Position on the Chips Act 2.0 (COM (2026) 504 final): Regions of Helsinki-Uusimaa and Tampere, including the cities of Espoo, Vantaa, and Tampere, and VTT Technical Research Centre of Finland

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The Helsinki-Uusimaa and Tampere regions, including the cities of Espoo, Vantaa and Tampere and VTT Technical Research Centre of Finland, welcome the Commission's proposal for a Regulation on a framework of measures for strengthening the Union's semiconductor ecosystem (Chips Act 2.0). The proposal identifies that Europe's difficulty lies less in invention than in industrialisation, and the introduction of demand-side instruments, of strategic projects and of a European Semiconductor Region of Excellence label are steps in the right direction. Building on the measures implemented through the European Chips Act I is important, since the already built infrastructure needs to be fully utilized.

We approach the proposal as the hosts of ecosystems where that transition is already underway. The extended Helsinki-Uusimaa-Tampere region functions as a research-to-pilot and pilot-to-industry hub, where advanced research, shared pilot infrastructure and industrial activity are closely integrated within a natural geographical setting where people and ideas commute daily. 78,8 % of the overall semiconductor turnover of Finland is produced in Helsinki-Uusimaa and Tampere Region. Finland can contribute with leading-edge strengths in advanced chip design, MEMS and sensors, photonics and optoelectronics, quantum technologies, specialised materials and process technologies, and in edge and physical AI systems.

Key messages on the Commission's proposal for the Regulation:

Funding for Chips Act

1. The Chips Act 2.0 and the forthcoming Quantum Act should be explicitly linked to all policy windows of the European Competitiveness Fund and to Horizon Europe, with a ring-fenced semiconductor budget between €30 to 60 billion.
2. Implementation of the Chips Act 2.0 funding should be determined by excellence, particularly in the next-generation technologies where Europe's competitors are not yet dominant, rather than by the availability of state aid. EU added value, not national budgets, should drive the development.

A clear linkage between the Chips Act and the Quantum dimension

3. The quantum dimension should be strengthened throughout the Regulation. Quantum and semiconductor technologies share the same processes, infrastructure and talent; hence, legislation should be designed as one framework.

4. Quantum chip manufacturing should be explicitly mentioned and able to qualify as a first-of-a-kind initiative, and operational objective 3 of the Chips for Europe Initiative 2.0 should include industrial uptake.

The European Semiconductor Region of Excellence label must be based on excellence and backed by funding

5. The European Semiconductor Region of Excellence label must have clearly defined impacts, including facilitated access to the European Competitiveness Fund and Horizon Europe. The Network established based on labeled regions should have permanent role in the legislation engaging in a structured dialogue with the Steering Committee of the Industrial Alliance for Semiconductors with a view to defining a common strategy on semiconductors
6. A region receiving the label should be defined by excellence and proximity rather than by the geographic boundaries of the applying authority, and an ecosystem spanning several authorities should be able to apply as one.
7. Regions of Excellence should complement one another and strengthen the whole European chain, from laboratory research to system integration, creating aggregated demand for industrial-scale production in Europe and building on the close cross-border cooperation already established between the pilot lines and the design platform. International partners, including from outside the Union, should remain able to participate where they bring capabilities not sufficiently available in Europe.

Europe needs skills to match the aims stated in the act

8. Europe can compete in next-generation semiconductor technologies only with the best available expertise. Talents need to be grown and attracted.
9. Skills instruments like the Union of Skills, the European Skills Academies, the Pact for Skills and Choose Europe, should be used to attract and retain top talent and to upskill and reskill the existing workforce.

Proposals for amendments

AM.	Commission's proposal	Proposal for amendments
1.	**Recital 41a (new) – Quantum chip facilities as first-of-a-kind initiatives**	
		(41a) The Union holds a strong position in quantum technologies relative to other segments of the semiconductor value chain, and pilot lines covering the leading quantum chip technology platforms are already operating. As those technologies mature, facilities for the manufacturing of quantum chips will be expanded. Such facilities will require the same regulatory conditions as other first-of-a-kind initiatives, including recognition of the public interest, accelerated permitting and access to public support, and should be

