

Reply to the European Commission's consultation on a renewed trade policy for a stronger Europe

Registration number
in the register of representative bodies:
976536291-45

November 2020

Introduction

The German Mechanical Engineering Industry Association (VDMA) represents more than 3.300 member companies in the SME-dominated mechanical engineering industry in Germany and Europe. With around 1,3 million employees in Germany and a turnover of EUR 230 billion (2019), the sector is the largest industrial employer and one of Germany's leading sectors of industry overall. However, we expect that the turnover in our sector for the year 2020 will be significantly lower because of the ongoing Covid-19 outbreak.

The export ratio of our industry is around 80%, with about half of all exports going to third countries outside the European Union. This explains why the machinery sector is interested in open markets for trade and investment, rule-based competition, international standards, and a strengthened role of the World Trade Organization (WTO). Hence, we have always supported the European Commission when it was negotiating and concluding Free Trade Agreements with third countries or regions.

We welcome this opportunity to participate in the European Commission's consultation on a renewed trade policy for a stronger Europe. Below you can find our reply to the questions that the European Commission raised in its corresponding consultation note.

Question 1: How can trade policy help to improve the EU's resilience and build a model of open strategic autonomy?

The outbreak of Covid-19 has further accelerated tendencies towards protectionism in many countries in the field of trade, has led to a rejection of global institutions by some actors and has led to calls for the reshoring of production in the European Union. This pandemic also disrupted many global value chains, including in the machinery sector.

In this context, the European Union proposed the concept of building more resilience as an objective of trade policy and industrial policy. VDMA shares the view that in the future, the ability to cope with economic shocks on both the supply and demand side, to adapt to volatile environments and to deal with uncertainty will be an essential element of competitiveness and economic success. The challenge is, however, that future risks and disruptions will be different from this crisis and will impact other sectors and actors. Therefore, in VDMA's view, resilience must be addressed on a profound and horizontal level by increasing capabilities and flexibility as well as laying good framework conditions, for example through education, investments in infrastructure, innovation capacity, technological excellence, effective EU competition policy, a strengthened EU Internal Market (for example the abolishment of the bureaucratic barriers in the area of posting of workers) and open markets of third countries. Resilience must not be interpreted in a too operational and vertical way, for example by reshoring or protecting European production sites or value chains. This would not only increase costs and reduce prosperity, but it would also create new vulnerabilities. For VDMA, global value chains and access to markets of third countries are essential for the business model of the European companies in the mechanical engineering sector.

VDMA believes that these global tendencies should not lead to protectionism and that resilience can be improved by the diversification and solidification of the global supply chains of our companies. We would like to stress that it should be up to the companies themselves to decide on their global value chains, as they are best placed to assess the risks, costs and need for action in their respective markets and products. These market-based decisions of companies will only improve the EU's resilience. The EU and the EU Member States should not intervene in these processes; instead, they should focus on putting in place the right framework conditions to enable the diversification and solidification of the global supply chains of our companies to take place as efficiently as possible. These right framework conditions can for example be laid down via access to markets of third countries through an ambitious and open EU trade and investment policy. Bilateral and regional trade agreements of the EU will for instance open-up markets of third countries or regions and create a level-

playing field. Furthermore, the EU should continue to support the multilateral framework in the field of trade (e.g. the World Trade Organization, the Organisation for Economic Co-operation and Development, G7 and G20) so that we can strengthen the rules-based international environment.

We are also of the opinion that the model of open strategic autonomy should not lead to a tightened scrutiny of foreign investments in the EU; the EU and its Member States must remain open for investments from third countries. Experience with investors from third countries in our sector has so far been overwhelmingly positive. At the same time, foreign capital must flow into the EU if we want to maintain our industrial base in the long-term and if we want to improve the resilience of the EU. Therefore, we do not see an urgent need to strengthen the Foreign Direct Investment Regulation.

Question 2: What initiatives should the EU take – alone or with other trading partners - to support businesses, including SMEs, to assess risks as well as solidifying and diversifying supply chains?

The various Free Trade Agreements and Investment Agreements of the European Union must increase trading opportunities for our companies by removing trade barriers (such as tariffs, quotas and technical barriers to trade) and by guaranteeing a level-playing field. As mentioned above, such broad and comprehensive agreements lay down important framework conditions that could help our SME-member companies to diversify and solidify their global supply chains. The EU should continue to conclude such broad agreements with third countries and regions.

