



Council of the European Union  
General Secretariat

**Brussels, 25 August 2025**

**WK 10595/2025 INIT**

**LIMITE**

**RECH  
COMPET  
IND  
MI**

*This is a paper intended for a specific community of recipients. Handling and further distribution are under the sole responsibility of community members.*

## **CONTRIBUTION**

---

From:	General Secretariat of the Council
To:	Working Party on Research
N° prev. doc.:	11624/25
Subject:	Council Conclusions on the importance of research and innovation for ‘The EU Startup and Scaleup Strategy’ - Table with Member States comments

---

Delegations will find attached a table with the Member States comments on above-mentioned document.

**Draft Council conclusions on the importance of R&I for the EU startup and scaleup strategy**

**From: AT, BE, CZ, DE, EE, EL, ES, FI, FR, HR, IE, IT, LT, MT, NL, PL, PT, SE**

Deadline: *20 August 2025*

Updated: 25/08/2025 15:02

**Guidelines to be followed**

*Please kindly provide your contributions in the table below.*

**Drafting suggestions:** you may use 'track changes'\* or formatting (for example bold-underline for additions and ~~strike-through~~ for deletions, where necessary, in a different colour). \*Track changes can only be connected once the cursor is placed in editable areas (Drafting or Comments columns).

To make it feasible to consolidate all contributions, the structure of the table must not be changed, so **no rows can be added or deleted**.

New provisions may only be added in any of the '**existing cells**'.

**Name of document:** please add the **two initials** of your delegation's country followed by a space (to the MS Word document name), followed by any optional text, for example, for Austria: **AT comments on ... .docx**

Thank you for your cooperation!

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
<b>General Comments</b>	CZ <b>(Comments):</b> <u>Overall, CZ requests to keep a consistent language and always speak about “higher education institutions and research and technology organizations” throughout the text, because startups can be created not only by higher education institutions, but also other research and technology institutions, therefore the Council Conclusions shall not be limited only to higher education institutions.</u>  ES <b>(Comments):</b> It is important to have a clearer reference to improve the connection with local and regional ecosystems; Venture builders is also something we need to underline as already identified by the TTO circle and the JRC publication in the field and finally please consider that some problems that you identify only in HEIs is also affecting RPOs and RTOs so we would encourage to use

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>a more general term in all the text. Women and gender balance should be strengthened in the text we have recovered some earlier proposals.</p> <p>IE (Comments):</p> <p>We welcome the revised text and support many of the amendments. However, there remains scope to ensure important developments under the ERA Policy Agendas are adequately reflected in these Conclusions. We suggest some amendments for the Presidency's consideration.</p> <p>Ireland cannot support #17 as currently drafted and retains its scrutiny reservation on the text.</p> <p>LT (Comments):</p> <p>We sincerely thank the Presidency for taking on board many of our comments. Some remaining issues are below:</p> <p>PT (Comments):</p> <ul style="list-style-type: none"> <li>- PT - The second version of the conclusions presents a more refined text in its terminology, which we consider to be positive.</li> <li>- The introduction of new themes, such as the promotion of female entrepreneurship, the importance of strategic autonomy, talent drain and the need for clear definitions for start-ups and scale-ups is also welcomed.</li> <li>- We welcome the reinforcement of the mention of ESNA, with the clear recognition of its specific role in fostering entrepreneurship, and underlining its contribution to the implementation of the current EU Start-up and Scale-Up Strategy, including in view of the data already acquired through this initiative.</li> </ul>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	– We suggest including, together with ESNA, the mention of the Enterprise Europe Network (EEN), as a useful tool for the internationalization of startups and connection to global markets.
<p align="center"><b><u>DRAFT COUNCIL CONCLUSIONS ON THE IMPORTANCE OF RESEARCH AND INNOVATION FOR ‘THE EU STARTUP AND SCALEUP STRATEGY’</u></b></p>	EL (Comments): We welcome the Presidency very good work to prepare an updated draft of the text, utilizing ms comments and the relevant discussion of the rwp meeting of 24/7. Below we provide a few comments/additions.
<p>THE COUNCIL OF THE EUROPEAN UNION</p>	
<p>RECALLING</p>	
<p>– its conclusions of 2 December 2022<sup>1</sup> on the New European Innovation Agenda, recognising that innovative startups and SMEs are key actors in transforming the European economy and the need to improve access to scaleup financing;</p>	

<sup>1</sup> 15602/22.

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
<p>– <u>its conclusions of 23 May 2024<sup>2</sup> on strengthening knowledge valorisation as a tool for a resilient and competitive industry and for strategic autonomy in an open economy in Europe;</u></p>	<p>FR                      (Comments):                      FR welcomes this addition.</p>
<p>– <u>its recommendation on the ERA Policy Agenda 2025-2027<sup>3</sup>, which sets out actions relevant for the start-up and scale-up strategy, such as knowledge valorisation, research and technology infrastructures, sustainable research careers or the reform of research assessment;</u></p>	<p>BE                      (Drafting Suggestions):                      – <u>its recommendation on the ERA Policy Agenda 2025-2027<sup>4</sup>, which sets out actions relevant for the start-up and scale-up strategy, such as knowledge valorisation, research and technology infrastructures, sustainable research careers, <b>gender equality and inclusiveness, industrial transformation</b> or the reform of research assessment;</u></p> <p>FR                      (Comments):                      FR welcomes this addition.</p>
<p>– <u>the European Council Conclusions of 26 June 2025<sup>5</sup>, welcoming the Commission’s ‘EU Startup and Scaleup Strategy’ and calling for work on implementation to begin swiftly.</u></p>	
<p>TAKING NOTE OF</p>	

<sup>2</sup> 10182/24.  
<sup>3</sup> OJ C, C/2025/3593, 30.6.2025.  
<sup>4</sup> OJ C, C/2025/3593, 30.6.2025.  
<sup>5</sup> EUCO 12/25.

**Draft Council conclusions on the importance of R&I for the EU startup and scaleup strategy**

**From: AT, BE, CZ, DE, EE, EL, ES, FI, FR, HR, IE, IT, LT, MT, NL, PL, PT, SE**

Deadline: *20 August 2025*

Updated: 25/08/2025 15:02

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
<p>– the Letta report of April 2024 ‘Much more than a market’, highlighting the need to strengthen financial support to startups and scaleups;</p>	
<p>– the Draghi report of September 2024 ‘The future of European competitiveness’ emphasising that Europe has many talented researchers and entrepreneurs, but lacks dynamism to translate innovative ideas into commercial success <b><u>and needs to improve the conditions for breakthrough innovation in its common R&amp;I programmes;</u></b></p>	
<p>– the Heitor report of October 2024 ‘Align, Act, Accelerate’ calling to boost Europe's global competitiveness by fostering impactful research, innovation and scaleups <b><u>and avoid entrepreneurial brain drain causing missed opportunities for the European ecosystem;</u></b></p>	<p>EL (Comments): We welcome the reference to the importance of avoiding the entrepreneurial brain drain, in particular for smaller member states already suffering from scientific brain drain.</p> <p>ES (Drafting Suggestions): – the Heitor report of October 2024 ‘Align, Act, Accelerate’ calling to boost Europe's global competitiveness by fostering impactful research, innovation and scaleups <b><u>and avoid entrepreneurial brain drain causing and missed opportunities for the local European ecosystem;</u></b></p> <p>ES (Comments): The correct citation from the Heitor report is: Whilst relocating overseas may provide increased market valuation gains and increased financing for EU scale ups, it saps Europe’s potential to retain industry leaders and develop new technologies and it weakens the flywheel effect by which new leaders</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	support the next generation of startups, <u>causing entrepreneurial brain drain and missed opportunities for the local European ecosystem.</u>
<p>– the results of the Horizon Europe interim evaluation<sup>6</sup> showing that despite 20% of the overall funding being allocated to SMEs, a persistent funding gap in the scale up phase remains a challenge together with knowledge valorisation.</p>	
AN AMBITIOUS STARTUP AND SCALEUP ECOSYSTEM FOR EUROPE	
<p>1. WELCOMES the startup and scaleup strategy as an important milestone in reinforcing European competitiveness and boosting innovation. STRESSES that concerted and bold action is urgently needed to close the innovation gap with global competitors <b><u>and within the Union</u></b> to ensure <b><u>continued high welfare</u></b>, economic security, <b><u>and</u></b> strategic autonomy <b><u>while preserving an open economy</u></b> and <del>continued high welfare in Europe</del> <b><u>the Union</u></b>. REMINDS of the complex dynamics of innovation <b><u>ecosystems</u></b> requiring the involvement of many actors along the value chain and well-functioning feedback loops <b><u>from innovators to research</u></b>. <b><u>EMPHASISES that making progress on current ERA policies and actions can contribute substantially to the objectives of the startup and scaleup strategy.</u></b></p>	<p>BE  <b>(Drafting Suggestions):</b>                      1. WELCOMES the startup and scaleup strategy as an important milestone in reinforcing European competitiveness and boosting innovation. STRESSES that concerted and bold action is urgently needed to close the innovation gap with global competitors <b><u>and within the Union</u></b> to ensure <b><u>continued high welfare</u></b>, economic security, <b><u>and</u></b> strategic autonomy <b><u>while preserving an open economy</u></b> and <del>continued high welfare in Europe</del> <b><u>the Union</u></b>. REMINDS of the complex dynamics of innovation <b><u>ecosystems</u></b> requiring the involvement of many actors along the value chain and well-functioning feedback loops <b><u>from innovators to research</u></b>. <b><u>EMPHASISES that making progress on <del>current</del> ERA policies and actions can contribute substantially to the objectives of the startup and scaleup strategy.</u></b></p> <p>BE</p>

<sup>6</sup> COM(2025) 189 final 8526/25.

