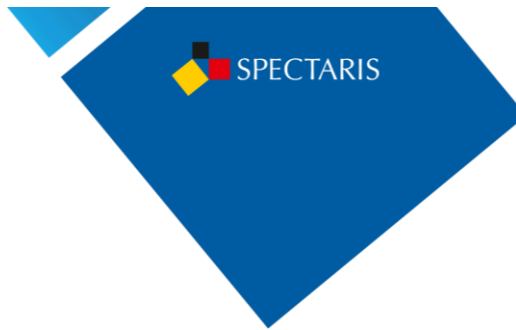




SPECTARIS Recommendations for Policymakers

Strengthening Europe's Technological Leadership – Proposals for Further Developing the EU's Approach to China

As of: October 2026

1. Background

China remains a key sales and sourcing market for the industries represented by SPECTARIS. At the same time, the operating environment has changed fundamentally in recent years. Chinese companies' technological capabilities in optics, photonics, analytical instrumentation and medical technology continue to grow. State-led industrial policy, increasing distortions of competition and geopolitical tensions are creating new challenges for European companies.

Against the backdrop of the current debate in Brussels on further developing the EU's approach to China, particularly regarding economic security, de-risking, competitiveness and trade instruments, Europe should pursue a differentiated approach: **de-risking rather than decoupling, support for technological development rather than protectionism, and competitiveness rather than a narrow focus on mitigating risks.**

For the industries represented by SPECTARIS, China is simultaneously a market, a competitor and a strategic factor in Europe's technological sovereignty.

2. Our Key Messages

Put technological leadership at the heart of European policy towards China

The greatest challenge is not market access in China alone, but safeguarding Europe's capacity for innovation and its competitiveness.

Optics, photonics, analytical instrumentation and medical technology are key technologies for healthcare, industrial transformation, digitalisation and security. Europe must strengthen its position as a global hub for innovation and create better conditions for research, scaling up and industrial production.

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SPECTARIS advocates:

- Greater investment in key technologies
- Faster innovation processes, regulatory approval procedures and funding processes
- Better conditions for technology-driven companies to scale up
- A stronger focus on photonics, medical technology and analytical instrumentation in European industrial and innovation programmes

Ensure a level playing field

European high-tech companies must be able to compete with Chinese suppliers in fair and transparent markets.

While European markets remain largely open, companies continue to face regulatory barriers, local procurement policies and distortions of competition in China. These challenges increasingly affect third-country markets as well.

SPECTARIS calls for:

- Consistent and immediate enforcement of the principle of reciprocity
- Open access to public procurement on both sides
- Further development of European procurement rules to give greater consideration to the resilience of European value chains and the availability of European technologies in tenders that are critical to security and continuity of supply
- A timely and appropriate policy response to market distortions and subsidies
- Stronger support for European companies facing regulatory barriers to market access

Specific proposal: Establish an ***EU-China High-Tech Market Access Dialogue*** for optics, photonics, analytical instrumentation and medical technology to systematically reduce barriers relating to regulatory approvals, certification and procurement.

Strengthening economic security through resilient supply chains

Dependencies exist not only in intermediate goods, but increasingly also in critical raw materials that are essential to the industries represented by SPECTARIS.

Europe must strengthen its resilience without creating new trade barriers.

SPECTARIS recommends:

- Diversifying critical supply chains
- Establishing strategic raw materials partnerships



- Strengthening European production capacity
- Accelerating the implementation of existing raw materials and resilience initiatives
- Working closely with trusted partner countries

Adopt targeted, sector-specific de-risking measures

Reducing one-sided strategic dependencies is necessary. At the same time, international cooperation, research networks and global value chains remain indispensable for innovation and growth.

For the industries represented by SPECTARIS, risks vary considerably depending on the technology, product category and supply chain. Blanket measures fail to reflect this reality.

SPECTARIS emphasises the need for:

- Risk-based rather than blanket de-risking measures
- Sector-specific impact assessments
- Early involvement of industry in the development of new regulations
- Proportionate export controls and investment screening
- Preservation of international research and innovation cooperation

Specific proposal: Introduce a European **High-Tech Resilience Check** for new measures concerning China, economic security and export controls. This should systematically assess their impact on innovation capacity, supply chains, raw materials supply and SMEs.

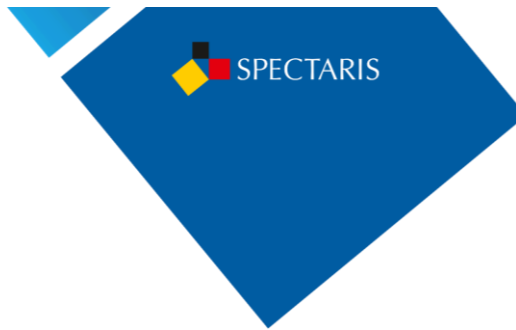
3. Our Call to the EU

The further development of the EU's approach to China should be guided not primarily by geopolitical risks, but by the question of how to safeguard Europe's long-term competitiveness.

Economic security must not be understood solely as risk minimisation. It must also strengthen the innovation capacity and competitiveness of Europe's key industries.

Our central message:

Europe needs a China strategy that gives equal weight to economic security, technological leadership and global competitiveness.



For the industries represented by SPECTARIS, the position is clear: yes to de-risking, no to decoupling. Support for technological development must become a core element of European policy towards China.

4. Specific Policy Recommendations

To the European Commission:

- Make technological leadership a central objective in the further development of the EU's approach to China.
- Explicitly include optics, photonics, analytical instrumentation and medical technology in economic security and industrial strategies.
- Establish an **EU–China High-Tech Market Access Dialogue** to address regulatory issues affecting the industries represented by SPECTARIS.
- Conduct a **High-Tech Resilience Check** before introducing new economic security measures to assess their impact on innovation, supply chains and SMEs.

To Member States and the German Federal Government:

- Strengthen innovation, research and scale-up programmes for European key technologies.
- Support the diversification of critical supply chains and the development of raw materials partnerships.
- Advocate proportionate and predictable export control procedures.
- Involve industry at an early stage in the design of new economic security and de-risking measures.

To the EU as a whole:

- Design de-risking measures on a sector-specific and risk-based basis.
- Consistently promote a level playing field and reciprocity in relations with China.
- Establish economic security and international competitiveness as joint guiding principles of European policy towards China.

SPECTARIS is the German industry association for optics, photonics, analytical instrumentation and medical technology, based in Berlin. The association represents around 400 German companies, most of which are export-oriented small and medium-sized enterprises. The industries represented—consumer optics (ophthalmic optics, binoculars and telescopes, and photographic equipment), photonics, medical technology, and analytical, biotechnology and laboratory equipment—generated a combined turnover of €91 billion in 2025 and employed around 360,000 people. A [study](#) by FutureManagementGroup ranks these fields among the ten most promising industries of the future.