We also would like to stress that the EU should continue to work with important third countries to find a solution for measures that affect trade negatively. We welcome here in particular the ongoing work of the European Union, United States and Japan to find new ways to strengthen global rules on industrial subsidies and forced-technology transfers.

Question 3: How should the multilateral trade framework (WTO) be strengthened to ensure stability, predictability and a rules-based environment for fair and sustainable trade and investment?

The World Trade Organization (WTO) has since its official launch in 1995 played an important role in the settlement of international trade disputes and in the regulation of international trade. This fundamental role of the WTO is also underlined during the Covid-19 outbreak, where it provides trade-related information (including notifications by WTO members of trade restrictive measures and the impact of the outbreak on exports and imports). Therefore, VDMA strongly believes that the role of this multilateral organization should be maintained and be strengthened.

Several actions can be envisaged to maintain and the strengthen the role of the WTO. Firstly, a reform of the WTO dispute settlement mechanism, including the WTO Appellate Body, is urgently needed. We would like to stress the fact that the EU should continue to engage to make sure that the United States and other countries are also on board when it comes to the Multi-Party Interim Appeal Arbitration Arrangement. Secondly, the Secretariat of the WTO needs to be reinforced in rule monitoring and enforcement, such as the right to name shortcomings by WTO members; this is of crucial importance during the Covid-19 outbreak. Thirdly, it is important for the mechanical engineering industry that new rules are created for issues, such as industrial subsidies, State-owned Enterprises (SOEs) and forced-technology transfers.

Question 4: How can we use our broad network of existing FTAs or new FTAs to improve market access for EU exporters and investors, and promote international regulatory cooperation – particularly in relation to digital and green technologies and standards in order to maximise their potential?

About half of our companies stated in a recent survey that they use existing EU Free Trade Agreements only partially. The main reasons for not using these FTAs or for not using them sufficiently include complex or different Rules of Origin in the Free Trade Agreements, low duty profit margins, high costs or bureaucracy associated with the determination of the preferential origin, insufficient internal capacity to implement the FTAs and non-fulfilment of Rules of Origin. We hope that the Commission will take these barriers into account when negotiating new trade agreements, updating already-existing trade agreements and implementing trade agreements. More information can be found in the attached survey from March 2020 on the utilisation of Free Trade Agreements (FTAs) by VDMA member companies for exports.

VDMA also welcomes the appointment of an EU Chief Trade Enforcement Officer. This appointment could improve the compliance and enforcement of EU trade agreements, in close cooperation with EU trade associations and EU Member States. The Chief Trade Enforcement Officer could for example play an important role to make sure that a solution is found for the problems of mandatory third-party certification in South Korea.

For the machinery sector, we would welcome in this aspect also the harmonization of technical requirements in Free Trade Agreements in line with the consensus-based international technical standards, such as of the ISO and IEC.

We also would like to refer in this regard to a VDMA study from August 2020 on German mechanical engineering exports at risk from foreign protectionism. The study shows that German mechanical engineering companies are increasingly competing with companies that receive extensive export subsidies in their home countries. This is particularly true for the most important export markets of the German mechanical and plant engineering industry: China, United States, Russia and the EU Member States. In some cases, between 70 and 100% of machinery exports in these countries compete with subsidised products. Export subsidies are, therefore, an important factor in the trade context and are becoming increasingly important in many customer countries. The study also shows that technical regulations in important markets such as Brazil, China and the USA make market access more difficult and increase costs for foreign suppliers. Added to this is the uncertainty of how these regulations are implemented. More information can be found in the attached extracts of the VDMA study on German mechanical engineering exports at risk from foreign protectionism.

VDMA would also like to underline the importance of the fact that all tariff lines within individual manufacturing sectors should be included in EU Free Trade Agreements without any exceptions and without long transition periods. Excluding certain tariff lines from a FTA would lead to difficulties in the implementation of the EU Free Trade Agreement and to less trade.

Question 5: With which partners and regions should the EU prioritise its engagement? In particular, how can we strengthen our trade and investment relationships with the neighbouring countries and Africa to our mutual benefit?

We are of the opinion that the EU should continue to deepen and accelerate its work of concluding trade and investments agreements with key trade partners at bilateral and regional level to avoid the creation of new tariffs and non-tariff barriers, while working on lowering existing ones. Such agreements will reinforce the geo-political relations, shall ensure a level playing field and will open markets of third countries and regions.

