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Directorate-General  
Communications Networks, Content, and  
Technology  
Unit C3 “Microelectronics and Photonics”

- Via European Commission Portal -

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27.11.2025	-	-	-

**Statement - Request for consultation of the Directorate General for Communications Networks, Content and Technology / Unit C3 “Microelectronics and Photonics” regarding the review of the Chips Act (Chips Act 2)**

AUMOVIO SE welcomes the opportunity to respond to the European Commission’s Public Consultation and Call for Evidence for the Review of the Chips Act (Chips Act 2). The revision of the EU Chips Act presents an important opportunity for the European Commission and its Member States to strengthen both semiconductor supply chains in Europe and globally.

AUMOVIO continues the business of the former Continental group sector Automotive (including the Contract Manufacturing division) as an independent company with after its spin-off in September 2025. The technology and electronics company offers a wide-ranging portfolio that makes mobility safe, exciting, connected, and autonomous. This includes sensor solutions, displays, braking, and comfort systems, as well as comprehensive expertise in software, architecture platforms, and assistance systems for software-defined vehicles. In the fiscal year 2024, the business areas which now belong to AUMOVIO generated sales of 19.6 billion Euro. The company is headquartered in Frankfurt, Germany and has over 86,000 employees in more than 100 locations worldwide.

**Key Points regarding the review of the Chips Act (Chips Act 2):**

- A comprehensive EU semiconductor strategy has to pave the way to support holistic semiconductor ecosystem development and support upstream supply chain components like fabless business models, design, packaging, and test. This avoids ecosystem fragmentation and strengthens supply chain security. In order to stabilize and widen the ecosystem in EU, also the Integrated Circuits (IC) design for standard IC and Application Specific Integrated Circuits (ASICs) need to be supported
- Chips JU initiative needs simplified and accelerated funding and permitting processes for SMEs, startups, and industrial users engaging in chip design and pilot production. Fast-tracking support helps the company scale chip development and prototype production efficiently in emerging technologies
- Expand and support focus on innovative legacy and specialized chips in the initiative. Maintain support for legacy, specialized sector specific chips (e.g. automotive) alongside advanced AI and quantum chips and match realities where long product lifecycles and reliability standards prevail

- Prioritize demanding and essential EU sectors (e.g. automotive, robotics, industrials) with attractive funding schemes for resilience
- Promote chip design and advanced / next-gen packaging for complex vehicle architectures and open chiplet-ecosystem. Position – through the Chips JU initiative - Europe as a leader in innovative packaging methods, fostering an ecosystem for advanced packaging and modular chiplet technologies that enhance performance, reliability, and cost efficiency. Also, the activities relating to software defined vehicles (SDV) are highly connected with the early stages of chip design
- Improve stronger collaboration between research centers and industry. Link semiconductor research hubs, pilot lines, and industrial developers (e.g. automotive suppliers) to enable rapid technology transfer and real-world validation of designed chips
- Investments in education and talent retention are essential and fundamental for the ecosystem and to its long-term competitiveness. A strong talent base in chip design, packaging, and attract, train, and retain semiconductor experts are fundamental and relevant to important EU industry sectors (e.g. automotive / smart mobility sector)

#### **Pillar I – The “Chips for Europe” Initiative**

- Pillar I offers strong research capabilities but lacks support for industrial-scale deployment for important European industries (e.g. automotive sector)
- No clear pipeline exists between Pillar I developments and future European manufacturing; a strong industry involvement is an essential element for bridging the gap between innovation and the market / future series deployment
- Pillar I must convert and reflect research into producible technologies and meet downstream industry needs (especially automotive) for innovations and value creation
- Chips Act 2 and its R&D arm should focus on end-user requirements - Goal: Ensure future capacity and address imbalance between high automotive demand and limited regional production, using collaborative R&I projects as main approach to join forces between research and industry

#### **Pillar II – Security of supply and resilience**

- Pillar II focuses mainly on frontend fabs; backend investments remain limited, creating critical capacity gaps; a support of partnerships along the whole semiconductor value chain is recommended
- OPEX support for backend (packaging, testing, assembly) is essential for industrial-scale deployment and meeting automotive demand
- State aid rules should allow targeted OPEX support while ensuring efficient funding.
- Structural issues—high energy costs, bureaucracy, permitting delays, skill shortages—must be addressed to make Europe competitive
- Investments should strengthen the entire automotive semiconductor ecosystem; EU-level coordination is key to avoid fragmentation
- Design/fabless activities and firms as well as upstream suppliers must be integrated into the security-of-supply framework, including eligibility of design centers
- Production facility incentives should align with market needs and full value-chain integration (e.g. maintain also a holistic AI approach and adaption for the industries)

#### **Pillar III – Monitoring and crisis response**

- Pillar III focuses on monitoring and crisis response but is reactive and limited to semiconductor supply data
- Current tools rely on static databases with limited ability to anticipate geopolitical risks, export controls, and disruptions
- Automotive sector vulnerabilities and end-user integration are insufficiently addressed
- Need of shift to proactive, continuous dialogue between industry and the Commission, based on real-time monitoring of geopolitical risks, logistics, and

bottlenecks; involve the whole semiconductor ecosystem to better anticipate future crises, but streamline information compilation and clear governance throughout Europe

- Establish clear early-warning indicators for critical components and geopolitical triggers
- Ensure EU-level coordination to avoid fragmented national responses
- Crisis preparedness must include industrialisation and market uptake bottlenecks, not just raw supply constraints

**Finale:**

- Securing the semiconductor ecosystem and market requires a strong, targeted, and less bureaucratic framework for key industries like automotive and semiconductors
- Such a framework should drive innovation, support advanced research, and enable next-generation chip design and development while attracting investment and strengthening the value chain, including shorten the time-to-state / European aid
- Furthermore, long-term access to strategic raw materials and intermediate products must be ensured

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