



## Inhalt

1. Leitmärkte.....	1
2. Wertschöpfung durch ausländische Direktinvestitionen .....	9
3. Förderliche Bedingungen für industrielle Produktion & Dekarbonisierung.....	10

## 1. Leitmärkte

### ANNEX II Union origin requirements for net-zero technologies

- Part I – Public procurement: accordance with Article 25a; public procurement procedures falling within the scope of Directives 2014/23/EU, 2014/24/EU or 2014/25/EU
- Part II – Auctions: accordance with Article 26; pre-qualification or award criteria
- Part III – Other forms of public intervention: accordance with Article 28b; new schemes or to update existing schemes benefitting households or companies that support the demand for net-zero technology; Member States, regional or local authorities, bodies governed by public law; beneficiaries shall be eligible to the scheme or to additional financial compensation only where the requirements are fulfilled
- IV – Member State support to construction or manufacturing of net-zero technologies: accordance with Article 28c

<u>Technology</u>	<u>Public Intervention Scheme</u>	<u>Local Content Requirements</u>
Battery energy storage systems	<u>Union origin requirements for net-zero technologies Part I – Public procurement</u>	<p><b>From [OP: Please insert the date = 1 year after entry into force of this Regulation] until [3 years after entry into force of this Regulation], the battery energy storage systems shall originate in the Union and, for projects including battery energy storage exceeding 1 Megawatt-hour, contain a battery management system that originates in the Union.</b></p> <p><b>From [OP: Please insert the date = 3 years after entry into force of this Regulation], the battery energy storage systems shall originate in the Union and contain battery cells, a battery management system as well as one additional main specific</b></p>

		component that originate in the Union.
	<u>Union origin requirements for net-zero technologies Part II – Auctions</u>	<p><b>For auctions published from [OP: Please insert the date = 1 year after entry into force</b> of this Regulation] until [OP: Please insert the date = 3 years after entry into force of this Regulation], the <b>battery energy storage system shall originate in the Union</b> and, for projects including battery energy storage exceeding 1 Megawatt-hour, contain a <b>battery management system that originates in the Union</b>.</p> <p><b>For auctions published after [OP: Please insert the date = 3 years after entry into force</b> of this Regulation], the <b>battery energy storage system shall originate in the Union</b> and contain <b>battery cells, a battery management system as well as one additional main specific components that originate in the Union</b>.</p>
	<u>Union origin requirements for net-zero technologies Part III – Other forms of public intervention</u>	<p><b>For schemes set up or updated between [OP: Please insert the date = 1 year after entry into force</b> of this Regulation] and [OP: Please insert the date = 3 years after entry into force of this Regulation], the <b>battery energy storage systems shall originate in the Union</b> and, for projects including battery energy storage exceeding 1 Megawatt-hour, <b>contain a battery management system that originates in the Union</b>.</p> <p><b>For schemes set up or updated from [OP: Please insert the date = 3 years after entry into force</b> of this Regulation], the <b>battery energy storage systems shall originate in the Union</b> and contain <b>battery cells, a battery management system as well as one additional main specific components that originate in the Union</b>.</p>
<b>Solar technologies</b>	<b>PV</b>	
	<u>Union origin requirements for net-zero technologies Part I – Public procurement</u>	<b>From [OP: Please insert the date = 3 years after entry into force</b> of this Regulation], the <b>PV inverter and the PV cells or equivalent shall originate in the Union</b> .
	<u>Union origin requirements for net-zero</u>	<b>For auctions published after [OP: Please insert the date = 3</b>

