

**IG Metall Vorstand**

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Executive Vice-President Henna Virkkunen  
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**To Commission Executive Vice President Henna Virkkunen -  
 Feedback EU consultation Chips Act 2.0**

27.11.2025

Dear Commissioner Virkkunen,

Ihr Zeichen:

IG Metall welcomes the European Commission's initiative to review the European Chips Act. As Europe's largest union representing workers in manufacturing and R&D, including semiconductors and microelectronics, we stress that the revision must go beyond strengthening Europe's technological sovereignty. It should also create quality jobs and uphold social and environmental standards.

Unser Zeichen:  
 VB02/JK/JCK

The call for evidence rightly emphasizes reducing EU dependency and enhancing manufacturing capacity. The revised Chips Act should more explicitly promote establishment of as many production steps as possible within the EU, not just for leading-edge chips. The preservation and creation of quality employment must be an explicit objective.

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Europe has already witnessed the near-complete disappearance of PCB manufacturing and decline in backend semiconductor fabrication (assembly, packaging, testing). This trend must be reversed, as resilience cannot be achieved without a certain degree of all parts of the semiconductor production chain in Europe. Achieving this is feasible with the right kind of policy support, as all aspects of semiconductor production can be competitively done in the EU. With the shift to advanced packaging, backend production has become less dependent on low labour costs, which traditionally fuelled offshoring.

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We welcome that the Chips Act allows member state subsidies for 'first-of-a-kind' semiconductor manufacturing facilities in the EU. We note positively that this definition includes leading-edge and legacy frontend production, semiconductor equipment, and backend production. We suggest further broadening this to include PCB manufacturing and semiconductor materials production. It should also cover frontend and backend manufacturing that is not 'first-of-a-kind' in the EU but reduces dependence on production in non-EU countries. Such dependence must be reduced for all parts of the semiconductor production chain and for all types of semiconductors, not just leading-edge chips.

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Most importantly, we call for funding under the revised Chips Act to be explicitly linked to employment commitments, including minimum numbers of jobs to be created and maintained over a defined period – with provisions for repayment of subsidies if commitments are not met. Public funding must be conditioned on robust social standards:

- Job security commitments with binding employment levels over defined durations
- Collective bargaining agreements with recognized trade unions
- Worker representation through works councils and equivalent structures

These requirements are essential, not only because working in cleanroom environments is physically and mentally demanding. Effective worker representation is necessary to develop tailored solutions with management that protect worker health, promote qualification as well as vocational training and ensure decent working conditions.

The revised Chips Act should ensure that funding mechanisms are more accessible to small and medium-sized enterprises, supporting a diverse and resilient semiconductor ecosystem. If their projects are not suitable to be considered for support under Pillar 2 of the Chips Act, there should be clear mechanisms to refer them to relevant funding mechanisms.

The call for evidence notes support for sustainable production facilities. IG Metall calls for concrete environmental criteria attached to funding decisions:

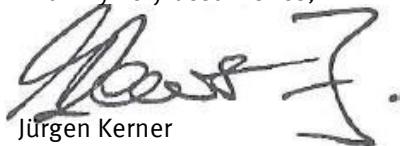
- Resource-efficient production using renewable energy
- Development of processes to avoid or minimize PFAS usage
- Water recycling and recovery systems

In conclusion, the revision presents a critical opportunity to build a European semiconductor industry that is technologically advanced, economically resilient, socially just, and environmentally sustainable.

*IG Metall's number in EU Transparency Register: 757195013270-80*

If you have any questions, please feel free to contact my colleague Mr. Moritz Niehaus at [moritz.niehaus@igmetall.de](mailto:moritz.niehaus@igmetall.de) or +49 69 6693-2557.

With my very best wishes,



Jürgen Kerner  
Second Chairman of IG Metall