



The undersigned organisations, as members of the newly established European Bioeconomy Clusters Alliance (EBCA) endorse the following Position Paper:

POSITION PAPER OF THE EUROPEAN BIOECONOMY CLUSTERS ALLIANCE (EBCA)

ON THE NEW EU BIOECONOMY STRATEGY

INTRODUCTION

In an era of rapidly shifting global markets, reinforcing regional and sectoral competitiveness has become a pressing policy priority for Europe. As outlined in Mario Draghi's report *The Future of European Competitiveness*, key strategic areas – including digitalisation, quantum technologies, defence, and the reduction of critical dependencies on raw materials – are fundamental to maintaining Europe's position in the global economy. Its analysis also calls for broader transformations across all sectors that can contribute to Europe's strategic autonomy and sustainable growth. In this context, the circular bioeconomy stands out as a key sector whose importance is fully acknowledged at EU level through the EU Bioeconomy Act. By turning biological resources and residues into high-value products, the bioeconomy reduces EU's dependency on fossil inputs and imported raw materials. It supports the green and industrial transitions and strengthens innovation ecosystems.

In addition, Europe already possesses the foundations needed to scale this transformation: innovation clusters! With more than 20 years of experience, European bioeconomy clusters have demonstrated their capacity to structure dynamic innovation ecosystems: connecting quadruple helix stakeholders: RTOs, industries, policy makers/government and civil society; and accelerating the deployment of bio-based solutions across domains such as green chemistry, agri-food, forestry, pulp and paper, bioenergy and biomaterials. Their long-standing work provides a proven mechanism for translating EU ambitions into regional impact.

As the EU prepares the next Multiannual financial framework (MFF), it is essential that this existing excellence is enforced. To fully realise the ambition of both Draghi report and the upcoming Bioeconomy Strategy, **innovation clusters must be formally recognised and supported as strategic implementation partners**. They provide territorial intelligence, cross-sectoral collaboration, innovation to market pathways and investment attraction that Europe needs to accelerate deployment at scale. Strengthening the support of innovation clusters, and especially of bioeconomy innovation clusters in the next MFF will allow Europe to build on past achievements while ensuring its green transition and long-term economic resilience. This will create synergies that accelerate productivity and reinforce Europe's global competitiveness.



Public consultation: Demand for activities performed by clusters

The results of the 2025 public consultation on the new EU Bioeconomy Strategy clearly demonstrate a strong stakeholder demand for the types of activities that bioeconomy clusters already perform. A majority of respondents (63 percent) identified increasing circularity across bioeconomy value chains as the main objective of the new Strategy, an outcome that requires precisely the kind of cross-sectoral cooperation, regional coordination and value-chain integration that innovation clusters enable. In addition, 85 percent of respondents emphasised the importance of improving policy consistency and harmonisation between EU and national regulations, while many also highlighted the lack of synergies between EU, national and local strategies as a key barrier to growth. Stakeholders further pointed to insufficient guidance, capacity building and support for SMEs and start-ups, and called for stronger mechanisms to facilitate innovation, investment and market scale-up. These findings show that the stakeholder community is seeking better coordination, collaboration and support structures across the bioeconomy, functions that innovation clusters are uniquely positioned to deliver. By formally recognising bioeconomy clusters in the new Strategy, the European Commission would directly respond to this expressed demand and ensure that regional actors and innovation ecosystems are effectively engaged in implementing Europe's bioeconomy ambitions.

The importance of clusters for businesses, industry and the innovation ecosystems, can be summarised as follows:

1. **Competitive Advantage:** geographic proximity – whether regional or national – enhances firms' competitiveness by fostering innovation, collaboration, specialisation, and efficiency within the local ecosystem.
2. **Knowledge Spillovers:** innovation clusters facilitate the exchange of knowledge, ideas, and best practices among businesses, academia, and other stakeholders, driving innovation and continuous improvement.
3. **Access to Talent and Resources:** by concentrating opportunities for collaboration, networking, and professional growth, clusters attract skilled professionals, entrepreneurs, and investors, creating a dynamic and resource-rich environment.
4. **Supporting Policy Decisions:** with bottom-up approach, innovation clusters help governments, policymakers, and industry leaders refine policies and better target investments in infrastructure, education, research, and innovation. They also contribute to shaping a regulatory environment that promotes entrepreneurship and business growth.

THE EBCA

On 10 February 2025, twelve European clusters and two associations came together to launch the "European Bioeconomy Clusters Alliance (EBCA)", uniting their efforts to support Europe's transition toward a sustainable and circular bioeconomy. All EBCA members share a common vision of a Europe where bio-based innovation drives the shift toward a resilient, competitive, and sustainable economy. The alliance is founded on the belief that regenerative and circular practices are essential for addressing climate change, fostering regional development, and transforming the ways we produce and consume.