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		capable of qualifying as such under this Regulation.
	Justification: Supports the amendments to Article 2, point (10), and Article 14(3). Recital 22 already recognises the aim of enabling the industrial deployment of quantum chips and of strengthening the Union's technological leadership in emerging semiconductor technologies. The first-of-a-kind regime should be aligned with that aim.	
2.	**Recital 68a (new) – Impacts of the label and link to the European Competitiveness Fund**	
		(68a) In order to attract investments, the European Semiconductor Region of Excellence label should be associated with identifiable impacts. The label should be taken into account as a positive factor in the assessment of operations under Union funding programmes, and it must provide a facilitated access to the European Competitiveness Fund and the Union framework programme for research and innovation for the development of semiconductor, photonic and quantum regional ecosystems in labelled regions, accessible to regional and local authorities, universities, research and technology organisations established in those regions.
	Justification: Supports the amendment to Article 26(3) and the new paragraphs 3a and 3b. A label with no attached consequence will neither attract international investors nor justify the administrative effort required by applicants.	
3.	**Article 2 – point (10) – Definition of first-of-a-kind initiative: quantum chip facilities**	
	(10) "first-of-a-kind initiative" means any of the following initiatives, which provides innovation in the Union with regard to the manufacturing process or final product to the extent that this innovation is not yet sufficiently present or committed to be built within the Union […]: (a) a new or substantially upgraded semiconductor manufacturing facility; (b) a new or substantially upgraded facility or process for the production of equipment; (c) a new or substantially upgraded facility or process for the production of key components for such equipment or other production of inputs predominantly used in semiconductor manufacturing, such as materials; (d) a new or substantially upgraded facility for electronics manufacturing or integration; (e) new manufacturing-centred chip design activities;	(10) "first-of-a-kind initiative" means any of the following initiatives, which provides innovation in the Union with regard to the manufacturing process, **product development** or final product to the extent that this innovation is not yet sufficiently present or committed to be built within the Union […]: (a) a new or substantially upgraded semiconductor manufacturing facility, **including a facility for the manufacturing of quantum chips;** (b) [unchanged]; (c) [unchanged]; (d) [unchanged]; (e) new manufacturing-centred chip design activities; **including connectivity, AI, photonic and quantum chips;**
	Justification: The broadening of the first-of-a-kind (FOAK) definition across the whole value chain is one of the proposal's main achievements and should be strengthened. Two gaps should be closed. Quantum-chip fabrication is not named in the list, although the proposal's own operational objective 3 (Article 5, point (c)) aims to move quantum chips from pilot lines towards prototyping and production. Europe – and Finland within it – holds a leading position in quantum technologies and should secure the manufacturing step as well.	

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	Product development – the step from process capability to marketable products – is where European innovation most often stalls. Recognising it explicitly ensures that the FOAK rights (public-interest status, preferential pilot-line access, fast-track permitting) also reach the specialty and mature-node segments where European companies, including many SMEs, lead globally. Connectivity and AI chips are added to point (e) for the same reason: they are the segments in which the custom chip design of Europe's system houses – in telecommunications, industrial automation, aerospace and defence – is concentrated.	
4.	**Article 5 – point (c) – Operational objective 3: quantum chips**	
	(c) under its operational objective 3: (i) support the development of new or existing pilot lines, clean rooms and foundries for prototyping and producing quantum chips for the integration of quantum circuits and control electronics; (ii) develop facilities for testing and validating advanced quantum chips produced by the pilot lines, with a view to closing the innovation feedback loop between designers, producers and users of quantum components; (iii) develop innovative design libraries for quantum chips in close relation with operational objective 1;	(c) under its operational objective 3: (i) support the development of new or existing pilot lines, clean rooms and foundries for prototyping and producing quantum chips for the integration of quantum circuits and control electronics; (ii) develop facilities for testing and validating advanced quantum chips produced by the pilot lines, with a view to closing the innovation feedback loop between designers, producers and users of quantum components; (iii) develop innovative design libraries for quantum chips in close relation with operational objective 1; **(iv) (new) support enabling technologies for quantum chips, including control and read-out electronics.** **(v) (new) prepare for the transfer and industrial uptake of technologies developed under this operational objective, including support for the first industrialisation of quantum chip technology platforms**.
	Justification: Operational objectives 2 and 5 each conclude with a point on the transfer and industrial uptake of the technologies developed. Operational objective 3 does not, although Annex I states that support for the first industrialisation of the most mature developments shall be provided. The operative text should reflect that commitment. Europe's relative position in quantum is stronger than in most segments of the semiconductor value chain, and the risk in this field is not that Europe fails to invent but that it fails to industrialise. The enabling technologies that determine whether quantum chips can be produced on a scale, namely control and read-out electronics, should be fundable in their own right rather than as an incidental element of pilot line work.	
5.	**Article 13 – new paragraph 3a – Support under all policy windows of the European Competitiveness Fund**	
	2. […] 3. […]	**3a. *(new)* Support under paragraphs 2 and 3 may be provided under any of the policy windows of Regulation (EU) XXXX/XXXX [European Competitiveness Fund], having regard to the enabling and cross-sectoral nature of semiconductor, photonic and quantum technologies for the clean transition and industrial decarbonisation, for digital leadership, for health and biotechnology, and for resilience, security, the defence industry and space.**
	Justification: Semiconductors, photonics and quantum technologies are enabling technologies for every sector the European Competitiveness Fund is designed to support.	

