European Commission Public Consultation

on the Review of the European Chips Act

November 28th, 2025

I welcome the opportunity to make a submission to the Public Consultation on the Review of the European Chips Act on behalf of MIDAS Ireland.

MIDAS is the industry association representing the semiconductor / microelectronics sector in Ireland. Established in 1999, MIDAS is an industry led partnership consisting of multinational and local companies, educational organisations, research institutions and government agencies working together to address common challenges within the sector in Ireland. MIDAS has about 90 member organizations today.

There are currently about 20,000 people employed in over 100 companies operating across the Irish Semiconductor ecosystem. Businesses range from semiconductor wafer fabs to chip design, services and advanced factory construction. The sector contributes about €13.5 Billion in exports annually to the Irish economy with many thousands of jobs in advanced R&D, Chip Design and Product Development.

Following on from the 2023 EU Chips Act, Ireland developed its own National Semiconductor Strategy called Silicon Island, which was launched by Minster for Enterprise, Mr Peter Burke, at Tyndall National Institute in May of this year. This strategy represents a very strong endorsement of the sector from the highest levels of the Irish Government.

The strategy sets ambitious goals to invest in and significantly grow the sector with three primary strands in the areas of *Building on our Existing Strong Ecosystem*, *Ensuring that there is a robust Talent Pipeline*, and *Identifying and Seizing new Growth Opportunities*, whether they be in Manufacturing or R&D. Across each of these three stands, there are a number of specific actions, so the ambitions of the strategy will become a reality.

In their report from Sept 2024, KPMG estimated that 34,500 additional semiconductor jobs can be created by 2040. Essentially the goal is to more than double the size of both Manufacturing and R&D areas, which is in line with the aspirations of the EU Chips Act.

In the Artificial Intelligence (AI) area, which is the next significant growth driver for this sector, Ireland is in a very strong position to contribute to Europe's future success. It has all the key building blocks in place, with many leading global AI companies, significant chip design, research, state-of-the art manufacturing and advanced factory construction operating and located in Ireland

For a future EU Chips Act, the following are some areas that should be considered.

1. Innovation.

(i) There should be a continued focus on building out the innovation infrastructure and ecosystem across Europe. Some excellent progress is already underway on the Pilot Lines, Design Platform and Competence Centres. These initiatives need to become fully operational and further expanded on.

(ii) As capability and leading-edge IP is developed within the research and university ecosystem, there needs to be an increased focus on commercialising these assets. Licensing and spinout of this IP and expertise from the research ecosystem into new start-up companies needs to be much easier and actively encouraged.

(iii) Funding for start-ups is probably their single biggest challenge today. Europe lags the rest of the World in terms of access to New Venture Finance today, and it is critical that this is fixed, so Europe can have its fair share of next generation 'Unicorns'.

2. To support the forecasted growth, there will need to be a dramatic increase in the talent pipeline for the semiconductor / semiconductor sector.

(i) This needs an increased entry to the STEM disciplines at third level. It also needs an increased percentage of STEM students choosing the semiconductor sector. This 'conversion' of STEM students to research and industry roles in this sector is way lower than it should be today, and needs to be dramatically increased.

(ii) To achieve an increase in STEM students, there needs to be a coordinated effort to influence the school curriculum (Primary, 2nd and 3rd Levels) to incorporate the sector's needs into what students learn and a connection built with teachers at each level such that they understand what the sector does and what career opportunities exist, and pass this knowledge to their students.

(iii) Probably the most important thing the sector needs to do is to market itself better to those outside the sector (students, parents and the general public) and tell the stories of where our technology is used and the incredible societal benefit of Semiconductors and how they directly contribute to solving all of the world's greatest challenges.

(iv) This is an ever-evolving sector with skills needs changing and expanding at an ever-increasing pace. This necessitates a constant up-skilling of the sector's existing workforce and hiring experienced people with new skillsets from adjacent sectors, and in particular those application areas that use semiconductors.

3. Expanding Europe's Semiconductor Manufacturing Footprint.

(i) Future manufacturing investments should be focussed on a business need within Europe with a view to enhancing Europe's long-term security and semiconductor supply lines.

(ii) While *first-of-a-kind* is an interesting and laudable ambition, it should not be the only consideration taken into account. Where there is a business / market need for a supply line to be present in Europe, then that should be encouraged and supported, even if it doesn't strictly align to the *first-of-a-kind* criteria.

The primary focus of my submission is to summarise the general areas that I strongly believe need to be supported, while not specifically referencing the precise content of what will be incorporated into any future EU legislation.

I hope this is helpful to the process, and I am very happy to discuss in more detail if that is requested.

Yours sincerely,

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