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COMMUNICATION FROM THE COMMISSION

**Second Guidance Note on the Strategic Technologies for Europe Platform (STEP)
clarifying elements of Regulation (EU) 2024/795 and Commission Communication
C/2024/3209**

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Second Guidance Note on the Strategic Technologies for Europe Platform (STEP) clarifying elements of Regulation (EU) 2024/795 and Commission Communication C/2024/3209

The purpose of this second non-binding Commission Guidance Note is to offer practical guidance on certain provisions of Regulation (EU) 2024/795 (the STEP Regulation), to facilitate implementation, taking into account lessons learnt from implementation on the ground, as well as the amendments introduced to the STEP Regulation by Regulation (EU) 2025/XXX¹ (the defence mini-omnibus). While the Note occasionally paraphrases EU legislation, it is not meant to add to or diminish the rights and obligations in the STEP Regulation. To assess the eligibility of projects for a specific funding opportunity under the STEP Regulation, project promoters are invited to refer to the relevant programme's rules (e.g., as defined in the respective basic acts, annual work programmes, calls, and topic descriptions), as these continue to apply. STEP is not a new funding instrument but works through existing EU programmes. This Note builds on the first Guidance issued in of May 2024, which remains valid. It is intended to further inform project promoters and managing authorities about how to implement STEP.

Introduction

The Strategic Technologies for Europe Platform (STEP), established by Regulation (EU) 2024/795, supports the development and manufacturing in the EU of critical technologies relevant to our competitiveness EU; together with the necessary skills and jobs for achieving these objectives.

The Commission published a first non-binding Guidance Note in May 2024² to offer practical guidance on certain provisions of the STEP Regulation and facilitate implementation. The defence mini-omnibus amends Article 2(7) of the STEP Regulation, calling on the Commission to update the Guidance Note to cover defence technologies.

This second Guidance Note responds to that mandate and to feedback and clarification requests emerging from the implementation of STEP. It clarifies STEP support to defence technologies and other information relevant to developing or manufacturing critical technologies. It is without prejudice to competition rules, in particular State aid. **It should be read in conjunction with the first Guidance Note, which remains valid and now applies to defence technologies as well.**

1. STEP objectives

Article 2(1) of the STEP Regulation outlines the main objectives: (a) supporting the development or manufacturing of critical technologies throughout the EU, or safeguarding and

¹ **Reference to be included once the defence mini-omnibus Regulation is adopted.**

² Commission Communication C/2024/3209, Guidance Note concerning certain provisions of Regulation (EU) 2024/795 establishing the Strategic Technologies for Europe Platform (STEP), 2024, available at: https://strategic-technologies.europa.eu/about/step-documents_en

strengthening their respective value chains; (b) addressing shortages of labour and skills critical to all kinds of quality jobs in support of the first objective.

The first STEP Guidance set out these objectives, which are now expanded on below and apply to defence technologies.

1.1. Supporting the development or manufacturing of critical technologies throughout the EU, or safeguarding and strengthening their respective value chains

- Strategic projects under the Critical Medicines Act (CMA)

In March 2025, the Commission proposed the Critical Medicines Act (CMA)³, to improve the availability, supply, and production of critical medicines within the EU. The proposed CMA would amend the STEP Regulation to align the existing treatment under STEP of projects identified as strategic under the Net-Zero Industry Act (NZIA) and the Critical Raw Materials Act (CRMA)⁴ and CMA.

As a result, strategic projects designated in accordance with the CMA that address a vulnerability in the supply chains of critical medicinal products must be regarded as contributing to the STEP objective referred to Article 2(1), point (a)(iii) of the STEP Regulation. However, this does not automatically entitle organisations to EU funding nor to the automatic award of the STEP Seal. In any event, any funding must be in line with EU State aid rules.

- Recycling and waste management including critical raw materials

Recycling and waste management projects may fall under STEP where they involve the development or manufacturing of new recycling technologies, or where they directly contribute to strengthening the value chains for critical raw materials (CRMs) used in critical technologies under STEP. By contrast, projects limited to the deployment of commercially available recycling processes are generally not eligible under STEP.