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>(Comments):</p> <p>All ERA policies are relevant.</p> <p>DE</p> <p>(Drafting Suggestions):</p> <p>1. WELCOMES the startup and scaleup strategy as an important milestone in reinforcing European competitiveness and boosting innovation. STRESSES that concerted and bold action is urgently needed to close the innovation gap with global competitors <b><u>and within the Union</u></b> to ensure <b><u>continued high welfare</u></b>, economic security, <b><u>and</u></b> strategic autonomy <b><u>while preserving an open economy</u></b> and <del>continued high welfare in Europe</del> <b><u>the Union</u></b>. REMINDS of the complex dynamics of innovation <b><u>ecosystems</u></b> requiring the involvement of many actors along the value chain and well-functioning feedback loops <b><u>from innovators to research</u></b>. <b>RECOGNISES</b> the role of different actors <b>providing well-targeted support to start ups and more broadly SMEs in their internationalisation and access to global markets, such as the Eureka network</b>. <b><u>EMPHASISES that making progress on current ERA policies and actions can contribute substantially to the objectives of the startup and scaleup strategy.</u></b></p> <p>DE</p> <p>(Comments):</p> <p>DE: Mentioning Eureka is important in this context rather than in para 8</p> <p>EE</p> <p>(Comments):</p> <p>EE supports keeping the reference to the EU's internal innovation gap.</p> <p>FI</p> <p>(Drafting Suggestions):</p> <p><b><u>and within the Union</u></b></p> <p>FR</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p><b>(Drafting Suggestions):</b></p> <p>1. WELCOMES the startup and scaleup strategy as an important milestone in reinforcing European competitiveness and boosting innovation. STRESSES that concerted and bold action is urgently needed to close the innovation gap with global competitors <u>and within the Union</u> to ensure <b><u>continued high welfare</u></b>, economic security, <b><u>and</u></b> strategic autonomy <b><u>while preserving an open economy</u></b> and <del>continued high welfare in Europe</del> <b><u>the Union</u></b>. REMINDS of the complex dynamics of innovation <b><u>ecosystems</u></b> requiring the involvement of many actors along the value chain and well-functioning feedback loops <b><u>from innovators to research</u></b>. <b><u>EMPHASISES that making progress on current ERA policies and actions can contribute substantially to the objectives of the startup and scaleup strategy.</u></b></p> <p>FR</p> <p><b>(Comments):</b></p> <p>While we share the objective of fostering innovation across all parts of the Union, this is not the key obstacle the EU faces when it comes to startup and scaleup strategy. This tends to dilute the message carried out by the para, which aims at emphasizing the need to bridge the innovation gap with our global competitors through an innovation-friendly environment for startups and scaleups in the EU.</p> <p>HR</p> <p><b>(Comments):</b></p> <p>Strong support to the recognition of innovation divide in text.</p> <p>IE</p> <p><b>(Drafting Suggestions):</b></p> <p>1. WELCOMES the startup and scaleup strategy as an important milestone in reinforcing European competitiveness and boosting innovation. STRESSES that concerted and bold action is urgently needed to close the</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>innovation gap with global competitors <b><u>and within the Union</u></b> to ensure <b><u>continued high welfare</u></b>, economic security, <b><u>and</u></b> strategic autonomy <b><u>while preserving an open economy</u></b> and <del>continued high welfare in Europe</del> <b><u>the Union</u></b>. <b>REMINDS of REITERATES</b> the complex dynamics of innovation <b><u>ecosystems</u></b> requiring the involvement of many actors along the value chain and well-functioning feedback loops <b><u>from innovators to research</u></b>. <b><u>EMPHASISES that making progress on current ERA structural policies and actions can contribute substantially to the objectives of the startup and scaleup strategy, in particular those addressing knowledge valorisation, research assessment reform, research careers and research and technology infrastructures.</u></b></p> <p>IE (Comments): We welcome the explicit focus on the ERA activities already under way that will also contribute to the implementation of the startup and scaleup strategy.</p> <p>To strengthen the text, we suggest including some of the main ERA activities of relevance to the implementation of the strategy.</p> <p>‘Reminds’ needs to be followed by someone/something – i.e. ‘Reminds X of ...’</p> <p>We suggest using an alternative verb such as ‘reiterates’ or ‘recalls’.</p> <p>LT (Comments): We strongly support current version of the second sentence. Deleting the mentioning of the internal EU innovation divide would be a red line for Lithuania.</p> <p>MT</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>(Comments):</p> <p>MT strongly supports the reference to closing the innovation gap within the Union; therefore, we insist on it being retained in the final version of the text.</p> <p>NL</p> <p>(Drafting Suggestions):</p> <p>WELCOMES the startup and scaleup strategy as an important milestone in reinforcing European competitiveness and boosting innovation. STRESSES that concerted and bold action is urgently needed to close the innovation gap with global competitors <del>and within the Union</del> to ensure <b><u>continued high welfare</u></b>, economic security, <b><u>and</u></b> strategic autonomy <b><u>while preserving an open economy</u></b> and continued high welfare in Europe <del>the Union</del>. REMINDS of the complex dynamics of innovation <b><u>ecosystems</u></b> requiring the involvement of many actors along the value chain and well-functioning feedback loops <b><u>from innovators to research</u></b>. <b><u>EMPHASISES that making progress on current ERA policies and actions can contribute substantially to the objectives of the startup and scaleup strategy.</u></b></p> <p>NL</p> <p>(Comments):</p> <p>NL is not in favour of diluting the focus of the text, which should be on the innovation gap with global competitors.</p> <p>PT</p> <p>(Comments):</p> <p><b>PT</b> - we reiterate the importance of maintaining the reference to the 'innovation gap' in the EU. Bridging this gap is essential to ensure sustainable and international competitiveness in the EU.</p> <p>SE</p> <p>(Drafting Suggestions):</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>STRESSES that concerted and bold action is urgently needed to close the innovation gap with global competitors <b>and within the Union</b> to ensure <b>continued high welfare</b>, economic security, <b>and open</b> strategic autonomy <b>while preserving an open economy</b> and continued high welfare in Europe <b>the Union</b>.</p>
<p>2. <del>PAYS ATTENTION TO</del> <b>ENCOURAGES</b> the Commission's, <b>in cooperation with Member States, to rapidly come forward with simple and practical</b> <del>planned</del> definitions of startups, scaleups and innovative companies <del>announced for 2026</del>, and RECOGNISES the significance of the future definitions for regulatory and funding purposes. RECALLS the Commission's ambitions to <b>reduce red tape in regulations and reporting requirements and simplify their practical implementation for the benefit of stakeholders, in particular SMEs</b> <del>simplify, streamline and reduce red tape</del>.</p>	<p>BE (Drafting Suggestions):</p> <p>2. <del>PAYS ATTENTION TO</del> <b>ENCOURAGES</b> the Commission's, <b>in cooperation with Member States, to rapidly come forward with simple and practical</b> <del>planned</del> definitions of startups, scaleups, <del>and</del> <b>and undertakings in difficulty</b> and RECOGNISES the <b>significance of the future</b> definitions for regulatory and funding purposes. RECALLS the Commission's ambitions to <b>reduce red tape in regulations and reporting requirements and simplify their practical implementation for the benefit of stakeholders, in particular SMEs</b> <del>simplify, streamline and reduce red tape</del>.</p> <p>BE (Comments):</p> <p>We highlight the need to reflect the specific financing dynamics of deep tech startups and scaleups—particularly their status as typical cash-burning ventures. The current definition of 'undertakings in difficulty' may disadvantage innovative companies that temporarily lack equity without being structurally unsound. A revised definition of 'undertaking in difficulty' is also necessary.</p> <p>EL (Comments):</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>We would like to repeat our request for the inclusion of the definition of the “undertakings in difficulty”, as also supported by The Netherlands in the previous circle of written comments</p> <p>ES (Comments):</p> <p>We support to anticipate as soon as possible the definitions. They are key to understand who we are targeting with the strategy, especially because priorities are not the same for startups and scaleups.</p> <p>IT (Drafting Suggestions):</p> <p><del>PAYS ATTENTION TO</del> <b><u>ENCOURAGES</u></b> the Commission<sup>2</sup>s, <b><u>in cooperation with Member States, to rapidly come forward with simple and practical</u></b> <del>planned</del> definitions of startups, scaleups and innovative companies <del>announced for 2026</del>, and RECOGNISES the significance of the future definitions for regulatory and funding purposes. RECALLS the Commission’s ambitions to <b><u>reduce red tape in regulations and reporting requirements and simplify their practical implementation and reduce the final economic burden for the benefit of stakeholders, in particular SMEs</u></b> <del>simplify, streamline and reduce red tape.</del></p> <p>IT (Comments):</p> <p>We might suggest adding to the final sentence the need to also reduce overall reporting costs, e.g.</p> <p>NL (Drafting Suggestions):</p> <p><del>PAYS ATTENTION TO</del> <b><u>ENCOURAGES</u></b> the Commission<sup>2</sup>s, <b><u>in cooperation with Member States, to rapidly come forward with simple</u></b></p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p><del>and practical planned</del> definitions of startups, scaleups and innovative companies <del>announced for 2026</del>, and RECOGNISES the significance of the future definitions for regulatory and funding purposes. <b><u>UNDERLINES the need to revise the Undertakings in Difficulty definition, so that highly innovative startups are able to attract public and private funding even though the time to market is relatively longer.</u></b> RECALLS the Commission’s ambitions to <b><u>reduce red tape in regulations and reporting requirements and simplify their practical implementation for the benefit of stakeholders, in particular SMEs</u></b> <del>simplify, streamline and reduce red tape.</del></p> <p>NL (Comments):</p> <p>The addition on Undertakings in Difficulty is especially needed to highlight this recurrent issue that hinders the emergence of new innovative SMEs that we so desperately need to boost competitiveness.</p> <p>PL (Drafting Suggestions):</p> <p><b><u>ENCOURAGES</u></b> the Commission<sup>2</sup>s, <b><u>in cooperation with Member States, to rapidly come forward with simple and practical</u></b> <del>planned</del> definitions of startups, scaleups, <b><u>midcaps</u></b> and innovative companies <del>announced for 2026</del>, and RECOGNISES the significance of the future definitions for regulatory and funding purposes. RECALLS the Commission’s ambitions to <b><u>reduce red tape in regulations and reporting requirements and simplify their practical implementation for the benefit of stakeholders, in particular SMEs</u></b> <del>simplify, streamline and reduce red tape.</del></p> <p>PL (Comments):</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>For clarity of rules for eligibility for financial support, it is important to have a precise definition of startups, scaleups and midcaps and identify differences between them.</p>
<p>3. [previous para 4] RECOGNISES the importance of a whole of government approach, <b><u>in particular for the implementation of the strategy, but and</u></b> ACKNOWLEDGES that many of the actions set out in the strategy goes beyond the scope of <b><u>research and innovation (R&amp;I)</u></b> and will be further developed through other <del>announced</del> acts, <b><u>as proposed by the Commission</u></b>. Therefore, focuses these conclusions on the activities related to R&amp;I to draw due attention to the importance of this segment of the value chain in terms of delivering on the strategy.</p>	<p>DE <b>(Comments):</b> DE: We suggest that the issues excluded from this DCC, such as the 28th regime, the Savings and Investment Union and public procurement law, be dealt with in the Finance and Economic Affairs Council or the Competitiveness Council (Internal Market and Industry).</p> <p>FR <b>(Drafting Suggestions):</b> 3. [previous para 4] RECOGNISES the importance of a whole of government approach, <b><u>in particular for the implementation of the strategy, including to support, attract and retain startups and scaleups in Europe. INVITES the Commission to identify means to reinforce exploitation in Europe of research results funded by EU programmes, but and</u></b> ACKNOWLEDGES that many of the actions set out in the strategy goes beyond the scope of <b><u>research and innovation (R&amp;I)</u></b> and will be further developed through other <del>announced</del> acts, <b><u>as proposed by the Commission</u></b>. Therefore, focuses these conclusions on the activities related to R&amp;I to draw due attention to the importance of this segment of the value chain in terms of delivering on the strategy.</p> <p>FR <b>(Comments):</b> The issue of attractiveness is not enough tackled in the text, although it represents one of the key challenges to overcome, and is in line with the Choose Europe strategy.</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	Improving the attractiveness of the EU would also enable to retain scaleups in Europe. In this regard, we encourage exploitation of research results in Europe for projects funded by EU programmes. This is essential to promote the EU’s strategic autonomy.
<p><del>UNIVERSITIES AS THE R&amp;I FOUNDATION OF THE ECOSYSTEM</del>  <b><u>ENABLING A STRONG R&amp;I FOUNDATION</u></b></p>	<p>ES  <b>(Comments):</b>                      We welcome that “universities” are deleted in the title, as this heading has a wider scope.</p>
<p>4. [previous para 2] HIGHLIGHTS the importance of ensuring predictability <b><u>and coherence</u></b> of <b><u>funding</u></b> programmes, strategies and regulations to provide startups, scaleups and investors with a <del>trusted</del> <b><u>trustworthy</u></b> environment thus facilitating long term planning. UNDERLINES THE NEED for <b><u>stimulating</u></b> <del>an overall change in mindset towards supporting</del> entrepreneurship and willingness to take risks, <b><u>including the right to fail and restart after failure</u></b>. <del>INCITES-ENCOURAGES</del> startups to pursue ambitions for growth and CALLS for the <del>EU</del> <b><u>Union</u></b> and Member States to ensure adequate support <del>support</del> <b><u>framework conditions</u></b>.</p>	
<p>5. <del>CONSIDERS-ACKNOWLEDGES</del> that strong <b><u>innovation</u></b> ecosystems <del>around universities, as well as</del> <b><u>originating from higher education institutions and</u></b> research and technology organisations, play a key <b><u>an important</u></b> role in supporting the <b><u>creation and</u></b> growth of startups and scaleups by providing access to <b><u>talent</u></b>, essential infrastructures and <b><u>related</u></b> services. STRESSES that <del>such</del> <b><u>these</u></b> ecosystems are crucial for ‘retaining, <b><u>anchoring</u></b> and scaling’; <b><u>academic spin-offs and startups</u></b>, in particular deep-tech companies, in Europe <del>the Union</del>. <del>by strengthening</del> <b><u>The</u></b> long-term</p>	<p>AT  <b>(Drafting Suggestions):</b>  <del>CONSIDERS-ACKNOWLEDGES</del> that strong <b><u>innovation</u></b> ecosystems <del>around universities, as well as</del> <b><u>originating from higher education institutions and</u></b> research and technology organisations, play a <del>key</del> <b><u>an important</u></b> role in supporting the <b><u>creation and</u></b> growth of startups and scaleups by providing access to <b><u>talent</u></b>, essential infrastructures and <b><u>related</u></b> services. STRESSES that <del>such</del> <b><u>these</u></b> ecosystems are crucial for ‘retaining,</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