Trade relations with the United States:

The USA is the most important export and investment market for the German mechanical engineering industry. VDMA would, therefore, strongly welcome an agreement between the EU and the United States on the elimination of tariffs for industrial goods and on conformity assessment procedures.

Beyond conformity assessment procedures, there is further scope for other types of regulatory cooperation between the USA and the EU. Moreover, we believe that there should be a more positive transatlantic trade relationship. This can for example be achieved by finding an international agreement on aviation subsidies to end the long-running dispute on Airbus / Boeing and by ending the various investigations in the United States under Section 232 of the 1962 Trade Expansion Act (in particular on mobile cranes). Furthermore, the continued threat by the United States of the imposition of tariffs on cars and car parts from the EU strains the transatlantic trade relations.

More information can be found in the attached position paper on EU negotiations with the USA on a transatlantic trade agreement and proposals for regulatory cooperation activities between the EU and US.

Trade relations with Latin America:

VDMA calls for a swift entry into force of the EU-Mercosur Trade Agreement. This trade agreement will for example improve market opportunities for the German mechanical engineering industry and lead to better chances in public procurement. Finally, it will provide a platform to discuss issues such as the deforestation of the Amazonian rain forest.

The German mechanical engineering industry also calls for the swift entry into force of the modernization of the trade part of the new EU-Mexico Global Agreement and for the quick conclusion of the negotiations on the modernization of the trade part of the EU-Chile Association Agreement.

Trade relations with China:

Another crucial market for VDMA is China. We always supported a rapid conclusion of the negotiations for an EU-China investment agreement. Our main requirements are free market access rights for EU companies and a significant reduction in the negative list of sectors where access for foreign investors in China has been restricted to date. This agreement should also govern other issues such as the prohibition of industrial subsidies for companies and the role of State-owned Enterprises in China. VDMA has also been calling on the EU to review its trade policy instruments and - where necessary - adapt to the new circumstances in its relationship with China and to achieve a level-playing field in areas such as merger control, subsidies and public procurement.

More information can be found in the attached position paper of VDMA on competitor China - realigning trade policy instruments.

Trade relations with Southeast Asia:

VDMA welcomes the entry into force of the EU-Vietnam Free Trade Agreement on 1 August 2020 and of the EU-Singapore Free Trade Agreement on 21 November 2019. VDMA would also welcome the conclusion of Free Trade Agreements with other Southeast Asian countries, such as Indonesia, because the group of ASEAN countries is the EU's third largest trading bloc outside Europe after the USA and China. And the European capital goods industry is currently under-represented in this region and should gain market shares through further Free Trade Agreements. China has already a long-standing Free Trade Agreement with ASEAN.

Trade relations with India:

VDMA would welcome the relaunch of the negotiations between the EU and India on a Trade and Investment Agreement. India is already a major sales market in Asia for the German engineering industry.

Trade relations with Australia and New Zealand:

The negotiations for a Free Trade Agreement with these like-minded countries is of importance to the German mechanical engineering industry. Therefore, we are of the opinion that the EU should continue to prioritise these negotiations.

Trade relations with Africa:

The African countries are also relevant markets for our SME-dominated member companies. We hope that the EU will continue to conclude and deepen Economic Partnership Agreements with African countries, where we expect a high economic growth in the future. However, one of the biggest hurdles is a lack of financing of projects in Africa, in particular in the infrastructure sector. We also need a European reply to the Chinese Belt & Road Initiative.

Trade relations with the United Kingdom:

The United Kingdom remains also of high importance to the German mechanical engineering industry after the United Kingdom ceased to be an EU Member State. It is in our view crucial that the EU and the United Kingdom agree as soon as possible on a broad and ambitious agreement, which covers issues such as level-playing field, tariffs and Rules of Origin.

Trade relations with Russia:

Since 2015, barriers to trade on the Russian market have increased for almost half of mechanical engineering firms. This is clearly linked to measures that have come into effect aimed at giving preferential treatment to Russian manufacturers in the State-dominated Russian economy. These include environmental levies, subsidies for domestically produced goods and preferences for domestic producers, when awarding public procurement contracts and by companies that are partly State-owned. Domestic manufacturers are also granted price preferences in tender procedures. In addition, customs clearance and technical regulations are also topical issues in relation to barriers to trade. The EU should find a solution for these trade barriers with Russia.

