

FOCUS ON

Research and Innovation

As far as research and innovation (R&I) is concerned, we welcome the approach of the Communication, particularly its references to the Innovation Principle through Better Regulation, the Important Project of Common European Interest (IPCEIs), lower-carbon economy and digitalisation. Moreover, the Communication strikes the right balance between the needs of SMEs and big companies, when it comes to research and innovation.

The following elements of Horizon 2020 are not explicitly mentioned in the Communication but should remain in the future Framework Programme (FP) to ensure that industry stays ahead of the global competition:

- the industrial pillar including the Public-Private Partnerships (PPPs) and Joint Technology Initiatives (JTIs);
- collaborative industrial research and innovation (R&I);
- grants;
- option to opt-out of open data.

The following four elements are only partially considered in the Communication and in the existing EU research & innovation framework and should therefore be more formally enforced in an EU industrial strategy:

- **Research and innovation as a driver for industrial growth**
High market uptake of research programmes into industry by large companies and SMEs in all industrial sectors should become a EU top priority to ensure the competitiveness of the EU industry. This would result in economic growth, jobs creation, raw-material security and higher return of taxpayer investment in transnational research.
- **Technological development and education**
A combined development of skills and technologies should be envisaged in order to maintain and increase Europe's attractiveness as a manufacturing base at all stages from education through industry (cf. **Focus on Skills & Training**).
- **Research & innovation in an international context**
There is currently no reciprocity of access to institutional and public programmes between

the EU and the rest of the world (such as Asia). Added value could be created by allowing European companies to participate in research programmes outside the EU. An adequate EU regulatory structure should therefore be put in place. Moreover, the finance gap in R&I between Europe and the rest of the world is affecting the worldwide industrial competition.

- **Access to research funding**

R&I programmes need to be further refined in order to increase the current low success rate. The current heavy administrative burdens should be reduced. Consistency and complementarity of R&I funding at different levels (EU-wide, Member States, Regions) should be improved and a funding roadmap should be created. All funding and financing opportunities should be further developed, including institutional PPPs (Joint Undertakings), direct grants to private companies and financing from private investors.

In a forward-looking perspective, the following points related to research and innovation should be implemented as a matter of priority as a follow-up to the Commission's Communication:

- With reference to research and innovation, the reduction of the time to market or end-user should be achieved by, inter alia, reducing legal uncertainty, increasing regulatory efficiency and systematic consideration of the Innovation Principle when developing new legislation.
- Innovation should help foster European growth and jobs. This can be best done if it leads to EU-based manufacturing. Therefore, the export of innovative products should be favoured over a pure know-how transfer. Technology and industrial R&I systems development should be a main area of the next Framework Programme.
- Regulatory and financial instruments should be put in place to incentivise well-established European industrial players to adapt to the lower carbon society in order to unleash their full innovation potential and compete at global level. This can be done by supporting the introduction of lower carbon innovation in the European industry and contribute to fast time-to-market of R&I developments.
- The close connection of the scientific and research infrastructure with industrial R&I is a main success factor for the European industry and provides a strong incentive for companies to stay in Europe. Strengthening the close relationship between scientific and industrial research should be a focus to keep industry and, by this, growth and jobs, in Europe.
- The EU budget should be re-balanced in light of the importance of R&I ensuring adequate coordination in order to create the basis for future prosperity of Europe.

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Access to Finance

We welcome the Communication's chapter on **Investing in the industry of the future** as it rightly puts a strong emphasis on the investments needed to drive industrial transformation. While the Communication outlines many useful initiatives, the following points should also be addressed to ease access to finance:

- **Leveraging private capital and bridging the investment gap**

Since industrial projects and the development of new technologies are capital intensive and need important upfront investment, an ambitious EU industrial strategy needs to foresee the further development of financing instruments to leverage private capital and bridge the investment gap until the revenue stream can be established.

- **Facilitating investments in industrial sectors**

The EU should further pursue its efforts to facilitate access to risk capital (e.g. the EFSI and first-of-a-kind financing instruments), reduce the merchant risk and the insurance risk, thus facilitating investments in industrial sectors.

- **Strengthening the existing funding mechanisms**

The creation of the new financing mechanisms, however, should not undermine the existing funding mechanisms (grants). A sound coordination between grants and other EIB finance instruments remains crucial for long-term investment planning for big industrial projects and deployment of new technologies, acknowledging that loans and guarantees cannot achieve the same objectives as grants.

- **Supporting investment in new technologies**

Achieving the EU goals transforms societies, economies and industries and requires investments in new technologies, including the ones for the energy transition and digitalisation. A bold EU industrial strategy should support the transition of historical sectors to adapt to the new requirements of the evolving policy targets and regulatory environment, e.g. the Paris Agreement.

