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Pani
Kamila Król
Podsekretarz Stanu
Ministerstwo Rozwoju i Technologii

Szanowna Pani Minister,

W związku z trwającymi pracami związanymi z Rozporządzeniem Parlamentu Europejskiego i Rady ustanawiającego ramy dotyczących środków na rzecz wzmocnienia europejskiego ekosystemu półprzewodników (również jako: Akt w sprawie czipów, EU Chips Act), Związek Pracodawców Technologii Cyfrowych Lewiatan przesyła uwagi w sprawie niniejszego tekstu.

Z poważaniem



Jolanta Jaworska
Prezes Związku Pracodawców Technologii Cyfrowych Lewiatan

Załącznik: Stanowisko Związku Pracodawców Technologii Cyfrowych Lewiatan w sprawie *Rozporządzenia Parlamentu Europejskiego i Rady ustanawiającego ramy dotyczących środków na rzecz wzmocnienia europejskiego ekosystemu półprzewodników (również jako: Akt w sprawie czipów, EU Chips Act).*

Digital Employers Association Lewiatan comments on EU Chips Act

Digital Employers Association Lewiatan welcomes and strongly supports the EU Chips Act package and its ambition to develop a more geographically diversified, sustainable, and resilient semiconductor supply chain. The initiative is timely to address key trends such as a) the EU decades-long decline in semiconductor manufacturing; b) the ever-growing EU demand and consumption of semiconductors, including leading-edge for AI, HPC, autonomous driving, metaverse, 5G, cloud and IoT applications; and c) the current dependencies on Asia that created the chip shortages experienced over the past years.

Outfall from the pandemic and the current geopolitical situation accelerated and deepened the shift from an efficiency driven global supply chain in semiconductors to a resilience based one. The EU Chips Act is a prerequisite to rebalance the global semiconductor supply chain and bring design, research as well as front-end and back-end production facilities of the advanced chips to Europe. Semiconductor facilities face significant cost disadvantages in Europe compared to other competitive locations in the rest of the world. Closing the cost gap with other attractive locations across the globe is essential to make these investments in the EU viable, hence government support is critical.

Based on our observations so far it appears that that European Commission, Parliament, and Council are aware of the importance of this legislation and the need for its swift adoption. In the absence of any major obstacles preventing the adoption we would like to urge the EU regulators, to adopt EU chips act in the first half of 2023 at the latest. Delaying the adoption will only deepen the competitive advantage of the semiconductor producers located outside of the European Union.

Aside from supply chain security aspect, the semiconductor-related investments will contribute to the economic growth and technological leadership. These benefits will be seen not only in the EU countries where semiconductor investments will be located but positive cross-EU spill-over effect will take place as collaboration with the EU suppliers and R&D partners will enhance.

However, the EU cannot do this in isolation, therefore transatlantic cooperation will be essential. Areas which EU-US Trade and Technology Council can facilitate are 1) training of the next generation workforce essential for the semiconductor industry, 2) coordination of the emergency measures, 3) collaboration on technical standards, 4) alignment on export controls, and 5) collaboration on research. Similar cooperation and alignment should take place with other likeminded countries.

Digital Employers Association Lewiatan and its members are looking forward to the adoption of the EU Chips Act. This is particularly important to the ICT industry represented by our association. We look forward to engaging in further discussions on this topic.