Question 6: How can trade policy support the European renewed industrial policy?

EU industrial policy and trade policy are interconnected and need to be mutually supportive of each other. This is illustrated by access to raw materials, which are the basis of many industrial value chains in the European Union. However, some third countries apply export taxes, import duties and price-fixing measures, which distort access to raw materials for our companies. Here EU trade policy plays an important role by making sure that international raw materials markets operate in a free and transparent way. A good example is the Free Trade Agreement with South Korea, which includes provisions on the prohibition of duties, taxes, or other fees on the export of raw materials.

We would like to stress that EU industrial policy should also consider the needs of SMEs that are a backbone of the EU's economy. They are often the "hidden champions" in home and export markets and depend on open markets. It is, therefore, essential that both industrial policy and trade policy ensure that SMEs and midcaps companies find suitable framework conditions, at home and abroad. Moreover, industrial policy should create the basis for international competitiveness of European companies. However, this should not happen through State intervention and through picking "winners". Instead EU industrial policy should

focus, as mentioned above, on the establishment of the right framework conditions for a good business environment where all companies can thrive, for example by strengthening the EU Internal Market.

Question 7: What more can be done to help SMEs benefit from the opportunities of international trade and investment? Where do they have specific needs or particular challenges that could be addressed by trade and investment policy measures and support?

Where new EU Free Trade Agreements are concluded with third countries or regions, the Rules of Origin in these trade agreements should be comparable with those of other Free Trade Agreements of the EU (e.g. with South Korea). This is because Rules of Origin that deviate from the known rules create additional bureaucracy and costs for SMEs and thus jeopardise the advantages of a trade agreement.

We also welcome the specific chapter on SMEs in EU Free Trade Agreements, but the needs of SMEs should be reflected in every part of such agreements. Furthermore, there is the need to address the issue of costs for SMEs to comply with increasing complex legislation that affects trade, e.g. due diligence requirements.

VDMA also calls upon the European Commission to reach out to business at the earliest possible stage when setting up new information portals or improving already existing information portals, so that the information needs of SMEs can be met in a practical way.

Question 8: How can trade policy facilitate the transition to a greener, fairer and more responsible economy at home and abroad? How can trade policy further promote the UN Sustainable Development Goals (SDGs)? How should implementation and enforcement support these objectives?

With the right framework in place to promote sustainability and the UN Sustainable Development Goals, the EU is able to make sure that our industries continue to maintain a global edge, to establish growth and to create jobs; the mechanical engineering industry plays an important role in the development and delivery of clean technologies and systems. However, free trade must, first and foremost, focus on Europe's long-term competitiveness; the main objective of EU trade policy is to open-up trade opportunities for our companies.

We, therefore, believe that the EU should not overburden its bilateral or regional trade agreements with political objectives relating to other policy areas, such as climate change, and that there should be no legally-binding sanctions for violations of the Chapter on Trade and Sustainable Development in EU Free Trade Agreements and Investment Agreements.

VDMA is supportive of a multilateral approach to combatting climate change as part of the European Green Deal. The EU is not alone, neither economically nor in our climate challenge. Effective and efficient instruments exist under the umbrella of Article 6 of the Paris Agreement. Such instruments will strengthen EU technology exporters and producers as well as stimulate more climate action around the globe. These instruments consist of creating carbon markets, direct enabling finance or forward-looking technology cooperation. By taking into consideration investments made by European exporters in technology transfer projects globally under the Paris Agreement, global cost-efficient investments in emission saving technology will be incentivised. However, this requires the EU to be receptive for such instruments in the EU climate law framework and contribute to climate action globally. Flattening the curve of global GHG emissions has the potential to generate more cost-effective approaches to reach the EU climate goals within the Paris Agreement Framework.

Any Commission proposal should be based on a proper and comprehensive Commission impact assessment that is carried out before any implementation. VDMA believes there is a significant risk that the problem will be passed on to the next stage of the production chain, so

that industries that are not currently at the forefront of carbon leakage could be pushed out of Europe.

The EU's climate policy must be consistent; if such a measure were to be introduced, it would have to be part of a coherent and overarching EU climate policy. At the same, it should not become a protectionist tool and should be in line with the rules of the WTO.