<p>collaboration between academia and industry <del>and enabling</del> <u>enables</u> knowledge circulation <del>valorisation and transfer</del>.</p>	<p><u>anchoring</u> and scaling’; <u>academic spin-offs and startups</u>, in particular deep-tech companies, in Europe <u>the Union</u>, by strengthening <del>The</del> long-term collaboration between academia and industry <del>and enabling</del> <u>enables</u> knowledge circulation <del>valorisation and transfer</del>. <b>ENCOURAGES European Universities’ Alliances to strengthen their activities related to innovation and knowledge valorisation</b></p> <p>AT (Comments):</p> <p>European Universities Alliances represent a strong example of an ecosystem that supports knowledge valorisation and facilitates sustained collaboration between academia and industry. For this reason, they should be explicitly mentioned here.</p> <p>EL (Drafting Suggestions):</p> <p>5. CONSIDERS ACKNOWLEDGES that strong innovation ecosystems around universities, as well as originating from higher education institutions and research and technology organisations, play a key an important role in supporting the creation and growth of startups and scaleups by providing access to talent, essential infrastructures and related services. STRESSES that such these ecosystems are crucial for ‘retaining, anchoring and scaling’, academic spin-offs and startups, in particular deep-tech companies, in Europe the Union. by strengtheningThe long-term collaboration between academia and industry and enabling enables knowledge circulation valorisation and transfer <b>because of the presence of these ecosystems</b></p> <p>EL (Comments):</p> <p>We think that the suggested addition makes the sentence more clear.</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>ES                      (Drafting Suggestions):</p> <p>5. <del>CONSIDERS</del> <b>ACKNOWLEDGES</b> that strong <b>innovation ecosystems</b> around universities, as well as <b>originating from higher education institutions, public research organisations and</b> research and technology organisations, play a key <b>an important</b> role in supporting the <b>creation and</b> growth of startups and scaleups by providing access to <b>talent</b>, essential infrastructures and <b>related</b> services. STRESSES that such <b>these</b> ecosystems are crucial for ‘retaining, <b>anchoring</b> and scaling’, <b>academic spin-offs and startups</b>, in particular deep-tech companies, in Europe <b>the Union</b>. by strengthening <b>The</b> long-term collaboration between academia and industry and enabling <b>enables</b> knowledge circulation <b>valorisation and transfer</b>.</p> <p>ES                      (Comments):</p> <p>We like this wording, as higher education institutions and research and technology organizations share most of the issues included in this recital.</p> <p>“Research and Technology Organisations” is a very specific type of organisation and using this term might exclude public research performing organisations, or RPOs.</p> <p>The start ups y scale ups strategy (page 12) uses the following phrasing: "...in research performing organisations, including Research and Technology Organisations, research infrastructures and universities". The term “<b>research performing organisations</b>” encompasses all the other institutions (incl. Universities and RTOs). Furthermore, it is aligned with the definition included in the Council Recomm. on Research Security.</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>If this suggestion is not feasible, then we suggest including the term "public research organisations", as already included in the text. The strategy specifically names these organisations in several parts of the text, so it would make sense that they are also included.</p> <p>FR (Drafting Suggestions):</p> <p><del>CONSIDERS</del> <b>ACKNOWLEDGES</b> that strong <b>innovation</b> ecosystems around universities, as well as <b>originating from higher education institutions and</b> research and technology organisations, play a key <b>an important</b> role in supporting the <b>creation and</b> growth of startups and scaleups by <b>training students and offering them entrepreneurship tracks to carry out entrepreneurial projects during their studies, expanding knowledge, developing new technologies providing access to talent, essential infrastructures and related services</b>. STRESSES that such <b>these</b> ecosystems are crucial for ‘retaining, <b>anchoring</b> and scaling’, <b>academic spin-offs and startups</b>, in particular deep-tech companies, in <del>Europe</del> <b>the Union</b>, by strengthening <del>The</del> long-term collaboration between academia and industry and enabling <b>enables</b> knowledge circulation <b>valorisation and transfer</b></p> <p>FR (Comments):</p> <p>As previously mentioned, R&amp;I players are not just providers of infrastructure or services, but also of skills and knowledge.</p> <p>NL (Drafting Suggestions):</p> <p><del>CONSIDERS</del> <b>ACKNOWLEDGES</b> that strong <b>research and innovation</b> ecosystems around universities, as well as <b>originating from higher education institutions and</b> research and technology organisations, play a</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>key <b><u>an important</u></b> role in supporting the <b><u>creation and</u></b> growth of startups and scaleups by providing access to <b><u>talent</u></b>, essential infrastructures and <b><u>related</u></b> services. STRESSES that <del>such</del> <b><u>these</u></b> ecosystems are crucial for ‘retaining, <b><u>anchoring</u></b> and scaling’, <b><u>academic spin-offs and startups</u></b>, in particular deep-tech companies, in Europe <b><u>the Union</u></b>. by strengthening <del>The</del> long-term collaboration between academia and industry and <del>enabling</del> <b><u>enables</u></b> knowledge circulation <del>valorisation and transfer</del>.</p> <p>NL (Comments): Research and innovation ecosystem is the more accurate term.</p> <p>PT (Drafting Suggestions): 5. <del>CONSIDERS</del> <b><u>ACKNOWLEDGES</u></b> that strong <b><u>innovation</u></b> ecosystems around universities, as well as <b><u>originating from higher education institutions and</u></b> research and technology organisations, play a key <b><u>an important</u></b> role in supporting the <b><u>creation and</u></b> growth of startups and scaleups by providing access to <b><u>talent</u></b>, essential infrastructures and <b><u>related</u></b> services. STRESSES that <del>such</del> <b><u>these</u></b> ecosystems are crucial for ‘retaining, <b><u>anchoring</u></b> and scaling’, <b><u>academic spin-offs and startups</u></b>, in particular deep-tech companies, in Europe <b><u>the Union</u></b>. by strengthening <del>The</del> long-term collaboration between <del>academia</del> <b><u>higher education institutions</u></b> and industry and <del>enabling</del> <b><u>enables</u></b> knowledge circulation <del>valorisation and transfer</del>.</p> <p>PT (Comments): PT supports that we should harmonize the reference to academia type of institutions by relating to higher education institutions.</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
<p>6. REQUESTS that the issue of access to university facilities, services and intellectual property rights for startups and scaleups be considered in the context of the revised State Aid rules and that proper guidance on the implementation of both current and revised rules is provided to Member States. ENCOURAGES Member States to ensure national laws applicable to universities are fit for seizing new opportunities and support the role of modern universities in rolling out innovation. <b><u>RECOGNISES that current State Aid rules pose challenges for higher education institutions to support startups emerging from within their ecosystems, particularly when providing access to services and infrastructure or transferring intellectual property rights to these startups. ENCOURAGES the Commission and Member States to look for solutions within the current regulatory framework. WELCOMES further guidance from the Commission to Member States on implementing State Aid rules and REQUESTS this guidance to address the implementation of current State Aid rules related to higher education institutions facilities.</u></b></p>	<p>CZ  <b>(Drafting Suggestions):</b>  <u>RECOGNISES that current State Aid rules pose challenges for higher education institutions and research and technology organisations to support startups particularly those emerging from them and within their ecosystems, particularly when providing access to services and infrastructure or transferring intellectual property rights to these startups. CALLS for radical simplification of state aid rules for startups and SMEs. ENCOURAGES the Commission and Member States to look for solutions within the current regulatory framework. WELCOMES further guidance from the Commission to Member States on implementing State Aid rules and REQUESTS this guidance to address the implementation of current State Aid rules related to higher education institutions and research and technology organisations facilities.</u></p> <p>EE  <b>(Drafting Suggestions):</b>          6. REQUESTS that the issue of access to university facilities, services and intellectual property rights for startups and scaleups be considered in the context of the revised State Aid rules and that proper guidance on the implementation of both current and revised rules is provided to Member States. ENCOURAGES Member States to ensure national laws applicable to universities are fit for seizing new opportunities and support the role of modern universities in rolling out innovation. <b><u>RECOGNISES that current State Aid rules pose challenges for higher education institutions and research and technology orgsations to support startups emerging from within their ecosystems, particularly when providing access to services and infrastructure or transferring intellectual property rights to these startups. ENCOURAGES the Commission and Member States to look for solutions within the current regulatory framework. WELCOMES</u></b></p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p><b><u>further guidance from the Commission to Member States on implementing State Aid rules and REQUESTS this guidance to address the implementation of current State Aid rules related to higher education institutions facilities.</u></b></p> <p>EE                      (Comments):                      State Aid rules are problematic also to RTOs. We would like to see the reference to RTOs here in order not to exclude research organisations.</p> <p>ES                      (Drafting Suggestions):</p> <p>6. REQUESTS that the issue of access to university facilities, services and intellectual property rights for startups and scaleups be considered in the context of the revised State Aid rules and that proper guidance on the implementation of both current and revised rules is provided to Member States. ENCOURAGES Member States to ensure national laws applicable to universities are fit for seizing new opportunities and support the role of modern universities in rolling out innovation. <b><u>RECOGNISES that current State Aid rules pose challenges for higher education institutions, public research organisations and research and technology organizations to support startups emerging from within their ecosystems, particularly when providing access to services and infrastructure or transferring intellectual property rights to these startups. ENCOURAGES the Commission and Member States to look for solutions within the current regulatory framework. WELCOMES further guidance from the Commission to Member States on implementing State Aid rules and REQUESTS this guidance to address the implementation of current State Aid rules related to higher education institutions research and innovation facilities.</u></b></p> <p>ES</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>(Comments):</p> <p>We would expect that in this recital, reference to research and technology organizations is also included. This I not limited to HEIs.</p> <p>LT</p> <p>(Drafting Suggestions):</p> <p>6. <del>REQUESTS that the issue of access to university facilities, services and intellectual property rights for startups and scaleups be considered in the context of the revised State Aid rules and that proper guidance on the implementation of both current and revised rules is provided to Member States. ENCOURAGES Member States to ensure national laws applicable to universities are fit for seizing new opportunities and support the role of modern universities in rolling out innovation.</del> <b><u>RECOGNISES that current State Aid rules pose challenges for higher education institutions and research and technology organisations to support startups emerging from within their ecosystems, particularly when providing access to services and infrastructure or transferring intellectual property rights to these startups. ENCOURAGES the Commission and Member States to look for solutions within the current regulatory framework. WELCOMES further guidance from the Commission to Member States on implementing State Aid rules and REQUESTS this guidance to address the implementation of current State Aid rules related to higher education institutions and research and technology organisations facilities.</u></b></p> <p>LT</p> <p>(Comments):</p> <p>We do not see the reason why this para concerning state aid is limited only to higher education institutions. We strongly recommend including also RTOs as at least in some MS they also have challenges with state aid rules.</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>NL                      (Drafting Suggestions):</p> <p>REQUESTS that the issue of access to university facilities, services and intellectual property rights for startups and scaleups be considered in the context of the revised State Aid rules and that proper guidance on the implementation of both current and revised rules is provided to Member States. ENCOURAGES Member States to ensure national laws applicable to universities are fit for seizing new opportunities and support the role of modern universities in rolling out innovation. <b><u>RECOGNISES that current State Aid rules pose challenges for higher education institutions to support startups emerging from within their ecosystems, particularly when providing access to services and infrastructure or transferring intellectual property rights to these startups. ENCOURAGES-URGES the Commission and Member States to look for solutions within the current regulatory framework. WELCOMES further guidance from the Commission to Member States on implementing State Aid rules and REQUESTS this guidance to address the implementation of current State Aid rules related to higher education institutions facilities.</u></b></p> <p>NL                      (Comments):</p> <p>The current text highlights the urgency insufficiently.</p>
<p>7. WELCOMES the increased focus on improving the framework conditions for research-based innovation at universities <b><u>higher education institutions</u></b>. AFFIRMS that universities <b><u>the central role of higher education institutions</u></b> have a core responsibility of <b><u>in</u></b> delivering excellent research and world-class education, while also driving innovation through support to <b><u>for</u></b> technology transfer and entrepreneurship. <b><u>UNDERLINES therefore the role of Technology Transfer Offices (TTOs) in fostering</u></b></p>	<p>BE                      (Drafting Suggestions):</p> <p>7. WELCOMES the increased focus on improving the framework conditions for research-based innovation at <b><u>higher education institutions</u></b>. AFFIRMS <b><u>the central role of higher education institutions</u></b> have a core responsibility of <b><u>in</u></b> delivering excellent research and world-class education, while also driving innovation through support to <b><u>for</u></b> technology transfer and</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
<p><del>collaboration between academia and businesses.</del> <del>WELCOMES</del>  <del>ACKNOWLEDGES</del> the Commission's plans for developing a blueprint for licensing, royalty- and revenue-sharing and equity participation for <del>academic</del>  <del>higher education</del> institutions and their investors when commercialising IPs and creating spinoff companies. <del>NOTES</del> <del>the efforts in consolidating</del>  <del>Intellectual Property rights regulations across programmes.</del></p>	<p>entrepreneurship. <b>UNDERLINES</b> therefore the role of <b>the Knowledge Technology Transfer Offices (KTTOs) in</b> <b>fostering collaboration between academia and businesses, including implementing Research into market-ready innovations and supporting spin-offs.</b>  <del>ACKNOWLEDGES</del> the Commission's plans for developing a blueprint for licensing, royalty- and revenue-sharing and equity participation for <b>higher education</b> institutions and their investors when commercialising IPs and creating spinoff companies.</p> <p>BE  <b>(Comments):</b>                  Thank you for the added text on <b>TTOs</b> in paragraph 7, however, we feel like the added text does not fully reflect the role they have. Other than fostering collaboration between academia and businesses, they also have a role themselves of <b>translating research into market-ready innovations and supporting spin-offs.</b></p> <p>CZ  <b>(Drafting Suggestions):</b>                  WELCOMES the increased focus on improving the framework conditions for research-based innovation at <del>universities</del> <b>higher education institutions and research and technology organisations</b>. AFFIRMS that <del>universities</del> <b>the central role of higher education institutions and research and technology organisations</b> have a core responsibility of <b>in</b> delivering excellent research and world-class education, while also driving innovation through support <del>to</del> <b>for</b> technology transfer and entrepreneurship.  <b>UNDERLINES</b> therefore the role of <b>Technology Transfer Offices (TTOs) in fostering collaboration between academia and businesses.</b>  <del>WELCOMES</del> <del>ACKNOWLEDGES</del> the Commission's plans for developing a blueprint for licensing, royalty- and revenue-sharing and equity participation for <del>academic</del> <b>higher education</b> institutions <b>and research and</b></p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p><del>technology organisations</del> and their investors when commercialising IPs and creating spinoff companies. <del>NOTES the efforts in consolidating Intellectual Property rights regulations across programmes.</del></p> <p>CZ                      (Comments):  <u>See general remark at the beginning.</u></p> <p>ES                      (Drafting Suggestions):</p> <p>7. WELCOMES the increased focus on improving the framework conditions for research-based innovation at <del>universities</del> <b><u>higher education institutions, public research organisations and research and technology organizations</u></b>. AFFIRMS that <del>universities</del> <b><u>their central role of higher education institutions</u></b> have a core responsibility of <b><u>in</u></b> delivering excellent research and world-class education, while also driving innovation through support to <b><u>for</u></b> technology transfer and entrepreneurship. <b><u>UNDERLINES therefore the role of Technology Transfer Offices (TTOs) in fostering collaboration between academia and businesses. CALLS the Commission to complement existing entrepreneurship programmes with the role of venture builder to facilitating the transition from technologies developed within RTOs into marketable products, and to fostering the scale up of startups and increasing smart capital investments.