

# ECRN feedback on the EU Bioeconomy Strategy

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## Contribution for the new Strategy

### Ensuring the long-term competitiveness of the EU bioeconomy. Simplifying access to support by strengthening the regional role

Regions play a crucial role in implementing EU policies and managing structural funds, but they often operate within a complex regulatory framework. It is therefore essential that the implementation of the new EU Bioeconomy Strategy is based on the **recognition of the role of regional administrations**, given their in-depth knowledge of local contexts, to ensure that funded actions are well aligned with territorial needs.

To maximize the potential of the EU bioeconomy, improve the knowledge developed by EU companies, and maintain the European leadership achieved in this area, in order to ensure European competitiveness in the international market, it is necessary for the future EU bioeconomy strategy to have a legislative framework that is capable of **removing regulatory barriers that create excessive burdens and hinder development** and the growth of European innovative technological solutions in the bioeconomy sector.

It is urgent to establish more **favourable State aid rules** to foster bioeconomy, able to support high-risk projects and improve access to financing for SMEs. Moreover, support measures introduced by the new Strategy should provide a consistent, stable, and recognisable framework, enabling businesses to plan their R&D&I investments.

Finally, the **introduction of dedicated NACE sub-codes** is crucial for supporting the recognition of products and the exploitation of bio-economy sectors and stimulating demand for bio-based products. This is also strategic for establishing targeted fiscal and administrative actions to enable the sector to realise its full potential, as well as fully recognising its environmental and social value within the framework of EU policies.

### Supporting the development of value chains

Circular economy, resource efficiency, and bioeconomy are strictly interlinked. For the bioeconomy to develop effectively, a **systemic view of value chains** is needed, rather than a narrow focus on individual biomasses. Action must be taken along the entire value chain—particularly in sourcing and processing—by adopting clear and stable regulations that promote the efficient and circular use of biological resources.

New business models can be generated from synergies between the agricultural and industrial sectors. To this aim, it is important to **promote the development of integrated bioeconomy value chains** involving the different actors (agriculture, processing, biorefineries).

Enhancing the competitiveness of entire value chains means strengthening the role of primary producers, who are involved both upstream and downstream: first, as bio-resource suppliers, and later as recipients of technologically advanced, low-impact, bio-based and eco-designed products.

As an example, this is coherent with the **Implementation Action Plan (2025–2027) for the Italian Bioeconomy Strategy (BIT II)**, approved in December 2024, which considers the sustainable and responsible management of primary production and forests a key driver for leveraging bioeconomy opportunities in rural, hilly, mountainous, and coastal areas, and for strengthening the economic resilience and attractiveness of these territories.

In particular, multi-purpose, multi-product **biorefineries and other bioeconomy processes fed with renewable feedstocks** from sustainable biomass (e.g. agroforestry biomass, intermediate crops, crops grown on marginal and degraded lands and areas, biowaste and by-products of the agri-food, livestock, forestry, marine and maritime sectors) **represent an effective solution** for revitalising soil productivity and regenerating fragile territories, while not competing with the food value chain. These activities can constitute a source of income diversification and an additional element of profitability for all local stakeholders along the value chain.

The Strategy should also **recognise the decarbonisation contribution of sustainable products, materials, chemicals, and energy obtained from biomass and other biological and renewable carbon sources**, and adopt measures to stimulate the demand and market uptake of those products (e.g. tax leverage, financial incentives, and GPP criteria).

Furthermore, considering the strategic role of the bioeconomy in decarbonisation and its alignment with the EU's climate neutrality goals and the Clean Industrial Deal, it is essential to **address barriers to the use of biofuels**. Despite meeting environmental standards, obstacles related to vehicle type approval and distribution infrastructure persist, hindering the deployment of renewable fuels and delaying the achievement of the European Green Deal objectives. The demand for sustainable bio-based feedstock will continue to grow as various industrial sectors shift towards bio-production. Ensuring widespread availability and accessibility of bio-based feedstocks should be a key priority for EU and national policymakers, taking into account current EU targets, the specific needs of each sector, and existing as well as prospective synergies.

