availability and decarbonization potential rather than cohesion-policy status.
Article 25 (2) (d) Designating national industrial manu- facturing	the Member State's regions' level of development, including least developed areas, regions in transition, and those undergoing industrial transformation.		(d) the Member State's regions' level of development, ~~including least developed areas, regions in transition, and those undergoing industrial transformation,~~ taking into account existing regional industrial capabilities, innovation assets,	Regional development alone is insufficient for identifying suitable Acceleration Areas if the aim is to strengthen European industry's global competitiveness relative to its international competitors. Existing industrial capabilities,

acceleration areas			infrastructure, energy connections, development of skills and ecosystem maturity. Particular attention could also be given to regions that strengthen the European Union's security of supply, energy security, maritime logistics and military mobility.	innovation assets and ecosystem maturity should also be considered to ensure that areas build on proven regional strengths and can deliver industrial acceleration effectively and can rapidly scale up industrial capacity and net-zero technologies and create added value for the competitiveness of the EU.
Article 25(3)(c) – Natura 2000	(c) prioritize locations outside Natura 2000 sites and outside areas designated under national protection schemes for nature and biodiversity conservation, as well as other areas identified on the basis of sensitivity maps and outside protected areas as referred to in Article 6 of Directive 2000/60/EC;	(c) Exclude Natura 2000 sites and areas designated under national protection schemes for nature and biodiversity conservation, as well as other areas identified on the basis of sensitivity maps and outside protected areas as referred to in Article 6 of Directive 2000/60/EC;	(c) prioritize locations outside Natura 2000 sites and areas designated under national protection schemes for nature and biodiversity conservation, without preventing the designation of a wider industrial manufacturing acceleration area where such protected sites are located within or adjacent to the area, provided that industrial projects fully comply with applicable Union environmental legislation and the conservation objectives of the protected sites.	Environmental protection requirements must be fully respected. However, the existence of a protected area within or adjacent to a wider industrial region should not automatically exclude the entire region from IMAA designation where industrial development can take place outside the protected area without compromising its conservation objectives.

Article 25(4)(d)	(d) the feasibility of connecting the acceleration area with sufficient low-carbon energy supply for the acceleration of industrial manufacturing activity;	(d) the feasibility of ensuring the timely connection in the acceleration area with sufficient low-carbon energy supply for the acceleration of industrial manufacturing activity; the availability of existing and planned electricity network capacity, the need for anticipatory grid investments and network reinforcements, the associated costs, climate resilience, and realistic grid connection timelines, taking into account current and reasonably foreseeable connection requests.	(d) the feasibility of ensuring the timely connection in the acceleration area with sufficient low-carbon energy supply for the acceleration of industrial manufacturing activity; the availability of existing and planned electricity network capacity, the need for anticipatory grid investments and network reinforcements, the associated costs, climate resilience, and realistic grid connection timelines, taking into account current and reasonably foreseeable connection requests.	Helsinki-Uusimaa Region supports the amendment and proposes that the assessment should take into account existing and planned electricity and other relevant energy network capacity, the need for anticipatory network investments and reinforcements, associated costs and realistic connection timelines. Access to sufficient and timely energy capacity is one of the key prerequisites for new industrial investments. Acceleration areas should therefore be integrated into forward-looking energy and grid planning rather than relying only on existing network capacity.
Article 25 (3) (new e) Designating national industrial manufacturing acceleration areas			(x) ensure the effective involvement of local and regional authorities and relevant regional innovation ecosystem actors in throughout the designation process.	Regional authorities play a central role in coordinating industrial ecosystems and mobilising regional stakeholders. Their systematic involvement in the designation process will improve ownership, coherence and implementation of Industrial Manufacturing Acceleration Areas.