</u></b> <del>WELCOMES</del> <b><u>ACKNOWLEDGES</u></b> the Commission's plans for developing a blueprint for licensing, royalty- and revenue-sharing and equity participation for <del>academia</del> <b><u>higher education institutions, public research organisations and research and technology organizations</u></b> and their investors when commercialising IPs and creating spinoff companies. <del>NOTES the efforts in consolidating Intellectual Property rights regulations across programmes.</del></p> <p>ES</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>(Comments):</p> <p>Similar comment to the previous one, as this is not limited to HEIs.</p> <p>Regarding venture builders: TTOs especially through publications of the TTO circle and JRC have focused on the critical role of venture builders. See <a href="https://publications.jrc.ec.europa.eu/repository/handle/JRC141029">https://publications.jrc.ec.europa.eu/repository/handle/JRC141029</a> 3.2.3.3. Venture builders</p> <p>LT</p> <p>(Comments):</p> <p>We support EE suggestion to include RTOs in this para as well. We do not see the need to make a specific distinction between higher education institutions and RTOs in the context of these Conclusions.</p> <p>NL</p> <p>(Drafting Suggestions):</p> <p>WELCOMES the increased focus on improving the framework conditions for research-based innovation at <del>universities</del> <b>higher education institutions</b>. AFFIRMS <del>that universities</del> <b>the central role of higher education institutions</b> have a core responsibility of <b>in</b> delivering excellent research and world-class education, while also driving innovation through support to <b>for</b> technology transfer and entrepreneurship. <b>UNDERLINES therefore the role of Technology Transfer Offices (TTOs) in fostering collaboration between academia and businesses.</b> <b>WELCOMES ACKNOWLEDGES WELCOMES</b> the Commission's plans for developing a blueprint for licensing, royalty- and revenue-sharing and equity participation for <del>academic</del> <b>higher education</b> institutions and their investors when commercialising IPs and creating spinoff companies. <del>NOTES the efforts in consolidating Intellectual Property rights regulations across programmes.</del></p> <p>NL</p> <p>(Comments):</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>The CCs identify the importance, challenges and needs around HEIs, IP and spinoff companies earlier. Against that background, ‘welcomes’ is more appropriate here than ‘acknowledges’.</p> <p>PL (Drafting Suggestions):</p> <p>WELCOMES the increased focus on improving the framework conditions for research-based innovation at <del>universities</del> <b>higher education institutions</b>. AFFIRMS <del>that universities</del> <b>the central role of higher education institutions</b> have a core responsibility of <b>in</b> delivering excellent research and world-class education, while also driving innovation through support to <b>for</b> technology transfer and entrepreneurship. <b>UNDERLINES therefore the role of professional and well-resourced Technology Transfer Offices (TTOs) and integrated innovation centres in fostering collaboration between academia and businesses.</b> WELCOMES <b>ACKNOWLEDGES</b> the Commission’s plans for developing a blueprint for licensing, royalty- and revenue-sharing and equity participation for <del>academie</del> <b>higher education</b> institutions and their investors when commercialising IPs and creating spinoff companies</p> <p>PL (Comments):</p> <p>PL recommends highlighting the necessity of building strong, well-resourced Technology Transfer Offices (TTOs) and integrated innovation centres at universities. This has an increasingly important role in particular in ecosystems with lower innovation performance.</p> <p>PT (Drafting Suggestions):</p> <p>7. WELCOMES the increased focus on improving the framework conditions for research-based innovation at <del>universities</del> <b>higher education institutions</b>. AFFIRMS <del>that universities</del> <b>the central role of higher</b></p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p><u>education institutions</u> have a core responsibility of <u>in</u> delivering excellent research and world-class education, while also driving innovation through support to <u>for</u> technology transfer, <b>knowledge valorisation</b> and entrepreneurship. <b>UNDERLINES therefore the role of Technology Transfer Offices (TTOs) in fostering collaboration between academia higher education institutions and businesses.</b> <b>WELCOMES ACKNOWLEDGES</b> the Commission’s plans for developing a blueprint for licensing, royalty- and revenue-sharing and equity participation for <b>academic higher education</b> institutions and their investors when commercialising IPs and creating spinoff companies. <b>NOTES</b> the efforts in consolidating Intellectual Property rights regulations across programmes.</p>
<p>8. ENCOURAGES Member States to support <del>universities</del> <b>higher education institutions</b> to strengthen innovation and entrepreneurial skills within curricula and training programmes, <b>whilst promoting gender balance and</b> with respect for <b>academic freedom</b>, institutional autonomy and national competences. <del>These N</del><u>new</u> skills are not only <del>needed</del> <b>relevant</b> for students and academic staff, but also <b>for</b> administrative staff responsible for <del>the supporting research</del> <b>and innovation, as well as knowledge transfer and valorisation</b>, activities. <del>ENCOURAGES the Commission to use existing relevant programmes, such as ERASMUS+ and the Marie Skłodowska-Curie Actions to support national efforts.</del> <b>RECOGNISES the role of the European Institute of Innovation and Technology (EIT), EUREKA, and the European Startup Nations Alliance (ESNA) in fostering entrepreneurship in the Union.</b></p>	<p>BE  <b>(Drafting Suggestions):</b></p> <p>8. ENCOURAGES Member States to support <del>universities</del> <b>higher education institutions</b> to strengthen innovation and entrepreneurial skills within curricula and training programmes, <b>whilst promoting gender balance and</b> with respect for <b>academic freedom</b>, institutional autonomy and national <b>and regional</b> competences. <del>These N</del><u>new</u> skills are not only <del>needed</del> <b>relevant</b> for students and academic staff, but also <b>for</b> administrative staff responsible for <del>the supporting research</del> <b>and innovation, as well as knowledge transfer and valorisation</b>, activities. <del>ENCOURAGES the Commission to use existing relevant programmes, such as ERASMUS+ and the Marie Skłodowska-Curie Actions to support national efforts.</del> <b>RECOGNISES the role of the European Institute of Innovation and Technology (EIT), EUREKA, and the European Startup Nations Alliance (ESNA) in fostering entrepreneurship in the Union.</b></p> <p>CZ  <b>(Drafting Suggestions):</b></p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>ENCOURAGES Member States to support <b><u>higher education institutions and research and technology organisations</u></b> to strengthen innovation and entrepreneurial skills within curricula and training programmes, <b><u>whilst promoting gender balance and</u></b> with respect for <b><u>academic freedom</u></b>, institutional autonomy and national competences. <b><u>These <del>N</del>ew</u></b> skills are not only <b><u>needed relevant</u></b> for students and academic staff, but also <b><u>for</u></b> administrative staff responsible for the supporting research <b><u>and innovation, as well as knowledge transfer and valorisation</u></b>, activities, <b><u>STRESSES the need for their capacity building, exchange of experience and sharing of good practice</u></b>. <b><u>RECOGNISES the role of the European Institute of Innovation and Technology (EIT), EUREKA, and the European Startup Nations Alliance (ESNA) in fostering entrepreneurship in the Union.</u></b></p> <p>CZ  <b>(Comments):</b>  <u>Comment on RTOs – see the general remark at the beginning.</u>  <u>CZ suggests deletion of “new”, as the innovation and entrepreneurial skills are not really new.</u>  <u>CZ would also like to put more stress on skills of administrative staff supporting researchers, as their supportive role in the R&amp;I system is also indispensable.</u></p> <p>DE  <b>(Drafting Suggestions):</b>              8. ENCOURAGES Member States to support <del>universities</del> <b><u>higher education institutions</u></b> to strengthen innovation and entrepreneurial skills within curricula and training programmes, <b><u>whilst promoting gender balance and</u></b> with respect for <b><u>academic freedom</u></b>, institutional autonomy and national competences. <b><u>These <del>N</del>ew</u></b> skills are not only <b><u>needed relevant</u></b> for students and academic staff, but also <b><u>for</u></b> administrative staff responsible for</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>the supporting research <b><u>and innovation, as well as knowledge transfer and valorisation</u></b>, activities. ENCOURAGES the Commission to use existing relevant programmes, such as ERASMUS+ and the Marie Skłodowska-Curie Actions to support national efforts. <b><u>RECOGNISES the role of the European Institute of Innovation and Technology (EIT), EUREKA, and the European Startup Nations Alliance (ESNA) in fostering entrepreneurship in the Union.</u></b></p> <p>EL  <b>(Drafting Suggestions):</b></p> <p>8. ENCOURAGES Member States to support universities higher education institutions to strengthen innovation and entrepreneurial skills within curricula and training programmes, whilst promoting gender balance <b>and inclusion</b> and with respect for academic freedom, institutional autonomy and national competences. These new skills are not only needed relevant for students and academic staff, but also for administrative staff responsible for the supporting research and innovation, as well as knowledge transfer and valorisation, activities. ENCOURAGES the Commission to use existing relevant programmes, such as ERASMUS+ and the Marie Skłodowska-Curie Actions to support national efforts. RECOGNISES the role of the European Institute of Innovation and Technology (EIT), EUREKA, and the European Startup Nations Alliance (ESNA) in fostering entrepreneurship in the Union.</p> <p>ES  <b>(Drafting Suggestions):</b></p> <p>8. ENCOURAGES Member States to support universities <b><u>higher education institutions, public research organisations and research and technology organizations</u></b> to strengthen innovation and entrepreneurial skills within curricula and training programmes, <b><u>whilst promoting gender balance and inclusive participation and</u></b> with respect for <b><u>academic freedom</u></b>, institutional autonomy and national competences. <b><u>These new</u></b> skills are not only needed <b><u>relevant</u></b> for students and academic staff, but also</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p><del>for administrative technical</del> staff responsible for the supporting research <b>and innovation, as well as knowledge transfer and valorisation</b>, activities.</p> <p><del>ENCOURAGES the Commission to use existing relevant programmes, such as ERASMUS+ and the Marie Skłodowska-Curie Actions to support national efforts. <b>RECOGNISES the role of the European Institute of Innovation and Technology (EIT), EUREKA, and the European Startup Nations Alliance (ESNA) in fostering entrepreneurship in the Union.</b></del></p> <p>ES  <b>(Comments):</b></p> <p>Keep the coherence of higher education institutions and research and technology organizations.                      Administrative staff should be better reflected as as defined in the Council Recommendation on a European framework to attract and retain research, innovation and entrepreneurial talents in Europe . Recommendation 3.</p> <p>Beside this, we feel it is not consistent to include EIT, Eureka and ESNA within these conclusions. The role of these three organizations is rather different in the context of fostering entrepreneurship in the Union and in some cases, not that relevant.                      We propose to eliminate this reference here, considering that some MS have requested to assess the EIT’s role for the future.</p> <p>FR  <b>(Drafting Suggestions):</b></p> <p>8. ENCOURAGES Member States to support <del>universities</del> <b>higher education institutions</b> to strengthen innovation and entrepreneurial skills within curricula and training programmes, <b>whilst promoting gender balance and</b> with respect for <b>academic freedom</b>, institutional autonomy and national competences. <del>These N</del><del>new</del> skills are not only <del>needed</del> <b>relevant</b> for students and academic staff, but also <b>for</b> administrative staff responsible for the supporting research <b>and innovation, as well as knowledge transfer and</b></p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p><u>valorisation</u>, activities. ENCOURAGES the Commission to use existing relevant programmes, such as ERASMUS+ and the Marie Skłodowska-Curie Actions to support national efforts. <b>RECOGNISES the role of <u>the European Institute of Innovation and Technology (EIT), EUREKA, and the European Startup Nations Alliance (ESNA) in fostering entrepreneurship in the Union. NOTES that transnational networks of higher education institutions, such as the ‘European Universities’ alliances’, can play a key role in achieving these objectives through greater student and staff mobility, the development of joint higher education programmes and the pooling of research facilities.</u></b></p> <p>FR  <b>(Comments):</b>                      The EIT should not be mentioned in this para, since its business model does not reflect a successful record track (e.g. lack of sustainability of KICs). In this regard, its contribution to fostering entrepreneurship is relative.</p> <p>On the contrary, European Universities’ Alliances could be better exploited to support entrepreneurship and innovation, since they can play a key role in fostering mobility, developing joint higher education programmes and pooling resources.</p> <p>IE  <b>(Drafting Suggestions):</b>                      ENCOURAGES Member States to support <del>universities</del> <b>higher education institutions</b> to strengthen innovation and entrepreneurial skills within curricula and training programmes, <b>while <del>st</del> promoting gender <del>balance</del> equality and <del>with</del> respecting <del>for</del> academic freedom</b>, institutional autonomy and national competences. <b>These <del>N</del>new skills are not only needed <del>relevant</del> for students and academic staff, but also <del>for</del> administrative staff responsible for the supporting research <b>and innovation, as well as knowledge transfer and valorisation</b>, activities. ENCOURAGES the Commission to use existing</b></p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>relevant programmes, such as ERASMUS+ and the Marie Skłodowska-Curie Actions to support national efforts.</p> <p>IE (Comments): We suggest some edits to improve the flow of the sentence and ensure the main messages are clear.</p> <p>The ERA priority focuses on gender equality. We should be consistent.</p> <p>LT (Comments): We still believe this para could be moved to next section and joined with para 9. But we leave the decision in the hands of the Presidency.</p> <p>NL (Drafting Suggestions): ENCOURAGES Member States to support <del>universities</del> <b>higher education institutions</b> to strengthen innovation and entrepreneurial skills within curricula and training programmes, <b>whilst promoting gender balance and</b> with respect for <b>academic freedom</b>, institutional autonomy and national competences. <del>These</del> <del>new</del> skills are not only <del>needed</del> <b>relevant</b> for students and <del>researchers</del> <del>academic staff</del>, but also <b>for</b> administrative staff responsible for the supporting research <b>and innovation, as well as knowledge transfer and valorisation</b>, activities. ENCOURAGES the Commission to use existing relevant programmes, such as ERASMUS+ and the Marie Skłodowska-Curie Actions to support national efforts. <b><u>RECOGNISES the role of the European Institute of Innovation and Technology (EIT), EUREKA, and the European Startup Nations Alliance (ESNA) in fostering entrepreneurship in the Union.</u></b></p> <p>NL</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>(Comments):</p> <p>Researchers is more than academic staff consistent with the term HEIs.</p> <p>PT</p> <p>(Drafting Suggestions):</p> <p>8. ENCOURAGES Member States to support <del>universities</del> <b>higher education institutions</b> to strengthen innovation and entrepreneurial skills within curricula and training programmes, <b>whilst promoting gender balance and</b> with respect for <b>academic freedom</b>, institutional autonomy and national competences. <del>These</del> <b>new</b> skills are not only <del>needed</del> <b>relevant</b> for students and academic staff, but also <b>for</b> administrative staff responsible for <del>the supporting research</del> <b>and innovation, as well as knowledge transfer and valorisation</b>, activities. ENCOURAGES the Commission to use existing relevant programmes, such as ERASMUS+ and the Marie Skłodowska-Curie Actions to support national efforts. <b>RECOGNISES the role of the European Horizon Europe including the Institute of Innovation and Technology (EIT), and EUREKA, and the European Startup Nations Alliance (ESNA) in fostering entrepreneurship in the Union.</b></p> <p>PT</p> <p>(Comments):</p> <p>PT supports that we should highlight Horizon Europe as the main programme, as a whole, that supports entrepreneurship in its different instruments.</p> <p>PT fully supports the role of ESNA but we believe that its aims can be better integrated in the scope of paragraph §20.</p>
FOSTERING, ATTRACTING AND RETAINING TALENTS AND SKILLS	

