nucleareurope

Position paper

An Industrial Accelerator Act fit for European Competitiveness

Nuclear is one of the few net-zero value chains to be fully based in Europe, spanning the entire lifecycle of our industry. Its strength lies in a complete, highly integrated value chain that extends far beyond the countries that operate nuclear reactors. Over 5,000 companies[1] across all Member States supply equipment, materials, digital technologies and specialised services, making nuclear one of Europe's broadest and most interconnected industrial ecosystems. Significant nuclear investments are planned over the coming years, providing the EU with abundant, homegrown clean energy (please see appendix).

Nucleareurope welcomes the inclusion of nuclear fission in the Industrial Accelerator Act (IAA). However, please find below a number of key recommendations to align the Act with its ambition and deliver a sovereign industry:

1. Lay down a solid basis for investments delivered by the European nuclear supply chain while maintaining EU openness to foreign technologies

In the EU, planned new reactors - both large-reactors and Small Modular Reactors (SMRs) - are expected to include both domestic and non-EU technology providers. For projects based on non-EU designs, the IAA requirements can represent a good opportunity to develop manufacturing capacity within the EU whilst striving to support the growth of the European nuclear supply chain. It is, therefore, vital that the Industrial Accelerator Act remains open to all technologies.

2. Strengthening supply chain growth and industrial leadership

Nucleareurope acknowledges the proposed 'Made in EU' provisions related to nuclear components. However, such an approach fails to capture the complexity of nuclear, which are, by definition, large strategic projects involving multiple components and sub-components, spanning across several decades and with unique safety requirements. Whilst it is important to remain open to all technologies in order to reduce costs and potential project delays, safeguarding long-term ownership of key intellectual property and expertise is also essential. Nucleareurope would therefore suggest considering an alternative approach, whereby component-based rules are replaced by holistic 'Made in EU' criteria that can be used by EU and national administrations to evaluate projects.

Such criteria would, for instance, include the following indicators, the level of which could be tailored by national administrations depending on each project:

- The ownership and control of Intellectual Property (IP) rights associated with components and sub-components
- The European origin of materials used in the manufacturing process
- The European location of manufacturing and processing operations for sub-components

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[1] https://supplychain.nucleareurope.eu/

- The local workforce used for the manufacturing/assembly of the final component/sub-component
- Gross Value Added in the EU
- The location of long-term maintenance and service contracts in the EU.

The proposed criteria should become applicable in a timely manner.
Nucleareurope considers that such an incentive-based approach would provide greater flexibility while supporting the objective of strengthening the European industrial base.

3. 'Made in EU' requirements should apply exclusively to newbuild projects

As proposed under the IAA, 'Made in EU' requirements should apply only to nuclear newbuild projects. They should not apply to research, development and innovation projects including the first industrial deployment of nuclear reactors, nor to existing nuclear reactors.

4. Set third-country 'Made in EU' equivalence criteria from the outset to provide clarity to investors

There is significant legal uncertainty around how the list of 'equivalent jurisdictions' will be defined. Nucleareurope believes that the criteria under which non-EU countries may qualify should be established from the start, to ensure clarity for upcoming nuclear projects. Changes to these conditions should not be applied retroactively.

5. Consideration of the nuclear fuel cycle in the IAA

As proposed under the IAA, fuel cycle technologies could be potentially added via a delegated act. A clear distinction should be established between potential IAA requirements (regarding fuel cycle facility components) and the upcoming REPowerEU proposal (regarding the origin of nuclear materials and fuels as well as service providers). The IAA should not replace potential provisions in support of the fuel cycle under REPowerEU.