Under Article 2(3) of the STEP Regulation, CRM projects can be in scope if they safeguard and strengthen the value chains of critical technologies, not only where they are “strategic” projects under the Critical Raw Materials Act (CRMA)⁵. Projects will still be required to support STEP objectives and satisfy at least one STEP condition to be considered critical (see section 3 of the first Guidance Note). Accordingly:

- If the project develops a new critical recycling/waste management technology, it may be deemed to fulfil STEP objectives and conditions (innovation or preventing/reducing dependencies).
- If the project relies on a commercially available technology, then CRMA rules apply:
 - If the recovered material is a strategic raw material (Annex I CRMA), the project must be checked against the CRMA’s “strategic project” definition

³Proposal for a Regulation laying a framework for strengthening the availability and security of supply of critical medicinal products as well as the availability of, and accessibility of, medicinal products of common interest, and amending Regulation (EU) 2024/795, 11 March 2025, available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52025PC0102>

⁴ See section 3.3 of the first Guidance Note, available at: https://strategic-technologies.europa.eu/about/step-documents_en

⁵ Regulation (EU) 2024/1252 establishing a framework for ensuring a secure and sustainable supply of critical raw materials and amending Regulations (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1724 and (EU) 2019/1020, 11 April 2024, available at: <https://eur-lex.europa.eu/eli/reg/2024/1252/oj/eng>

(Article 6). Under Article 2(5) of the STEP Regulation, projects designated as strategic under the CRMA automatically fall within STEP scope.

- If the recovered material is a critical raw material (Annex II CRMA), the project may be considered an associated service critical for and specific to the development or manufacturing of STEP technologies, provided it clearly supports their value chains.

For other recycling or waste management projects not linked to CRMs, only projects that develop or manufacture critical technologies (i.e., support the STEP objectives and satisfy at least one STEP condition) may qualify under STEP.

1.1.1 Supporting the development or manufacturing of critical technologies throughout the EU

Under the STEP Regulation and the first Guidance Note, STEP does not cover the installation and deployment of the final products. However, it may cover associated services that are critical and specific to the development and manufacturing of these products within the STEP sectors (see section 1.1.2 of the first Guidance Note), including where deployment may align with STEP if it qualifies as an associated service.

Under the first Guidance Note, for the purpose of eligibility under the STEP regulation, manufacturing should be understood as including setting up new production lines, including first-of-a-kind-facilities (see Section 1 of the first Guidance Note). The deployment of first-of-a-kind (FOAK) facilities could be eligible when they are integral to developing a highly innovative technology or scaling up an innovative process previously demonstrated only at pilot scale, as long as such technology or process (i) contributes to the STEP objectives and (ii) meets at least one of the STEP conditions.

STEP may support projects setting up production lines, provided the activities predominantly support the development or manufacturing of critical technologies within the STEP sectors (e.g., first-of-a-kind facilities, pilot lines, or scaling-up of innovative processes). By contrast, broad deployment or routine mass-production of end products, as well as peripheral activities not critical and specific to the development or manufacturing of critical technologies fall outside the scope of STEP.

For example, with electric vehicles, STEP can support the development or manufacturing of critical technologies (e.g., electric propulsion systems, advanced batteries, power electronics and energy management systems) provided the technologies are within STEP sectors and meet STEP objectives, including STEP conditions. However, the broad production of EVs as such, or peripheral activities such as paint shops, would not be eligible under STEP.

For example, the deployment of electrolysers could be eligible under STEP provided the support is granted for a technology which is at the time of eligibility assessment first-of-a kind and represents a significant innovation: (1) the electrolyser capacity is larger than the current state of the art (i.e. <20MW is considered not innovative); or (2) they include an innovative technology other than the standard PEM/Alkaline (e.g., solid oxide electrolyser cell (SOEC)); or (3) because they form part of an integrated and highly innovative project/solution or because they have an innovative application, or innovative business model, while there are no similar projects deployed in the Union yet or that compared to similar projects, the demonstration project has important superior characteristics in terms of innovation potential.

