

ECRN position on the Critical Medicines Act

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The European Chemical Regions Network (ECRN) strongly supports the objectives of the Critical Medicines Act, recognizing the strategic importance of securing the supply and accessibility of essential medicines across Europe. As an alliance representing diverse chemical regions, we underline the necessity for cohesive, inclusive, and regionally balanced approaches to pharmaceutical and chemical sector resilience.

- ECRN emphasizes the **imperative to bolster Europe's strategic autonomy in pharmaceutical production, aligning closely with our broader agenda of enhancing European chemical sector competitiveness**. Current dependencies, particularly on non-EU sources for active pharmaceutical ingredients (APIs) and intermediates, pose significant risks to supply stability and health security. To address these vulnerabilities, we propose:
 - EU-level assessments must be holistic and dynamic, considering the complete vulnerability profile of supply chains rather than solely the severity of medical conditions treated.
 - Incentives for pharmaceutical production and innovation should be strategically inclusive, catering to companies of all sizes, ensuring fair competition among regions and avoiding disparities caused by national fiscal capacities.
 - Current EU state aid constraints need reconsideration. We advocate for regulatory frameworks that enable agile investment responses, allowing for broader and faster deployment of resources such as IPCEI and STEP, while ensuring technological neutrality.
- The **complexity and overlapping requirements in pharmaceutical regulation currently impose significant administrative burdens**, increasing costs without corresponding benefits. Specifically, we propose:
 - Leverage existing frameworks such as the European Medicines Verification System (EMVS) rather than imposing new reporting obligations.
 - Move away from fragmented national stockpiling mandates towards coordinated European strategic reserves, reducing logistical inefficiencies and unnecessary financial burdens.
- ECRN strongly supports a **procurement strategy that balances affordability with supply security**:
 - Criteria for pharmaceutical procurement must extend beyond pricing to include supplier diversification, reliability, and sustainability.
 - Joint procurement mechanisms should be selectively employed and clearly defined, avoiding market rigidity and preserving the agility needed to respond to regional and local supply contexts.

In conclusion, the **pharmaceutical sector must integrate sustainability principles without compromising industrial competitiveness**. Accordingly, it is necessary to ensure that new environmental regulations, including those on micro-pollutants and substances like PFAS, align realistically with industrial capabilities and strategic autonomy goals.

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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