



Recommendations to the Polish Presidency of the Council of the European Union

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Foreword



Malte Lohan

CEO

AmCham EU

Poland assumes the Presidency of the Council of the European Union at a time when the EU's attractiveness for investment is under threat. For too many companies, it is becoming increasingly difficult to operate in Europe. The Polish Presidency must now play its part in turning this tide.

Last September offered up one of the starkest reminders of Europe's attractiveness problem yet: the Draghi report. The report identified a widening competitiveness gap, which has emerged due to well-documented issues: overregulation, a cautious approach to innovation and high energy costs. These factors contribute to a concerning trend, where the GDP gap between the EU and other leading economies continues to widen.

The call to action for EU policymakers is therefore clear. To sustain its long-term economic resilience and prosperity, the EU must sharpen its competitive edge, fostering a regulatory environment that encourages innovation and investment.

Transatlantic trade and investment is a key part of this ambition. In Poland alone, US firms support over 221,000 jobs thanks to an investment base worth more than €11 billion. Across the EU, these figures balloon to 4.9 million jobs and a total of €3.7 trillion in investment. This investment does more than just fuel economic growth. US firms also play a central role in supporting the EU's economic resilience and driving innovation, industrial modernisation and research and development throughout the bloc.

It is encouraging to see the Polish government recognise the value of this transatlantic partnership and commit to 'strengthening Euro-Atlantic ties' during its Presidency. As President Duda puts it, the goal is to see 'more United States in Europe, more European Union in the United States'. This momentum comes at the right time: if last year was the year of elections, this year is about putting plans into action.

For decades, the EU and US have remained each other's most important trade and investment partners, navigating geopolitical challenges and periods of political realignment. American companies invested in Europe are committed to playing their part in maintaining that economic bond. Now, as the EU kicks off a mandate focused on making the region more competitive, we stand ready to work with the Polish Presidency to unlock the full potential of the transatlantic economy.

Attractiveness of Europe

Agenda for Action 2024-2029

The attractiveness of Europe is under threat. A heavy regulatory agenda, protectionist trends and sluggish growth have created a difficult environment for business in a context of global uncertainty. But the future does not have to be bleak. With decisive action, the EU can reset the agenda and boost its competitiveness in the global economy. American companies stand ready to help build a brighter future in Europe.

Our *Agenda for Action* outlines the three priority areas that should drive the European political agenda to strengthen the attractiveness of the region and tackle global issues.



A competitive, sustainable and digital Single Market

- Regulatory burden
- Innovation
- Sustainability
- Digital



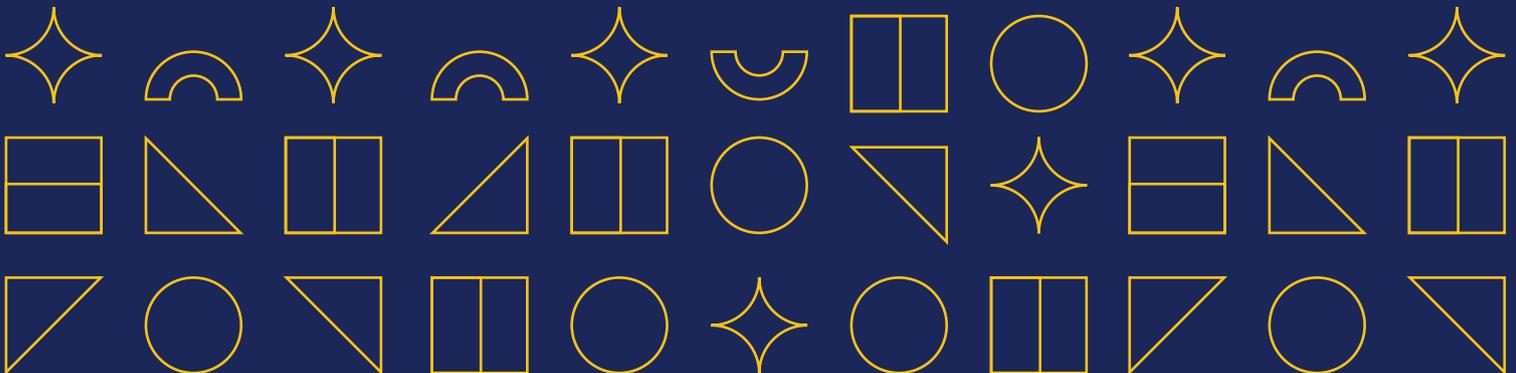
A strong and resilient Europe on the international scene

- Trade
- Transatlantic relationship
- Security
- Global standards



An equitable and democratic Europe

- Skills
- Inclusion
- Democracy
- Future of the EU





Competitiveness scorecard for the EU

A **ten-point checklist** to assess the impact of a regulatory proposal on competitiveness.

How will this proposal...

- 1** ... enhance the Single Market and ensure an even playing field?
- 2** ... make the EU more open and attractive to trade and investment and strengthen the EU's relationship with like-minded trade partners?
- 3** ... make the EU's workforce more skilled?
- 4** ... directly foster innovation and the translation of innovation to industry?
- 5** ... effectively support necessary supply chains and infrastructure investments across the EU?
- 6** ... help to grow gross domestic product and productivity across the EU?
- 7** ... accelerate digitalisation across the EU?
- 8** ... decrease costs and regulatory burdens for business and consumers?
- 9** ... improve consumers' purchasing power?
- 10** ... enhance the EU's competitive resilience in a changing economic, environmental and social landscape?

Opportunities for transatlantic cooperation in testing times



A strong transatlantic relationship benefits the EU, the US and the world. However, as new administrations take office on both sides of the Atlantic, this longstanding relationship – counting on the €8 trillion transatlantic economy – may be put under increasing stress. Regardless of political leadership, AmCham EU's priorities remain the same: we support an affirmative agenda for the transatlantic economy. That is why we strongly advise against 'go-alone' policies and measures that restrict open trade. Self-sufficiency is not a realistic path to economic security. Rather, governments should seek to build the resilience of their supply chains through diversification, cooperating with like-minded partners.

In that context, the new EU and US administrations should focus on taking advantage of common opportunities that serve their shared political priorities. These areas of opportunity for cooperation include:



- Data transfers
- Technical standards for emerging technologies



- Critical raw materials trade
- Energy cooperation (eg liquefied natural gas)
- Complementary industrial policies



- Transatlantic defence capabilities
- Non-market trading practices
- Trade facilitation

Agriculture

Food is a strategic good. Ensuring food security requires innovation and sustainable practices, backed by administrative simplification and a modernised common agricultural policy. We call on the Polish Presidency to champion resilient and competitive food systems in Europe.



Julie Vermooten,
Chair, Agriculture &
Food Committee



Common Agricultural Policy (CAP)

The CAP is critical to creating a fairer and greener European agricultural ecosystem that can meet the world's demands. It is time to make it fit for the future.

Recommendations:

- Develop renewed agricultural policies that are fair and non-discriminatory between local and imported raw materials by removing non-tariff barriers to trade and recognising different agronomic needs around the world.
- Support R&D initiatives in agriculture, including digital and precision farming.
- Incentivise farmers to adopt more sustainable agriculture.
- Ensure the CAP contributes to a well-functioning, resilient international agri-food supply chain.

Deforestation Regulation (EUDR)

The Polish Presidency has the opportunity to pressure for clear guidelines to facilitate the EUDR's implementation.

Recommendations:

- Further develop and disseminate as soon as possible comprehensive frequently asked questions and guidance documents for economic operators and national administrations.
- Clarify how the information system will operate, including the precise data that will be required throughout the supply chain and the timeline for its full functionality. Additionally, ensure that enough learning opportunities are given to economic operators, facilitating smooth implementation.
- Communicate the date of the country benchmarking system's launch.
- Establish meaningful thresholds to ensure that the EUDR tackles significant environmental impact which companies should prioritise over minor or negligible claims.

Food security and affordability

Inflation and geopolitics have made food too expensive for too many households. Policymakers must ensure European food sovereignty.

Recommendations:

- Designate the entire food production chain as essential. Export restrictions for agricultural raw materials hinder the necessary free trade policies that contribute to greater food security.
- Stimulate free trade for agricultural products, leveraging different trade agreements to diversify supply chains and grow the volume of goods traded.
- Implement short- and long-term measures, agreed through private-public collaboration, to ensure sustainable food security and affordability.
- Make innovation accessible to farmers to enable them to fulfil their full production potential with the advancement of sustainable agricultural machinery.
- Ensure that regulatory frameworks do not create additional uncertainties in global food production and trade flows.

Trade of agri-food products

As outlined in the Farm to Fork strategy and the European Green Deal, the EU must stay focused on creating more sustainable food systems.

Recommendations:

- Ensure the correct application of reciprocity in food trade agreements, also known as mirror clauses, to help the private sector promote sustainable food systems.
- Provide a science-based assessment of import standards that ensures trade agreement predictability, guarantees compliance with WTO rules and recognises the local specificities of EU trading partners.
- Conduct an impact assessment on the effects of mirror clauses and develop a common vision on mirror clauses in collaboration with global partners and organisations.
- Consider the adoption of equivalence agreements with third countries that have similar production methods to the EU.