For example, in the area of biotechnologies, this can include among others and in line with the Medical Countermeasures Strategy and projects already supported under the EU4Health programme, the launch of calls for innovative manufacturing ensured by investments in

resilient, scalable, smart, modular and flexible innovative manufacturing technologies, as well as calls for processes for the production of medical countermeasures and technologies for the security of production sites (such as cybersecurity). Such actions are expected to result in more agile, easier to scale-up, sustainable and resilient manufacturing, allowing for better capacity to respond to demand surges and prevent shortages of medical countermeasures as well as improved competitiveness of the Union's manufacturing industry and support to the Union's strategic autonomy and the Union's industrial strategy in the field of medical countermeasures.

1.1.2 Other examples

In accordance with the first Guidance Note, 'associated services' include specialised services that are critical for and specific to the development and manufacturing of final products which are themselves within the scope of STEP. However, only infrastructure or equipment critical and specific to the development or manufacturing of critical technologies or relevant skills is eligible under STEP. General-purpose infrastructure is not eligible as a standalone project, but ancillary costs may be included if allowed under programme-specific rules.⁶ Purchasing land as part of a project could be considered eligible as an ancillary cost, in line with programme-specific rules. It should not form a significant part of the project expenditure.

Technology transfer activities may qualify under STEP, provided they clearly contribute to the development or manufacturing of STEP technologies in one of the STEP sectors and meet at least one of the STEP conditions. Projects supporting ecosystems may be STEP-relevant, provided that their output activities predominantly support the development or manufacturing of critical technologies. Examples of ecosystems include competence centres, hubs, technology parks and clusters.

1.2. Addressing shortages of labour and skills

Addressing shortages of labour and skills critical to all kinds of quality jobs is one of the objectives of STEP. Support may therefore be provided for developing skills that are directly relevant to the development and manufacturing of critical technologies in STEP sectors. Given the persistent shortages in these areas and the time required to build such competences, projects aimed at developing skills essential for the medium or long-term development of a critical technology may qualify as STEP projects. Supporting such skills is necessary to strengthen the EU's capacity to develop and manufacture critical technologies in the future.

Broad and transferable skills can only be supported under STEP when combined with STEP-specific skills, and only if the latter are predominant. Such skills components can only be considered as contributing to STEP if they are ancillary elements within a broader STEP project and in accordance with fund-specific rules. Projects or activities focused solely on general or transferable skills do not qualify as STEP projects.

STEP-related skills projects have already been supported under several EU funding programmes such as the Digital Europe Programme (DEP), the European Regional Development Fund (ERDF), the Just Transition Fund (JTF), and the European Social Fund Plus (ESF+). These projects cover a wide range of specialised skill development activities relevant to the development and manufacturing of critical technologies. Projects supporting the STEP objective on skills (i.e., addressing the labour and skills shortage) should be relevant to the development or manufacturing of critical technologies. Support may take different forms, including vocational education and training, higher education, adult learning, apprenticeships,

⁶ Readers are encouraged to consult the rules of each of the eleven STEP programmes and funds.

and job placements. The STEP Regulation does not limit the type of learning activity, provided that such activity supports the development or manufacturing of critical technologies.

Skills relevant to the technologies in the defence sector are assessed according to the same criteria as for the other STEP sectors.

2. STEP technology sectors

The first Guidance Note provides indicative lists of technology areas and technologies that qualify under each STEP sector (see Section 2 of the first Guidance Note). These lists remain valid and are indicative and non-exhaustive (i.e., technologies not listed may still be relevant for STEP). To qualify as critical, technologies must support STEP objectives and satisfy at least one of the two STEP conditions (see Section 3 of the first Guidance Note).

Certain elements are added for clarity in this second Guidance Note, both relating to the first three sectors introduced by the STEP Regulation and to the new sector on defence technologies as established by the defence mini-omnibus.

