

VCI-STATEMENT

EU-Commission Whitepaper R&D on dual-use technologies

The German Chemical Industry Association (VCI), in line with BDI, acknowledges the initiative of the European Commission for a more effective promotion of dual-use technologies.

VCI appreciates the term “research and development involving technologies with dual-use potential”. This ensures a clear distinction from the very important term “dual-use research of concern” and the measures associated with it. We reject a “dual use flagging mechanism” for any kind of technology. Dual use depends on the intended type of use and the will of the actor, whether an innovation is used for beneficial or harmful purposes. One step in the right direction is to raise awareness of this issue in all areas of research.

Flagging Mechanism

The introduction of a flagging system can lead to false positives* and negatives, inhibit innovation, require significant financial, infrastructural and human resources, potentially compromise confidentiality, introduce bureaucratic complexity and lead to inconsistent application due to subjective assessments.

* False positives: Legitimate research could be misclassified as dual-use or dangerous, leading to unnecessary scrutiny, delays or even the termination of important scientific work.

The funding opportunities described in the Whitepaper altogether lack the capacity to fully exploit the potential of cross-fertilisation and international competitiveness of those technologies. Since they do not adequately address the following aspects:

- Funding of dual-use research should not be at the expense of civil R&D funding. An example is the decision of Member States to reduce the size of the STEP platform from an initial €10 to €1.5 billion and shift the money only to the European Defense Fund.
- Funding mechanism should reduce the complexity of the application process.
- Funding programs should support of the whole innovation chain from lab to market – all Technology Readiness Levels – and from substance/material to product.

We will be happy to explain further details in a personal meeting.

Contact:

[Redacted]

Science and Research | Science, technology and environment

[Redacted]

German Chemical Industry Association

Mainzer Landstrasse 55, 60329 Frankfurt, Germany

www.vci.de | www.ihre-chemie.de | www.chemiehoch3.de | [LinkedIn](#) | [X](#) | [YouTube](#) | [Facebook](#)
[Data protection rules](#) | [Compliance-Guideline](#) | [Transparenz](#)

- Identification no. in the EU Transparency Register: 15423437054-40
- The VCI is registered with registration no. R000476 in the Lobbying Register for the Representation of Special Interests vis-à-vis the German Bundestag and the Federal Government.

The VCI and its sector associations represent the interests of around 1,900 companies from the chemical-pharmaceutical industry and related sectors vis-à-vis politicians, public authorities, other industries, science and media. In 2022, the VCI member companies realized sales of ca. 260 billion euros and employed nearly 550,000 staff.