	<u>technologies Part II – Auctions</u>	<b>years after entry into force</b> of this Regulation], PV inverter and the PV cells or equivalent shall originate in the Union.
	<u>Union origin requirements for net-zero technologies Part III – Other forms of public intervention</u>	<b>For schemes set up or updated from [OP: Please insert the date = 3 years after entry into force</b> of this Regulation], the PV inverter and the PV cells or equivalent shall originate in the Union.
<b>Hydronic heat pumps</b>	<u>Union origin requirements for net-zero technologies Part I – Public procurement</u>	<b>From [OP: Please insert: 3 years after the entry into force</b> of this Regulation] the hydronic heat pump shall originate in the Union.
	<u>Union origin requirements for net-zero technologies Part III – Other forms of public intervention</u>	<b>For schemes set up or updated from [OP: Please insert the date = 3 years after entry into force</b> of this Regulation], the hydronic heat pump shall originate in the Union.
<b>Onshore and offshore wind technologies</b>	<u>Union origin requirements for net-zero technologies Part I – Public procurement</u>	<b>From [OP: Please insert the date = 1 year after the entry into force</b> of this Regulation] until [OP: Please insert the date = 3 years after entry into force of this Regulation], <b>one main specific component shall originate in the Union.</b>  <b>From [OP: Please insert the date = 3 years after the entry into force</b> of this Regulation], <b>two main specific components shall originate in the Union.</b>
	<u>Union origin requirements for net-zero technologies Part II – Auctions</u>	<b>For auctions published from [OP: Please insert the date = 1 year after entry into force</b> of this Regulation] until [OP: Please insert the date = 3 years after entry into force of this Regulation], <b>one main specific component of the wind turbine shall originate in the Union.</b>  <b>For auctions published after [OP: Please insert the date = 3 years after entry into force</b> of this Regulation], <b>two main specific components of the wind turbine shall originate in the Union.</b>
<b>Hydrogen</b>	<u>Union origin requirements for net-zero technologies Part II – Auctions</u>	<b>For auctions published after [OP: Please insert the date = 1 year after the entry into force</b> of this Regulation], the <b>electrolysers</b>

		<p>used to produce the hydrogen <b>shall originate in the Union</b>, and the <b>stacks as well as one additional main specific component shall originate in the Union.</b></p> <p><b>For auctions published after [OP: Please insert the date = 3 years after the entry into force</b> of this Regulation], the <b>electrolysers</b> used to produce the hydrogen <b>shall originate in the Union</b>, and the <b>stacks as well as two additional main specific components shall originate in the Union.</b></p>
	<p><u>Union origin requirements for net-zero technologies IV – Member State support to construction or manufacturing of net-zero technologies</u></p>	<p><b>From [OP: Please insert the date = 1 year after entry into force</b> of this Regulation] when setting up new support schemes for investments into supporting the manufacturing capacity of electrolysers, Member States shall ensure that the <b>electrolyser originates in the Union and the stack and at least one additional main specific component of the electrolyser originate in the Union.</b></p> <p><b>From [OP: Please insert the date = 3 years after entry into force</b> of this Regulation] when setting up new support schemes for investments into supporting the manufacturing capacity of electrolysers, Member States shall ensure that the <b>electrolyser originates in the Union and the stack and at least two additional main specific components of the electrolyser originate in the Union.</b></p>

## ANNEX III Union origin requirements for vehicles

Part I – Public procurement procedures of electric vehicles	Part II – Other forms of public intervention and financial support for corporate vehicles	Part III – Super credits for small zero-emission vehicles
<p>New pure electric vehicles (PEV), off-vehicle charging hybrid electric vehicles (OVC-HEV) or fuel cell vehicles (FCV) purchased, leased, rented or hire-purchased in public procurement procedures that fall within the scope of Directive 2014/24/EU, or Directive 2014/25/EU, <b>launched on or after [OP: Please insert the date = six months after the date of entry into force</b> of this Regulation] shall comply with the Union origin requirements set out in this Annex.</p> <p>New PEV, OVC-HEV and FCV that are used for the provision of services sourced through public procurement procedures that fall within the scope of Directive 2014/24/EU, or Directive 2014/25/EU, shall comply with the Union origin requirements set out in this Annex.</p> <p><b>Vehicles referred to in subparagraphs 1 and 2 shall include the following Union origin requirements:</b></p> <ol style="list-style-type: none"> <li>a. the vehicle is assembled within the Union;</li> <li>b. the ratio between the total ex-works price of vehicle components - excluding the vehicle battery - originating in the Union and the total ex-works price of all components –</li> </ol>	<p>For <b>schemes established or updated after [OP: Please insert the date = six months after the date of entry into force</b> of this Regulation] that support the purchase, lease, rent or hire purchase of <b>new PEV, OVC-HEV or FCV</b>, Member States, regional or local authorities, bodies governed by public law or associations formed by one or more such authorities or one or more such bodies governed by public law shall ensure that only vehicles that comply with the below minimum Union origin requirements are eligible under the scheme.</p> <p>For the purpose of considering corporate cars and vans 'made in the European Union' in accordance with Article 4 of the [Proposal for a Regulation of 16 December 2025 on clean corporate vehicles], <b>the below requirements apply.</b></p> <ol style="list-style-type: none"> <li>a. the vehicle is assembled within the Union;</li> <li>b. the ratio between the total ex-works price of vehicle components - excluding the vehicle battery - originating in the Union and the total ex-works price of all vehicle components – excluding the battery – is equal to or greater than 70%;</li> </ol>	<p>For the purpose of considering vehicles as “made in the EU” in accordance with Article 5 of Regulation (EU) 2019/631 [as amended by the Proposal for a Regulation of 16 December 2025 amending Regulation (EU) 2019/631 as regards <b>CO2 emission performance standards for new light duty vehicles and vehicle labelling</b>], <b>the following criteria apply:</b></p> <ol style="list-style-type: none"> <li>1. the vehicle is assembled within the Union;</li> <li>2. and one of the two criteria below: <ol style="list-style-type: none"> <li>(a) the ratio between the total ex-works price of vehicle components - excluding the vehicle battery - originating in the Union and the total ex-works price of all vehicle components – excluding the battery – is equal to or greater than 70%; or</li> <li>(b) the vehicle’s traction battery contains at least three main specific components of batteries, among which the battery cells, originating in the Union.</li> </ol> </li> </ol>