Competitiveness

A competitive economy is the backbone of growth and innovation in the Single Market. Abusing competition rules to achieve industrial policy goals only risks decreasing the attractiveness of Europe as an investment destination. Companies invested in Europe want to be certain they are operating on a level playing field.



Elsa Sependa,
Chair, Competition
Policy Committee



The €8 trillion transatlantic economy – the largest and wealthiest market in the world – is a powerful asset the EU can lean on as it pursues its competitiveness agenda.



Claudia Selli,
Chair, Transatlantic
Task Force

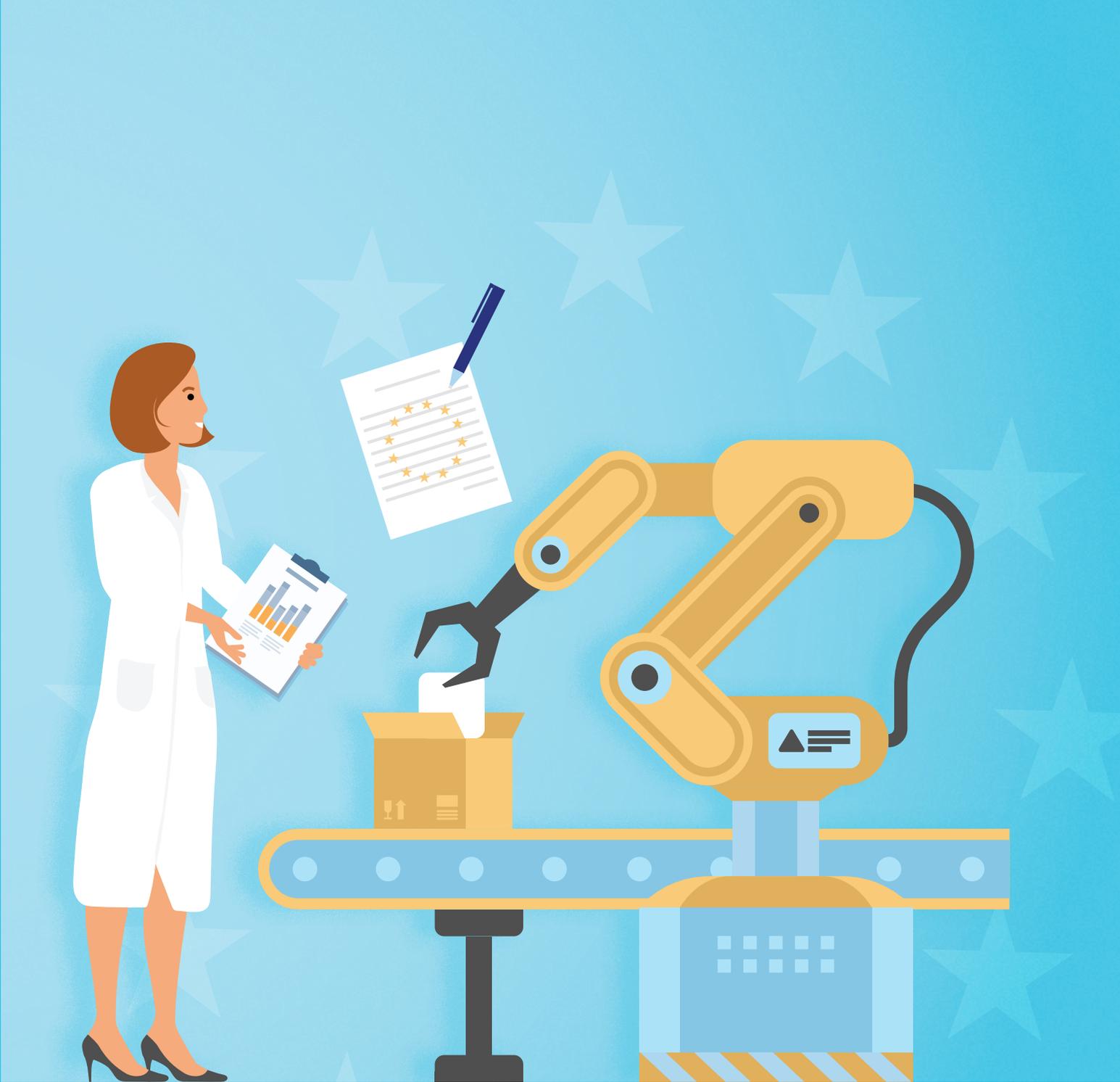


Intellectual property (IP) is vital for the EU's competitiveness, with IP-intensive industries accounting for around 42% of EU gross domestic product. Balanced IP policy attracts foreign direct investment and creates new jobs. To ensure that the EU remains an attractive place to invest by rewarding innovation, the Polish Presidency should advocate for a balanced IP rights framework. We further recommend that the Polish Presidency actively supports EU efforts regarding IP rights protection and enforcement in third countries with a particular focus on combating counterfeiting and pirated goods.



Simona Popa,
Chair, Intellectual
Property Committee





Article 102 Guidelines

At a time when the EU is prioritising a competitiveness agenda, the current draft guidelines put forward counterproductive structural impediments to innovation and business growth in Europe.

Recommendations:

- Provide more clarity on assessing dominance in aftermarkets.
- Address recent theories of harm and anticompetitive practices, such as self-preferencing, data leveraging and excessive pricing. This would ensure that the guidelines remain relevant in rapidly evolving markets, particularly in the digital economy.
- Return to an effects-based approach, ensuring that the Commission only targets conduct that genuinely harms competition.

Competition law modernisation

EU competition law forms the bedrock of investment in the Single Market. If properly modernised, it can ensure an open and free market system for all.

Recommendations:

- Improve the efficiency and relevance of antitrust procedural rules and maintain their coherence with modern and fast-moving markets and other EU policies, particularly the Digital Markets Act.
- Maintain a level playing field, avoiding a tilt towards favouring EU companies versus foreign acquirers. Such an imbalance would damage the EU's competitiveness by disincentivising the establishment of companies within the bloc.
- Expand cooperation between enforcers to increase transparency, harmonise implementation and minimise overlaps.
- Utilise guidelines, workshops and informal guidance (eg 'comfort letters') to decrease compliance risk from and between EU and Member States' competition instruments.
- Improve the Commission's current competition policy and enforcement set-up to fully protect due process.
- Pursue a more cooperative and open approach to stakeholders, using public consultations and publishing guiding principles.
- Promote the contestability of markets to ensure the growth of fledgling and innovative EU companies in critical sectors.

Foreign Investment Screening Regulation

The Foreign Investment Screening Regulation proposal currently risks resulting in increased scrutiny of low-risk transactions, inadvertently raising barriers to positive investment.

Recommendations:

- Set clearer requirements for national foreign direct investment (FDI) screening systems based on the principles of transparency, good governance and due diligence.
- Narrow the scope of transactions subject to FDI screening and the Cooperation Mechanism to a clearly defined set of high-risk technologies.
- Increase resources for FDI screening teams.
- Better align filing requirements and timelines between merger control, foreign subsidies screening and FDI clearance.
- Define the scope of sectors or products subject to monitoring as clearly as possible and strive for coherence with existing legislative and regulatory tools.
- Ensure that monitoring remains focused on high-risk technologies to avoid unnecessary scrutiny of low-risk transactions, which could create additional investment barriers.

Foreign Subsidies Regulation (FSR)

Uncertainty over the FSR's implementation continues to keep compliance costs high.

Recommendations:

- Encourage the Commission to clarify key concepts and use the revision provisions within the FSR to narrow its scope further.
- Publish comprehensive implementation guidelines based on case law, industry feedback and administration as soon as possible.
- Organise Commission-led workshops with industry and other stakeholders.
- Consider legislative paths to further align FSR exemptions with state aid exemptions.
- Monitor the impact of the FSR's review and implementation timelines on European procurement markets.

Intellectual property rights (IPR)

Balanced IPR protections foster innovation. With copyright and trademark violations on the rise, particularly in the online space, appropriate enforcement is critical to safeguarding revenues and promoting growth and competitiveness. A coordinated global response is needed to address the challenges posed by counterfeiting and piracy.

Recommendations:

- Ensure uniform and balanced application of existing IPR legislation across Member States to foster innovation and competitiveness within the EU.
- Promote public awareness of the value that IPR policy and competition bring to the EU, emphasising their contribution to innovation, economic security and growth.
- Strengthen international cooperation, particularly with key partners such as the United States, to efficiently combat counterfeiting and piracy.
- Support the Commission's efforts to address illegal content online, including IP-infringing goods, while promoting a strong and predictable framework.
- Encourage continued multi-stakeholder engagement and public-private cooperation to develop solutions for the growing challenges of online IPR enforcement.
- Introduce and enforce appropriate penalties and disincentives for copyright and trademark infringements to deter violations and promote a balanced environment for innovation.
- Ensure that the compulsory licensing of patents proposal does not undermine incentives to invest in research and innovation in the EU as well as the predictability of the current IP system.
- Safeguard the robustness of the EU IP protection system by making sure there is adequate judicial oversight throughout the compulsory licensing granting process.

Economic and Financial Affairs

The Draghi report underscored the central role financial services will play in unlocking Europe's competitiveness agenda and the continued advancement of the twin transitions. As the development of a Savings and Investment Union gets underway, the Polish Presidency can help to further strengthen the transatlantic financial marketplace and avoid obstacles to cross-border investments.