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	Energy efficiency in computing infrastructure is a decarbonisation question, power electronics an electrification question, trusted components a defence and resilience question, and sensing and imaging a health question. If the Chips Act 2.0 is treated in practice as belonging to a single digital window, it will compete for a narrow allocation while the value it creates is realised across all of them. The same applies to the forthcoming Quantum Act, and the two instruments should be consistent on this point.	
6.	**Article 14 – paragraph 3 – European semiconductor technology initiatives (consequential)**	
	3. European semiconductor technology initiatives shall be first-of-a-kind initiatives that contribute to the indispensability, resilience and prosperity and security of supply of the Union's semiconductor ecosystem.	3. European semiconductor technology initiatives shall be first-of-a-kind initiatives that contribute to the indispensability, resilience and prosperity and security of supply of the Union's semiconductor ecosystem, **including facilities for the manufacturing of quantum chips**.
	Justification: Consequential to the amendment to Article 2, point (10). Making the coverage explicit in the operative provision removes any doubt for applicants and for national competent authorities and aligns the first-of-a-kind regime with the operational objectives of the Initiative, which already cover quantum chips.	
7.	**Article 26 – paragraph 1 – Eligible applicants and joint applications**	
	1. The Commission may decide to award the European Semiconductor Region of Excellence label by means of implementing act. The label may be awarded following an application by a regional authority and shall be explicitly endorsed by the relevant Member State.	1. The Commission may decide to award the European Semiconductor Region of Excellence label by means of implementing act. The label may be awarded following an application by a regional authority and shall be explicitly endorsed by the relevant Member State **The label may be awarded following an application by one or several regional authorities.**
	Justification: Semiconductor ecosystems in Europe are district-scale and rarely coincide with a single region's administrative boundaries. Those ecosystems depend on enabling conditions largely delivered by cities and other local authorities, including land, clean and reliable energy and grid capacity, transport and water infrastructure, housing, permitting capacity, and the attraction and retention of international talent. The level of government that creates those conditions should not be excluded from the instrument that recognises them. The proposal neither permits nor prohibits joint applications by two or more authorities, and that silence is itself a barrier. We ask that joint applications by two or more regional authorities be expressly permitted, that endorsement by each Member State concerned be sufficient, and that no additional procedural burden attaches to applying jointly.	
8.	**Article 26 – paragraph 3 and new paragraphs 3a, 3b – Effects of the label and earmarked support from Union funding programmes**	
	3. Without prejudice to the applicable rules governing Union programmes and instruments, the European Semiconductor Regions of Excellence label may be taken into account when assessing and selecting operations proposed under Union funding programmes.	3. Without prejudice to the applicable rules governing Union programmes and instruments, the European Semiconductor Regions of Excellence label shall be taken into account as a positive factor when assessing and selecting operations proposed under Union funding programmes, including under all policy windows of the European Competitiveness Fund and Horizon Europe. **3a. *(new)* A dedicated share of the resources of Regulation (EU) XXXX/XXXX [European Competitiveness Fund] and o f the Union framework programme for research and innovation shall be allocated**