- **Unleashing regional investment opportunities**

The added value of regional investment opportunities should be unleashed by creating an enabling framework for inter-regional investment platforms and financial schemes that take into account both technological and regional characteristics.

- **Achieving a level-playing field globally**

Globally, a level playing field needs to be established taking into account the developments in other world regions (e.g. financial backing to the state-owned companies). An EU industrial strategy should ensure adequate policy responses to put European companies on the same footing, in particular regarding the support for exporting EU products and technologies. The EU should support exports by facilitating overseas financing through the EIB and Export Credit Agencies. The EU should also work with other OECD members to ensure that the OECD export credit rules are well adapted to the needs of the EU' s exporting industries.

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Internal market

The European Single Market is one of the EU's greatest achievements. Its high standards have underpinned the competitiveness of European businesses, establishing the European Union as a key global market and export partner. The Single Market has improved the everyday life of European businesses and citizens by stimulating investments and economic growth, boosting employment, and reducing costs and administrative/regulatory burdens.

However, the dynamics of integration have been slowing down while new challenges have arisen in the past years. Barriers remain or resurge, hampering the realisation of a fully integrated Single Market for products and services and increasing cumulative costs for the European industry. Divergences between Member States' interpretation of EU law lead to significant challenges for businesses to compete on a level-playing field. Furthermore, a lack of harmonised rules and/or standards in certain sectors or legal domains often leads to the enforcement of different national rules, challenging a truly free movement of goods across the EU.

Against this background, we welcome the fact that the Communication acknowledges the internal market as a key driver for the competitiveness of the European industry. However, the document fails to provide a long-term vision or a commitment to complete the Single Market with ambitious EU action. 2018 will mark the 25th anniversary of the European Single Market, which represents an opportunity to take stock of its benefits and current limitations. The European industry calls upon European institutions to set a long-term vision of the European Single Market for the next 25 years. With a solid legal framework for the Single Market and a strong industrial base in Europe, we are convinced that the European Union will live up to the global challenges across the three pillars of sustainability: social, economic and environmental.

An impactful and comprehensive internal market strategy should have the following elements as cornerstones:

- **Long-term predictability for business certainty and innovation**

The European industry needs a long-term, stable framework to be able to invest, innovate and thrive sustainably in Europe. The legal framework should not only encourage industry to stay in the EU for research, development and manufacturing, but should also incentivise companies who moved production plants outside the EU to come back.

- **Effective implementation of EU law**

EU law is not always applied in a harmonised way by Member States, which can create a fragmentation of the Single Market. Issues can be experienced due to the non-harmonised interpretation of European legislation and unequal transposition of Directives. The European Commission should step up in its role to make sure that EU law is properly enforced and that national legislation within harmonised sectors is respecting EU law. Additionally, before coming up with new legislative proposals at EU level, it should be checked if the existing ones have been properly and fully enforced. New laws and rules should be based on science and evidence-based facts.

- **Stronger market surveillance**

Market surveillance is a prerogative of Member States, or even of Regions, which creates different levels of surveillance across the EU – hence an unlevel-playing field between products on the EU market. In this respect, we welcome the expected revision of the rulebook on market surveillance but expect an ambitious proposal to achieve increased coordination between authorities. This could be achieved, for example, through an EU agency when relevant for an industry. Furthermore, more accredited laboratories would be needed for both market surveillance authorities and industry to perform physical checks of products.

- **A level-playing field in the EU Single Market**

A level playing field must be ensured for companies – European and non-European – competing on the EU market. Clear and equal rules should be set for all operators and effectively enforced. Otherwise, the consequence is unfair competition in the European market, where domestic producers are at a competitive disadvantage. It is also important to step up EU customs to ensure the level-playing field with non-European companies. In this field, a key priority lies in the improvement of the safety of products entering the Single Market, for example by an efficient implementation of the REACH Regulation.

- **Harmonised standards**

The New Approach and European standardisation have contributed significantly to the development of the Single Market. The European standardisation system has played a vital role in ensuring the free movement of goods by removing technical barriers to trade. We regret that the Commission Communication on a “Renewed EU Industrial Policy Strategy” does not address the crucial point of harmonised standards as they are key to complete the Single Market. The references of harmonised standards must be systematically, without unnecessary delay, published in the Official Journal of the European Union under their respective Directives.

- **Complete the Single Market**

For certain products and materials, the Internal Market is not yet a reality as national standards and regulations stand in the way of the free circulation of goods. Mandatory requirements at EU level should therefore be adopted by European institutions to allow for the internal market to become a reality for all products. For non-harmonised sectors, the fragmentation of the single market should be prevented, for instance through improved functioning of the mutual recognition principle. In this respect, we welcome the intention of the Commission to simplify and clarify the functioning of mutual recognition and compliance procedures.