H el ene Benoist,
Vice-Chair, Financial
Services Committee



Europe needs a pro-growth tax policy. Aligning EU tax rules with global tax rules – particularly in a Pillar Two world – helps to give businesses the stability and confidence to invest in Europe.



Jonathan Lacey,
Chair, Tax Committee



The Polish Presidency has an important role to play in enhancing the usability and proportionality of the EU's sustainable finance framework, helping to mobilise the private capital flows needed to support Europe's economic growth and fund its green transition. Simplification, clear and consistent guidance and internationally aligned standards are key to attracting much needed international and domestic investment.



Ilan Jacobs,
Chair, Sustainable Finance Task Force



Business in Europe: Framework for Income Taxation (BEFIT)

The BEFIT package needs to be critically examined to reduce administrative burdens and simplify the EU's tax system. One size does not fit all: existing proposals will increase the costs of compliance for tax authorities and businesses.

Recommendations:

- Focus on reducing reporting requirements, particularly in view of developments related to Pillars One and Two, rather than prioritising BEFIT.
- Consider BEFIT as optional at the company level.
- Maintain the arm's length principle as a global approach for intercompany transactions to ensure that taxes are paid where value is created, preserving flexibility for businesses and national tax authorities.
- Amend the existing directive to be closer to the existing Pillar Two legislation, particularly required adjustments and Generally Accepted Accounting Principles references.
- Include provisions for loss consolidation and automatic cross-border loss relief to support business operations and maintain fairness in tax treatment across Member States.

Capital Markets Union (CMU)

As geopolitical tensions increase obstacles to cross-border investments, it is more important than ever to strengthen the EU's financial sector by completing the Capital Markets Union.

Recommendations:

- Apply an open, flexible and outward-looking approach to ensure equal and non-discriminatory access for third-country financial institutions and avoid additional obstacles to cross-border investments.
- Avoid fragmentation of global liquidity pools.
- Advance global trade for financial services to minimise current and potential FDI restrictions on EU companies that transact in multiple jurisdictions, as well as advance risk-transfer solutions for large risks (eg climate and cyber risks).
- Ensure access to third-country insurance market capacity for EU clients.

Digital finance

The integration of digital technologies can revolutionise the financial sector through new business models, services and products.

Recommendations:

- Adopt a regulatory framework that both encourages and facilitates financial institutions' adoption of digital business models and innovative payment solutions.
- Focus on outcomes, fostering industry innovation and enhancing consumer experiences, while maintaining strong consumer protection.
- Ensure a level playing field and avoid creating an asymmetric regime that could disadvantage third-country companies.
- Encourage the new Commission to focus on implementing existing legislation, allowing it to mature and demonstrate its effectiveness before considering any revisions.
- Focus Digital Euro discussions on how to leverage existing payments infrastructure, the value proposition of the project and interoperability.
- Pursue a regulatory approach to cybersecurity, aligned with the Digital Operational Resilience Act and the Network and Information Security Directive, that reduces duplicative oversight and reporting requirements, allowing firms to focus on risk management within both European and global frameworks.

Framework for financial data access (FiDA)

The potential benefits of open finance frameworks can only be achieved by building trust and the right incentives.

Recommendations:

- Provide greater clarity on FiDA's scope and definitions to promote financial data sharing schemes (FDSS).
- Ensure legal certainty and the right incentives for all actors in the data value chain.
- Avoid exclusions and restrictions on specific actors that would create an asymmetric regime ultimately detrimental to both innovation and competition.
- Allow scheme members to play a key role in shaping the key features of future schemes (eg specific data points).
- Extend the development period for financial data sharing schemes beyond the initially envisioned 18-month deadline, as suggested by co-legislators.

Payment services

The industry needs a risk-based and outcome-based approach to foster the development of innovative payment services while maintaining a high level of protection against increasingly elaborate fraud schemes.

Recommendations:

- Take into account aspects such as the seamlessness of the payment transaction, abandonment rates of transactions and the use of transaction risk
- Ensure regulation encourages cooperation between payment service providers for fraud prevention, monitoring and mitigation by providing clearer grounds for cooperation amongst themselves.
- Avoid unconditional refund rights that could lead to unintended consequences (eg friendly fraud, lack of vigilance).
- Give service providers flexibility to rely on contractually agreed liability. Any new liability should be subject to proportionality and reasonableness.

Public country-by-country reporting (CbCR)

Public CbCR should be aligned with OECD standards and harmonised across the EU. National divergences create confusion and increase compliance burdens for businesses.

Recommendations:

- Include a qualifying narrative and disclaimer in public CbCR templates to specify that reported data covers corporate income taxes only. By excluding other contributions, public CbCR fails to provide a holistic view of taxes paid and remitted by businesses.
- Clarify which multinational enterprises are required to use the common template and electronic reporting requirements, and what options exist for others, while allowing flexibility in reporting formats.
- Maximise alignment with OECD templates, aligning markup language to the most globally harmonious level possible.
- Minimise divergence by limiting Member States' ability to introduce additional columns or nation-specific requirements in reporting formats.
- Advocate for a harmonised implementation timeline across all member states, with clear guidance on early implementation by certain countries.

Sustainable finance

Private capital is crucial for meeting the EU's climate and sustainability goals. However, its potential has not yet been fully leveraged.

Recommendations:

- Proportionately and workably implement the new sustainable finance framework (including sustainability reporting), considering complex default and potential market risks.
- Adopt an evidence-based, flexible and outward-looking approach that ensures coherence and future proofing. Such an approach should allow for the practical mobilisation of private capital through clear and workable guidelines, including a definitive and objective definition of 'sustainable'. Without such clarity, investors face regulatory uncertainty, which can hinder investments.
- Avoid exclusionary approaches towards entire sectors: for the entire economy to transition, all sectors need access to finance for their own transformations.
- Account for the extensive efforts and resources required for the green transition. This includes sequencing the implementation timelines of new regulations to give businesses adequate time to prepare and adjust their operations.
- Offer businesses clear guidance and harmonise the implementation of the sustainability reporting framework – particularly concerning the requirements for third-country companies – to establish the necessary regulatory certainty and facilitate compliance across borders.
- Strive for international alignment, which is key to prevent fragmented jurisdictional approaches.
- Promote discussions in international forums and cooperate with third-country stakeholders to ensure regulatory certainty and international alignment in environmental, social and governance (ESG) disclosures.
- Ensure equal and non-discriminatory access for all third-country financial institutions, businesses and investors to help support and grow the European economy.

Tax compliance simplification and certainty ('Tax decluttering')

The European tax regime is extremely cluttered, with overlapping and redundant provisions that lead to tax uncertainty and an increased compliance burden.

Recommendations:

- Examine ways to identify redundant provisions and reduce administrative burdens on businesses, particularly as a result of the implementation of the global 15% minimum corporate income tax (Pillar Two).
- Review and simplify existing measures aimed at increasing administrative cooperation and transparency and addressing base erosion and profit shifting.
- Avoid overlapping legislation that creates duplicative compliance and reporting requirements.

Transfer Pricing (TP) Directive

The proposal to enshrine the arm's length principle (ALP) into EU law could restrict tax authorities' flexibility to negotiate, particularly with third countries, potentially leading to uncertainty and double taxation.

Recommendations:

- Prioritise a successful implementation of Pillar Two and finalise international transfer pricing negotiations (e.g. Amount B of Pillar One) prior to legislating the ALP.
- Ensure the uniform application of ALP across the EU.
- Establish a forum in which the Commission, Member States and taxpayers can discuss and identify practical solutions to transfer pricing problems.
- Expand the availability of, and access to, advance pricing agreements and ensure tax authorities are appropriately resourced to manage such taxpayer requests.

Unshell Directive

The scope of the Unshell proposal should be narrow, focusing only on abusive arrangements enabled by the use of shell companies.

Recommendations:

- Avoid hampering atypical valid business models that generate value in the Single Market.
- Apply a tailored and proportionate approach to target fraudulent actors without placing unnecessary administrative burdens on compliant businesses.
- Apply the Directive only to companies outside of the scope of the Pillar Two Implementing Directive with gateway provisions applied upon its implementation.

Value added tax (VAT) for charitable donations

VAT liability for companies that make large or regular donations can reach a tipping point where donations are no longer a viable option. Instead, these companies are forced to destroy wholesome goods that could otherwise be donated. Reassessing this system could create significant social benefits and bolster key EU sustainability goals, such as those in the Waste Framework Directive and sustainability reporting.

Recommendations:

- Put in place VAT for charitable donations frameworks that contain sufficient anti-fraud measures but are still simple, electronically supported and neutral towards the type and use of donated goods.
- Ensure that within these systems, eligible charity partners are broadly defined to allow recognised charities and special entities such as schools, orphanages, hospitals and hospices to receive donated goods, even if they come from different Member States.
- Consider an EU-wide registry for charity partners or entities that are automatically qualified to receive donations.

VAT in the Digital Age (ViDA)

VAT in the Digital Age (ViDA) would make a significant contribution to businesses of all sizes in Europe by modernising and streamlining VAT requirements for vendors and marketplaces alike.