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		for the development of semiconductor, photonic and quantum regional ecosystems located in European Semiconductor Regions of Excellence. **3b. *(new)* Regional and local authorities, universities, research and technology organisations established in the European Semiconductor Region of Excellence shall be eligible applicants for, and beneficiaries of, that support. It may cover the implementation of the Semiconductor Region Investment Plan, including enabling infrastructure, shared research and pilot facilities, skills measures and ecosystem coordination.**
	Justification: As drafted, the label carries no real consequence. "May be taken into account" imposes no obligation on any managing authority and confers no advantage on any applicant. Regions are asked to produce a ten-year strategic vision under Article 27 and to report annually under Article 28(5) in return for nothing they can rely on. Few will invest the effort, and those that do will struggle to use the label when seeking private co-investment. The European Competitiveness Fund will be the Union's principal investment instrument for 2028 to 2034, and cities and regions are barely recognised within it. Linking the label of excellence to the EU funding programmes strengthens the benefits of the label and ensures that the label will have a greater impact.	
9.	**Article 27 – paragraph 1 and new paragraph 2 – Content of the European Semiconductor Region Investment Plan**	
	1. The European Semiconductor Region Investment Plan […] shall include a description of the region […] and, at least, the following elements: […] (d) support to education, skills and workforce […]: (iii) a description of actions to attract, retain and upskill semiconductor industry-related talent, including international talent where appropriate; […]	1. The European Semiconductor Region Investment Plan […] shall include a description of the region […] and, at least, the following elements: […] (d) support to education, skills and workforce […]: (iii) a description of actions to attract, retain and upskill semiconductor industry-related talent, including international talent where appropriate, **in synergy with the Union of Skills, the European Skills Academies, the Pact for Skills and the Choose Europe initiative, and including adult learning and vocational conversion pathways into the semiconductor, photonic and quantum sectors;** **(f) *(new)* the contribution of the region to the security, resilience and dual-use dimension of the Union's semiconductor and quantum ecosystem, including trusted supply for critical sectors as referred to in Annex V;** **2. *(new)* The preparation and implementation of the Semiconductor Region Investment Plan may be financed from a combination of Union, national, regional and private sources, and no single**

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		funding instrument shall be mandatory for that purpose.
	Justification: Three additions. First, the skills description should be tied to the Union instruments that already exist. Chips and quantum compete globally for a small pool of specialists, and the Union's leverage on talent attraction lies in the Union of Skills and Choose Europe rather than in this Regulation. Adult learning and conversion pathways are the fastest route to closing shortages in the short term. Second, the security and dual-use dimension of the semiconductor ecosystem is developing rapidly and should be visible in the Plan. Third, the new paragraph 2 confirms that a region may draw on several funding channels. which complements rather than limits the earmark proposed under Article 26(3a): the earmark makes Union funding reliably available, while paragraph 2 ensures no region is obliged to rely on a single instrument.	
10.	**Article 28 – paragraph 1 and new paragraph 1a – Assessment of applications**	
	1. The Commission shall assess applications for the European Semiconductor Region of Excellence label on the basis of coherence and credibility of the Semiconductor Region Investment Plan and the level of commitment by the relevant authorities.	1. The Commission shall assess applications for the European Semiconductor Region of Excellence label on the basis of coherence and credibility of the Semiconductor Region Investment Plan and the level of commitment by the relevant authorities. **Where an application is submitted jointly by two or more authorities, the assessment shall be carried out in respect of the combined ecosystem.** **1a. (new) The Commission shall provide guidance on the information required under Article 27 and on its relevant format and shall make that guidance available before the first applications are submitted.** **7 *(new)* The Commission shall assess how the measures set out in the Plan could be supported by relevant Union funding programmes and instruments, in particular Regulation (EU) XXXX/XXXX [European Competitiveness Fund] and Regulation (EU) 2021/695 [Horizon Europe] and its successor framework programme for research and innovation, with a view to ensuring complementarity and synergy between Union, national, regional and private investments.**
	Justification: Article 15(2) obliges the Commission to provide guidance on the information required from applicants for the status of European semiconductor technology initiative, and on its format. There is no equivalent obligation for the label, although the Investment Plan is a substantial document and the assessment criteria are stated in a single sentence. Without guidance, regions will guess at the required evidence and the assessment will be difficult to review. The term "level of commitment" should also be clarified: as drafted it could mean political endorsement alone or demonstrated financial commitment, and applicants cannot prepare against an undefined standard. Finally, where an ecosystem applies jointly, it must be assessed as one ecosystem rather than as a set of separate territories. As the label comes with facilitated access to the European Competitiveness Fund and Horizon Europe programme, the Commission shall assess the possibilities to fund the plan from the respective programmes.	
11.	**Article 29 – paragraphs 2, 4 and 5 – Network of European Semiconductor Regions of Excellence**	