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
<p>9. WELCOMES the strong focus on talent and skills in the strategy and RECOGNISES that a strong startup and scaleup ecosystem requires a high-quality <b>highly skilled</b> workforce in areas such as science, technology and engineering, <del>but also</del> <b>as well as</b> legal, <b>commercial</b>, and financial expertise. <b><u>STRESSES the importance of promoting women-led entrepreneurship.</u></b> WELCOMES the Commission’s ‘Choose Europe’ initiative and ENCOURAGES <b><u>the Commission</u></b> to build on existing <b><u>programmes and activities instruments</u></b> such as <b><u>ERASMUS+, the European Research Council (ERC), Marie Skłodowska-Curie Actions, and EURAXESSERASMUS+, the EU talent pool and partnerships, complementing national and regional initiatives.</u></b></p>	<p>AT  <b>(Drafting Suggestions):</b></p> <p>9. WELCOMES the strong focus on talent and skills in the strategy and RECOGNISES that a strong startup and scaleup ecosystem requires a high-quality <b>highly skilled</b> workforce in areas such as science, technology and engineering, <del>but also</del> <b>as well as</b> legal, <b>commercial</b>, and financial expertise. <b><u>STRESSES the importance of promoting women-led entrepreneurship and of advancing gender equality by promoting women’s leadership, participation, and entrepreneurial mindset in innovation and start-ups.</u></b> WELCOMES the Commission’s ‘Choose Europe’ initiative and ENCOURAGES <b><u>the Commission</u></b> to build on existing <b><u>programmes and activities instruments</u></b> such as <b><u>ERASMUS+, the European Research Council (ERC), Marie Skłodowska-Curie Actions, and EURAXESSERASMUS+, the EU talent pool and partnerships, complementing national and regional initiatives.</u></b></p> <p>AT  <b>(Comments):</b></p> <p>Explicit support for the SI proposal made in the RWP meeting of 24 July, with a slightly changed wording.</p> <p>BE  <b>(Drafting Suggestions):</b></p> <p>9. WELCOMES the strong focus on talent and skills in the strategy and RECOGNISES that a strong startup and scaleup ecosystem requires a high-quality <b>highly skilled</b> workforce in areas such as science, technology and engineering, <del>but also</del> <b>as well as</b> legal, <b>commercial</b>, and financial expertise. <b><u>STRESSES the importance of promoting women-led entrepreneurship.</u></b> <b><u>STRESSES the importance of advancing gender equality by promoting women’s leadership, participation, and entrepreneurship in innovation and start-ups.</u></b> WELCOMES the Commission’s ‘Choose Europe’ initiative</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>and ENCOURAGES <b>the Commission</b> to build on existing <b>programmes and activities instruments</b> such as <b>ERASMUS+, the European Research Council (ERC), Marie Skłodowska-Curie Actions, and EURAXESSERASMUS+</b>, the EU talent pool and partnerships, <b>complementing national and regional initiatives <u>funding opportunities.</u></b></p> <p>BE (Comments):</p> <p>There is currently no EU-wide consensus on the definition of "highly skilled," with some Member States interpreting it narrowly—limited to those with higher education degrees—while others apply a broader understanding. To avoid restricting the concept to academic qualifications alone, we prefer using "skilled workforce" as a more inclusive term.</p> <p>Support SI text proposal on gender.</p> <p>“Initiatives" makes it general; the Choose Europe for Science website refers to "national and regional funding opportunities" (<a href="#">Jobs and opportunities   EURAXESS</a> ). This makes the wording more concrete.</p> <p>CZ (Drafting Suggestions):</p> <p>WELCOMES the strong focus on talent and skills in the strategy and RECOGNISES that a strong startup and scaleup ecosystem requires a <b>highly skilled</b> workforce in areas such as science, technology and engineering, <b>as well as</b> legal, <b>commercial</b>, and financial expertise. <b><u>STRESSES the importance of promoting women-led entrepreneurship, RECOGNISES that persistent gender inequalities constitute a significant barrier to exploiting Europe’s full innovation capacity and potential and UNDERLINES that closing this gap is essential as a matter of social justice and a strategic investment in the competitiveness, innovation and productivity of the EU.</u></b> WELCOMES the Commission’s ‘Choose Europe’</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>initiative and ENCOURAGES <b><u>the Commission</u></b> to build on existing <b><u>programmes and instruments</u></b> such as <b><u>ERASMUS+, the European Research Council (ERC), Marie Skłodowska-Curie Actions, and EURAXESS, complementing national and regional initiatives.</u></b></p> <p>CZ (Comments): <u>CZ would like to strengthen the paragraph regarding gender equality as in the area of startups, scaleups and innovation, where women remain severely underrepresented, which in turn hampers the competitiveness of the EU by overlooking the potential, excellence and knowledge they bring.</u></p> <p>ES (Drafting Suggestions): 9. WELCOMES the strong focus on talent and skills in the strategy and RECOGNISES that a strong startup and scaleup ecosystem requires a high-quality <b><u>highly skilled</u></b> workforce <u>collaborating</u> in areas such as science, technology and engineering, <del>but also as well as</del> <b><u>legal, commercial,</u></b> and financial expertise. <b><u>STRESSES the importance of promoting women talent and gender balanced leadership and diversitywomen-led entrepreneurship.</u></b> WELCOMES the Commission’s ‘Choose Europe’ initiative and ENCOURAGES <b><u>the Commission</u></b> to build on existing <b><u>programmes and</u></b> activities <b><u>instruments</u></b> such as <b><u>ERASMUSErasmus+, the European Research Council (ERC), Marie Skłodowska-Curie Actions, and EURAXESSERASMUS+, the EU talent pool and partnerships, complementing national and regional initiatives.</u></b></p> <p>ES (Comments): We welcome the stressed importance on woman entrepreneurship. The collaboration among all of these areas is essential. The name of the Erasmus+ programme is not written in capital letters.</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>FR (Comments): FR welcomes the reference to the ERC and MSCA.</p> <p>IT (Drafting Suggestions): ENCOURAGES <b>the Commission</b> to build on existing <b>programmes and activities instruments</b> such as <b>ERASMUS+, the European Research Council (ERC), Marie Skłodowska-Curie Actions, and EURAXESSERASMUS+, the EU talent pool and partnerships, complementing national and regional initiatives, and to leverage the high value of the EU–AU innovation agenda as a tool for fostering effective collaboration on innovation and technology between Europe and the African continent.</b></p> <p>IT (Comments): It would be useful to integrate the final statement with a reference to the EU–AU Innovation Agenda, which is a key priority for Italy and for the G7 countries participating in Horizon Europe, in line with the 2024 G7 Science and Technology Communiqué. Please see below:</p> <p>NL (Drafting Suggestions): WELCOMES the strong focus on talent and skills in the strategy and RECOGNISES that a strong startup and scaleup ecosystem requires a <del>high-quality</del> <b>highly skilled</b> workforce in areas such as science, technology and engineering, <del>but also as well as</del> <b>legal, commercial,</b> and financial expertise. <b><u>STRESSES the importance of promoting women-led entrepreneurship.</u></b> WELCOMES the Commission’s ‘Choose Europe’ initiative and</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>ENCOURAGES <b><u>the Commission</u></b> to build on existing <b><u>programmes and activities instruments</u></b> such as <b><u>ERASMUS+, the European Research Council (ERC), Marie Skłodowska-Curie Actions, and EURAXESSERASMUS+, the EU talent pool and partnerships, complementing national and regional competences and initiatives.</u></b></p> <p>NL (Comments): We cannot omit a reference to national competences in this area.</p> <p>PL (Drafting Suggestions): WELCOMES the strong focus on talent and skills in the strategy and RECOGNISES that a strong startup and scaleup ecosystem requires a <del>high-quality</del> <b><u>highly skilled</u></b> workforce in areas such as science, technology and engineering, <del>but also as well as</del> legal, <b><u>commercial</u></b>, and financial expertise. <b><u>STRESSES the importance of promoting women-led entrepreneurship.</u></b> WELCOMES the Commission’s ‘Choose Europe’ initiative and ENCOURAGES <b><u>the Commission</u></b> to build on existing <b><u>programmes and activities instruments</u></b> such as <b><u>ERASMUS+, the European Research Council (ERC), Marie Skłodowska-Curie Actions, and EURAXESSERASMUS+, the EU talent pool and partnerships, complementing national and regional initiatives.</u></b></p> <p>PL (Comments): Typo correction</p> <p>PT (Drafting Suggestions): 9. WELCOMES the strong focus on talent and skills in the strategy and RECOGNISES that a strong startup and scaleup ecosystem requires a <del>high-</del></p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>quality <b>highly skilled and entrepreneurial</b> workforce in areas such as science, technology and engineering, <del>but also as well as</del> legal, <b>commercial</b>, and financial expertise. <b><u>STRESSES the importance of promoting women-led entrepreneurship.</u></b> WELCOMES the Commission’s ‘Choose Europe’ initiative and ENCOURAGES <b><u>the Commission</u></b> to build on existing <b><u>programmes and activities instruments</u></b> such as <b><u>ERASMUS+, the European Research Council (ERC), Marie Skłodowska-Curie Actions, and EURAXESSERASMUS+, the EU talent pool and partnerships, complementing national and regional initiatives.</u></b></p> <p>PT  <b>(Comments):</b></p> <p>– PT suggests the stress the entrepreneurial mindset as well.</p>
<p>10. REMINDS that the challenge is not only to attract talents, but also to foster <b><u>and retain</u></b> talents in <b><u>the Union</u></b>-Europe. HIGHLIGHTS that non-EU researchers attracted to <del>universities</del> <b><u>higher education institutions</u></b> or research and technology organisations <del>shall</del> <b><u>should</u></b> also be able to transition into entrepreneurial roles or employment in startups, scaleups or larger industries seeking their expertise. AGREES on the need to reward academic staff in their career not only by number <b><u>and impact</u></b> of publications, but <del>also</del> <b><u>equally</u></b> for efforts in <b><u>knowledge transfer and valorisation</u></b>, commercialising <b><u>of</u></b> their results and engaging in a-knowledge sharing dialogue with policy makers and citizens. <b><u>UNDERLINES that these efforts should be pursued in line with appropriate safeguards for research security</u></b><sup>7</sup>. <b><u>ACKNOWLEDGES the ongoing work through initiatives like the Coalition for Advancing Research Assessment (CoARA).</u></b></p>	<p>DE  <b>(Drafting Suggestions):</b></p> <p>10. REMINDS that the challenge is not only to attract talents, but also to foster <b><u>and retain</u></b> talents in <b><u>the Union</u></b>-Europe. HIGHLIGHTS that non-EU researchers attracted to <del>universities</del> <b><u>higher education institutions</u></b> or research and technology organisations <del>shall</del> <b><u>should</u></b> also be able to transition into entrepreneurial roles or employment in startups, scaleups or larger industries seeking their expertise. AGREES on the need to reward academic staff in their career not only by number <b><u>and impact</u></b> of publications, but <del>also</del> <b><u>equally</u></b> for efforts in <b><u>knowledge transfer and valorisation</u></b>, commercialising <b><u>of</u></b> their results and engaging in a-knowledge sharing dialogue with policy makers and citizens. <b><u>UNDERLINES that these efforts should be pursued in line with appropriate safeguards for research</u></b></p>