Recommendations:

- Encourage ViDA's quick implementation to ensure that small and medium-sized enterprises and larger businesses alike can immediately reap its benefits.
- Ensure that Member States are aligned with ViDA and do not implement new VAT systems.

Education, Youth, Culture and Sport

A truly competitive EU workforce must be both skilled and inclusive. This requires a collaborative commitment from public and private sectors to ensure that people from all walks of life have access to quality training and career opportunities.



Albert Vallejo,
Chair, Diversity, Equity &
Inclusion Task Force



ISSUE

Education

Employers need a workforce with inter-disciplinary profiles and transferable skills. Developing these skills must be education systems' key priority.

Recommendations:

- Support exchange programmes for primary school students between European countries.
- Address vocational and technical education training by promoting apprenticeships and ensuring workplace training skills through cooperation between schools and employers.
- Encourage public-private partnerships in curricula development to ensure inclusion of in-demand skills and specific business requirements.
- Increase investment in high-quality teacher training, facilities and infrastructure.

Reskilling and upskilling

Europe faces a major skills shortage for green and digital jobs. Public-private partnerships are needed to encourage training opportunities.

Recommendations:

- Encourage employees to engage in lifelong learning through business-sponsored reskilling and upskilling.
- Facilitate collaboration within industry and between Member States to help public authorities and small companies provide reskilling and lifelong learning initiatives.
- Provide standardised certifications of innovative programmes to enhance their recognition.
- Use the Multiannual Financial Framework to provide ambitious funding for educational institutions and private operators to collaborate and help the active workforce adapt its skillsets to new demands.
- Increase horizontal coordination to focus national curricula on adopting more digital tools as well as broader science, technology, engineering, mathematics and non-cognitive skills, such as adaptability and creativity.

Youth

Younger generations' wellbeing and growth should be at the heart of the EU's skills funding initiatives.

Recommendations:

- Support programmes to foster human skills and exchanges, such as Erasmus+, the Youth Employment Initiative and Erasmus for Young Entrepreneurs.
- Develop new public-private partnerships with Member States aimed at transferring business and digital skills to younger citizens.

Employment, Social Policy, Health and Consumer Affairs

Innovation, patient access, competitiveness and sustainability are for us the four cornerstones of EU health policy. The Polish Presidency can play a critical role in ensuring the EU's regulatory frameworks for pharmaceuticals and medical devices provide people with access to the latest medical advances.



Felix Uedelhoven,
Chair, Healthcare
Committee



A fair consumer agenda in the EU benefits consumers and businesses alike. The key is striking the right balance between protecting consumers and enabling business innovation.



Michal Penkala-Norwicki,
Chair, Consumer Affairs
Committee



Critical Medicines Act

A future Critical Medicines Act is an opportunity to strategically address challenges and root causes of shortages impacting critical products in a proportionate manner, potentially revitalising the competitiveness of the healthcare sector.

Recommendations:

- Address the EU's structural challenges regarding the competitiveness of medicines production and medicine shortages by adopting a multidimensional approach that focuses on the overall attractiveness of the market and framework conditions.
- Harmonise shortages management approaches at the EU level, ensuring interoperability where possible and avoiding duplication and discrepancies.
- Unify national and European critical medicines lists but ensure the list remains limited and focused, with clear expectations and targeted, proportionate and - where needed - differentiated obligations.
- Recognise the shortcomings of national stockpiling and instead promote structural solutions to prevent shortages. Protectionist policies favouring local production at the expense of global imports risk the sustainability of supply.
- Leverage the EU's track record in industrial policy, as demonstrated by the Chips Act. This approach prioritises sector incentivisation over increased bureaucratic hurdles, increasing the competitiveness of EU manufacturing of critical medicines.

Digital Fairness

Consumers should be protected everywhere, including in digital spaces.

Recommendations:

- Enforce existing digital fairness rules by channelling adequate resources, preventing discrimination against size or place of establishment and coordinating with key stakeholders.
- Avoid creating frameworks that overlap with existing legal frameworks, for example on data protection or online safety, thus creating legal uncertainty.
- Build rules that protect consumers, deliver legal certainty and avoid negative impacts for innovation and business development – only where gaps in the current consumer protection framework exist. Where feasible, legislation should not be technology or channel specific.

Digital Fairness (cont.)

- Learn from existing legislation and build on international best practices to better understand the effect of new requirements. For example, policymakers can use sandboxing, a regulatory approach that allows for the testing of new policies or innovations in a controlled environment, before broader implementation.

Digitalisation of healthcare

Digitalisation has the potential to transform healthcare delivery, making it more efficient, personalised and accessible.

Recommendations:

- Promote the use of health data through the European Health Data Space (EHDS) to improve patient care, facilitate research and support health policy development.
- Promote the harmonised adoption of telemedicine and other digital health tools and their integration into national healthcare systems as well as in the context of cross-border healthcare.
- Support initiatives that leverage health data for research and innovation, and facilitate collaboration between healthcare providers, researchers and technology companies.
- Ensure harmonised implementation of EHDS in Member States and the development of needed infrastructure to unleash the potential of data-driven healthcare.

Fairness in the EU consumer agenda

Existing consumer protection regulations are not effectively and consistently enforced, which leads to uneven compliance among businesses and makes those that comply less competitive.

Recommendations:

- Ensure that all existing EU consumer protection regulations are clear, enforceable and consistently applied across Member States.
- Enforce legislation uniformly and without discrimination against non-EU companies operating in Europe.
- Adhere to Better Regulation principles when crafting new consumer legislation and apply a cost-benefit analysis during the legislative process.
- Create coherent and consistent enforcement mechanisms, including for the digital sector.
- Enforce the European consumer network and avoid creating another set of new regulators.

Fairness in the EU consumer agenda (cont.)

- Ensure regulatory compliance to EU standards of safety and consumer protection. This is key to prevent unfair competition that disincentivises direct investment in the EU, undermining the EU's competitiveness agenda.

Life sciences strategy

The anticipated EU Life Sciences Strategy should deliver on its promise to create an end-to-end vision for life sciences in the EU, enhancing the environment for research, discovery, development and delivery of medicinal products, medical devices and health technologies.

Recommendations:

- Establish an EU Office for Life Sciences to oversee the strategy, ensuring a holistic view of the sector and conducting competitiveness checks when horizontal legislation (eg environmental proposals) impacts the sector.
- Adopt a comprehensive approach that fosters innovation and prioritises clinical research to address gaps in the EU's clinical trials landscape.
- Include measures to harness European health data, enhance technology transfer and improve collaboration across the life sciences ecosystem.
- Ensure accessible funding opportunities and a supportive regulatory framework that is modernised and future-proofed.
- Strengthen the framework for manufacturing and prioritise the training and retention of a skilled workforce to support long-term sector growth.

Medical Devices Regulation (MDR)

The MDR should play a vital role in ensuring that patients can benefit from timely access to established and innovative medical technology.

Recommendations:

- Support timely revision of the MDR, initiated by the European Commission, to ensure that the regulatory framework is efficient, predictable and fit for purpose.
- Consider short-term targeted legislative and non-legislative measures to ensure the smooth functioning of the transition period.
- Ensure that the regulatory framework is conducive to innovation, helping to guarantee the EU's global competitiveness

Pharmaceutical package

The Polish Presidency can ensure that the revision of the pharmaceutical legislation bolsters Europe's life sciences sector, safeguarding its competitiveness.

Recommendations:

- Preserve a predictable and robust regulatory and IP framework with appropriate incentives that ensure timely access for patients to innovative products (at least by bringing Regulatory Data Protection and Orphan Market Exclusivity back to their current baselines).
- Define unmet medical needs by taking a patient-centred approach that encourages research for life threatening, severely debilitating and chronically debilitating diseases.
- Base the modulated extensions of the Regulatory Data Protection on factors within the control of the company.
- Modernise the regulatory framework and maximise the use of expedited pathways to meet the needs of patients.
- Ensure open, diversified supply chains to allow the free flow of critical materials and goods and to avoid delays in patient access to medicinal products. Obligations on companies with regards to supply chain reporting should be proportionate to risks and feasible to implement.
- Encourage ground-breaking therapies, such as advanced therapy medicinal products, while accounting for their unique nature. This includes clarifying under which circumstances the hospital exemption scheme could be deployed.
- Avoid including social and environmental standards in pharmaceutical Good Manufacturing Practice (GMP) inspections, as they do not recognise the links to internationally harmonised inspection practices and outcomes. This difference risks invalidating the EU's existing Mutual Recognition Agreements on GMP with seven key trading partners, including the US, Canada and Japan.

Product Liability Directive

The Product Liability Directive must be implemented in a balanced way that ensures appropriate redress for genuine claimants whilst protecting defendants' fundamental rights and avoiding interference in the judicial sovereignty of the Member States.

Recommendations:

- Maintain the claimant's burden of proof by using Article 10's rebuttable presumptions sparingly, ensuring no reversal of this principle.
- Provide harmonised guidance to ensure consistent application across Member States.
- Protect confidential information and legally privileged documents when implementing the new Directive.
- Encourage the right of recourse between liable economic operators.
- Offer guidance to balance claimant and innovation interests, and engage stakeholders through workshops and expert forums during and beyond the 24-month implementation period.