Under the amended Article 2(1)(a) of the STEP Regulation, which now includes point (iv) “defence technologies”, the following sectors are in the scope of STEP:

- **Digital technologies and deep tech innovation;**
- **Clean and resource efficient technologies;**
- **Biotechnologies;**
- **Defence technologies.**

2.1. Digital technologies & deep tech innovation

The AI gigafactories are relevant for STEP as they are key infrastructures expected to expand rapidly the power of AI also in defence technologies, including those with dual-use potential, which are now open for support under STEP based on the defence mini-omnibus.

2.2. Clean and resource efficient technologies

Since the adoption of the first STEP Guidance Note, the Commission adopted a delegated act, including an Annex⁷ to amend Net-Zero Industry Act’s (NZIA) Annex based on the list of net-zero technologies set out in Article 4 of the NZIA. This delegated act lists the technologies and sub-categories of net-zero technologies, as well as their final products and specific components considered to be primarily used for the production of net-zero technologies.

2.3. Biotechnologies

This includes medicinal products on the EU list of critical medicines⁸ and their components, and those referenced in the Critical Medicines Act (CMA). Biotechnologies, such as medical countermeasures, are also increasingly relevant in the defence sector, offering a wide range of opportunities from bio-engineered novel materials to human enhancement technologies.

⁷ Annex to the Commission Delegated Regulation C(2025) 2901, amending Regulation (EU) 2024/1735 of the European Parliament and of the Council as regards the identification of sub-categories within net-zero technologies and the list of specific components used for those technologies. available at: https://single-market-economy.ec.europa.eu/document/download/71990287-f945-4bdc-a59b-b4a631d2dcf5_en?filename=C_2025_2901_1_EN_annexe_acte_autonome_part1_v6.pdf

⁸ <https://www.ema.europa.eu/en/news/first-version-union-list-critical-medicines-agreed-help-avoid-potential-shortages-eu>

2.4. Defence technologies

In accordance with the STEP Regulation, as amended by the defence mini-omnibus, the term “defence technologies” used in the STEP Regulation refers to those embodied in, or necessary for developing and manufacturing defence-related products referred to in the Annex to Directive 2009/43/EC⁹, which corresponds to the EU Common Military List¹⁰. The List is updated regularly by the Council. For STEP purposes, the most recent version of the List published in the Official Journal is to be considered. Any updates to the EU Common Military List do not affect the validity of ongoing projects. Moreover, technologies removed from the List in future updates, may remain eligible for STEP support in other STEP sectors provided they continue to support STEP objectives and satisfy at least one STEP condition, and comply with the applicable programme-specific rules.

Defence technologies also include those relevant to the EU Capability Development Priorities¹¹. However, particular attention should be paid to the defence technologies that are relevant to the priority capability areas identified by the European Council on 6 March 2025¹², namely: (i) air and missile defence; (ii) artillery systems, including deep precision strike capabilities; (iii) missiles and ammunition; (iv) drones and anti-drone systems; (v) strategic enablers, including in relation to space and critical infrastructure protection; (vi) military mobility; and (vii) cyber, AI, and electronic warfare. In addition to these seven priority capability areas, the Defence Readiness Roadmap 2030 also covers ground and maritime combat.

In addition, several of the EU’s programmes covered by STEP also support technologies with possible dual-use applications (i.e. for both civilian and defence purposes). Such technologies with dual-use potential could include, advanced cyber and AI solutions, space infrastructure, CBRN¹³ and medical countermeasures, and certain advanced materials. Where technologies have dual-use potential, they may be relevant under several STEP sectors. Their eligibility under either STEP sector must be assessed against both the programme-specific rules and the STEP conditions.

If a defence technology is in the abovementioned lists and official documents, it may be considered relevant for STEP. However, it will still be required to support STEP objectives and satisfy at least one STEP condition to be considered critical (see section 3 of the first Guidance Note).

The table below reflects priority capability areas identified by the European Council¹⁴ (6 March 2025), the Defence Readiness Roadmap¹⁵ (16 October 2025) and the EU Capability Development Priorities.