Article 26 Enabling conditions			(x) facilitate cooperation with existing regional innovation ecosystems, industrial clusters and innovation infrastructures supporting the scale-up of manufacturing projects.	Industrial Manufacturing Acceleration Areas should not operate in isolation. Facilitating cooperation with existing regional innovation ecosystems, industrial clusters and innovation infrastructures will support technology uptake, SME participation and the scale-up of manufacturing projects.
Article 27 Permit-granting procedures in acceleration areas	1. For each designated industrial manufacturing acceleration area, Member States shall prepare and issue an aggregated baseline permit authorising industrial activities located within that area. This aggregated baseline permit shall cover the permits and administrative authorisations required for the industrial manufacturing projects located within the acceleration area, excluding those permits that are installation specific. 2. Before issuing the aggregated baseline permit referred to in paragraph 1, Member States shall carry out all necessary assessments, including relevant	1. For each designated industrial manufacturing acceleration area, Member States shall prepare and issue an aggregated baseline permit authorising industrial activities located within that area. This aggregated baseline permit shall cover the permits and administrative authorisations required for the industrial manufacturing projects located within the acceleration area, with the exception of industrial manufacturing projects referred to in Article 26(2a), excluding those permits that are installation specific and grid connection permits or agreements.	Deleted. OR Member States may establish an aggregated baseline permit or equivalent area-level assessment for matters that can lawfully and effectively be assessed at the level of the acceleration area. Such an instrument shall not replace municipal land-use planning, installation-specific environmental permitting, grid connection procedures or the participation and legal protection rights of local communities, residents and businesses. Matters already	The EU should refrain from regulating Member States' spatial planning. Such simplification must fully respect Member States' competences and spatial planning systems, as well as the principles of local and regional self-government. At the same time, accelerated permitting procedures should not reduce opportunities for local communities, residents and businesses to participate in planning processes and influence decision-making at an early stage. Area-level assessments can reduce unnecessary duplication and shorten project lead times

	environmental assessments, planning procedures and evaluations applicable at the level of the acceleration area. Member States shall take into account the assessment carried out pursuant to Article 25(5). 3. Industrial manufacturing projects located within an industrial manufacturing acceleration area shall be required to obtain only those additional permits or authorisations that fall outside the scope of the aggregated baseline permit referred to in paragraph 1. 4. The provisions of this Article shall not apply where rules to streamline the administrative and permit-granting processes are established in other Union legislative acts for specific industrial manufacturing sectors.		duly assessed at area level should not be reassessed in individual project procedures unless substantial new circumstances have arisen.	without transferring land-use planning powers away from municipalities. The Regulation should distinguish clearly between matters that can be assessed once at area level and those that require project-specific decisions. Spatial planning is a core expression of local democracy and municipal self-government. It is closely linked to land policy and land ownership, and municipalities have broad powers to determine whether planning is re-quired and to prepare and adopt plans. As directly elected local representatives, municipal decision-makers are best placed to balance competing interests and determine appropriate land-use solutions in light of local conditions. Spatial planning and permitting are distinct processes. However, permitting rules may in practice interfere with spatial planning. Competence limits cannot be circumvented
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				through the harmonisation of permitting procedures: regulation that effectively directs planning discretion interferes with municipal competences regardless of its for-mal characterisation.
ANNEX I Strategic sectors for industrial manu-facturing acceleration areas	Energy-intensive industries: (a) Manufacture of paper and paper products, as classified under NACE Code C17; (b) Manufacture of coke and refined petroleum products, as classified under NACE Code C19; (c) Manufacture of chemicals and chemical products, as classified under NACE Code C20; (d) Manufacture of rubber and plastic products, as classified under NACE Code C22; (e) Manufacture of other non-metallic minerals, as classified under NACE Code C23; (f) Manufacture of basic metals, as classified under NACE Code C24. 2. Automotive industry: Manufacture of motor vehicles, trailers and semi-trailers, as classified under NACE Code C29;	3a. Materials of recovery activities: Recovery of sorted materials, as classified under NACE Code E38.21, where the secondary raw materials produced are intended for use in the sectors listed in points 1, 2 or 3 of this Annex.	1. Energy-intensive industries: (a) Manufacture of paper and paper products, as classified under NACE Code C17; (b) Manufacture of coke and refined petroleum products, as classified under NACE Code C19; (c) Manufacture of chemicals and chemical products, as classified under NACE Code C20; (d) Manufacture of rubber and plastic products, as classified under NACE Code C22; (e) Manufacture of other non-metallic minerals, as classified under NACE Code C23; (f) Manufacture of basic metals, as classified under NACE Code C24. 2. Automotive industry: Manufacture of motor vehicles,	

	3. Net-zero technologies, as referred to in Article 4(1) of Regulation (EU) 2024/1735;		trailers and semi-trailers, as classified under NACE Code C29; 3. Net-zero technologies, as referred to in Article 4(1) of Regulation (EU) 2024/1735; 4.Semiconductors as referred to in Article 2 in Regulation 2026/504 (Chips Act 2.0.) 5.Materials recovery activities: Recovery of sorted materials, as classified under NACE Code E38.21, where the secondary raw materials produced are intended for use in the sectors listed in this Annex. 6.Maritime manufacturing industry, including shipyards, maritime equipment manufacturers and related industrial supply chains, where these contribute to the Union's economic security, resilience, clean shipping technologies or strategic maritime capabilities.	Circular economy, recovery of secondary raw materials and industrial symbiosis are integral to the decarbonization and resilience of European industrial value chains. Materials recovery activities should therefore be eligible within acceleration areas where they directly support the strategic sectors covered by the Regulation.
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