Environment

The 2019-2024 mandate was focused on adopting an unprecedented package of environmental legislation. Now, the new mandate should be all about helping businesses invest in the green transition, simplifying the regulatory framework and promoting competitiveness.



Natasa Sbrizaj,
Chair, Environment
Committee



The Polish Presidency should push for a clear, harmonised and proportionate due diligence framework that puts all companies on the path to more responsible business conduct.



Elsa Venturini,
Vice-Chair, Responsible
Business Conduct Task Force



Chemicals industry package (REACH [Regulation on Registration, Evaluation, Authorisation and Restriction of Chemicals]; per- and polyfluoroalkyl substances [PFAS] restriction)

The EU needs a science-based, risk-differentiated regulatory framework that maintains the balance between human health and safety, environmental preservation and the continued operation and growth of Europe's industrial sectors.

Recommendations:

- Improve REACH by clarifying deadlines, streamlining processes, improving enforcement and preventing regulatory overlap with sector-specific legislation.
- Uphold safety and maintain principles of risk assessment and science-based decision-making at the core of chemicals legislation. Hazard-based regulatory instruments fail to consider key socioeconomic factors.
- Differentiate among PFAS and avoid blanket bans without scientific justification to prevent unnecessary disruption across key sectors.
- Adopt timebound exemptions for critical industries and strategic sectors, aligning with the Green Deal principles where no viable, scalable alternatives exist.
- Avoid restrictive timelines and inadequate consideration of the availability and viability of alternatives, including in manufacturing processes.
- Ensure any potential PFAS regulation is proportionate, balancing environmental protection with the economy.
- Exclude remanufactured, refurbished or repurposed products and components from the package's scope.
- Avoid double-regulation and ensure that the REACH regulation remains the EU's primary chemicals regulation.

Circular Economy Act

Business involvement is key to the success and implementation of the circular economy in Europe.

Recommendations:

- Encourage cooperation between governments, industry and civil society to achieve circularity in products and services at every stage of their lifecycle.
- Support innovative approaches for an efficient and responsible use of resources.
- Ensure regulatory coherence and avoid contradiction across policy initiatives and between horizontal and sectorial legislation.
- Support models and practices that expand the useful life of products.

Circular Economy Act (cont.)

- Ensure large-scale availability of economically competitive secondary raw materials for the relevant waste streams, enabled by intra-EU waste shipments.

Corporate sustainability due diligence and reporting

To promote sustainable corporate practices, provisions within the Corporate Sustainability Due Diligence Directive (CS3D) and the Corporate Sustainability Reporting Directive (CSRD) still need clarification and further simplification.

Recommendations:

- Monitor the implementation of the CS3D carefully to ensure that potential incoherence with the wider policy framework can be addressed ahead of time without legal uncertainty.
- Assess and address the potential issues related to the extra-territorial impact of CS3D and its potential conflict with third-country legislation.
- Provide comprehensive guidance documents two years ahead of the entry date of application to clarify uncertain terms and complex sections of the legislation and offer compliance examples.
- Ensure that the CS3D is consistently implemented throughout the Single Market to prevent discrepancies in application.
- Make enforcement mechanisms both practical and enforceable, particularly given the extraterritorial impact of the legislation.
- Regularly integrate stakeholder feedback into the implementation process to address ongoing concerns and facilitate a smoother transition for businesses.
- Simplify CSRD obligations and push implementation dates back to give industry time to comply.

Green Claims Directive

The implementation of the Green Claims Directive should focus on providing business with clarity, predictability and legal certainty.

Recommendations:

- Adopt a science-based approach, in line with international standards and avoid restricting market actors to EU-based labels only.
- Accommodate diverse carbon offset techniques and methodologies.
- Include a presumption of conformity for specific claims with recognised methodologies, avoiding the introduction of a cumulative nature to criteria.
- Address the question of hazardous substances in REACH as a priority and ensure that products compliant with REACH can continue to use Green Claims.

Implementation of legislation adopted in the last mandate (Batteries Regulation, Ecodesign for Sustainable Products Regulation [ESPR] and the Packaging and Packaging Waste Regulation [PPWR])

The previous mandate saw the EU adopt an array of ambitious environmental regulation. The new mandate must smoothly implement this legislation to minimise value chain disruption.

Recommendations:

- Support product-specific ecodesign measures, while avoiding horizontal measures that might overlap with other legislation.
- Ensure adequate transition time to adapt to product-specific ecodesign requirements, while accounting for trade-offs between different environmental aspects and ensuring alignment with sectoral legislation.
- Make secondary legislation, working plans, Digital Product Passport (DPP) standards and non-legislative acts for the implementation of ecodesign requirements at different phases available in a timely manner.
- Offer a high level of protection for confidential business information and alignment with the International Organization for Standardization.
- Ensure the detail and structure of proposed secondary legislation (eg carbon footprint declaration, durability and performance requirements, due diligence policies etc) and the architecture of the DPP are published well before the implementation date of the respective requirement.
- Adopt evidence-based secondary legislation and guidance documents for the PPWR to ensure minimal disruption to value chains that depend on packaging for the commercialisation of products in the European market.
- Consider the specificities of each sector and the safety of operators and users as part of recycling and reuse objectives.
- Encourage national legislation that increases packaging collection through deposit return schemes.
- Revise or extend implementation timelines if clear guidance is delayed.

Pellets Regulation

The Pellets Regulation proposal constitutes an important step towards pellet management across EU value chains based on existing best practices.

Recommendation:

- Ensure coherence with other EU and international initiatives such as the International Maritime Organization's work on plastic pellet management during maritime transport, the REACH restriction on microplastics adopted in October 2023 and the recently agreed revision of the Industrial Emissions Directive.

Low-carbon and competitive economy

The private sector supports EU climate goals in a competitive economy, but ambitious targets and short timelines demand larger investments for industries to adapt and comply.

Recommendations:

- Address the current lack of measures equivalent to the EU Emissions Trading System (ETS) in third countries, which puts the EU's energy-intensive sectors in an unfavourable position.
- Support the development of low-carbon technologies and low-carbon business solutions.
- Ensure the EU's climate and energy policy framework is all encompassing and balances sustainability, competitiveness and innovation.
- Ensure that Member States proactively translate the 2030 biomethane production goals into their National Climate and Energy Plans and enact appropriate fiscal measures to scale up the use of biomethane and related technologies.
- Establish enabling conditions for achieving the 2040 climate target.

Waste Framework Directive

The proposed Waste Framework Directive revision aims to reduce food waste and bring about more circular and sustainable management of textile waste.

Recommendations:

- Enable greater harmonisation through reporting guidelines and EU eco-modulation criteria.
- Integrate good governance principles for the efficient and transparent organisation of producer responsibility organisations.

Water resilience

Water quality and availability are critically important for citizens, businesses and communities. However, existing water infrastructure is not resilient enough to cope with the challenges of increasing water scarcity – already affecting 40% of Europeans – and the rising frequency of extreme weather events.

Recommendations

- Enhance infrastructure resilience by reducing water leakages and promoting water reuse technologies.
- Support the implementation of advanced digital monitoring systems using artificial intelligence (AI) and the Internet of Things (IoT) to provide real-time data on water quality and quantity. This would facilitate better management and crisis mitigation.
- Foster public-private partnerships for ecosystem restoration and increase funding for water-resilient projects to support national and local efforts.

Foreign Affairs and General Affairs

The EU needs clear, simple and effective customs procedures. We stand ready to work with the Polish Presidency to advocate for a modern, robust customs framework that allows the safe movement of goods within the global supply chain.



Pablo Muñiz,
Chair, Customs & Trade
Facilitation Committee



Partnership is the only way to ensure the security and defence of Europe. Inclusive collaboration and cooperation among allies and partners at both the EU and NATO levels are needed to strengthen European security while scaling up our defence industry to effectively support our armed forces.



Florian Gleissner,
Chair, Security, Defence
& Space Committee



The Polish Presidency should kick off the new mandate as a champion of open trade. In a world dominated by geopolitical rivalries, trade remains a key driver of economic growth, competitiveness and overall prosperity.



Emanuele Frezza,
Chair, Trade & External
Affairs Committee



Transparent implementation of recovery initiatives is key to the Ukraine's economic transformation. We are committed to supporting sustainable security and economic prosperity in Ukraine and Europe.



Yana Humen,
Chair, Ukraine Task Force





Current and future trade agreements

Free trade agreements (FTAs) still play a key role in connecting the EU businesses to important sources of growth and new market opportunities. The EU should prioritise key comprehensive FTAs, concluding and ratifying ongoing trade deals and engaging in trade talks with new partners.

Recommendations:

- Ratify existing agreements with Mercosur, Mexico, Chile and the investment chapter of the EU-Canada Comprehensive Economic and Trade Agreement (CETA).
- Conclude and advance negotiations with Australia, Indonesia, India, Thailand, the Philippines and Malaysia, while exploring agreements with ASEAN countries and consider joining the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP).
- Strengthen trade relationships with key regions, including Africa (especially in services trade) and launch new FTA negotiations with countries essential to EU sectors, such as services.
- Maintain credibility by avoiding the reopening of concluded FTAs and refrain from overloading agreements with non-trade policy objectives.
- Tailor trade agreements to each partner's unique needs and, where possible, pursue EU-only agreements to ensure timely ratification.