<sup>7</sup> OJ C, C/2024/3510, 30.5.2024

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
<p>ENCOURAGES the Commission to come up with new ideas for incentives to reward researchers in the announced blueprint for an academic career development framework, provided the blueprint is implemented on a voluntary basis.</p>	<p><u>security</u><sup>8</sup>. <b>ACKNOWLEDGES the ongoing work through initiatives like the Coalition for Advancing Research Assessment (CoARA).</b>  <del>ENCOURAGES the Commission to come up with new ideas for incentives to reward researchers in the announced blueprint for an academic career development framework, provided the blueprint is implemented on a voluntary basis.</del></p> <p>DE  <b>(Comments):</b>                      DE: The added value of new incentives provided by the COM is unclear. Instead, efforts should focus on integrating and seeking synergies with further initiatives already emerging within the EPA 2025–2027, such as science for policy, and citizen participation, or strengthening intersectoral careers for talents.</p> <p>FR  <b>(Comments):</b>                      FR welcomes the reference to research security and the CoARA.</p> <p>IE  <b>(Drafting Suggestions):</b>                      10. <b>REMINDS REITERATES</b> that the challenge is not only to attract talents, but also to foster <b>and retain</b> talents in <b>the Union</b>-Europe. <b>HIGHLIGHTS</b> that non-EU researchers attracted to <del>universities</del> <b>higher education institutions</b> or research and technology organisations <del>shall</del> <b>should</b> also be able to transition into entrepreneurial roles or employment in startups, scaleups or larger industries seeking their expertise. <b>AGREES</b> on the need to reward academic staff in their career not only by number <b>and impact</b> of publications, but <del>also</del> <b>equally</b> for efforts in <b>knowledge transfer and valorisation</b>, commercialising <b>of</b> their results and engaging in a-knowledge</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>sharing dialogue with policy makers and citizens. <b><u>ACKNOWLEDGES STRESSES the importance of the ongoing work through-under initiatives like the Coalition for Advancing Research Assessment (CoARA) initiative to reform research assessment systems across Europe and beyond.</u></b> <b><u>UNDERLINES that these efforts should be pursued in line with appropriate safeguards for research security<sup>9</sup>.</u></b> <b><u>ACKNOWLEDGES the ongoing work through initiatives like the Coalition for Advancing Research Assessment (CoARA).</u></b> ENCOURAGES the Commission to come up with new ideas for incentives to reward researchers in the announced blueprint for an academic career development framework, provided the blueprint is implemented on a voluntary basis.</p> <p>IE (Comments):</p> <p>This is a very important paragraph. We welcome the amendments to strengthen the text.</p> <p>However, the text as currently drafted does not adequately reflect the importance of the ongoing work under the CoARA initiative – one of the key measures agreed by MS under the first ERA Policy Agenda to accelerate research assessment reform. We suggest some edits to address this.</p> <p>We also believe that the sentence on research security should come after the text on research assessment reform to address the flow of this paragraph.</p> <p>NL (Drafting Suggestions):</p> <p>REMINDS that the challenge is not only to attract talents, but also to foster <b><u>and retain</u></b> talents in <b><u>the Union</u></b>-Europe. HIGHLIGHTS that non-EU researchers attracted to <del>universities</del> <b><u>higher education institutions</u></b> or</p>

<sup>9</sup> OJ C, C/2024/3510, 30.5.2024

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>research and technology organisations <del>shall</del><b>should</b> also be able to transition into entrepreneurial roles or employment in startups, scaleups or larger industries seeking their expertise. AGREES on the need to reward <del>academic staff</del><b>researchers</b> in their career not only by number <b>and impact</b> of publications, but also <b>equally</b> for efforts in <b>knowledge transfer and valorisation</b>, commercialising <del>of</del> their results and engaging in a knowledge sharing dialogue with policy makers and citizens. <b><u>UNDERLINES that these efforts should be pursued in line with appropriate safeguards for research security<sup>10</sup>. ACKNOWLEDGES the ongoing work through initiatives like the Coalition for Advancing Research Assessment (CoARA).</u></b> ENCOURAGES the Commission to come up with new ideas for incentives to reward researchers in the announced blueprint for an academic career development framework, provided the blueprint is implemented on a voluntary basis.</p> <p>NL <b>(Comments):</b> See earlier comment, apart from the linguistic correction.</p> <p>PT <b>(Comments):</b> – <b>PT</b> - we agree with the added reference to the need to reward teachers in their careers also for their efforts to transfer and enhance knowledge.</p>
ACCESS TO INFRASTRUCTURES AND NETWORKING FOR BUILDING INTERCONNECTED ECOSYSTEMS	

<sup>10</sup> OJ C, C/2024/3510, 30.5.2024

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
<p>11. REITERATES the importance of state-of-the-art, <u>visible</u>, and easily accessible research and technology infrastructures for a well-functioning and competitive R&amp;I ecosystem in Europe <del>the Union</del>. REQUESTS the Commission to make best use of the ongoing mapping of infrastructures and share the results on a user-friendly and regularly updated platform. WELCOMES the proposed ‘Charter of Access <u>for industrial users</u>’ to facilitate <u>Union and</u> Member States support to startups and scaleups in accessing <u>relevant</u> regional, national or cross-border infrastructures <u>and their related services</u>. CALLS on the Commission to <del>explain</del> <u>suggest</u> how the Charter of Access should be implemented <del>nationally and</del> at EU <u>Union, national, and regional</u> level.</p>	<p>EL (Drafting Suggestions):</p> <p>11. REITERATES the importance of state-of-the-art, visible, <b>well funded</b> and easily accessible research and technology infrastructures for a well-functioning and competitive R&amp;I ecosystem in Europe the Union <b>on the basis of excellence</b>. REQUESTS the Commission to make best use of the ongoing mapping of infrastructures and share the results on a user-friendly and regularly updated platform. WELCOMES the proposed ‘Charter of Access for industrial users’ to facilitate Union and Member States support to startups and scaleups in accessing relevant regional, national or cross-border infrastructures and their related services. CALLS on the Commission to explain suggest how the Charter of Access should be implemented nationally and at EU Union, national, and regional level.</p> <p>EL (Comments):</p> <p>We think that the Research Infrastructures should be well funded and should operate on the basis of excellence.</p> <p>ES (Comments):</p> <p>We welcome the inclusion of its visibility, as requested in previous versions as well as the wider scope of the infrastructures and their services.</p> <p>FR (Drafting Suggestions):</p> <p>11. REITERATES the importance of state-of-the-art, <u>visible</u>, and easily accessible research and technology infrastructures for a well-functioning and competitive R&amp;I ecosystem in Europe <del>the Union</del>. REQUESTS the Commission to make best use of the ongoing mapping of infrastructures and</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>share the results on a user-friendly and regularly updated platform.  <u>CONSIDERS that technological infrastructures that are the most critical for EU sovereignty and strategic autonomy should be supported in priority.</u> WELCOMES the proposed ‘Charter of Access <u>for industrial users</u>’ to facilitate <u>Union and</u> Member States support to startups and scaleups in accessing <u>relevant</u> regional, national or cross-border infrastructures <u>and their related services</u>. CALLS on the Commission to explain <u>suggest</u> how the Charter of Access should be implemented <del>nationally</del> and at EU <u>Union, national, and regional</u> level.</p> <p>FR  <b>(Comments):</b></p> <p>Since EU funding programmes such as Horizon Europe will not be able to support the deployment and the scale-up of all technology infrastructures, there should be a sound methodology and processes – developed in collaboration with Member States and stakeholders – to define which TIs represent an added value at EU level and should be funded in priority. It should be oriented towards key strategic sectors to avoid fragmentation of funding.</p> <p>PT  <b>(Drafting Suggestions):</b></p> <p>11. REITERATES the importance of state-of-the-art, <b>visible, well advertised</b> and easily accessible research and technology infrastructures for a well-functioning and competitive R&amp;I ecosystem in <del>Europe</del> <u>the Union</u>. REQUESTS the Commission to make best use of the ongoing mapping of infrastructures and share the results on a user-friendly and regularly updated platform. WELCOMES the proposed ‘Charter of Access <u>for industrial users</u>’ to facilitate <u>Union and</u> Member States support to startups and scaleups in accessing <u>relevant</u> regional, national or cross-border infrastructures <u>and their related services</u>. CALLS on the Commission to</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>explain <del>suggest</del> how the Charter of Access should be implemented nationally and at EU <u>Union, national, and regional</u> level.</p> <p>PT (Comments): PT believes that ‘visible’ may not me the best wording. A suggestion is made in the text.</p>
<p>12. WELCOMES the idea of accelerating <b>reinforcing</b> networking and collaboration of European startup and scaleup hubs, <b>drawing on the experience of existing initiatives, such as the European Universities’ Alliances and Rise Europe</b> and CALLS for quick action to establish a network of hubs at EU level. RECOGNISES that it requires national and regional prioritisation and engagement to foster and maintain these hubs. STRESSES the important contribution of private <b>and public</b> funding to reach the 3% GDP target for R&amp;ID and CALLS on <b>ENCOURAGES</b> larger industry to engage with startups and scaleups and establish business relationships to retain homegrown innovation.</p>	<p>DE (Drafting Suggestions): 12. WELCOMES the idea of accelerating <b>reinforcing</b> networking and collaboration of European startup and scaleup hubs, <b>buildingdrawing on the experience of existing initiatives, such as the European Universities’ Alliances and Rise Europe, Startup Europe, the StepUp Startups Initiative and the EU Startup Nation Standard Initiative</b> and CALLS for quick action to establish a network of hubs at EU level. RECOGNISES that it requires national and regional prioritisation and engagement to foster and maintain these hubs. STRESSES the important contribution of private <b>and public</b> funding to reach the 3% GDP target for R&amp;ID and CALLS on <b>ENCOURAGES</b> larger industry to engage with startups and scaleups and establish business relationships to retain homegrown innovation.</p> <p>ES (Drafting Suggestions): 12. WELCOMES the idea of accelerating <b>reinforcing</b> networking and collaboration of European startup and scaleup hubs, <b>drawing on the experience of existing initiatives, such as the European Universities’ Alliances and Rise Europe</b> and CALLS for quick action to establish a network of hubs at EU level. RECOGNISES that it requires national and regional prioritisation and engagement to foster and maintain these hubs.</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>STRESSES the important contribution of private <b>and public</b> funding to reach the 3% GDP target for R&amp;I and <del>CALLS on</del> <b>ENCOURAGES</b> larger industry to engage with startups and scaleups and establish business relationships to retain homegrown innovation.</p> <p>ES (Comments):</p> <p>We like the idea of constructing on top of the numerous existing networks (and not creating new ones) but we feel examples are not needed in this kind of documents. The nature of these hubs does not match with the scope of the examples provided.</p> <p>FR (Drafting Suggestions):</p> <p>12. WELCOMES the idea of <del>accelerating</del> <b>reinforcing</b> networking and collaboration of European startup and scaleup hubs, <b>drawing on the experience of existing initiatives, such as the European Universities' Alliances and Rise Europe</b> and <del>CALLS for quick action to establish a network of hubs at EU level.</del> RECOGNISES that it requires national and regional prioritisation and engagement to foster and maintain these hubs. STRESSES the important contribution of private <b>and public</b> funding to reach the 3% GDP target for R&amp;I and <del>CALLS on</del> <b>ENCOURAGES</b> larger industry to engage with startups and scaleups and establish business relationships to retain homegrown innovation <b>and to this end, CONSIDERS the creation of the European Corporate network initiative should be a priority.</b></p> <p>FR (Comments):</p> <p>European Corporate Network will play an important role in supporting the connection between innovative start-ups and their customers from the private sector.</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>IE (Comments): Regarding reference to ‘hubs’ here and in #13, it would be useful to clarify the type/function of the ‘hubs’ in question, considering the different types of R&amp;I facilities categorised as hubs.</p> <p>NL (Drafting Suggestions): WELCOMES the idea of <del>accelerating</del> <b>reinforcing</b> networking and collaboration of European startup and scaleup hubs, <b>drawing on the experience of existing initiatives, such as <del>the European Universities’ Alliances and Rise Europe</del></b> and CALLS for quick action to <del>establish a network of hubs at EU level</del>. RECOGNISES that it requires national and regional prioritisation and engagement to foster and maintain these hubs. STRESSES the important contribution of private <b>and public</b> funding to reach the 3% GDP target for R&amp;I and <del>CALLS on</del> <b>ENCOURAGES</b> larger industry to engage with startups and scaleups and establish business relationships to retain homegrown innovation. <b><u>UNDERLINES the importance for ecosystem parties to foster-mutual knowhow on working together efficiently.</u></b></p> <p>NL (Comments): Referring to the European University Alliances does not make sense as they do not have developed any relevant experience to draw on for the European startup and scaleup hubs.</p> <p>A lack of actual knowhow to work together in the ecosystem can be a problem, therefore important to refer to this.</p>
	<p>ES</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p><b>(Drafting Suggestions):</b></p> <p><u>RECALLS the critical importance of fostering an environment that promotes innovation, collaboration, and business scale-up, while noting that the current R&amp;I ecosystem in Europe is part of a fragmented internal market, marked by national, regional and local disparities, and by actors who, despite their ability to generate and share knowledge, often lack networking and technical capacity or prior experience with the public sector. CALLS on the Commission to dedicate tailor-made actions to foster a more connected and resilient ecosystem by linking local ecosystems with established hubs building a cohesive ecosystem and market.</u></p> <p>ES</p> <p><b>(Comments):</b></p> <p>The internal market fragmentation is marked by national, regional and local disparities, and by actors who, despite their ability to generate and share excellent knowledge in pockets of excellence away from mature ecosystems, often lack networking capacities to emerge, scale and have impact.</p>
<p>13. ENCOURAGES <b>the Commission</b> to take advantage of digital technologies to promote the interconnectedness of hubs across <del>Europe</del> <b>the Union</b>. PROPOSES that the network <b>of hubs</b> engages in the following best-practice sharing activities to harmonise the support to startups and scaleups in <del>Europe</del> <b>the Union</b>: startup and scaleup ecosystems developments, <b>collaboration between academia and startups, scaleups and larger companies and open innovation</b> and <del>university modernisation, management</del></p>	<p>BE</p> <p><b>(Drafting Suggestions):</b></p> <p>13. ENCOURAGES <b>the Commission</b> to take advantage of digital technologies to promote the interconnectedness of hubs across <del>Europe</del> <b>the Union</b>. PROPOSES that the network <b>of hubs</b> engages in the following best-practice sharing activities to harmonise the support to startups and scaleups</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
<p>of seed funding, <del>and access and</del> coordination of <u>Union</u>, EU and national, <del>and regional</del> investments, <del>funding systems, and improving access to finance, including risk-financing</del> collaboration between academia and startups, scaleups and larger companies and open innovation. The network should further <u>promote the uptake of the Charter of Access and</u> provide <del>guidance</del> <u>advice</u> on access to research and technology infrastructures, on management of Intellectual Property Rights, <u>and applicable</u> State Aid rules and access to EU and national funding systems.</p>	<p>in Europe <del>the Union</del>: startup and scaleup ecosystems developments, <u>collaboration between academia and startups, scaleups and larger companies and open innovation</u> and university modernisation, management of seed funding, <del>and access and</del> coordination of <u>Union</u>, EU and national, <del>and regional</del> investments, <del>funding systems, and improving access to finance, including risk-financing</del> collaboration between academia and startups, scaleups and larger companies and open innovation. The network should further <u>promote the uptake of the Charter of Access</u> <b>for industrial users and</b> provide <del>guidance</del> <u>advice</u> on access to research and technology infrastructures, on management of Intellectual Property Rights, <u>and applicable</u> State Aid rules and access to EU and national funding systems.</p> <p>BE (Comments): Also add here for clarity.</p> <p>ES (Comments): We would encourage to include 12bis or adapt 13 by adding “CALLS on the Commission to dedicate tailor-made actions to foster a more connected and resilient ecosystem by linking local ecosystems with established hubs building a cohesive ecosystem and market.”</p> <p>NL (Drafting Suggestions): ENCOURAGES <u>the Commission</u> to take advantage of digital technologies to promote the interconnectedness of hubs across <del>Europe</del> <u>the Union</u>. PROPOSES that the network <u>of hubs</u> engages in the following best-practice sharing activities to harmonise the support to startups and scaleups in <del>Europe</del> <u>the Union</u>: startup and scaleup ecosystems developments, <u>collaboration between academia and startups, scaleups and larger companies and open</u></p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p><del>innovation and university modernisation, management of seed funding, and access and coordination of Union, EU and national, and regional investments, funding systems, and improving access to finance, including risk-financing collaboration between academia and startups, scaleups and larger companies and open innovation. The network should further aim to promote the uptake of the Charter of Access and provide guidance advice on access to research and technology infrastructures, on management of Intellectual Property Rights, and applicable State Aid rules and access to EU and national funding systems.</del></p> <p>NL  <b>(Comments):</b>                      The current text still gives the impression that the network is going to take on a lot of additional activities, instead of engage in best practice sharing of existing activities and knowhow. NL suggests to make the text a bit softer to reflect the actual expectations of the network, in line with the explanation given by the Commission in the RWP.</p> <p>PT  <b>(Drafting Suggestions):</b>                      13. ENCOURAGES <u>the Commission</u> to take advantage of digital technologies to promote the interconnectedness of hubs across <del>Europe</del> <u>the Union</u>. PROPOSES that the network <u>of hubs</u> engages in the following best-practice sharing activities to harmonise the support to startups and scaleups in <del>Europe</del> <u>the Union</u>: startup and scaleup ecosystems developments, <u>collaboration between academia higher education institutions and startups, scaleups and larger companies and open innovation</u> <del>and university modernisation, management of seed funding, and access and coordination of Union, EU and national, and regional investments, funding systems, and improving access to finance, including risk-financing collaboration between academia and startups, scaleups and larger companies and open innovation.</del> The network should further <u>promote the uptake of the</u></p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p><u>Charter of Access and</u> provide <del>guidance</del> <u>advice</u> on access to research and technology infrastructures, on management of Intellectual Property Rights, <u>and applicable</u> State Aid rules <del>and access to EU and national funding systems.</del></p> <p>PT (Comments): For harmonization purposes.</p> <p>SE (Comments): Sweden would like to state that the FAIR principles should be highlighted more clearly to ensure that strengthened IP efforts and standardization are based on the practice of researchers and research performers and enable both protection and responsible availability of research results.</p>
<p>14. RECOGNISES the importance of <b>regulatory</b> sandboxes to facilitate market entry of innovations by supporting innovative startups and scaleups in developing and testing new ideas, assessing regulatory compliance of new technologies, products and solutions, <b>improving regulatory learning</b>, as well as issuing recommendations for overcoming regulatory hurdles. SUPPORTS the development of clear, unbureaucratic implementation rules for regulatory sandboxes in the forthcoming <b>proposal for a European</b> EU Innovation Act <b>and URGES the Commission to develop a sound methodology and processes for the rapid and effective implementation of regulatory sandboxes.</b></p>	<p>BE (Drafting Suggestions):</p> <p>14. RECOGNISES the importance of <b>regulatory</b> sandboxes to facilitate market entry of innovations by supporting innovative startups and scaleups in developing and testing new ideas, assessing regulatory compliance of new technologies, products and solutions, <b>improving regulatory learning</b>, as well as issuing recommendations for overcoming regulatory hurdles. SUPPORTS the development of clear, unbureaucratic implementation rules for regulatory sandboxes in the forthcoming <b>proposal for a European</b> EU Innovation Act, <b>ensuring coherence with existing EU instruments which provide rules for regulatory sandboxes</b>, and <b>URGES the Commission to develop a sound methodology and processes for the rapid and effective implementation of regulatory sandboxes.</b></p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>BE (Comments):</p> <p>We would suggest the addition of a sentence advocating that the EU Innovation Act learns from existing regulation on sandboxes (examples are the AI Act and the Interoperable Europe Act) to ensure coherence at EU level.</p> <p>We expect that the sandbox provisions in the EU Innovation Act will have a cross-cutting scope, in contrast to existing frameworks which are predominantly technology-specific or sectoral. To ensure legal certainty and effective implementation, coherence between these regulatory instruments at EU level is important.</p> <p>DE (Drafting Suggestions):</p> <p>14. RECOGNISES the importance of <b>regulatory</b> sandboxes to facilitate market entry of innovations by supporting innovative startups and scaleups in developing and testing new ideas, assessing regulatory compliance of new technologies, products and solutions, <b>improving regulatory learning</b>, as well as issuing recommendations for overcoming regulatory hurdles. <b>CONSIDERS</b>SUPPORTS the development of clear, unbureaucratic implementation rules for regulatory sandboxes in the forthcoming <b>proposal for a European</b> EU-Innovation Act <b>and URGES the Commission to develop in a manner that recognises protection standards a sound methodology and processes for the rapid and effective implementation of regulatory sandboxes.</b> <b>CALLS</b> for more emphasis to be placed on offering innovators real benefits and room for manoeuvre, creating experimentation clauses for testing in relevant innovation areas in Union law, as well as clear structures for the transfer of knowledge into legislation.</p> <p>DE</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p><b>(Comments):</b></p> <p>DE: In view of the forthcoming proposal for an EU Innovation Act, we welcome the fact that the regulations for sandboxes are being kept open at this point in time and that no preliminary decisions are being made. We support FIN's proposal to change 'SUPPORTS' to 'CONSIDERS'.</p> <p>It is important to us that it is not only a matter of designing processes and criteria for the implementation of sandboxes, but also of creating room for manoeuvre in European law in the form of experimentation clauses so that sandboxes offer companies real added value at national level and enable regulatory learning.</p> <p>ES</p> <p><b>(Drafting Suggestions):</b></p> <p>14. RECOGNISES the importance of <b>regulatory</b> sandboxes to facilitate market entry of innovations by supporting innovative startups and scaleups in developing and testing new ideas, assessing regulatory compliance of new technologies, products and solutions, <b>improving regulatory learning</b>, as well as issuing recommendations for overcoming regulatory hurdles. SUPPORTS the development of clear, unbureaucratic implementation rules for regulatory sandboxes in the forthcoming <b>proposal for a European</b> <del>EU</del> Innovation Act <b>and URGES the Commission to develop a sound methodology and processes for the rapid and effective implementation of regulatory sandboxes, including EU-wide sandboxes.</b></p> <p>ES</p> <p><b>(Comments):</b></p> <p>It could be important that some of these sandboxes could be EU-wide as a real single market is still the first hurdle for scaling up companies in Europe</p> <p>FI</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>(Drafting Suggestions):</p> <p>SUPPORTS -&gt; CONSIDERS</p> <p>FI</p> <p>(Comments):</p> <p>We would prefer a softer formulation, as the proposed content in the IA is still unknown. Alternatively, the second part of the sentence would suffice (seems like the message is somewhat duplicated).</p> <p>FR</p> <p>(Comments):</p> <p>FR welcomes the last sentence.</p> <p>PT</p> <p>(Comments):</p> <p>PT - we agree with the strengthening of the theme of 'Sanboxes', namely the last sentence.</p> <p>SE</p> <p>(Drafting Suggestions):</p> <p>SUPPORTS the development of clear <b>and efficient</b> <del>unbureaucratic</del> <del>implementation</del> rules for regulatory sandboxes in the forthcoming European Innovation Act and URGES the Commission to develop a sound methodology and processes for the rapid and effective implementation of regulatory sandboxes.</p>
BRIDGING FINANCIAL GAPS IN THE VALUE CHAIN	
15. RECOGNISES the role of the European Innovation Council (EIC) in supporting <b>innovative</b> European startups and scaleups <b>and WELCOMES</b>	DE