<p>excluding the battery – is at least 70%;</p> <p>c. the vehicle's traction battery contains at least three main specific components of batteries, among which the battery cells, originating in the Union;</p> <p>d. the vehicle's traction battery contains at least five main specific components of batteries, among which the battery cells, the cathode active material, and the battery management system, originating in the Union;</p> <p>e. the ratio between the total ex-works price of e-powertrain components originating in the Union and the total ex-works price of all e-powertrain components is at least 50%;</p> <p>f. the ratio between the total ex-works price of main electronic systems originating in the Union and the total ex-works price of all main electronic systems is equal to or greater than 50%.</p> <p><b>The requirements set out in points d), e) and f) apply from [OP: please insert date 3 years after the date of entry into force] of this Regulation].</b></p> <p>By way of derogation to the requirements set</p>	<p>c. the vehicle's traction battery contains at least three main specific components of batteries, among which the battery cells, originating in the Union;</p> <p>d. the vehicle's traction battery contains at least five main specific components of batteries, among which the battery cells, the cathode active material, and the battery management system, originating in the Union;</p> <p>e. the ratio between the total ex-works price of e-powertrain components originating in the Union and the total ex-works price of all e-powertrain components is equal to or greater than 50%;</p> <p>f. the ratio between the total ex-works price of main electronic systems originating in the Union and the total ex-works price of all main electronic systems is equal to or greater than 50%.</p> <p><b>The requirements set out in points d), e) and f) apply from [OP: please insert date three years after the date of entry into force] of this Regulation].</b></p> <p>By way of derogation to the requirements set out above, <b>small electric vehicles of subcategory M1E</b>, as defined in Regulation (EU) 2018/858, <b>shall include the following Union origin requirements.</b></p> <p>1. the vehicle is assembled within the</p>	
---	---	--

<p>out above, <b>small electric vehicles of subcategory M1E</b>, as defined in Regulation (EU) 2018/858, <b>shall include the following Union origin requirements:</b></p> <ol style="list-style-type: none"> <li>1. the vehicle is assembled within the Union;</li> <li>2. and one of the two criteria below: <ol style="list-style-type: none"> <li>(a) the ratio between the total ex-works price of vehicle components - excluding the vehicle battery - originating in the Union and the total ex-works price of all vehicle components – excluding the battery – is equal to or greater than 70%; or</li> <li>(b) the vehicle’s traction battery contains at least three main specific components of batteries, among which the battery cells, originating in the Union.</li> </ol> </li> </ol> <p>Upon request of a vehicle manufacturer, all PEV, OVC-HEV or FCV from that vehicle manufacturer <b>can be considered compliant, for a period of twelve months</b>, with the Union origin requirements <b>if the manufacturer demonstrates that the total number of all PEV, OVC HEC or FCV vehicles compliant with the Union origin requirements that were assembled by that vehicle manufacturer during the period comprised between 1 January and 31 December (included) of the previous year represent a percentage equal or greater than 85% of the total number of PEV, OVC-HEV or FCV from</b></p>	<p>Union;</p> <ol style="list-style-type: none"> <li>2. one of the two criteria below: <ol style="list-style-type: none"> <li>(a) the ratio between the total ex-works price of vehicle components - excluding the vehicle battery - originating in the Union and the total ex-works price of all vehicle components – excluding the battery – is equal to or greater than 70%; or</li> <li>(b) the vehicle’s traction battery contains at least three main specific components of batteries, among which the battery cells, originating in the Union.</li> </ol> </li> </ol> <p>Upon request of a vehicle manufacturer, all PEV, OVC-HEV or FCV from that vehicle manufacturer <b>can be considered compliant, for a period of twelve months</b>, with the Union origin requirements <b>if the manufacturer demonstrates that all PEV, OVC-HEV or FCV compliant with the Union origin requirements that were assembled by that vehicle manufacturer during the period comprised between 1 January and 31 December (included) of the previous year represent a percentage equal or greater than 85% of the total number of PEV, OVC-HEV or FCV from the same vehicle manufacturer that were registered within the Union in the same period.</b></p>	
--	---	--

