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ECRN role in the Critical Chemical Alliance and Criteria for Critical Chemical Sites



As the only EU-wide network representing regional authorities in key chemical regions, ECRN is uniquely placed to act as a strategic partner in both the Critical Chemicals Alliance (CCA) and in the designation and implementation of Critical Chemical Sites (CCS).

ECRN's potential roles

A. Within the Critical Chemical Alliance (CCA)

ECRN can support by:

- Bridging the regional and European levels, bringing forward local insights that shape effective and realistic industrial policies.
- Representing Europe's chemical regions and integrated industrial clusters as key actors in the green and digital transition.
- Coordinating the bottom-up identification of CCS opportunities, based on a shared methodology and dialogue among territorial stakeholders.
- Ensuring the alignment of funding, regulatory, and permitting tools with actual regional investment needs, especially in areas such as decarbonisation, circularity, infrastructure, and workforce upskilling.

B. In the designation of Critical Chemical Sites (CCS)

ECRN can contribute by:

- Co-developing clear and consistent selection criteria.
- While proposing a few pilot-sites chosen among its members, so to start concrete action in a short period of time.
- Mapping regional capacities and transformation potential, including infrastructure and innovation ecosystems.
- Ensuring geographic balance and cohesion, preventing a concentration of support in only a few Member States.
- Facilitating implementation and monitoring and fostering knowledge exchange among sites.

With its deep understanding of regional industrial ecosystems, regulatory challenges, infrastructure needs, and investment readiness, ECRN provides vital territorial intelligence that national administrations often cannot capture alone.

Recommendations and key messages to the European Commission:

Methodology and process

- Launch an EU-wide regional mapping initiative, co-led with ECRN, to identify potential sites and ecosystems.
- Entrust ECRN with the selection and potentially with the coordination tasks around the Critical Chemical Sites.
- Enable regional participation alongside Member States, in recognition of their industrial and regulatory competencies.

Financing and policy tools

- Link CCS status to dedicated EU funding instruments, including Cohesion Policy, Innovation Fund, and structural tools.
- Provide fast-track permitting and regulatory support for transformation investments.
- Expand support beyond IPCEIs to include cluster-wide decarbonisation, digitalisation, and circular economy projects.
- Introduce corrective mechanisms to ensure fair geographic distribution of support and co-financing capacity.

Key messages based on ECRN member input

- Go beyond individual molecules or production units: prioritise integrated ecosystems that can drive full-scale transformation.
- Avoid an Alliance limited to declarations or studies: the industrial crisis demands rapid and tangible measures.
- Support strategic investment de-risking: CCS designation must be coupled with streamlined permitting, energy access, and targeted funding.
- Promote fair access to EU support: reduce inequalities in state aid capacity through EU-level co-financing mechanisms (for strategic sector like chemistry EU should allow state-aids all along the industrial value chain).
- Embrace systemic approaches: prioritise clusters that integrate chemicals, energy, logistics, waste, education, and research.
- Recognise institutional maturity: sites with clear governance, investment roadmaps, and stakeholder coordination should be prioritised.
- Strengthen resilience and security: criteria should account for energy stability, water resilience, disaster preparedness, and strategic logistics.

Proposed criteria for identifying Critical Chemical Sites (CCS)

ECRN proposes a set of criteria that reflect both the EU's strategic goals and the diversity of regional strengths and challenges. All the following criteria shall be validated during the process with the support of all the actors involved: such as Industries, Trade Unions, R&I organizations and the European Committee of the Regions as ECRN support in territorial legitimacy

Industrial and ecosystem integration

- Existence of chemically and logistically integrated industrial ecosystems
- Shared utilities, pipelines, energy systems, and circularity platforms
- Connection to strategic infrastructure such as ports, rail, pipelines, or TEN-T nodes

Strategic production and transformation capabilities

- Production of critical molecules or intermediates essential to EU value chains
- Potential to supply strategic sectors like clean tech, health, defence, and semiconductors
- Capacity to shift toward sustainable feedstocks, including hydrogen and bio-based sources

Innovation, research, and skills

- Presence of research institutions, training centres, and pilot facilities
- Track record of innovation in sustainability, circularity, or digitalisation
- Active collaboration between industry, academia, and public authorities

Sustainability and transition potential

- Clearly defined climate-neutrality strategies and decarbonisation investments
- Proven performance in water reuse, energy efficiency, and waste valorisation
- Alignment with the EU Green Deal and Fit for 55 objectives

Governance and territorial readiness

- Functioning regional public-private governance platforms
- Administrative capacity for project implementation, permitting, and fund absorption
- Alignment with regional smart specialisation strategies or industrial plans

Security and resilience

- Preparedness for risks such as cyber threats, industrial safety incidents, and external shocks
- Redundancy in infrastructure (e.g. water supply, logistics, energy)
- Capacity for CO₂ capture, storage, or utilisation (CCUS) and other resilience-enhancing technologies

Risks to avoid

- A centralised or top-down process disconnected from regional industrial realities
- Narrow focus on legacy production or molecule types, excluding innovation potential
- Unequal access to funding due to varying national state aid capabilities
- Excessive complexity, delays, or administrative burdens that deter private investment
- Dilution of objectives by attempting to meet too many targets at once

Conclusion

ECRN is ready to support the EU's ambition for a resilient, green, and globally competitive chemical sector. We bring:

- Territorial legitimacy and local intelligence to the selection and support of CCS
- Coordination capacity for site mapping, stakeholder engagement, and governance
- A platform for knowledge exchange, benchmarking, and capacity building across regions

The transition of the chemical sector must be a shared European project — not only between institutions and industry, but also across territories.

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 13 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.



provincie limburg



REGIONE ABRUZZO



provincie Drenthe

ústecký kraj



provincie ZUID HOLLAND



REGIONE LIGURIA



POLSKA IZBA PRZEMYSŁU CHEMICZNEGO



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