E-commerce

The expansion of digital commerce has demonstrated that current customs rules are not fit for the realities of today's supply chains.

Recommendations:

- Balance the needs of e-commerce businesses and consumers, while maintaining safety and security.
- Encourage the integration of the new E-commerce Agreement into the World Trade Organization (WTO) rulebook, extend the WTO's Moratorium on Customs Duties on Electronic Transmissions at the next Ministerial Conference and establish a permanent moratorium.

EU Defence Industrial Strategy (EDIS)

EDIS can boost EU Member States' investments by strengthening the EU's defence technological and industrial base and ensuring a secure supply chain.

Recommendations:

- Strengthen and promote mutually beneficial government-to-business and business-to-business partnerships with like-minded third-country entities to improve the EU's defence industrial readiness and resilience.
- Ensure that third-country controls with the European Defence Industrial Programme (EDIP) are flexible to maintain attractiveness and usability for national requirements.
- Harmonise the application of EDIP's 'guarantees' language to provide blanket derogations for eligible EU-based entities controlled by third-country entities, ensuring consistency across Member States and reducing the risk of discriminatory practices.
- Support national governments in procuring urgently needed capabilities in the short term, while supporting the competitiveness of the EDTIB over the long term.

EU-China relationship

Geopolitical challenges, as well as technology competition between the US and China, require the EU to play a leading role on the international scene and strive for enhanced global cooperation.

Recommendations:

- Coordinate with Europe's most important like-minded partner, the US, on common challenges posed by China through existing cooperation forums like the Trade and Technology Council.
- Manage the EU relationship with China so as to allow businesses to reap the benefits of the Chinese market while mitigating the risks posed by its policies and geopolitical challenges.

EU-UK trade and investment relationship

Considering the EU and the UK's close political and economic ties, it is vital to maintain a positive relationship and a comprehensive economic partnership.

Recommendations:

- Implement the EU-UK Trade and Cooperation Agreement thoroughly alongside the new Windsor Framework to provide business with certainty.
- Rebuild close communication between the EU and the UK to manage their respective regulatory environments and minimise disruption and regulatory divergence.
- Broaden the scope of the relationship over time.

EU-US relationship

The EU's close partnership with the US is critical for the region's security and prosperity. With new administrations on both sides, the EU and the US should focus on finding windows of opportunity for strengthening collaboration where interests are aligned.

Recommendations:

- Remove and avoid creating barriers to trade and investment in the name of national security, while also resolving existing outstanding trade disputes through mutually beneficial deals.
- Collaborate with the US in the development of technical standards for emerging technologies.
- Work with the US to build complementary industrial ecosystems, avoiding zero-sum competition.
- Strengthen energy cooperation.
- Advance critical raw materials trade, including through a Critical Minerals Agreement.
- Bolster the transatlantic digital marketplace by guaranteeing EU-US data transfers and avoiding barriers to digital trade.
- Build upon the work of the Trade and Technology Council to preserve and continue cooperation on common emerging issues and advance trade and investment flows.
- Conclude the Global Agreement for Sustainable Steel and Aluminium and solve the Aircraft Subsidies Dispute.

Implementation of Green Deal and other customs-related initiatives

The trend towards non-fiscal tasks for customs authorities has accelerated and added successively more responsibilities to customs processes.

Recommendations:

- Ensure streamlined, inclusive, sector-agnostic and coherent policy that makes trade as smooth as possible when implementing the Green Deal and other initiatives with a customs dimension (eg the Green Claims Directive, Carbon Border Adjustment Mechanism [CBAM], Deforestation Regulation and Forced Labour Regulation).

Open trade in a world of geopolitical rivalry

An open EU trade policy can contribute to economic growth, resilience and competitiveness, societal development and the green and digital transitions.

Recommendations:

- Promote open, free and rules-based trade and make trade policy a priority for the next mandate.
- Keep the EU market open for imports to ensure that businesses can source their raw materials from different suppliers at reasonable costs instead of becoming dependent on only a few.
- Reduce the bureaucratic burden on EU operators and traders of new ESG initiatives (CBAM, the Deforestation Regulation etc).
- Open new markets to EU exports by reducing tariff and non-tariff barriers.
- Enhance the EU's business environment and Single Market to safeguard its attractiveness (eg through customs facilitation).
- Avoid imposing additional tariffs on imported goods used by downstream EU industries when adopting trade defence or compensatory measures, as this offsets other initiatives to boost competitiveness.
- Assess the impact of restrictive and defensive measures on trade and keep these measures transparent, targeted, temporary and of last resort.
- Focus on economic de-risking instead of decoupling from countries that present a risk to EU economic resilience and do not share similar values.
- Drive efforts to achieve regulatory consistency across jurisdictions, especially by developing a new harmonised export control arrangement to replace the Wassenaar Arrangement (considering the conflict between Ukraine and Russia).

Space (transatlantic alignment on space regulations)

Increasing militarisation in space, coupled with fragmented and uncoordinated regulations, risk increased security threats.

Recommendations:

- Coordinate regulatory measures for space and build a strong international framework, avoiding a regional patchwork.
- Consolidate the EU-US Space Dialogue to coordinate policies and share information on space activities, including to address emerging threats, harmonise standards and develop joint strategies for space exploration and commercial activities.
- Encourage transatlantic public-private partnerships to drive innovation and commercial growth in the space sector.
- Negotiate reciprocal market access agreements to facilitate easier entry and operation for space companies in both the EU and the US.

The Trade and Technology Council (TTC)

The TTC has achieved several successes that have strengthened transatlantic cooperation, but more can be done to amplify its impact.

Recommendations:

- Refine the TTC's objectives, simplify its workstreams and increase transparency and stakeholder engagement.
- Clarify the TTC's output and ensure razor-sharp focus by advancing strategic workstreams that create transatlantic approaches and concrete deliverables for common industrial challenges.
- Create, in concert with the US, a more permanent platform for cooperation.
- Encourage transparency and increase stakeholder engagement, as well as enhance its external dimension by working in alignment with existing forums and dialogues between the EU and the US (eg G7/G20, and WTO) and using them as a springboard to advance shared priorities.

Transatlantic Defence Technological and Industrial Cooperation (TADIC)

A strong and prosperous TADIC is instrumental to foster the EU-US relationship, encourage sustainable growth and achieve collective security.

Recommendations:

- Encourage capability development programmes that include both EU and US stakeholders to enhance cost-effective innovation, standardisation, interoperability, interchangeability and technological leadership on both sides.
- Establish open and resilient defence markets reciprocally to guarantee similar regulatory conditions on both sides of the Atlantic.
- Discuss common areas of transatlantic cooperation in the co-design, co-development, co-production and co-sustainment of next generation defence technologies and capabilities.
- Encourage effective export licensing and testing/certification regimes to allow collaborative development and production among allies.
- Refine the EU-US Security and Defence Dialogue's objectives and increase transparency and stakeholder engagement.
- Insert a recurring agenda item in the Inter-parliamentary meetings of the Transatlantic Legislators' Dialogue between EU and US lawmakers.

Ukraine

The EU's support is crucial for Ukraine's sustained recovery, continued modernisation and closer integration into Euro-Atlantic structures.

Recommendations:

- Effectively implement the Ukraine Facility, ensuring funds are distributed transparently and accountably while incorporating feedback from all stakeholders, including the private sector.
- Favour projects that provide both immediate relief and long-term support for Ukraine's economic development and infrastructure. Extending financial support beyond the current budgetary framework would offer Ukraine a reliable financial outlook, crucial for planning and implementing extensive reconstruction and reform projects.
- Enhance the capabilities of Ukrainian institutions to manage and use EU funds, including through training in project management, financial oversight and anti-corruption measures.
- Continue to provide the necessary support to align Ukraine's legal and regulatory frameworks with those of the EU, fostering better governance and combating corruption.

Ukraine (cont.)

- Continue to strengthen Ukraine's defence capabilities through ongoing NATO cooperation during and after the war.
- Ensure stable and predictable trade relations with Ukraine while accession talks continue by seizing the opportunity of the Deep and Comprehensive Free Trade Area review.

Union Customs Code

The Polish Presidency has the opportunity to ensure the reformed Customs Code contributes to a more seamless and secure trade environment.

Recommendations:

- Ensure the swift rollout of information technology systems associated with the UCC Work Programme by 31 December 2025.
- Enhance data collection and data sharing mechanisms involving all ecommerce actors (sellers, platforms, logistics providers and brokers) to support risk-based enforcement, better coordination among authorities and increase customs' capacity to detect fraud.
- Address issues related to the Import One Stop Shop (IOSS) VAT number verification process and double taxation, while making the IOSS authorisation mandatory for all marketplaces.
- Set up enhanced customs-relevant data-sharing programmes, establish a streamlined European Data Hub and extend customs simplifications under the Trust & Check Trader scheme.
- Ensure that the Liability of Indirect Representation has a comprehensive risk assessment, robust safeguards and clear guidelines, while the proposed marketplace importer requirements apply proportional obligations.
- Make the EU Customs Authority responsible not only for enforcement and risk management but also for the uniform interpretation of customs legislation.
- Harmonise customs infringements, non-criminal sanctions and restrictions and prohibitions, all while limiting sanctions to cases of obvious negligence or intentional infringement.
- Adapt the implementation timelines and the reduction in temporary storage periods.