6. Include further measures beyond the IAA to maximise EU wide development of the nuclear supply chain

While the IAA sends a positive signal for the further development of the local nuclear supply chain, additional measures are essential to reinforce this support, particularly in areas such as workforce, skills, and research. As highlighted in our Action Plan for Nuclear[2], these include the following:

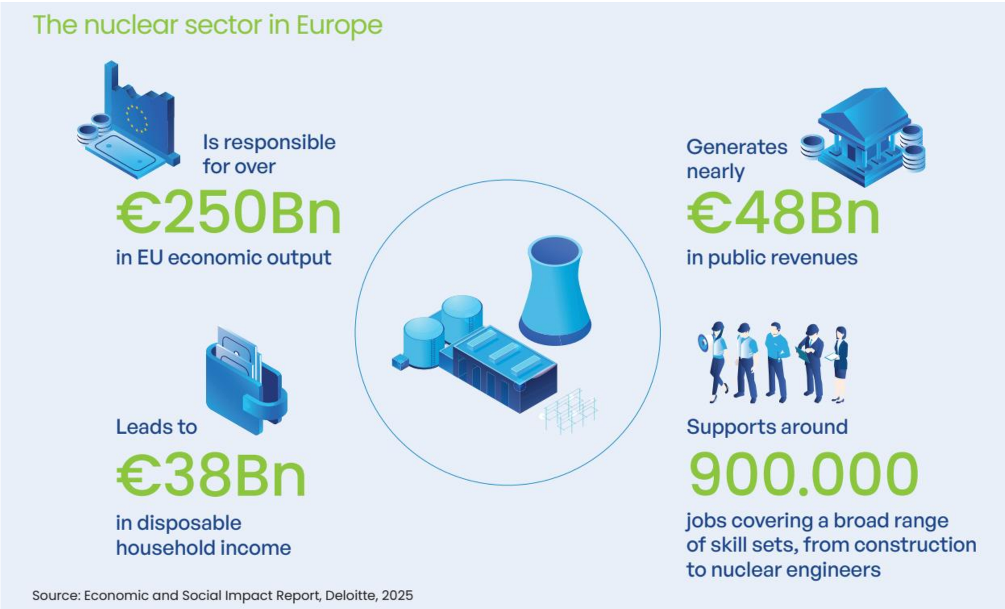
- All energy technologies promoted under the IAA should be treated equally under wider EU policies, including when it comes to financing and the overall policy framework;
- Ensure that the Nuclear Illustrative Programme (PINC) effectively tracks progress of nuclear investments and functions as a strategic instrument;
- Reform the EU energy and climate governance framework (for example by establishing a clean energy target for 2040);
- Provide continued support for the European Industrial Alliance on SMRs in its mission to facilitate and accelerate the development, demonstration, and deployment of SMRs in Europe by the early 2030s, including through specific funding instruments;
- Encourage greater synergies across sectors in the fields of skills, research and development.

[2] Unleashing the Power of Nuclear: a Plan for Action – full report - 23 March 2026

APPENDIX – the nuclear value chain, a strategic asset for Europe

The nuclear value chain

Nuclear is one of the few strategic net zero value chains that is almost entirely based in Europe, spanning the entire lifecycle of our industry. Not only does this reinforce our industrial sovereignty and reduce our dependence on external suppliers, it also ensures that innovation, economic value and high-quality employment grow in Europe.



Europe's nuclear industry is a recognised world leader, built on decades of technological excellence, innovative progress and a uniquely comprehensive value chain. From fuel cycle services and reactor technologies and components to advanced materials, digital systems and engineering expertise, European companies offer capabilities matched by few global competitors.

Its strength lies in a complete, highly integrated value chain that extends far beyond the countries that operate nuclear reactors. As shown on nucleareurope's supply chain website, over five thousand companies across all Member States supply equipment, materials, digital technologies and specialist services, making nuclear one of Europe's broadest and most interconnected industrial ecosystems. This ecosystem reaches far beyond energy generation, as it also includes vital medical diagnosis and treatment, as well as space and agricultural applications.

Nuclear investments in the coming years

Significant nuclear investments are planned over the coming years, as installed nuclear capacity is set to grow from around 100 Gigawatts (GW) to close to 150GW by 2050[3] in the EU.

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[3] Investments of **EUR 535 billion (**undiscounted value) for large reactors and LTO as mentioned in the Final PINC SWD (nucleareurope calculations based on figure 6)

This will provide the EU with abundant, homegrown clean energy. It will also bring considerable economic benefits to the wider European economy, both in terms of jobs, economic output, household income and public revenues.