<p><b>the same vehicle manufacturer that were registered within the Union in the same period.</b></p> <p>Where public procurement procedures concern public service contracts referred to in subparagraph 2, vehicles already registered in the Union shall be deemed to comply with the requirements set out in this Annex until 31 December 2035.</p>		
---	--	--

## 2. Wertschöpfung durch ausländische Direktinvestitionen

### Bedingungen für bestimmte ausländische Direktinvestitionen

- für ausländische Direktinvestitionen
  - > 100 Mio €
  - Herkunftsland des Investors kontrolliert > 40% der globalen Produktionskapazität
- **Aus den Sektoren:**
  - **Batterietechnologien & Batterie Energiespeichersysteme**
  - **PV Solartechnologie**
  - **Elektrische Fahrzeuge (PEV), Hybridfahrzeuge mit externer Ladefunktion (OVC-HEV) oder Brennstoffzellenfahrzeuge (FCV)**
  - **Gewinnung, Verarbeitung und Recycling kritischer Rohstoffe**
- **1 Jahr nach Inkrafttreten**
- 4 der folgenden 6 Bedingungen müssen erfüllt werden:
  - Begrenzte Kontrolle: Ausländischer Investor darf maximal 49% Anteile bzw. Stimmrechte halten
  - Joint Venture: Investition erfolgt über ein Joint Venture mit EU-Partnern
  - Technologie- und Know-how Transfer: Investor muss Lizenzen und Know-how an das EU-Unternehmen übertragen
  - Forschung & Entwicklung: Investor muss mindestens 1% des Jahresumsatzes des EU-Assets in F&E innerhalb der EU investieren
  - EU-Arbeitsplätze: Mind. 50% der Beschäftigten müssen EU Arbeitnehmer sein
  - EU-Wertschöpfungsketten: Investor muss eine EU Sourcing-Strategie veröffentlichen und mindestens 30% der Vorprodukte in der EU einkaufen

### 3. Förderliche Bedingungen für industrielle Produktion & Dekarbonisierung

#### ANNEX I Strategic sectors for industrial manufacturing acceleration areas

- **Einrichtung des Beschleunigungs gebiets innerhalb von 1 Jahr nach Inkrafttreten**
- Jeder Mitgliedstaat muss mind. 1 sog. „Industrial manufacturing acceleration area“ einrichten, um industrielle Fertigungsprojekte in einem oder mehreren der strategischen Sektoren zu bündeln
- Dort soll es eine „aggregierte Basisgenehmigung“ geben, die Umweltverträglichkeit und weitere Umweltverfahren bereits abdeckt
- Status als „strategisches Projekt“ nach Art. 14 des Vorschlags zur Beschleunigung von Umweltprüfungen, COM(2025) 984 final)
- Begleitmaßnahmen durch die mitgliedstaatlichen Behörden, u.a. Erhebung des Energiebedarfs der angesiedelten Unternehmen, des Bedarfs der Infrastruktur, Forschungsförderung
- **Sektoren u.a.**
  - **Automotive industry:** Manufacture of motor vehicles, trailers and semi-trailers, as classified under NACE Code C29
  - **Net-zero technologies**, as referred to in Article 4(1) of Regulation (EU) 2024/1735

#### Weitere Beschleunigungsmaßnahmen

#### Alle Aktivitäten nach NACE Code C (verarbeitendes Gewerbe) mit Ausnahme von C12 (Tabakverarbeitung)

#### Single Access Point

- Einheitliches Genehmigungsverfahren inkl. Frist von 45 Tagen, innerhalb derer die Behörde dem Projektwerber mitteilen muss, ob die Unterlagen vollständig sind
- **Keine Frist vorgesehen**

#### FEEI – Fachverband der Elektro- und Elektronikindustrie

Mariahilfer Straße 37–39, 1060 Wien • T +43/1/588 39-0 • E info@feei.at • www.feei.at

Bank Austria UniCredit Group • BLZ 11000 • Kontonummer 0121 01705 00 • IBAN AT42 1100 0012 1017 0500 • BIC BKAUATWW • lautend auf WKÖ/Fachorganisationen