FICSIMM
Federația pentru Inovare și Competitivitate Sustenabilă în IMM-uri
Membră a confederației patronale Concordia

Organizația Femeilor Antreprenor® 2020

Industrial Decarbonisation Accelerator Act –

point of view by the Federation for Innovation and Sustainable Competitiveness in SMEs (FICSIMM), Romania

1. Ensure full SME integration in decarbonisation support mechanisms

FICSIMM welcomes the strategic ambition of the **Industrial Decarbonisation Accelerator Act**, but firmly stresses the need for **dedicated mechanisms tailored to SMEs** within energy-intensive sectors and their value chains.

The draft text focuses on large-scale industrial players and lead markets, with insufficient attention to **the systemic disadvantages faced by smaller actors**. Many SMEs operating in downstream segments - such as subcontracting, material transformation or local supply - depend heavily on **access to decarbonised inputs and affordable clean technologies**, yet lack the capital and technical capacity to initiate such transitions on their own.

FICSIMM therefore proposes the **inclusion of SME-specific access windows** to permitting support, **dedicated advisory hubs** and **guarantee-backed financial instruments** for decarbonisation projects under €5 million. Moreover, the Act should mandate the creation of **technical assistance programs targeting SME clusters** in less developed regions, ensuring territorial equity and effective scaling of industrial sustainability.

2. Simplify permitting processes with digital-first, regionalized platforms

The Act identifies the acceleration of permitting procedures as a core priority, which FICSIMM strongly supports. However, the risk remains that such streamlining efforts might benefit only **high-capacity operators** capable of navigating cross-border regulatory frameworks.

FICSIMM advocates that the EU integrate **end-to-end digital platforms** for decarbonisation permitting that are **interoperable across Member States**, but **localized at the regional level** to allow SMEs and local authorities direct engagement. These platforms must include **pre-validation tools, timeline tracking**, and **standardized documentation templates** to reduce ambiguity and compliance delays.

Additionally, FICSIMM calls for **mandatory maximum response times** from national agencies and the appointment of **regional decarbonisation ombudsmen** to mediate conflicts and provide procedural guidance. These changes would not only **de-risk investment decisions** for smaller firms, but also support Member States in complying with transparency and accountability obligations under the Green Deal framework.

3. Create a European "Green Procurement Accelerator" for clean industrial products

The proposal acknowledges a **critical lack of demand for clean industrial products** at market-viable prices. FICSIMM believes this challenge must be addressed not only through subsidies or certification, but also via **structural market creation mechanisms**.

We propose the establishment of a **European Green Procurement Accelerator**, under which **public authorities, large corporations and cross-border procurement platforms** are incentivized - and in some cases, mandated - to prioritize products certified as **low-carbon, circular and resource-efficient**. This initiative would act as a **lead market stimulator** for early-stage producers of decarbonised goods, including SME suppliers. To ensure inclusion, the

Accelerator should adopt a **tiered access framework**, with simplified certification and pricing mechanisms for SMEs.

Moreover, the Act should explicitly promote **"green-by-design" procurement methodologies**, linking product lifecycle assessment (LCA) tools to publicly funded projects in infrastructure, health, construction and mobility. This would **build stable demand pipelines** for SMEs investing in industrial decarbonisation.

4. Align industrial decarbonisation with Cohesion Policy and Just Transition goals

FICSIMM reminds the European Commission that industrial transformation cannot succeed if it exacerbates **regional disparities or economic fragmentation**. The current draft places insufficient emphasis on how the Accelerator Act will interface with **Cohesion Policy**, **Just Transition Funds** and **territorial development instruments**.

We recommend a legal obligation for Member States to define **Regional Industrial Decarbonisation Strategies** that integrate permitting facilitation, energy infrastructure upgrades and support for SME consortia. These strategies must be developed in partnership with **local governments and employers' organizations**, ensuring **bottom-up relevance**.

Additionally, FICSIMM proposes including **monitoring indicators on territorial equity**, such as the number of supported projects per NUTS2 region or the share of funds reaching rural and peri-urban areas. Industrial resilience must be **equally distributed** if Europe is to maintain public support for the green transition and deliver on its long-term objective of **climate-neutral, socially cohesive growth**.

5. Embed upskilling and workforce adaptation in all decarbonisation actions

While the proposal briefly refers to skills and job quality as a sixth priority under the Clean Industrial Deal, FICSIMM believes this must be **institutionalized across all pillars** of the Accelerator Act. Every permitting process, funding instrument and procurement scheme should include **obligatory assessments of workforce needs**, including **gender equality metrics**, **upskilling pathways** and **access to technical training** for SME employees.

We propose that the EU create a **“Skills for Industrial Resilience” platform**, linked to ESF+ and Regional Development Programs, offering both **on-site modular training** and **digital learning environments** tailored to sector-specific decarbonisation challenges.

Particular attention must be paid to **older workers, women in non-traditional sectors and employees of SMEs in transition areas**, many of whom face structural exclusion from lifelong learning initiatives.

By embedding workforce adaptability into the legislative core of the Act, the EU would significantly reduce transition risks and ensure **inclusive competitiveness** as a hallmark of the Green Deal.