EBCA is dedicated to accelerating innovation in agri-food, bioproducts, biorefineries, and sustainable technologies, while promoting the creation of strong infrastructure and effective funding mechanisms that enable these solutions to scale. In pursuit of this mission, the alliance also advocates for harmonised European frameworks that facilitate market access for sustainable products, ensuring that bio-based solutions can compete on fair and efficient terms. By fostering collaboration with international research and policy networks, sharing best practices, and promoting the creation of joint initiatives, EBCA plays a key role in building a more connected and impactful European bioeconomy. Through active policy advocacy and support for the circular transition, EBCA ensures that the collective voice of its members drives progress toward a future in which innovation and sustainability advance together.

EBCA AND THE NEW BIOECONOMY STRATEGY

The new European Bioeconomy Strategy is a critical step toward realising a sustainable, resilient, and regenerative bioeconomy. Yet, strategies alone are insufficient — effective governance and binding legal frameworks are essential. The underdevelopment of the Circular Bioeconomy sector is largely due to the absence of such tools, compounded by regulatory paradoxes that apply rules designed for conventional industries to innovative, biobased systems.

Biobased products from integrated biorefineries are not standalone commodities — they are part of complex, interconnected systems. Only by recognising them as such can we unlock their full transformative potential. Treating these products as isolated, conventional-sector outputs undermines and their capacity to contribute to a circular, sustainable economy.

Europe must establish a coherent, systemic legislative framework that fosters innovation, encourages long-term investment, and builds industrial capacity, adaptability, and resilience. Such a framework will allow the Circular Bioeconomy to thrive, delivering tangible environmental, economic, and social benefits.

To realise the full potential of the Circular Bioeconomy, we consider the following points paramount:

1. **Introduce dedicated NACE codes for biorefineries**, following the U.S. example. Recognising the sector in official classifications will highlight its unique value and remove barriers that currently limit the valorisation of secondary raw materials.
2. **Embed bio-based products** into EU legislation through enabling measures that create real market demand, including targeted incentives and, where appropriate, mandatory bio-based content requirements. The CAP should support bio-based solutions through eco-schemes and rural development, while complementary tools such as fiscal incentives and green public procurement can strengthen market uptake.
3. **Enable the use of biotech solutions** for better valorisation of biomass (side-streams and new types as microbial protein, less edible parts of crops) **in novel food legislation** towards nutritious and tasty new food ingredients available on the market.
4. **Recognise key nutrients** derived from bio-based and circular materials as strategic resources for European food security, comparable in importance to critical raw materials for industry. Europe's dependency on imported mineral inputs exposes its agricultural systems to geopolitical and economic risks. Strengthening nutrient recovery and circular resource flows enhances strategic



autonomy, reduces environmental pressures, and contributes directly to the objectives of the Green Deal, the Circular Economy Act, and the Farm-to-Fork Strategy.

5. **Promote truly sustainable bio-based, biodegradable, and compostable products** that do not accumulate in soil or water, while supporting the collection, treatment, and valorisation of organic waste and side streams. Investment in adequate infrastructure is essential to ensure the production of high-quality products, recover valuable feedstock, and the circularity of organic materials.
6. **Ensure the sustainable use of biomass for the bioeconomy**, safeguarding resources while driving economic and environmental benefits.
7. **Scale up technologies to industrial level**, including for the recovery of by-products and co-products throughout the bioeconomic value chain. This will see bioeconomy become market reality, leveraging synergies with primary producers, such as foresters, farmers, fisherfolks, food processors and producers of chemical building blocks. Supporting strategic investments will unlock the sector's full potential.
8. **Accompany the new EU Bioeconomy Strategy with a concrete Implementation Action Plan**, creating synergies with the Circular Economy Act, the EU Biotech Act, and the Circular Bioeconomy Regulatory Framework. This coordinated approach should pave the way for a comprehensive regulatory framework on bioeconomy at EU level, providing coherence, clarity, stability, and incentives for long-term sector growth.
9. **Recognise the significant added value of bioeconomy value networks for regional development.** Support regional and national authorities to align their bioeconomy strategies and use funding programmes to support their regional bioeconomy innovation clusters, in order to enhance the implementation of their respective regional bioeconomy strategies.

EBCA calls on the European Commission to formally recognise bioeconomy clusters as strategic partners in governance and implementation of its new EU Bioeconomy Strategy. The results of the 2025 public consultation show a clear call from stakeholders for stronger coordination between EU, national and regional levels, improved policy consistency and harmonisation, and greater support for SMEs and start-ups. These are precisely the functions that bioeconomy clusters perform. The inclusion of bioeconomy clusters in the Strategy will ensure that regional voices and industrial realities are reflected in European decision-making.

Signatories

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Bioeconomy Cluster (*Slovakia*)

CLIB - Cluster Industrial Biotechnology (*Germany*)



Circular Bioeconomy Cluster (*Ireland*)

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Irish Bioeconomy Foundation (*Ireland*)

LitMEA/Smart Food Cluster (*Lithuania*)

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