Justice and Home Affairs

On top of the EU's regulatory complexity, businesses are now also having to contend with a growing litigation burden. To ensure Europe remains an attractive place to do business, the EU needs to ensure its justice ecosystem safeguards against abusive and profit-driven litigation.



Michal Penkala-Norwicki,
Chair, Consumer Affairs
Committee



EU-US cross-border access to electronic evidence

The Commission's positive first review of the EU-US Data Privacy Framework puts businesses on both sides of the Atlantic a step closer to a predictable transatlantic data transfers regime.

Recommendations:

- Safeguard data subjects' fundamental rights with transparent and balanced rules, while also allowing effective cross-border access to data in criminal investigations.
- Work towards a balanced and harmonised framework, a pre-condition for concluding any international agreement.
- Build on the Data Privacy Framework to work towards a swift conclusion of an EU-US Agreement on e-Evidence.

Forced Labour Regulation implementation

The Forced Labour Regulation's incoherent policy framework, non-working tools and increased administrative burden could create confusion for businesses.

Recommendations:

- Clarify administrative procedures available to contest decisions and ensure that investigations are only initiated in cases of substantiated concerns. These should be risk based and founded on evidence.
- Ensure the effectiveness of the regulation's investigative mechanism and allow sufficient time for companies to provide all the information requested by authorities.
- Take the complexity of supply chains into account.

Litigation burden

Increasing litigation costs and profit-driven practices across the EU negatively impact both businesses and consumers, leading to significant financial and reputational damage and undermining trust in the legal system.

Recommendations:

- Revise the Representative Actions Directive to include strong safeguards against abusive litigation practices, such as stringent criteria for representing consumers and requirements for consumer consent before launching actions.
- Harmonise regulations across the EU to prevent forum shopping and a regulatory race-to-the-bottom in protections against abusive litigation.
- Introduce appropriate regulation of third-party litigation funding in order to establish clear oversight of third-party funders, require transparency in funding arrangements and implement mechanisms to prevent conflicts of interest, exploitative practices and geopolitical risks.

Transport, Telecommunications and Energy

Achieving the 2030 Digital Decade goals is crucial for the EU's competitiveness agenda. The Polish Presidency should advocate for AI adoption, coupled with a robust implementation of cybersecurity rules, to unlock a high-productivity, secure digital economy.



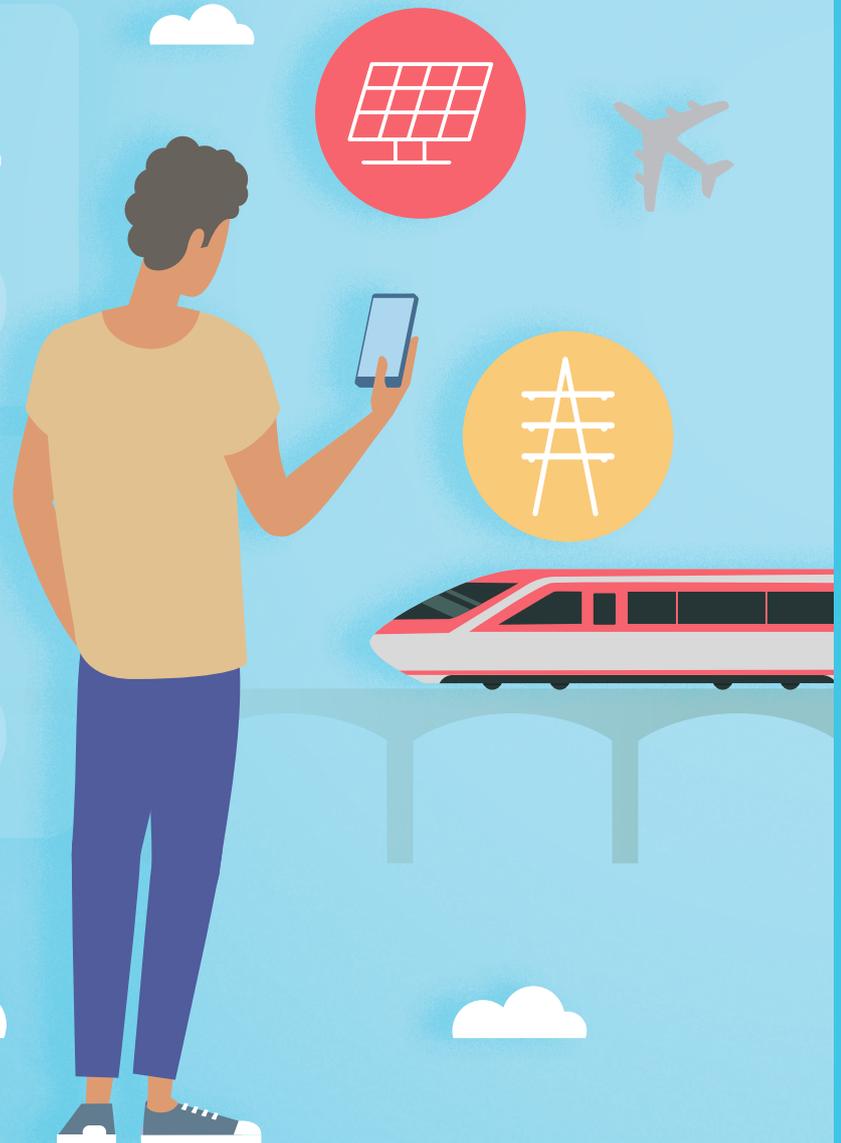
Jean-Marc Leclerc,
Chair, Digital Economy
Committee



The EU can only achieve its climate ambitions if it makes room for investment and innovation. There is not just one pathway to drive the energy transition. EU policy should enable investment in a broad range of promising, scalable low-carbon technologies.



Antonella Sopranzetti,
Chair, Transport, Energy &
Climate Committee



Artificial intelligence

How the AI Act is implemented will determine Europe's attractiveness for AI development and the extent to which businesses and citizens can benefit from the technology's potential.

Recommendations:

- Ensure sufficient time for input from industry on the implementing and delegated acts, as well as regulatory guidelines.
- Actively engage with the industry on AI-related initiatives such as the AI Factories initiative and the potential EU Cloud and AI Development Act, proposed in the Draghi report.
- Build on the previous work by international standard organisations to ensure compliance between technical standards and AI Act requirements.
- Ensure that regulatory agencies, the AI Office and the AI Board promote coordination across the Member States to avoid fragmentation and uneven implementation.
- Coordinate with international organisations (eg G7, OECD) and like-minded countries, particularly the US, to ensure international interoperability of AI policies.
- Maintain the principle of self-assessment and declaration of conformity for high-risk AI systems, as subjecting high-risk AI systems to prior third-party assessment would delay product launches and hinder AI uptake.

Cloud for public administration

Cloud-computing plays a vital role in public administrations across the EU. The bloc needs a framework for public procurement that enables innovation, flexibility and customer choice and that abides by the WTO Government Procurement Agreement.

Recommendations:

- Submit the Guidelines to a wide public consultation, open not only to all types of cloud providers, but also to all EU and national administrations and public agencies that use cloud services.
- Ensure that the guidelines are balanced and retain a level playing field for all cloud providers — European and non-European alike.
- Avoid sovereignty requirements based on nationality or location that do not effectively enhance cyber protection yet create exclusionary effects towards non-EU players.

Connectivity (5G and 6G)

Connectivity technologies like 5G – and eventually 6G – are critical building blocks of Europe’s digital economy and society.

Recommendations:

- Adopt and swiftly implement Member States’ 5G roadmaps and 2030 digital decade targets.
- Release both licensed and unlicensed spectrum in a timely and coordinated fashion.
- Finalise the implementation of the Electronic Communications Code in Member States quickly and consistently.
- Ensure the freedom to develop new business models, as 5G is crucial for business digitisation.
- Consult and coordinate among stakeholders to ensure European businesses and consumers reap the full potential of 5G.
- Continue to ensure a common European approach to trustworthy, resilient, diverse and competitive supply chains for ICT, especially as the rollout of 5G accelerates.

Consolidation and alignment of digital policies (eg artificial intelligence, cybersecurity and data)

After five years of intense legislative work, businesses now find themselves in a complex digital regulatory landscape, with severe regulatory overlaps and a lack of public-private collaboration in implementing digital policies.

Recommendations:

- Clarify and map out all the requirements in digital policy while identifying overlaps and potential contradictions.
- Foster public-private collaboration to ensure that businesses’ concerns are addressed to minimise disruption.
- Develop sector-specific guidelines as part of the Cyber Resilience Act to better accommodate industries’ unique characteristics and support them as they gradually comply.
- Provide guidelines with the AI Act to better distinguish the high-risk and low-risk product categories as soon as possible, while ensuring adherence to the ‘risk-based approach’ so only high-risk products are classified as such.
- Issue guidelines for the Data Act in a timely manner to ensure uniform implementation across Member States.
- Recognise the importance of global cooperation to boost resilience and identify and respond to cyber threats, while respecting local privacy laws.
- Provide clear definitions of products with digital elements in the Cyber Resilience Act that do not lead to duplication of conformity assessments.

