CEN – European Committee for Standardization
CENELEC – European Committee for Electrotechnical Standardization

CEN Identification number in the EC register: 63623305522-13
CENELEC Identification number in the EC register: 58258552517-56

Position Paper

Call for Evidence on the Industrial Decarbonisation Accelerator Act

Executive Summary

CEN and CENELEC believe that standards will play a key role in meeting Europe's climate neutrality objectives. To fully realise this potential, CEN and CENELEC asks the European Commission to:

- apply standards consistently in future legislation, including through the IDAA, and to fully leverage relevant existing standards that can support the IDAA, including in grid harmonisation, life cycle assessment (LCA) calculations, hydrogen infrastructure, the circular economy and wind energy.
- ensure coherence with existing EU rules, such as the ESPR and the EU Taxonomy, which already set requirements for energy-intensive industries, such as steel.
- fully leverage the knowledge of European experts to support international standardization of emerging technologies to support industrial decarbonisation.
- fully realize the potential of decarbonisation technologies, policy makers should promptly engage with standardization experts when developing legislation. This ensures decisions are grounded in technical reality and aligned with market dynamics, avoiding barriers to industry uptake and innovation.

Standardization ensures clarity, interoperability, trust and democratizes access in the market, while reducing costs, barriers and enabling scale. These are essential in aiding the European industry to decarbonize. CEN and CENELEC welcome a dialogue with the European Commission on how to make these recommendations reality.

Accelerating industrial decarbonisation in Europe

CEN and CENELEC support Europe's industrial decarbonisation ambitions. In 2023, CEN/TC 474 'Carbon dioxide Capture, transportation, Utilisation, and Storage (CCUS)' was established to coordinate European standardization in this critical sector. CCUS is a key emissions reduction technology, enabling carbon capture from industrial processes, its transport, and either reuse or permanent storage—laying the groundwork for negative emissions.

CEN/TC 474 contributes to finding the technical solutions along the CCUS value chain for decarbonisation of the industry through standards. Currently, the TC is working on:

- standards on CO_2 composition specifying different grades of purity and determination methods, and where needed, developing standards for determination methods of newly identified elements and impurities.
- standards to facilitate (cross-border) transportation of CO_2 by pipeline or shipping,

including safety, integrity, interoperability and environmental aspects.
- standards related to well governance of geological storage of CO_2 during the full lifecycle.
- standards on CO_2 quantification and verification applicable to the entire or parts of the carbon capture and storage (CCS) and carbon capture and utilization (CCU) value chain.

In the future, harmonized European standards on support mechanisms for carbon removals and CCU will need to be developed. Currently, accounting in the Emissions Trading System has been based on generic standards, thus the European Commission should consider existing specific CCU/CCS accounting standards like:

- (Project) DIN EN 00474003 Quantification and verification of carbon dioxide in the entire CCS value chain
- ISO/DIS 27920 Carbon dioxide capture, transport and geological storage (CCS) - Quantification and verification
- ISO/TR 27915 Carbon dioxide capture, transportation and geological storage - Accounting and verification
- ISO/TR 27922 Carbon dioxide capture CO2 capture in cement production - Processes and performance evaluation
- ISO 27919-1 Carbon dioxide capture - Procedure for the performance evaluation of post-combustion CO2 capture in power generation facilities

Further examples of ongoing work to support decarbonisation is that being carried out by CEN/TC 467 on 'Climate Change'. Currently, CEN/TC 467 is developing a standard on 'Industrial Decarbonisation: Sectoral Transition Plans' (ENpr18074), which will be published by the end of 2025. It will specify requirements for developing sectoral transition plans and essential tools for structuring decarbonisation across value chains, in line with European climate objectives. By offering a planning and monitoring tool for the low-carbon transition, this standard will provide a structured operational response to standard users, like industry and public authorities, that is aligned with the ambitions of the IDAA. This will ensure coherence, transparency and effectiveness in decarbonisation efforts at European level.

CEN and CENELEC also support decarbonisation through other technical committees, including:

- CEN/CLC/JTC 10 Material efficiency aspects for products in scope of Eco-design legislation
- CEN/TC 12 Oil and gas industries including lower carbon energy
- CEN/CLC/JTC 14 Energy management and energy efficiency in the framework of energy transition
- CENELEC/TC 82 Solar photovoltaic energy systems
- CENELEC/TC 88 Wind turbines
- CENELEC/ TC 111X Environment
- CEN/TC 335 Solid Biofuels and Pyrogenic Biocarbon
- CEN/TC 408 Biomethane and other renewable and low-carbon methane rich gases
- CEN/TC 473 Circular Economy

➢ **CEN and CENELEC call for the European Commission to apply standards consistently in future legislation, including through the IDAA, and to fully leverage relevant existing standards that can support the IDAA, including in grid harmonisation, life cycle assessment (LCA) calculations, hydrogen infrastructure, the circular economy and wind energy.**

Labelling schemes and sustainability and resilience criteria

The potential development of a voluntary carbon intensity label scheme as part of the IDAA should consider existing standards and avoid imposing unnecessary burden on companies by having separate requirements. Companies are already required to comply with other legislation

covering similar products, including the Ecodesign Regulation (ESPR) and the EU taxonomy. Rather than creating different labelling schemes and thus diluting the different labels, the European Commission should consider using Eco-design requirements where applicable.

Available standards could be used as a tool to establish resilience and sustainability criteria to increase demand for greener products, especially in energy-intensive sectors. For example, CEN and CENELEC are currently developing standards for sustainable concrete (of which cement is a significant component) and steel recycling.