- **The key importance of Public Procurement**

Public procurement accounts for a significant share of the EU economy (around 20% of EU GDP) and is crucial for many industrial sectors. We welcome the fact that public procurement is acknowledged as 'a driver for smart, sustainable and innovative technology' in the Communication. The 2014 revised framework provides that more established and transparent qualitative, social and environmental criteria can become determining factors in the choice of a contractor. This approach should be promoted and implemented properly. Furthermore, it is also essential to ensure a uniform application and enforcement of EU public procurement law to guarantee a level-playing field between EU and non-EU market players.

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Trade and International Market Access

Fair trade and fair access to third markets are vital for the European industry. The European industry is a global leader in many industrial sectors, and many jobs in Europe actually depend on exports. Trade is also crucial for the development of SMEs, which account for a large majority of European companies and constitute the backbone of the EU economy and supply. In recent years, the European Commission has been quite active in supporting companies in their efforts to export, e.g. with the Market Access Database or Export Helpdesk, or with increased transparency for stakeholders on trade negotiations.

However, there are significant challenges to overcome. Countries around the world are putting industry at the very top of their political agendas (e.g. Made in China 2025, Make in India, America First), pushing their companies to go abroad and become export leaders, sometimes to the detriment of international trade rules. This includes governments subsidies to state-owned enterprises at levels prohibited in the EU single market rules, overcapacities, export duties on or double pricing of raw materials. Furthermore, protectionist measures, tariff and non-tariff barriers tend to increase on international markets, thus reducing market access and business opportunities for European companies. The European industry, both large- and small-scale, therefore faces considerable challenges with respect to global competition.

Against this background, we welcome the Communication as a step in the right direction. However, the document fails to address pressing needs, such as a long-term vision for EU trade policy, the question of implementation and monitoring of trade deals, or the issue of governance. An ambitious and comprehensive trade strategy, accompanied by a concrete action plan to materialise the objectives, is needed to maintain the EU industry position as both important EU supplier and world export leader. In this strategy, efforts should be put on:

- **Defining a long-term vision**

As in other fields, the European industry needs a predictable and stable framework to thrive and invest – what is the long-term vision of European institutions when it comes to trade? What could be the specific targets and Key Performance Indicators to assess the market share of European companies on international markets?

- **Improving market access**

International trade should be open, and the EU trade policy should strive to open new markets, be it through multilateral or bilateral paths, and actively address tariff and non-tariff barriers that hamper European companies worldwide.

- **Achieving a level-playing field in terms of market access**

We welcome the reference, in the Commission Communication, to the promotion by the EU of a 'global level-playing field in bi- and multilateral trade negotiations'. Indeed, international trade should be fair, and European companies should be able to compete on an equal footing with their competitors. The EU must have the instruments at its disposal to ensure that the rules are respected and to act decisively when countries engage in unfair practices. In the absence of international competition rules, a level-playing field should be achieved through an efficient trade defence system, market surveillance and the strict enforcement of EU law. Strengthening Intellectual Property Rights, and achieving a level-playing field notably in the fields of investment and public procurement, are also key for rules-based trade. The recent proposal of an enabling framework to screen foreign direct investments that may pose a threat to security or public order should be discussed in light of current global competition trends. Currently, sustainability chapters in Free Trade Agreements (FTAs) mainly refer to labour standards. In response to calls to introduce sanctions in case of non-compliance, it is rather desirable to include positive references to safety, health and environment standards (e.g. UN SAICM, Paris Agreement etc.).

- **Implementing and monitoring trade deals**

We welcome the ambitious trade agenda on FTAs presented in the Communication. However, beyond negotiations of new trade deals, the implementation and monitoring phase is key to ensure that European companies do reap the full benefits of the agreements. Likewise, communication and dissemination of information on the possibilities created by FTAs should be increased, starting by emphasising export opportunities for EU companies. In the European Commission, resources allocated to trade, and in particular to implementing and monitoring trade deals, should be increased – especially given the new generation of trade agreements that will enter into force in the coming years.

- **Enabling a swifter governance**

European institutions should adopt a more coordinated approach when it comes to trade, and more consistency between trade, customs and industrial policies should be fostered. Coordination between the different Directorate Generals of the European Commission needs to be reinforced. Furthermore, the Commission should establish a monitoring system on burdens of the European industry to which global competitors are not subject, such as unilateral regulatory costs and administrative burdens in the EU. In light of the Communication, we would like to stress that the EU should equip itself with an ambitious economic diplomacy strategy in consultation with EU Member States and businesses. Finally, negotiating processes and trade procedures, although complex, should be shortened to match more business needs.