TLT PCB
Gaujos g. 4,
LT02121 Vilnius,
Lithuania

Date: 28.11.2025

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

- via European Commission Portal

Recommendations for the Chips Act Upgrade 2026

TLT PCB appreciates the chance to engage with the European Commission's Public Consultation and Call for Evidence on the upcoming Chips Act review (Chips Act 2). The revision of the EU Chips Act represents a strategic opportunity for the European Commission and Member States to reinforce and optimise semiconductor supply chains at both European and global levels.

TLT PCB in Vilnius, Lithuania – the first PCB factory in the history of Lithuania, and currently the most modern PCB factory in Europe, featuring top-level automation, digitalisation, and sustainability solutions. Over the past 20 years, no new PCB factory has been built in Europe.

This document presents TLT PCB's recommendations for the upcoming 2026 European Chips Act revision. It reflects the company's practical insights from building Europe's most advanced greenfield PCB factory and outlines key policy actions needed to strengthen Europe's electronics sovereignty. The recommendations emphasise that Printed Circuit Boards (PCBs) - together with critical raw materials such as copper and laminates - must be recognised as strategic pillars of the European semiconductor and electronics ecosystem.

1. Include PCBs in the Chips Act Ecosystem

The Chips Act currently focuses on semiconductors, yet chips cannot function without PCBs. It is essential to explicitly recognise PCB manufacturing, design and supply chains as a strategic layer within the Chips Act ecosystem. The Act should establish a European PCB Competence Centre, mirroring existing semiconductor competence centres.

2. Targeted Financial Support for PCB and Raw Material Manufacturing

A dedicated 'PCB and Materials Facility Support Scheme' should be created to promote the establishment and modernisation of PCB and copper laminate manufacturing in the EU. The scheme should provide grants, soft loans, or tax incentives for:

- Acquisition of production equipment and infrastructure
- Automation, digitalisation, and sustainability projects
- Development of local copper and laminate supply chains to reduce dependence on Asia.

3. Strategic Public Procurement and Security

To strengthen the EU's security of supply and reduce strategic dependencies – particularly on Asian manufacturing – the EU should consider adapting its public procurement framework so that public purchasers in the sectors of defence, aviation, healthcare, energy, and communication prioritise semiconductors, PCBs, laminates, and related components manufactured within the EU, NATO or in trusted partner jurisdictions. Quality, resilience, and security of supply should take precedence over lowest-cost criteria. Such an approach would reinforce Europe's industrial base, enhance supply-chain security, and support the objectives of the revised Chips Act.

4. Streamlined Certification and Market Access

Establish an EU-wide certification program for PCB and electronic component manufacturing to accelerate qualification for defence and industrial supply chains. Financial support should be available for companies obtaining UL, ISO, and other defence-grade certifications, as well as for establishing testing and validation laboratories in Europe.

5. Security and Intellectual Property Protection

Introduce an 'EU Trusted PCB Standard' requiring full traceability from design to production and guaranteeing that critical electronics are manufactured within EU or NATO jurisdictions. This would significantly reduce IP leakage and the risk of hardware-based cyber threats ('Trojan horses').

6. Strategic Resilience and Capacity Reservation

Integrate PCB and copper laminate manufacturing into the 'European Electronics Resilience Reserve'. Introduce a capacity reservation mechanism for critical sectors such as defence and industrial automation. European-based production ensures delivery of critical components within days instead of months from Asia.

7. Skills, Awareness, and Competence Development

Support cooperation between industry and education to strengthen PCB and materials expertise. Integrate PCB-related modules into the 'Chips Academy' and fund training, internships, and research in advanced electronics materials.

Expected Impact

- Reduced dependency on Asia
- Enhanced European technological sovereignty and defence autonomy
- Revitalisation of PCB and copper laminate manufacturing in Europe
- Improved IP and cybersecurity protection
- Creation of high-skilled jobs and regional innovation centres

Contact person:
Vytautas Ilgūnas
Chief Commercial Officer
TLT PCB, Vilnius, Lithuania
email: vytautas.ilgunas@tlt-pcb.com