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
<p><b><u>the announced simplifications of its rules. AGREES that the scale-up financing gap should be reduced as quickly as possible.</u></b> <del>WELCOMES the announced extensions and simplifications as well as</del> <b><u>TAKES NOTE of the reasoning for a Scaleup Europe Fund, to be set up as part of the EIC Fund in collaboration with the private sector</u></b>, to help bridge the financing gap of deep-tech scale-up companies. INVITES the Commission to <del>position</del> <b><u>provide more information about the Scaleup Europe Fund and to position it</u></b> clearly in the overall funding landscape with synergies to other <b><u>Union, national, and regional</u></b> instruments. CALLS on the Commission to <del>define</del> <b><u>swiftly propose the Fund's set-up and governance structure and sources of finance of the Scaleup Europe Fund</u></b>, as well as strategic sectors to be supported under the current Multiannual Financial Framework (MFF), before the end of 2025, <b><u>without prejudice to the negotiations on the post-2027 MFF.</u></b></p>	<p><b>(Drafting Suggestions):</b></p> <p>15. RECOGNISES in addition to private investments the importance of the role of the European Innovation Council (EIC) in supporting <b>innovative</b> European startups and scaleups <b>and WELCOMES the announced simplifications of its rules. AGREES that the scale-up financing gap should be reduced as quickly as possible.</b> <del>WELCOMES the announced extensions and simplifications as well as</del> <b><u>TAKES NOTE of the reasoning for a Scaleup Europe Fund, to be set up as part of the EIC Fund in collaboration with the private sector</u></b>, to help bridge the financing gap of deep-tech scale-up companies. <b>INVITES CALLS on</b> the Commission to <del>position</del> <b><u>provide more information about the Scaleup Europe Fund and to position it</u></b> clearly in the overall funding landscape with synergies to other <b><u>Union, national, and regional</u></b> instruments. CALLS on the Commission to <del>define</del> <b><u>swiftly propose the Fund's set-up and governance structure and available sources of finance of the Scaleup Europe Fund</u></b>, as well as <b>the</b> strategic sectors to be supported <b>with available means</b> under the current Multiannual Financial Framework (MFF), before the end of 2025, <b><u>without prejudice to the negotiations on the post-2027 MFF.</u></b> <b>INVITES the Commission to conduct a market sounding with regard to the selected sectors, needs of the market and private investor appetite.</b></p> <p>EL  <b>(Comments):</b></p> <p>We agree with the new version of this paragraph. Access to funding for startups and scaleups is very important in the framework of “the complex dynamics of innovation” that is correctly mentioned in the draft text (art.1). Moreover we strongly agree with the invitation to the Commission to provide more information on the role of the Scaleup Europe Fund and, even more, in relation to other existing funding Instruments.</p> <p>ES</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p><b>(Drafting Suggestions):</b></p> <p>15. RECOGNISES the role of the European Innovation Council (EIC) in supporting <b>innovative</b> European startups and scaleups <b>and WELCOMES the announced simplifications of its rules. AGREES that the scale-up financing gap should be reduced as quickly as possible.</b> <del>WELCOMES the announced extensions and simplifications as well as</del> <b>TAKES NOTE of the reasoning for a</b> Scaleup Europe Fund, to be set up as part of the EIC Fund <b>in collaboration with the private sector, and InvestEU support</b>, to help bridge the financing gap of deep-tech scale-up companies <b>within the scaling phase.</b> INVITES the Commission to <del>position</del> <b>provide more information about</b> the Scaleup Europe Fund <b>and to position it</b> clearly in the overall funding landscape with synergies to other <b>Union, national, and regional</b> instruments. CALLS on the Commission to <del>define</del> <b>swiftly propose</b> the Fund's set-up and governance structure <b>and sources of finance of the Scaleup Europe Fund</b>, as well as strategic sectors to be supported under the current Multiannual Financial Framework (MFF), <b>before the end of 2025, without prejudice to the negotiations on the post-2027 MFF.</b></p> <p>ES</p> <p><b>(Comments):</b></p> <p>With a proper definition of scaleups (some of the most popular are shown below), this Scaleup Europe Fund is targeting deep tech companies in a stage quite more mature than the expected one to be supported under the EIC within Horizon Europe. While it makes sense to build on the experience of the direct fund management used under the EIC to set this new fund (in comparison with the indirect instruments used within the InvestEU initiative), the source of this new fund can not come from Horizon Europe program, but from InvestEU.</p> <p>Furthermore, its urgency to be set up before the end of the year is not that critical if it is based on a wrong approach. (the EIC pilot was launched in 2018 under a format which was not technically feasible in 2020, and took two years more to become operative until sept 2022)</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>(The traditional definition from OCDE defines scale-ups as businesses that experience annualised growth in employment or turnover of at least 10% over a three-year period, having had at least 10 employees at the start of this period. (<a href="https://www.oecd.org/en/about/programmes/helping-smes-scale-up.html">https://www.oecd.org/en/about/programmes/helping-smes-scale-up.html</a> )</p> <p>The tech scaleup definition, i.e. used by StartupGenomes, does not trust on company KPIs but on money raised from VCs. They consider a tech scaleup when they are getting a Series B from investors or when they reach company valuations of at least 50M€. <a href="https://startupgenome.com/article/defining-a-tech-scaleup">https://startupgenome.com/article/defining-a-tech-scaleup</a>.</p> <p>The EIB in their scale-up gap report defines an scaleup as companies that have successfully concluded a deal with a post-money valuation of between \$500 million and \$10 billion. <a href="https://www.eib.org/en/publications/20240130-the-scale-up-gap">https://www.eib.org/en/publications/20240130-the-scale-up-gap</a>)</p> <p>FR</p> <p><b>(Drafting Suggestions):</b></p> <p>RECOGNISES the role of the European Innovation Council (EIC) in supporting <b>innovative</b> European startups and scaleups <b>and WELCOMES the announced simplifications of its rules and the Commission’s intention to draw inspiration from ARPA-like practices and ask for further details in this regard. AGREES that the scale-up financing gap should be reduced as quickly as possible. WELCOMES the announced extensions and simplifications as well as TAKES NOTE of the reasoning for a Scaleup Europe Fund, to be set up as part of the EIC Fund in collaboration with the private sector</b>, to help bridge the financing gap of deep-tech scale-up companies. INVITES the Commission to <b>provide more information about the Scaleup Europe Fund and to position it</b> clearly in the overall funding landscape with synergies to other <b>Union, national, and regional</b> instruments. CALLS on the Commission to <b>define swiftly propose</b> the Fund’s set-up and governance structure <b>and sources of finance of the Scaleup Europe Fund</b>, as well as strategic sectors to be</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>supported under the current Multiannual Financial Framework (MFF), before the end of 2025, <b><u>without prejudice to the negotiations on the post-2027 MFF.</u></b></p> <p>FR (Comments):</p> <p>French authorities support the experimentation of ‘ARPA-style practices’ in the EIC, and asks for further details regarding its implementation.</p> <p>NL (Drafting Suggestions):</p> <p>RECOGNISES the role of the European Innovation Council (EIC) in supporting <b><u>innovative</u></b> European startups and scaleups <b><u>and WELCOMES the announced simplifications of its rules. AGREES that the scale-up financing gap should be reduced as quickly as possible.</u></b> <del>WELCOMES the announced extensions and simplifications as well as</del> <b><u>TAKES NOTE of the reasoning for a</u></b> <b><u>WELCOMES the</u></b> Scaleup Europe Fund, to be set up as part of the EIC Fund <b><u>in collaboration with the private sector</u></b>, to help bridge the financing gap of deep-tech scale-up companies. INVITES the Commission to <del>position</del> <b><u>provide more information about</u></b> the Scaleup Europe Fund <b><u>and to position it</u></b> clearly in the overall funding landscape with synergies to other <b><u>Union, national, and regional</u></b> instruments. CALLS on the Commission to <del>define</del> <b><u>swiftly propose</u></b> the Fund’s set-up and governance structure <b><u>and sources of finance of the Scaleup Europe Fund</u></b>, as well as strategic sectors to be supported under the current Multiannual Financial Framework (MFF), before the end of 2025, <b><u>without prejudice to the negotiations on the post-2027 MFF.</u></b></p> <p>NL (Comments):</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>In order to be consistent it is necessary to welcome the Scaleup Europe Fund after the text agrees that the scale-up financing gap should be reduced as quickly as possible.</p> <p>SE (Drafting Suggestions):</p> <p>RECOGNISES the role of the European Innovation Council (EIC) in supporting innovative European startups and scaleups and WELCOMES the announced simplifications of its rules. <b>TAKES NOTE of the Commissions view AGREES</b> that the scale-up financing gap should be reduced as quickly as possible. WELCOMES the announced extensions and simplifications as well as TAKES NOTE of the reasoning for a Scaleup Europe Fund, to be set up as part of the EIC Fund in collaboration with the private sector, to help bridge the financing gap of deep-tech scale-up companies. INVITES the Commission to position provide more information about the Scaleup Europe Fund and to position it clearly in the overall funding landscape with synergies to other Union, national, and regional instruments. <b>INVITES the Commission to provide more information about</b> <del>CALLS on the Commission to define swiftly propose</del> the Fund’s set-up and governance structure and sources of finance <b>through reprioritization</b> of the Scaleup Europe Fund, <del>as well as strategic sectors to be supported</del> under the current Multiannual Financial Framework (MFF), before the end of 2025, without prejudice to the negotiations on the post-2027 MFF.</p> <p>SE (Comments):</p> <p>Sweden welcomes the cautious position that calls for more information and for the fund to be fully financed. However, we believe it goes too far to, in the same paragraph where a fund is discussed and with the upcoming MFF negotiations, agree that a very large financing gap should be filled. This should primarily be done by private actors.</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	Regarding the reasoning on strategic sectors, see comments on paragraph 19.
<p>16. RECOGNISES that, in line with the subsidiarity principle, initial small funding <del>amounts</del> <b>rounds</b> targeted at the early stages from ideation to startup creation should be covered at national/regional level to facilitate the interaction between the individual <b><u>innovator or</u></b> researcher and the <b><u>relevant national/regional</u></b> funding body. <b><u>INVITES the Commission, Member States, and regional authorities to explore synergies with cohesion policy.</u></b></p> <p><del>CONSIDERS that shared language and proximity are key to building a trusted relationship allowing for more efficient and effective decisions on support to be taken.</del></p>	<p>EE <b>(Drafting Suggestions):</b></p> <p>16. RECOGNISES that, in line with the subsidiarity principle, initial small funding <del>amounts</del> <b>rounds</b> targeted at the early stages from ideation to startup creation should be covered at national/regional/<b><u>institutional</u></b> level <del>to facilitate the interaction between the individual <b><u>innovator or</u></b> researcher and the <b><u>relevant national/regional</u></b> funding body.</del> <b><u>INVITES the Commission, Member States, and regional authorities to explore synergies with cohesion policy.</u></b> <del>CONSIDERS that shared language and proximity are key to building a trusted relationship allowing for more efficient and effective decisions on support to be taken.</del></p> <p>EE <b>(Comments):</b></p> <p>We support LT. Wording as it is now leaves the impression that the purpose of national/regional funding is to mediate interaction, not to act as a stepping stone for the ideas.</p> <p>ES <b>(Drafting Suggestions):</b></p> <p>16. RECOGNISES that, in line with the subsidiarity principle, initial <b>small</b> funding <del>amounts</del> <b>rounds</b> targeted at the early stages from ideation to startup creation should be covered at national/regional level to facilitate the interaction between the individual <b><u>innovator or</u></b> researcher and the <b><u>relevant national/regional</u></b> funding body. <b><u>INVITES the Commission, Member States, and regional authorities to explore synergies with cohesion policy.</u></b> <del>CONSIDERS that shared language and proximity are key to building a</del></p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>trusted relationship allowing for more efficient and effective decisions on support to be taken.</p> <p>ES (Comments):</p> <p>We welcome the rewording. We would suggest keeping only the “initial”, as the “small” may be understood different across MS and sectors. The invitation, within the second part of the recital seems a bit wide.</p> <p>FR (Comments):</p> <p>FR welcomes the addition related to synergies.</p> <p>LT (Drafting Suggestions):</p> <p>16. RECOGNISES that, in line with the subsidiarity principle, initial small funding amounts <b>rounds</b> targeted at the early stages from ideation to startup creation should be covered at national/regional/<b>institutional</b> level <del>to facilitate the interaction between the individual innovator or researcher and the relevant national/regional funding body.</del> <b><u>INVITES the Commission, Member States, and regional authorities to explore synergies with cohesion policy.</u></b> <del>CONSIDERS that shared language and proximity are key to building a trusted relationship allowing for more efficient and effective decisions on support to be taken.</del></p> <p>LT (Comments):</p> <p>We thank for the oral explanation during last RWP meeting regarding this para. We fully understand the message that first small investments at local level are very important in the creation of startups and their further developments. Hence, we suggest adding institutional level as in some higher education</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>institutions and RTOs this support exists and is the closest one to the individual researcher/innovator.                      However, the last part of this sentence creates unnecessary confusion. In our opinion this part should be deleted as the first part is enough to convey the message.</p> <p>PT                      (Comments):</p> <p>– PT agrees given the importance of developing synergies, including with cohesion policy, for the success of the European Strategy for Start-ups and Scale-ups. However, if no consensus is reached, we can support a compromise on an alternative wording.</p> <p>SE                      (Comments):</p> <p>What is the reasoning behind the addition to explore synergies with the cohesion policy?</p>
<p>17. UNDERSTANDS <del>INVITES</del> <b>the Commission to explain</b> the proposed extension of the EIC accelerator programme to dual use <b>applications</b> in view of the geopolitical situation. NOTES the proposal from the Commission to support high-tech defence startups and scaleups <b>through separate instruments</b>. <del>however,</del> <b>QUESTIONS, however,</b> if separate instruments are needed which will just add complexity and silos to the <b>Union</b> funding landscape. <del>ENCOURAGES the Commission to define what existing instruments will be leveraged to support European security and defence startups and scaleups and to build strategic bridges between the EIC and the European Defence Fund.</del> <b>HIGHLIGHTS</b> that the targeted support of single entities within defence through R&amp;I instruments should not compromise the</p>	<p>AT                      (Comments):</p> <p>While AT is open for allowing dual use applications, we <b>reject the use of budgetary means from the Framework Programme for pure defence applications.</b></p> <p>A <b>clear distinction of tasks</b> between Horizon Europe and the European Defence Fund is therefore needed and budgetary demarcations need to be respected.</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
<p><del>principles of open competition and excellence.</del> <b><u>HIGHLIGHTS that R&amp;I targeted instruments should always be driven by the principles of open competition and excellence.</u></b></p>	<p>One has to differentiate between ‘use of instruments’ and ‘use of funding’. While the mere ‘use of EIC as an instrument’ (by other funds than Horizon Europe) seems imaginable, AT is strictly against the use of Horizon Europe funding for Defence-only projects. Funding for ‘Defence-only projects’ must exclusively stem from EDF.</p> <p>CZ (Drafting Suggestions):</p> <p><b><u>INVITES the Commission to explain UNDERSTANDS</u></b> the proposed extension of the EIC accelerator programme to dual use <b><u>applications</u></b> in view of the geopolitical situation. NOTES the proposal from the Commission to support high-tech defence startups and scaleups <b><u>through separate instruments</u></b>, however, QUESTIONS, <b><u>however</u></b>, if separate instruments are needed, which will just add complexity and silos to the <b><u>Union</u></b> funding landscape. <b><u>ENCOURAGES the Commission to define what existing instruments will be leveraged to support European security and defense startups and scaleups and to build strategic bridges between the EIC and the European Defense Fund.</u></b> <b><u>HIGHLIGHTS that R&amp;I targeted instruments should always be driven by the principles of open competition and excellence.</u></b></p> <p>CZ (Comments):</p> <p><b><u>CZ prefers the previous wording of the paragraph, as the current wording is a bit unclear. CZ believes that the reasons for inclusion of the dual-use applications into the EIC have already been explained by the EC, both to the RWP and while the omnibus package had been discussed. CZ is not against the inclusion of the dual use applications in the EIC, as the global security context changed dramatically in the previous years and sticking to the past solutions in a new security situation would have been unwise.</u></b></p> <p>EE</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p><b>(Drafting Suggestions):</b></p> <p>17. UNDERSTANDS <del>INVITES UNDERSTANDS</del> <b><u>the Commission to explain</u></b> the proposed extension of the EIC accelerator programme to dual use <b><u>applications</u></b> in view of the geopolitical situation. NOTES the proposal from the Commission to support high-tech defence startups and scaleups <b><u>through separate instruments.</u></b>; however, QUESTIONS, <b><u>however,</u></b> if separate instruments are needed which will just add complexity and silos to the <b><u>Union</u></b> funding landscape. ENCOURAGES the Commission to define what existing instruments will be leveraged to support European security and defence startups and scaleups and to build strategic bridges between the EIC and the European Defence Fund. HIGHLIGHTS that the targeted support of single entities within defence through R&amp;I instruments should not compromise the principles of open competition and excellence. <b><u>HIGHLIGHTS that R&amp;I targeted instruments should always be driven by the principles of open competition and Excellence and encourage the Member States to cooperate/exchange by initiating priority-based alliances in critical technologies.</u></b></p> <p>EE <b>(Comments):</b> We Support LT on comments regarding the Council’s capability to understand geopolitical situation and regarding the reality of R&amp;I targeted instruments. We’d like to add amendment to the last sentence - in order to gain a competitive advantage and build competence in critical technologies and areas requiring high investment, such as AI and deep technology, it would be wise for Member States to cooperate in clusters based on priorities and strengths, rather than investing in the creation of national centres.</p> <p>ES <b>(Comments):</b> The rewording is a bit confusing.</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>As previously commented, the EIC budget and potential support within this budget to the dual use community is very limited to justify the openness of HE to defence technologies at this point, considering the current budget already devoted to defence in the EDF.</p> <p>FI (Drafting Suggestions):</p> <p><del><b>INVITES the Commission to explain</b></del> the proposed extension of the EIC accelerator programme to dual use <u>applications</u> in view of the geopolitical situation. <del>NOTES the proposal from the Commission to support high tech defence startups and scaleups <u>through separate instruments.</u>, however, QUESTIONS, however,</del> if separate instruments are needed which will just add complexity and silos to the <u>Union</u> funding landscape.</p> <p>FI (Comments):</p> <p>We find the new wording very negative, considering also the latest Competitiveness Council ministerial discussion, where the need to support dual use RDI seemed to receive rather wide support. We would prefer a positive or minimally a more neutral tone. We could accept the earlier formulation of the paragraph or deleting the text if consensus seems unlikely.</p> <p>HR (Drafting Suggestions):</p> <p>17. UNDERSTANDS <del><b>INVITES the Commission to explain</b></del> <b>Acknowledges</b> the proposed extension of the EIC accelerator programme to dual use <u>applications</u> in view of the geopolitical situation. <del>NOTES the proposal from the Commission to support high-tech defence startups and scaleups <u>through separate instruments.</u>, however, QUESTIONS, however,</del> if separate instruments are needed which will just add complexity and silos to the <u>Union</u> funding landscape. <del>ENCOURAGES the Commission to define what existing instruments will be leveraged to support European security and</del></p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>defence startups and scaleups and to build strategic bridges between the EIC and the European Defence Fund. <u>HIGHLIGHTS that the targeted support of single entities within defence through R&amp;I instruments should not compromise the principles of open competition and excellence.</u></p> <p><u>HIGHLIGHTS that R&amp;I targeted instruments should always be driven by the principles of open competition and excellence.</u></p> <p>IE (Drafting Suggestions):</p> <p>17. UNDERSTANDS <u>INVITES the Commission to explain</u> the proposed extension of the EIC accelerator programme to dual use <u>applications</u> in view of the geopolitical situation. NOTES the proposal from the Commission to support high-tech defence startups and scaleups <u>through separate instruments.</u>; however, <u>QUESTIONS, however, if separate instruments are needed which will just add complexity and silos to the Union funding landscape.</u> ENCOURAGES the Commission to define what existing instruments will be leveraged to support European security and defence startups and scaleups and to build strategic bridges between the EIC and the European Defence Fund. <u>HIGHLIGHTS that the targeted support of single entities within defence through R&amp;I instruments should not compromise the principles of open competition and excellence.</u> <u>HIGHLIGHTS that R&amp;I targeted instruments should always be driven by the principles of open competition and excellence.</u></p> <p>IE (Comments):</p> <p>Ireland cannot support this paragraph as currently drafted. We maintain our scrutiny reservation on this paragraph.</p> <p>While Ireland recognises the changed geopolitical context, our preference is to maintain the civilian focus of the FPs. Any suggestion that pure defence technologies could be funded under the FPs is a red line issue for Ireland.</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>The EDF and EDIP would seem to be more appropriate instruments to use to develop defence and dual use related R&amp;I supports.</p> <p>Given the diversity of views expressed at the last RWP meeting and in the previous round of written comments, further consideration of the implications of moving away from an exclusively civilian FP are required. Given time constraints and ongoing discussions by the DIWP, it may not be possible to do so in time for these Conclusions.