Cybersecurity for critical infrastructure and the Internet of Things

Given the growing complexity of value chains, the diversity of business models and fast-developing cyberthreats, companies need to retain the flexibility to develop and continually update the security features for their unique risk situations.

Recommendations:

- Create strong public-private partnerships to maintain a voluntary and market-driven approach to tackle IoT security, particularly in regards to existing relevant standards.
- Ensure consistency with existing international practices and standards, including in conformity assessment, product safety and security, reporting processes and cryptography.
- Implement provisions in a harmonised way across Member States to reduce administrative burdens.
- Map existing cybersecurity requirements to identify overlaps and ensure coherent policies (eg avoid conflicting safety, security and sustainability requirements).
- Avoid introducing political considerations into technical instruments, including cybersecurity certification schemes.
- Avoid including digital sovereignty requirements in any cybersecurity scheme. This would limit competition in the cloud market, raise the cost of cloud services, limit the choice of trusted technology partners for European businesses and endanger international cooperation on sharing threat intelligence.
- Build and improve cybersecurity skills.

Digital Single Market

The Single Market for digital services and technologies is far from being a reality, even with the Digital Single Market strategy.

Recommendations:

- Create a Digital Single Market where people can benefit from the free movement of online services, goods and data.
- Ensure the EU remains an attractive and open market to foreign investors by avoiding discriminatory and protectionist policies.
- Apply principle- and risk-based policymaking to keep frameworks relevant for fast-evolving technologies.
- Accelerate investment, innovation and entrepreneurship to foster the uptake and scale-up of new technologies while investing in connectivity.
- Strengthen coordination between Member States on export controls, including the application of export controls to dual-use 'critical technologies'.

European data strategy

To achieve the European data strategy, data must be high-quality, credible, timely and available in machine-readable formats. At the same time, cloud infrastructure must be trustworthy, secure and energy efficient.

Recommendations:

- Collaborate to ensure access to a wide range of options in technology and partners.
- Invest to achieve the EU's aims in competitive storage, processing and profitable use of data.
- Assess new regulatory initiatives against existing regulations (including personal data protection and liability for defective products) to avoid conflicting and burdensome obligations.
- Involve and encourage industry to help teach skills and data literacy.
- Prevent the Data Act from disrupting functioning data sharing and processing models, making collaboration more difficult or imposing mandatory data sharing or portability obligations.
- Avoid conflicts between other laws (eg the General Data Protection Regulation and the Digital Markets Act) and enable the free flow of data while acknowledging IPR and protecting trade secrets.
- Solve issues around foreign authorities' access to data through multilateral governmental discussions (eg TTC) rather than by imposing regulatory requirements on a specific sector.
- Institute a pan-European supervisory authority or a one-stop mechanism, and clarify how data sharing responsibilities are allocated between data protection authorities and sectoral regulators.
- Ensure the upcoming Cloud Rulebook and Marketplace Services Requirements catalogue consider broad feedback from the relevant stakeholders and reflect the market reality and diversity of applicable initiatives.

International digital cooperation

To achieve the 2030 Digital Decade targets and remain competitive, Europe must build strong international digital partnerships.

Recommendations:

- Create and strengthen global alliances with trusted partners, including public and private partnerships, to reach shared policy goals (eg shaping technical standards).
- Build a TTC fit for the future and advocate for the use of international platforms like the OECD or the G7 to develop common standards, definitions and initiatives in the digital sphere.
- Cooperate with the US on the EU-US Data Privacy Framework and the effective functioning of the mechanisms that ensure its development.

Semiconductor technologies

Semiconductors are at the heart of the increasingly digitalised EU economy. The Chips Act is an important step to foster R&D and design, attract investments in manufacturing and reduce risks of chip shortages.

Recommendations:

- Continue fostering favourable conditions for semiconductor companies, their suppliers and customers to operate competitively in Europe, by lowering energy prices and reducing red tape.
- Increase the sector's resilience by pooling public and private investments in R&D, design and manufacturing.
- Build a talent pipeline and promote upskilling/reskilling activities driven by governments, in close coordination with industry.

Energy market

The recent energy crisis underscores Europe's urgent need for a liberalised, secure and sustainable energy market to drive its transition to a low-carbon economy.

Recommendations

- Ensure that energy regulations remain inclusive of low-carbon technologies that, while not formally designated as green, play a critical role in achieving EU decarbonisation goals.
- Improve permitting processes, which are currently slow and unpredictable in their outcomes. This drives investment away from European projects and is a significant impediment to the success of the EU's critical raw materials (CRM) policy.
- Incentivise and support CRM mining, refining and recycling projects (with circularity in mind).

Industrial policy for open markets and green innovation

Existing regulatory incoherence hinders green innovation.

Recommendations:

- Ensure that third-country entities have the same opportunities as European companies to qualify for incentives like the Net-Zero Industry Act and other Green Deal Industrial Plan schemes, acknowledging their role in fostering innovation, employment and growth within the net-zero economy in the EU.
- Ensure that any new green regulations encompass all sectors across the value chain.
- Increase manufacturing capacity across all sectors to support the development and retention of targeted low-carbon technologies in the EU.
- Stimulate innovation and remove unnecessary administrative and reporting requirements to facilitate the deployment of sustainable technologies that enable the green transition, especially in key sectors such as energy and sustainable aviation.
- Deploy systematic competitiveness checks and other evaluations of how administrative processes in existing legislation impact industry.

Sustainable aviation

The aviation sector supports the Green Deal objectives and the decarbonisation of flight. Industry and regulators must cooperate, as there is not one single method to decarbonise the sector.

Recommendations:

- Enable pathways to develop more efficient aircraft and engines, sustainable aviation fuels (SAFs) and economic strategies that lead to reduced emissions as well as pathways to more efficient air traffic management and aircraft operations to improve fuel efficiency.
- Incentivise and make funding available for the development of next-generation technologies as key enablers of fuel efficiency to reduce emissions in the mid- to long-term.
- Foster European large scale integration and validation of next generation technologies to allow for a faster entry into service.
- Develop regulatory and financial incentives for the research, development and deployment of sustainable aviation fuel.
- Create and implement a Book and Claim (B&C) mechanism to allow faster scaling up of sustainable aviation fuels. Encourage the European Commission to establish a well-designed trading deck to guarantee the traceability of all B&C certificates across Europe to avoid fraud.

Sustainable aviation (cont.)

- Promote the aviation sector integration's into hydrogen valleys and accelerate the provision of hydrogen to airports across Europe.
- Support efforts to attract private investment, maintaining efficient aircraft in the EU Taxonomy while facilitating its implementation and directing ETS revenues toward decarbonisation.
- Ensure a coherent mission reporting framework as proposed by CountEmissions EU and in line with existing industry methodologies and the European Union Aviation Safety Agency's environmental flight label. This will help to avoid duplications and unnecessary reporting burdens.
- Implement a Single European Sky and deliver the Digital European Sky under the Single European Sky ATM Research 3 Joint Undertaking and the SESAR Deployment Manager.
- Continue to finance research projects to improve understanding of the effects of aviation non-CO2 emissions and provide a foundation for regulation.
- Facilitate a due process for industry collaboration in research projects, including consideration of stakeholders' technical contributions.
- Maintain engagement at the International Civil Aviation Organization to foster global solutions for the decarbonisation of aviation.

Sustainable transportation

Significant investment is needed for the transport industry to contribute to net-zero emissions by 2050.

Recommendations:

- Enable multiple commercial-scale pathways for producing zero-emission vehicles and sustainable and/or lower-carbon replacement fuel.
- Provide a stable regulatory environment for businesses and investors who need predictability to derisk investment
- Channel investments into the latest generation of transport technologies to ensure the industry remains competitive.
- Deploy cooperative, connected and automated mobility and Intelligent Transport Systems in Europe to increase road efficiency and improve vehicles' safety and environmental performance.
- Adapt to the requirements for various types of transport to ensure fair treatment while accounting for the complexity of technical data used in the mobility sector. Ensure this is harmonised across Europe.
- Adapt road infrastructure ahead of the deployment of zero-emission and autonomous vehicles.

Sustainable transportation (cont.)

- Foster flexible and technology-neutral rules for data processing.
- Alleviate labour shortages in the industry and provide business certainty for manufacturers and transport operators investing in sustainable transport.

Twin green and digital transition

Digital technologies play a vital role in the EU economy and underpin the Union's plans to achieve energy security.

Recommendations:

- Ensure measures that address the information and communication technology sector's energy consumption do not undermine the critical role of digital technologies in reducing carbon emissions and helping the EU achieve its energy and climate objectives.
- Foster grid modernisation by transitioning to smart grids built on digital and IoT solutions. The benefits of digitalisation (ie adding intelligence to existing infrastructure by deploying digital equipment and devices strategically to complement existing systems) should be considered in future policy developments.
- Create a policy environment that allows for the rapid scaling, development and deployment of solutions to achieve the green transition and climate neutrality by 2050.
- Strengthen EU-US cooperation on green and digital issues.
- Quantify the benefits of digital solutions for green issues in a systematic way, including through an accurate methodology developed by the European Green Digital Coalition, among others.
- Harmonise, implement and align labels and codes of conduct with already existing internationally agreed standards.

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