- **CEN and CENELEC call for the European Commission to ensure coherence with existing EU rules when developing an EU voluntary label on the carbon intensity of industrial products, such as the ESPR and the EU Taxonomy, which already set requirements for energy-intensive industries, such as steel and concrete.**

Permitting procedures, public tenders and procurement

Referencing standards can facilitate the procurement process for European companies in different Member States while enabling Member States to design tenders according to market conditions and national requirements. Likewise, they can encourage the use of European products in the public procurement of strategic sectors and technologies. **Therefore, standards can contribute to the Europe's production capacity and deployment of decarbonisation technologies.**

Standards set requirements for the safety and interoperability of technologies but can also provide guidelines for non-price criteria such as recycled content, recyclability and calculation methods for sustainability in construction projects. By setting these criteria buying authorities can place emphasis on European manufacturers in line with the ambition to set European preference criteria in public procurement for strategic sectors, as outlined in the Clean Industrial Deal. Some Member States set legal requirements for the certification of wind turbines in line with international standards. The requirements contribute to clarity between public and private actors while ensuring consistency between developments at national, European and international levels[1].

Accelerating industrial decarbonisation globally

Currently, CEN/TC 474 is developing a standard 'Carbon dioxide capture, transportation and geological storage - Pipeline transportation systems'. This standard is based on an international ISO standard (ISO 27913:2024) that is being supplemented with European homegrown documents tailored to the need of European stakeholders. Important standards have been developed internationally for decarbonisation, including the EN ISO 14064 series focused on greenhouse gas (GHG) accounting and verification. The series provides a framework for organizations to quantify, monitor, report, and verify their greenhouse gas emissions and removals, which is indispensable for assessing the impact of implemented solutions. Under the Standardization Request M/580[2] to CEN and CENELEC, this series is being revised to support Regulation 765/2008 on Accreditation and Conformity Assessment. This reflects the European Standardization System's commitment to international alignment.

Using international standards when suitable is an efficient way of carrying out standardization work and facilitating international trade. Of the 2135 CEN Standards offered for citation in the Official Journal, 29% are identical or based on ISO standards, while of the 1223 CENELEC

[1] Danish 'Executive order on technical certification and servicing of wind turbines etc.'
[2] Register of Commission Documents - C(2021)9277

standards offered for citation in the Official Journal, 66% are identical or based on IEC standards[3]. **This opens the market for European Industry globally when applying European Standards and reduces costs as products do not have to be manufactures differently for each market.**

In international standard setting, CEN and CENELEC Members play an important role in promoting global competitiveness through participation in ISO and IEC, supported by the Vienna and Frankfurt Agreements. In the decarbonisation sector, European Members are leading work in:

- ISO/TC 67 Oil and gas industries including lower carbon energy NEN Secretariat
- ISO/TC 238 Solid Biofuels and Pyrogenic Biocarbon SIS Secretariat
- IEC/TC 88 Wind turbines DS Secretariat
- IEC/TC 117 Solar thermal electric plants UNE Secretariat
- IEC/TC 111 Environmental standardization for electrical and electronic products and systems CEI Secretariat
- ISO/TC 265 Carbon dioxide capture, transportation, and geological storage SCC Secretariat

➢ **CEN and CENELEC call on the European Commission to fully leverage the knowledge of European experts to support the international standardization of emerging technologies to support industrial decarbonisation.**

Supporting clean technologies innovation

The longstanding Public-Private Partnership of the ESS empowers European Standards to act as catalysts for innovation. With a network of over 90,000 experts, CEN and CENELEC ensure that standards reflect industry best practices and cutting-edge innovations. The bottom-up, expert-driven nature of standards development is key for bringing research outcomes to market as innovative products and services as well as ensuring favourable conditions for market scale-up. CEN and CENELEC, and our Members, actively bridge research and standardization through targeted initiatives like RISERS[4], Standards + Innovation platform[5] and HSBooster.eu[6]. The IDAA should consider how these best practices can support innovation in clean technologies.

Standards not only guide product and service development but also drive private sector innovation. **Hence, it is paramount that industry continues to have a strong voice in standards development, so standards remain market-driven and support European industry.**

➢ **CEN and CENELEC call on the European Commission to fully realize the potential of decarbonisation technologies, policy makers should promptly engage with standardization experts when developing legislation. This ensures decisions are grounded in technical reality and aligned with market dynamics, avoiding barriers to industry uptake and innovation.**

[3] CEN CENELEC in figures - Quarterly
[4] RISERS
[5] Standards + Innovation | Boost your innovation with European standards
[6] Key Recommendations from HSBooster.eu: Future Standardisation Booster Framework | HSBooster.eu

About CEN and CENELEC

CEN (European Committee for Standardization) and CENELEC (European Committee for Electrotechnical Standardization) are recognized by the European Union (EU) and the European Free Trade Association (EFTA) as European Standardization Organizations responsible for developing standards at European level, as per European Regulation 1025/2012. The members are the National Standards Bodies (CEN) and National Electrotechnical Committees (CENELEC) from 34 European countries. European Standards (ENs) and other standardization deliverables are adopted by CEN and CENELEC, are accepted and recognized in all of these countries. These standards contribute to enhancing safety, improving quality, facilitating cross-border trade and strengthening of the European Single Market. They are developed through a process of collaboration among experts nominated by business and industry, research institutions, consumer and environmental organizations, trade unions and other societal stakeholders. CEN and CENELEC work to promote the international alignment of standards in the framework of technical cooperation agreements with ISO (International Organization for Standardization) and the IEC (International Electrotechnical Commission).