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	2. The Network shall organise its work autonomously. It may establish its own working methods, including the organisation of meetings, the designation of a Chair on a rotating basis among participating regions, and the adoption of informal arrangements to facilitate cooperation and exchange of information.	2. The Network shall organise its work autonomously. It may establish its own working methods, including the organisation of meetings, the designation of a Chair on a rotating basis among participating regions, and the adoption of informal arrangements to facilitate cooperation and exchange of information. **The Commission shall provide administrative and secretarial support for the activities of the Network.**
	[…]	[…]
	4. The objectives of the Network shall include the following:	4. The objectives of the Network shall include the following:
	(a) to facilitate cooperation and exchange of best practices among European Semiconductor Regions of Excellence;	(a) to facilitate cooperation and exchange of best practices among European Semiconductor Regions of Excellence;
	(b) to promote the Network and its activities among member and non-member regions […];	(b) to promote the Network and its activities among member and non-member regions […];
	(c) to promote synergies and complementarities between regional semiconductor ecosystems across the Union […];	(c) to promote synergies and complementarities between regional semiconductor ecosystems across the Union […];
	(d) to enhance the visibility and attractiveness of European Semiconductor Regions of Excellence for private investment and international partnerships.	(d) to enhance the visibility and attractiveness of European Semiconductor Regions of Excellence for private investment and international partnerships;
		(e) to contribute, as a permanent participant, to the structured dialogue referred to in Article 44(1), point (d), and to provide input to the sub-groups of the European Semiconductor Board established pursuant to Article 45(3);
		(f) to develop cooperation with semiconductor and quantum clusters, regional ecosystems and research infrastructures in third countries, where the Union has concluded relevant international agreements or strategic partnerships with those countries.
	5. The Commission may facilitate the functioning of the Network and may organise meetings, workshops or other activities to support the exchange of information and cooperation among participating regions.	5. The Commission **shall** facilitate the functioning of the Network and may organise meetings, workshops or other activities to support the exchange of information and cooperation among participating regions. **The Commission shall ensure that participation in the Network remains based on the award of the label pursuant to Article 26. The Network shall interact with interested regions and provide information about its activities**
	Justification: The Network is the only body in the Regulation that represents the regional and local level, yet it has no secretariat, no budget and no route into the governance structure. There are four changes that need to be made. First, the Commission should support the functioning of the Network, as it already supports the European Semiconductor Board under Article 46(3). Second, the Network should have a defined place in the dialogue between the	

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	Board and the Industrial Alliance, since the conditions that determine semiconductor investment, namely land, energy, permitting, housing and talent, are delivered at regional and local level. Third, participation should remain tied to the label. A network open to all regions would dilute the signal the label sends to investors and remove the incentive to prepare a credible Investment Plan, while open communication of the Network's activities keeps its work available to regions outside it. Fourth, cooperation with partners in third countries is added because regional ecosystems depend on partnerships reaching beyond the largest Member States and, in some technology areas, beyond the Union.	
12.	**Article 44 – paragraph 1, points (d) and (e) – Structured dialogue with industry and regions**	
	(d) engaging in a structured dialogue with the Steering Committee of the Industrial Alliance for Semiconductors with a view to defining a common strategy on semiconductors; (e) exchanging views with the Commission on the progress of implementation of the Investment Plans of Semiconductor Regions of Excellence;	(d) engaging in a structured dialogue with the Steering Committee of the Industrial Alliance for Semiconductors **and with the Network of European Semiconductor Regions of Excellence with a view to defining a common strategy on semiconductors**; (e) exchanging views with the Commission **and with the regions concerned** about the progress of implementation of the Investment Plans of Semiconductor Regions of Excellence;
	Justification: The dialogue between the Union and industry is the right mechanism, but it is incomplete without the level of government that supplies the conditions industry depends on. Land, grid capacity, permitting, housing, transport and much of the talent pipeline are delivered regionally and locally, and investment decisions are taken against those conditions. Article 45(4) already envisages that the Network may be invited as a stakeholder organisation; the amendment makes that participation structural rather than discretionary. On point (e), the Board cannot meaningfully exchange views on the implementation of Investment Plans without the regions that wrote them.	