Question 9: How can trade policy help to foster more responsible business conduct? What role should trade policy play in promoting transparent, responsible and sustainable supply chains?

Mechanical engineers and plant manufacturers in Germany are fully aware of their responsibility in this field and have long been actively committed to ensuring responsible business conduct. However, their influence on the actions and behaviour of third parties is limited. This is for example illustrated by the ongoing discussions in Germany and the EU about rules on mandatory human rights due diligence obligations for companies. However, no small and medium-sized company has the capacity or the resources to identify human rights obligations worldwide and to monitor whether these are being observed by third parties. Therefore, VDMA opposes any legislation that deals with the responsibility of companies in supply chains, which exposes companies to unmanageable and unreasonable liability risks. A mandatory approach without concrete guidance to handle this law would be a huge additional burden and would overcharge the financial and personal resources of our companies, in particular of SMEs - even without the current Covid-19 crisis. It is also important to underline here that States are primarily responsible for the protection of human rights, and this responsibility should not be placed on companies. EU trade agreements can help to establish responsible business practices in third countries as well by promoting good practises, dialogue and cooperation.

Question 10: How can digital trade rules benefit EU businesses, including SMEs? How could the digital transition, within the EU but also in developing country trade partners, be supported by trade policy, in particular when it comes to key digital technologies and major developments (e.g. block chain, artificial intelligence, big data flows)?

For the mechanical engineering industry, digital technologies are essential to maintain its global product leadership and competitiveness. They connect machines, they enhance them with intelligent functions and they are more and more the basis for new services and business models. Connectivity and exchange of data are as important as the exchange of physical goods.

Therefore, EU policymakers must continue to address rules on digital trade. EU trade policy plays a role in digital trade in two dimensions. At bilateral level, we welcome the inclusion of a broad and ambitious chapter on digital trade (including the free flow of data) in Free Trade Agreements of the EU with third countries or regions. At plurilateral level, we support the negotiations to put in place global rules on electronic commerce. These rules would for instance address forced data localisation requirements and forced disclosure of the source code.

Question 11: What are the biggest barriers and opportunities for European businesses engaging in digital trade in third countries or for consumers when engaging in e-commerce? How important are the international transfers of data for EU business activity?

The international transfer of data is also a crucial element for our industry, as the success of the German mechanical and plant engineering industry increasingly depends as well on globally available and reliable digital business models. They are thus dependent on the unhindered and secure flow of international data. However, our industry is facing more and

more digital protectionism by third countries. Compliance requirements, increasing costs for local data storage and concerns about the disclosure of trade secrets make market access particularly difficult for SMEs and companies are facing asymmetrical regulatory environment.

Question 12: In addition to existing instruments, such as trade defence, how should the EU address coercive, distortive and unfair trading practices by third countries? Should existing instruments be further improved or additional instruments be considered?

VDMA strongly supports trade, that is open and based on international rules. However, we are concerned by the increasingly protectionist policies and trends which some third countries have adopted, such as in the areas of public procurement and subsidies.

Companies from third countries should enjoy guaranteed market access in the public procurement in the EU, if a binding international agreement or Free Trade Agreement exists that reciprocally grants free, equal, transparent and discrimination-free market access. Otherwise exclusion must be possible. VDMA also supports the strict application of the clauses in the WTO Government Procurement Agreement that enable the exclusion of bidders from non-GPA countries. Moreover, the public entity putting out the tender in the EU should stipulate in its award procedure that bidders whose sub-contractors and sub-suppliers come from third countries must comply with internationally agreed employment, human rights and sustainability standards. Finally, VDMA favours the rapid introduction of the International Procurement Instrument (IPI). This instrument will promote the principle of reciprocity and give the EU negotiating power in negotiations with third countries on the opening-up of their procurement markets to EU companies.

WTO members are currently obliged to report subsidies, but practice reveals that this only happens to a limited extent. The burden of proof in relation to potential market-distorting subsidies lies with the plaintiff in the event of a complaint. As a result, VDMA is calling for this instrument to be tightened up. Unreported subsidies should automatically be classified as “market-distorting” together with the opportunity to introduce retaliatory measures. This would reverse the burden of proof in proceedings in such cases. One can also look at the possibility of applying this reversal of proof to State-Owned Enterprises of third countries.