Technology area	Examples of technologies (indicative, non-exhaustive)
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⁹ Directive 2009/43/EC of the European Parliament and of the Council of 6 May 2009, simplifying terms and conditions of transfers of defence-related products within the Community, available at: <https://eur-lex.europa.eu/eli/dir/2009/43/oj/eng>

¹⁰ The latest Common Military list was adopted by the Council on 24 February 2025 (OJ C 149), available at: <https://eur-lex.europa.eu/eli/C/2025/1499/oj/eng>

¹¹ <https://op.europa.eu/en/publication-detail/-/publication/0b3d446f-7df8-11ee-99ba-01aa75ed71a1>

¹² Council Conclusions, Special meeting of the European Council of 6 March 2025 (EUCO 6/25), available at: <https://www.consilium.europa.eu/media/tzkadtec/20250306-european-council-conclusions-en.pdf>

¹³ Chemical, biological, radiological, and nuclear defence

¹⁴ <https://www.consilium.europa.eu/media/tzkadtec/20250306-european-council-conclusions-en.pdf>

¹⁵ https://defence-industry-space.ec.europa.eu/eu-defence-industry/readiness-roadmap-2030_en

Air and missile defence	Integrated multi-layered air and missile defence systems, interceptors, detection systems (radars)
Artillery & precision strike	Artillery systems, long-range precision strike, advanced munitions
Missiles & ammunition	Guided missiles and ammunition, conventional munitions, warheads, propellants
Drones & counter-drones	UAVs (all classes), swarming systems, jammers, anti-UAV systems
Strategic enablers	Space assets and their protection, space situational awareness, space-based services such as Earth Observation, PNT and secure communications, critical infrastructure protection, energy security
Cyber, AI & electronic warfare	AI for command and control, cyber-defence, information warfare, electromagnetic spectrum operations, including electronic warfare suites, digital transformation of armed forces, optronics and radiofrequency systems
Military mobility	Warehousing and engineering capabilities, sustainable and agile logistics, additive manufacturing for combat maintenance
Ground combat	Close fire support systems, soldier systems, manned and unmanned ground systems
Maritime	Maritime situational awareness, surface and underwater combat manned and unmanned systems, seabed and anti-submarine warfare systems
Air combat	Air combat systems, airborne early warning, tactical and strategic air transport systems, rotorcraft, air-to-air refuelling
Medical (incl. countermeasures)	CBRN warfare including dedicated sensors and protective, decontamination and recovery systems

3. Illustration - high-level assessment approach

To assess whether a technology is critical under STEP and therefore whether projects may fall under the scope of STEP, project promoters are encouraged to:

- Consult the [STEP Portal](#), including the page on STEP [funding opportunities](#), showcasing (i) examples of calls for proposals (both open and closed) that are aligned with STEP and (ii) [examples of STEP projects](#).
- Consider the indicative and non-exhaustive lists of technology areas under each STEP sector in the first and second Guidance Notes (see section 2 of the first and second Guidance Notes).

It is not a sufficient for projects to be considered STEP relevant to receive Union funding in accordance with programme-specific rules.

To assess whether a project is supporting a STEP technology, a three-level assessment is to be carried out, in accordance with the STEP Regulation (as further detailed in STEP Guidance Notes):

1) STEP sectors

STEP projects should support technologies under any of the four STEP sectors or under a combination of them (digital and deep, clean and resource efficient technologies, biotechnologies, and defence technologies).

The STEP Regulation, the defence mini-omnibus, the first and second Guidance Notes and a number of other relevant acts cited in these documents provide a number of indications to that end. The fact that a specific technology is not explicitly listed in the abovementioned documents does not automatically disqualify a project from being a STEP project.

2) *STEP objectives*

STEP projects should support STEP's main objectives, including supporting the development or manufacturing of critical technologies throughout the EU, safeguarding and strengthening their respective value chains, and/or addressing the labour and skills shortage. Projects involving the deployment or roll-out of commercially available solutions (including commercial off-the-shelf solutions) generally fall outside STEP's scope.

3) *STEP conditions*

Finally, STEP projects should only support technologies that are classified as critical. To qualify as critical, technologies must either (i) bring an innovative emerging and cutting-edge element with significant economic potential to the internal market or (ii) contribute to reducing or preventing the strategic dependencies of the EU (see section 3 of the first Guidance Note).