Building on these considerations, the new EU Bioeconomy Strategy should focus on the following aspects:

- **promoting industrial symbiosis within the bioeconomy** to improve environmental and economic performance by converting one actor's residues into another's resources, thereby valorising waste as raw materials and recovering energy;
- as for organic residues, efforts should focus on **incentivising the development of industrial bioeconomy solutions for the valorisation of biological waste and by-products from the agri-food sector**, bio-based industries, and urban bio-waste management, as well as their integration into production processes. As a notable example there is the "By-products Working Group" in the Piedmont Region, which has contributed to reducing regulatory uncertainty for local bioeconomy enterprises and has facilitated the classification of residues as by-products rather than waste-(in accordance to Art. 184-bis of Legislative Decree No. 152/2006, Italy's main environmental regulation). Similar initiatives should be acknowledged and incorporated into a harmonised EU regulatory framework;

- **leveraging the full potential of urban biowaste**, wastewater sludge, and wastewater through a multi-product, integrated biorefinery approach aimed at producing chemicals, materials, and energy, while also valorising additional outputs of the process—such as clean water, fertilisers, nutrients, and critical materials including nitrogen, phosphorus, and potassium;
- **promoting measures to preserve and strengthen strategic local supply chains**, particularly in light of current energy cost volatility—which significantly impacts the profitability and competitiveness of businesses, especially those operating local biomass valorisation plants—in the context of today's fragile geopolitical environment.

### Skills and technology transfer

Bioeconomy development requires advanced skills and effective mechanisms for technology transfer.

In addition to direct support to business investment, companies should be facilitated in accessing national and EU-level research and technology infrastructures and other facilities like test beds and pilot lines to accelerate the testing phase of technologies and the time-to-market of innovations.

**Enabling access to these services supports industrial exploitation of biomass in high value-added sectors** (e.g., nutraceuticals). These actions are in line with the EU's "Competitiveness Compass", which calls for the creation of knowledge ecosystems linking research, business, and institutions. These are also consistent with above mentioned updated Action Plan (2025–2027) for the implementation of the Italian Bioeconomy Strategy (BIT II), which emphasizes the development of skills, the strengthening of technology transfer mechanisms, and the enhancement of research infrastructures as key drivers for sustainable and circular bioeconomy growth across the country.

### Investing in education and awareness for businesses and citizens

The success of the bioeconomy hinges on widespread awareness, both among citizens and the production system, of its territorial importance. Investment is needed in creating local networks that foster dialogue among research, businesses, training providers, and the general public, encouraging sustainable and circular practices.

It is essential to stimulate informed demand for bio-based products and build consumer trust in the bioeconomy as a sustainable model. ECRN highlights the importance of targeted scientific outreach, vocational training, and engagement of local communities—especially in rural and mountain areas. These actions must be supported by coherent EU policies that accompany the transition from research to market and create favourable conditions for a resilient and inclusive bioeconomy ecosystem.

Note: This position was based on the contribution of Piemonte Region.

# The European Chemical Regions Network in a nutshell

Over the last 20 years, the European Chemical Regions Network (ECRN) has and continues to serve as the **collective voice of its member regions**, in which the chemical industry plays a crucial role in economic development, growth, and employment.

ECRN originally started as an INTERREG IIIc project in 2004, to help regions better tackle common challenges by exchanging information, exploring innovative solutions, and by speaking with a single voice in Europe. Today the network has grown from a temporary project to a **recognized European chemical stakeholder and a network full of expertise**. ECRN is a registered non-profit association under Belgian law and the network currently covers various European chemical regions, whose cooperation is supported by a Brussels-based secretariat.

We work together with European and regional chemical stakeholders and contribute to a range of policy areas from industrial policy, competitiveness, chemical regulation and REACH to skills, innovation, environment, and circular economy.

At ECRN, we advocate for a **stronger regional dimension in European strategies and policies related to the chemical industry**. We believe that the chemical industry can effectively respond to Europe's societal challenges with sustainable and innovative solutions if its economic growth is linked to territorial development. By bringing concrete local experiences and solutions into EU policymaking, the network aims to bridge the gap between policy elaboration and local impact.

We currently represent 12 regions in 7 different countries (Italy, Poland, Netherlands, Germany, Spain, Belgium and Czech Republic). Also, we have contributed to the Union policymaking with 44 policy papers and participated in 11 EU-funded projects.



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