The White Paper of the Commission of 17 June 2020 on subsidies from third countries can at least partially fulfil the hopes of our small and medium-sized industry. VDMA supports, just as the Monopolies Commission in Germany, the introduction of one uniform EU legal instrument with which third country's subsidies and aid of EU Member States would be equated. This instrument should not consist of several modules and should intervene in the case of all third-country subsidies which, as a Member State measure, would violate Article 107 (1) TFEU. Moreover, only the European Commission has the responsibility for its enforcement. There should also be a presumption with undertakings from third countries where the State has capital ownership above a certain threshold (for instance 20%) that measures are taken with regard to them which would violate Article 107 (1) TFEU as a Member State measure. However, this uniform EU legal instrument should not lead to additional bureaucratic obstacles for companies in the mechanical engineering industry. Furthermore, the EU must remain open to foreign investment and a possible new subsidy instrument should not collude with already existing EU instruments, such as the Foreign Direct Investment Regulation and EU State aid control. More information can be found in the attached position paper on subsidies from third countries.

Our umbrella association Orgalim expressed several times its concerns concerning the steel safeguard measures that restrict the flexibility of downstream industries. Orgalim urged the European Commission to consider the interests of the downstream steel users regarding steel safeguard measures, as the competitiveness of European manufacturing needs to be preserved. VDMA fully supports these efforts of Orgalim.

Question 13: What other important topics not covered by the questions above should the Trade Policy Review address?

Firstly, the extra-territorial effects of sanctions of third countries (e.g. the sanctions of the United States against Iran) are increasingly a problem for VDMA member companies. VDMA, therefore, calls for ensured access to indispensable export-related services, in particular for the processing of payments, and State financial support for companies that are harmed in the context of external sanctions by punitive measures taken by third countries against them.

Secondly, export controls are becoming more and more an issue for VDMA. China has for example published its new export control law with extra-territorial elements based on the US model, including re-export controls. This means that goods of Chinese origin controlled by law would also be subject to Chinese export controls abroad in the event of resale with associated commercial risks for the buyers of such Chinese goods. The export controls proposed by China also permit the rejection of export approval “due to discrimination against China by the export controls of other states” which means the purpose of control serves a trade policy rather than a security policy objective. While this only concerns export-controlled goods, it is nevertheless the political basis for possible further trade sanctions against discriminating states.

Thirdly, export credit insurance plays an important role in the German mechanical engineering industry, even more during the current Covid-19 outbreak. Export credit insurance ensures the protection of exporters and financing banks against the risk of non-payment by a foreign buyer. Therefore, VDMA welcomes the decisions of the European Commission of 27 March 2020 and 13 October 2020 to temporarily remove all countries from the list of “marketable risk” countries under its Communication on short-term export-credit insurance. This decision makes public short-term export credit insurance more widely available during the current economic crisis. We also call for more support for private credit insurers if system relevant for credit supply. The current race for improving national export promoting measures all over the world underlines the need to preserve a level playing for export credits. The German mechanical engineering industry welcomes the EU activities vis-à-vis the other participating countries to reform the OECD arrangement for export credit promotion schemes. However, we are also of the opinion that the EU should also insist on immediate updates of this OECD arrangement, such as the improvement of the local content rules and new guiding principles for a fundamental modernization within OECD. This will be beneficial for the mechanical engineering industry as well as for our clients and partners abroad. Moreover, it will secure mechanical engineering jobs in the EU Member States, which is of particular importance during the current crisis.

Attachments:

- Extracts of the VDMA study on German mechanical engineering exports at risk from foreign protectionism (August 2020)
- VDMA survey on the utilisation of Free Trade Agreements (FTAs) by VDMA member companies for exports (March 2020)
- VDMA position paper on competitor China - realigning trade policy instruments (January 2020)
- VDMA position paper on EU negotiations with the USA on a transatlantic trade agreement (January 2019)
- VDMA proposals for regulatory cooperation activities between the EU and US (April 2019)
- VDMA position paper on subsidies from third countries (November 2020)

Contacts at VDMA

Ulrich Ackermann

Foreign Trade Department

Phone + 49 69 6603 1441

E-Mail ulrich.ackermann@vdma.org

Oliver Wack

Foreign Trade Department

Phone +49 69 6603 1444

E-Mail oliver.wack@vdma.org

Niels Karssen

European Office Brussels

Phone +32 2 7068207

E-Mail niels.karssen@vdma.org