</p> <p>LT  (Drafting Suggestions):</p> <p>17. <del>UNDERSTANDS</del> <b>UNDERSTANDS INVITES the Commission to explain</b> the proposed extension of the EIC accelerator programme to dual use <b>applications</b> in view of the geopolitical situation. NOTES the proposal from the Commission to support high-tech defence startups and scaleups <b>through separate instruments.</b>; however, <del>QUESTIONS,</del> <b>however,</b> if separate instruments are needed which will just add complexity and silos to the <b>Union</b> funding landscape. <del>ENCOURAGES the Commission to define what existing instruments will be leveraged to support European security and defence startups and scaleups and to build strategic bridges between the EIC and the European Defence Fund. HIGHLIGHTS that the targeted support of single entities within defence through R&amp;I instruments should not compromise the principles of open competition and excellence. HIGHLIGHTS that R&amp;I targeted instruments should</del> <b>always be driven by the principles of open competition and excellence and encourage the Member States to cooperate by initiating alliances in critical technologies.</b></p> <p>LT  (Comments):</p> <p>We strongly believe that the Council understands the geopolitical situation itself and that there is no need for the Commission to explain to the Council</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>the necessity to embrace dual use applications. Furthermore, this topic is already discussed in another Council configuration. We suggest keeping the previous version in order to convey a coherent message across the Council.</p> <p>The word “always” is not compatible with reality nor with current HEU regulation (where we also have a strong emphasis on impact and feasibility). Furthermore, we support EE suggestion on the need to pull resources. We agree that to gain a competitive advantage and build competence in critical technologies and areas requiring high investment, such as AI and deep technology, it would be wise for Member States to make alliances, rather than investing in the creation of national centres.</p> <p>NL  <b>(Drafting Suggestions):</b>  <del>UNDERSTANDS</del> <b>INVITES the Commission to explain</b> the proposed extension of the EIC accelerator programme to dual use <b>applications</b> in view of the geopolitical situation. <del>NOTES</del> the proposal from the Commission to support high-tech defence startups and scaleups <b>through separate instruments.</b>, <del>however,</del> <b>QUESTIONS, however,</b> if separate instruments are needed which will just add complexity and silos to the <b>Union</b> funding landscape. <b>EMPHASIZES the added value of synergy between separate civilian and military research programmes, for example through spin-in mechanisms.</b> <del>ENCOURAGES</del> the Commission to define what existing instruments will be leveraged to support European security and defence startups and scaleups and to build strategic bridges between the EIC and the European Defence Fund. <del>HIGHLIGHTS</del> that the targeted support of single entities within defence through R&amp;I instruments should not compromise the principles of open competition and excellence. <b>HIGHLIGHTS that R&amp;I targeted instruments should always be driven by the principles of open competition and excellence. STRESSES that their implementation rules and conditions should integrate aspects such as but not limited to</b></p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p><u>possibilities for international cooperation, the accessibility for entities from outside the defence sector, proportional security requirements, ethical frameworks and the application of open science.</u></p> <p>NL (Comments):</p> <p>Suggestion on synergy aims to show how separate programmes can benefit each other, avoiding silo effects.</p> <p>Last suggestion adds relevant principles of R&amp;I targeted instruments, in addition to open competition and excellence.</p> <p>PL (Drafting Suggestions):</p> <p><b><u>INVITES the Commission to explain</u></b> the proposed extension of the EIC accelerator programme to dual use <b><u>applications</u></b> in view of the geopolitical situation. <del>NOTES the proposal from the Commission to support high-tech defence startups and scaleups <b><u>through separate instruments.</u></b>, however, QUESTIONS, <b><u>however,</u></b> if separate instruments are needed which will just add complexity and silos to the <b><u>Union</u></b> funding landscape. <del>ENCOURAGES the Commission to define what existing instruments will be leveraged to support European security and defence startups and scaleups and to build strategic bridges between the EIC and the European Defence Fund. HIGHLIGHTS that the targeted support of single entities within defence through R&amp;I instruments should not compromise the principles of open competition and excellence.</del> <b><u>HIGHLIGHTS that R&amp;I targeted instruments should always be driven by the principles of open and fair competition, and excellence.</u></b></del></p> <p>PL (Comments):</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>We highlight the importance of <b>open and fair competition</b> for identifying excellent projects to be funded.</p> <p>PT                      (Drafting Suggestions):</p> <p>17. <del>UNDERSTANDS-INVITES the Commission to explain</del> the proposed extension of the EIC accelerator programme to dual use <b>applications</b> in view of the geopolitical situation. NOTES the proposal from the Commission to support high-tech defence startups and scaleups <b>through separate instruments</b>; <del>however,</del> <b>QUESTIONING, however,</b> if separate instruments are needed which will just add complexity and silos to the <b>Union</b> funding landscape. <del>ENCOURAGES the Commission to define what existing instruments will be leveraged to support European security and defence startups and scaleups and to build strategic bridges between the EIC and the European Defence Fund.</del> <b>HIGHLIGHTS that the targeted support of single entities within defence through R&amp;I instruments should not compromise the principles of open competition and excellence. HIGHLIGHTS that R&amp;I targeted instruments namely the Horizon Europe should always be driven by the principles of open competition and excellence and solely channelled to R&amp;I activities. Furthermore, ENCOURAGES the Commission to build strategic bridges between the EIC and the European Defence Fund, ensuring that any financing for dual-use applications comes from the European Defence Fund's budget.</b></p> <p>PT                      (Comments):</p> <p>PT supports that the main instrument to support R&amp;I at EU level should be driven by the principles of competition and excellence and solely channelled to R&amp;I activities.</p> <p>Furthermore, we consider that by deleting the phrase encouraging the Commission to "build strategic bridges between the EIC and the European Defence Fund (EDF)", the main argument for ensuring that dual-use</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>technology funding comes from the defence budget and not from Horizon Europe (civil R&amp;I) is lost.</p> <p>SE (Comments):</p> <p>Sweden welcomes extension to dual use applications, but underlines SE is opposed to extension of EIC to pure military/defence applications in the next MFF.</p>
<p>18. INVITES the Commission to simplify the landscape of funding instruments and service platforms for startups and scaleups, as well as the landscape of mobility instruments for students, researchers and workers under the current MFF- <b>by establishing</b> <del>Enable</del> a ‘one stop’ access portal guiding the user to the best option in a resource efficient way. <del>CONSIDERS integrating to the extent possible also i</del>Information about national programmes and their access requirements <b>and information on venture capital and other private investments for startups and scaleups, should also be integrated to the extent possible</b>. ADVISES <b>RECOMMENDS</b> that the Commission considers introducing proof of concept or proof of market options for <b>all</b> relevant EU <b>Union</b> funded research and innovation (R&amp;I) projects <b>and not only within the ERC and EIC</b>. ENCOURAGES the Commission to find new methods to raise awareness and promote the use of innovative technologies in the public and private sector. ADVOCATES a more proactive use of pre-commercial procurement to establish <del>such</del> interfaces <b>between innovators and procurers in the public and private sector</b>.</p>	<p>ES (Drafting Suggestions):</p> <p>18. INVITES the Commission to simplify the landscape of funding instruments and service platforms for startups and scaleups, as well as the landscape of mobility instruments for students, researchers and workers under the current MFF- <b>by establishing</b> <del>Enable</del> a ‘one stop’ access portal guiding the user to the best option in a resource efficient way. <del>CONSIDERS integrating to the extent possible also i</del>Information about national programmes and their access requirements <b>and information on venture capital and other private investments for startups and scaleups, should also be integrated to the extent possible</b>. ADVISES <b>RECOMMENDS</b> that the Commission considers introducing proof of concept or proof of market options for <b>all</b> relevant EU <b>Union</b> funded research and innovation (R&amp;I) projects <b>and not only within the ERC and EIC</b>. ENCOURAGES the Commission to find new methods to raise awareness and promote the use of innovative technologies in the public and private sector. ADVOCATES a more proactive use of pre-commercial procurement to establish <del>such</del> interfaces <b>between innovators and procurers in the public and private sector especially in areas such as health, in which public sector is the main client</b>.</p> <p>ES</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p><b>(Comments):</b></p> <p>The “one stop” concept is nice in design but in practice, most of the previous attempts to build one have failed in guaranteeing that the national and regional references included there are kept updated and useful. We welcome that the proof of concept or proof of market options can be a standard option for all R&amp;I funded projects.</p> <p>As public healthcare systems are the main purchasers of health products (similar situation for defense), promoting public innovation procurement (including Public Procurement of Innovative solutions, PPI, and Pre-commercial Procurement, PCP) would accelerate the adoption of new technologies and services.</p> <p>FR</p> <p><b>(Drafting Suggestions):</b></p> <p>INVITES the Commission to simplify the landscape of funding instruments and service platforms for startups and scaleups, as well as the landscape of mobility instruments for students, researchers and workers under the current MFF- <b>by establishing</b> <del>Enable</del> a ‘one stop’ access portal guiding the user to the best option in a resource efficient way. <del>CONSIDERS integrating to the extent possible also i</del>Information about national programmes and their access requirements <b>and information on venture capital and other private investments for startups and scaleups, should also be integrated to the extent possible.</b> ADVISES <b>RECOMMENDS</b> that the Commission considers introducing proof of concept or proof of market options for <b>all</b> relevant <b>EU Union</b> funded <del>research and innovation (R&amp;I)</del> projects <b>and not only within the ERC and EIC.</b> ENCOURAGES the Commission to find new methods to raise awareness and promote the use of innovative technologies in the public and private sector. ADVOCATES a more proactive use of pre-commercial procurement to establish <del>such</del> interfaces <b>between innovators and procurers in the public and private sector.</b> <b>To</b></p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p><u>this end, RECOMMENDS the introduction of a principle of European preference which is not limited to certain sectors, and the introduction of an European definition of innovative purchasing.</u></p> <p>FR                      (Comments):</p> <p>Although we support the promotion of pre-commercial procurement, it could first benefit to our global competitors in the absence of a European preference principle. If the objective of the strategy is to support startups and scaleups in Europe, there should be clear rules to ensure EU funding is oriented towards them.</p> <p>NL                      (Drafting Suggestions):</p> <p>INVITES the Commission to simplify the landscape of funding instruments and service platforms for startups and scaleups, as well as the landscape of mobility instruments for students, researchers and workers under the current MFF- <u>by establishing</u> <del>Enable</del> a ‘one stop’ access portal guiding the user to the best option in a resource efficient way. <b>EMPHASIZES that simplification should benefit the beneficiaries.</b> <del>CONSIDERS integrating to the extent possible also i</del>Information about national programmes and their access requirements <b>and information on venture capital and other private investments for startups and scaleups, should also be integrated to the extent possible.</b> <del>ADVISES</del> <b>RECOMMENDS</b> that the Commission considers introducing proof of concept or proof of market options for <b>all</b> relevant EU <b>Union</b> funded <del>research and innovation (R&amp;I)</del> projects <b>and not only within the ERC and EIC.</b> ENCOURAGES the Commission to find new methods to raise awareness and promote the use of innovative technologies in the public and private sector. <b>ADVOCATES a more proactive use of pre-commercial procurement to establish such interfaces between innovators and procurers in the public and private sector.</b></p> <p>NL</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>(Comments):</p> <p>Simplification should benefit the beneficiary, not the Commission.</p> <p>PL</p> <p>(Drafting Suggestions):</p> <p><b>RECOMMENDS</b> that the Commission <del>considers-introduces</del> proof of concept or proof of market options for <b>all</b> relevant EU <b>Union</b> funded research and innovation (R&amp;I) projects <b><u>and not only within the ERC and EIC.</u></b></p> <p>PL</p> <p>(Comments):</p> <p>PL strongly supports the recommendation to introduce proof of concept and proof of market options for all relevant EU-funded projects. This would ensure a stronger connection between R&amp;D results and successful market uptake, especially important for Widening countries' innovators.</p> <p>SE</p> <p>(Drafting Suggestions):</p> <p>INVITES the Commission to simplify the landscape of funding instruments and service platforms for startups and scaleups, as well as the landscape of mobility instruments for students, researchers and workers under the current MFF. <del>by establishing</del> <b>Encourages the commission to also consider</b> <del>Enable</del> a 'one stop' access portal guiding the user to the best option in a resource efficient way.</p> <p>SE</p> <p>(Comments):</p> <p>Sweden believes that it is more efficient to simplify the landscape of funding instruments and services platforms in its own. It can also be considered to add a one stop guide to the more simplified landscape.</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
A STRONG IMPLEMENTATION	
<p>19. <i>[previous para 3]</i> CALLS on the Commission, <b><u>in collaboration with Member States</u></b>, to identify emerging technological trends and disruptive technologies across <b><u>Union, national, and regional programmes</u></b> parts of Horizon Europe <b><u>and disseminate the findings across these programmes</u></b>. CONSIDERS that the knowledge on trends should be disseminated across all programmes supporting R&amp;I at EU level and shared with Member States. ENCOURAGES <b><u>the Commission and</u></b> Member States and the Commission to engage in close dialogue on future strategic priority areas, including <b><u>for</u></b> key technologies, <b><u>based on the acquired evidence</u></b>.</p>	<p>ES  <b>(Comments):</b>                      We welcome the rewording of this recital.</p> <p>NL  <b>(Drafting Suggestions):</b>  <i>[previous para 3]</i> CALLS on the Commission, <b><u>in collaboration with Member States</u></b>, to identify emerging technological trends and disruptive technologies across <b><u>Union, national, and regional programmes</u></b> parts of Horizon Europe <b><u>and disseminate the findings across these programmes</u></b>. CONSIDERS that the knowledge on trends should be disseminated across all programmes supporting R&amp;I at EU level and shared with Member States. ENCOURAGES <b><u>the Commission and</u></b> Member States and the Commission to engage in close dialogue on future strategic priority areas, including <b><u>for</u></b> key technologies <b><u>and research areas, based on the acquired evidence, which should guide the programming of thematically driven areas of the framework programme for research and innovation.</u></b></p> <p>NL  <b>(Comments):</b>                      We should not only hold a dialogue but move towards strategic programming in Horizon Europe on the basis of the identification of key technology &amp; research areas.</p> <p>SE  <b>(Drafting Suggestions):</b></p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>CALLS on the Commission, in collaboration with Member States, to identify emerging <del>technological</del> trends and <b>clear market failures disruptive technologies</b> across Union, national, and regional programmes parts of Horizon Europe and disseminate the findings across these programmes. CONSIDERS that the knowledge on trends should be disseminated across all programmes supporting R&amp;I at EU level and shared with Member States. ENCOURAGES the Commission and Member States <del>and the Commission</del> to engage in close dialogue on <b>how to best improve the framework conditions for startups and scaleups</b> <del>future strategic priority areas, including for key technologies</del>, based on the acquired evidence.</p> <p>SE (Comments):</p> <p>Sweden believes it's important to foster good frameworks for innovation, entrepreneurship and a good business climate in the EU. Sweden stands by that prioritization reallocation of resources is best done by the market and has therefore suggested a writing to horizontally support startups and scaleups.</p>
<p>20. [previous para 19] WELCOMES the announced European Startup and Scaleup Scoreboard and the set of Key Performance Indicators (KPIs) <b>and SUGGESTS exploring synergies with the ERA monitoring framework</b>. INVITES the Commission to include strategic sectoral breakdowns for the KPIs, as well as indicators reflecting the contribution of <del>universities</del> <b>higher education institutions</b> and research and technology organisations. HIGHLIGHTS the importance of the availability of <del>and</del> <b>openness of</b> data, <b>and</b> clear methodologies for data collection <del>and open data</del>. REQUESTS a weighting based on population size to be applied for optimal cross-country comparisons. LOOKS FORWARD to the first reporting in 2027.</p>	<p>FR (Drafting Suggestions):</p> <p>20. [previous para 19] WELCOMES the announced European Startup and Scaleup Scoreboard and the set of Key Performance Indicators (KPIs) <b>and SUGGESTS exploring synergies with the ERA monitoring framework</b>. INVITES the Commission to include strategic sectoral breakdowns for the KPIs, as well as indicators reflecting the contribution of <del>universities</del> <b>higher education institutions</b> and research and technology organisations. <b>CALLS for setting up smooth information flows from Member States, with the objective of alleviating reporting burden</b>. HIGHLIGHTS the importance of the availability of <del>and</del> <b>openness of</b> data, <b>and</b> clear methodologies for data collection <del>and open data</del>. REQUESTS a</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>weighting based on population size to be applied for optimal cross-country comparisons. LOOKS FORWARD to the first reporting in 2027.</p> <p>FR  <b>(Comments):</b></p> <p>As mentioned in the Council Recommendation on the 2d ERA Policy Agenda, reporting should not be time-consuming for Member States.</p> <p>IE  <b>(Drafting Suggestions):</b></p> <p>20. [previous para 19] WELCOMES the announced European Startup and Scaleup Scoreboard and the set of Key Performance Indicators (KPIs) <b>and SUGGESTS exploring synergies with the ERA monitoring framework. EMPHASES the importance of minimising the administrative burden when considering the reporting requirements.</b> INVITES the Commission to include strategic sectoral breakdowns for the KPIs, as well as indicators reflecting the contribution of <del>universities</del> <b>higher education institutions</b> and research and technology organisations. HIGHLIGHTS the importance of the availability of <b>and openness of</b> data, <b>and</b> clear methodologies for data collection <del>and open data</del>. REQUESTS a weighting based on population size to be applied for optimal cross-country comparisons. LOOKS FORWARD to the first reporting in 2027.</p> <p>IE  <b>(Comments):</b></p> <p>Careful consideration needs to be given to the potential additional admin burden arising from the proposed reporting measures.</p> <p>LT  <b>(Drafting Suggestions):</b></p> <p>20. [previous para 19] WELCOMES the announced European Startup and Scaleup Scoreboard and the set of Key Performance Indicators (KPIs)</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p><b>and SUGGESTS exploring synergies with the ERA monitoring Framework or other existing relevant instruments.</b> INVITES the Commission to include strategic sectoral breakdowns for the KPIs, as well as indicators reflecting the contribution of <del>universities</del> <b>higher education institutions</b> and research and technology organisations. HIGHLIGHTS the importance of the availability of <b>and openness of</b> data, <b>and</b> clear methodologies for data collection <del>and open data</del>. REQUESTS a weighting based on population size to be applied for optimal cross-country comparisons. LOOKS FORWARD to the first reporting in 2027.</p> <p>LT  <b>(Comments):</b></p> <p>We think that there could be other more relevant frameworks or instruments in this context, e.g. EIS and RIS, therefore we suggest keeping the explorations for possible synergies more open. However, we leave the decision in the hands of the Presidency.</p> <p>PL  <b>(Drafting Suggestions):</b></p> <p>WELCOMES the announced European Startup and Scaleup Scoreboard and the set of Key Performance Indicators (KPIs) <b>and SUGGESTS exploring synergies with the ERA monitoring framework.</b> INVITES the Commission to include strategic sectoral breakdowns for the KPIs, as well as indicators reflecting the contribution of <del>universities</del> <b>higher education institutions</b> and research and technology organisations. HIGHLIGHTS the importance of the availability of <b>and openness of</b> data, <b>and</b> clear methodologies for data collection <b>and safety</b> <del>and open data</del>. REQUESTS a weighting based on population size to be applied for optimal cross-country comparisons. LOOKS FORWARD to the first reporting in 2027.</p> <p>PL  <b>(Comments):</b></p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p>Security of collected data should be considered.</p> <p>PT (Drafting Suggestions):</p> <p>20. [previous para 19] WELCOMES the announced European Startup and Scaleup Scoreboard and the set of Key Performance Indicators (KPIs). <b><u>Recalling the Commission’s support to the European Startup Nations Alliance (ESNA) enabling up-to-date information and analysis on the startup ecosystem to be made available on a single digital platform, ENCOURAGES the use of ESNA knowledge and, in addition, SUGGESTS exploring synergies with the ERA monitoring framework.</u></b> INVITES the Commission to include strategic sectoral breakdowns for the KPIs, as well as indicators reflecting the contribution of <del>universities</del> <b><u>higher education institutions</u></b> and research and technology organisations. HIGHLIGHTS the importance of the availability of <b><u>and openness of</u></b> data, <b><u>and</u></b> clear methodologies for data collection <del>and open data</del>. REQUESTS a weighting based on population size to be applied for optimal cross-country comparisons. LOOKS FORWARD to the first reporting in 2027.</p> <p>PT (Comments):</p> <p>PT - we stress the importance of referring the monitoring and evaluation of the progress of the EU Start-up and Scale-Up Strategy to ESNA which is already having that as a core mission. See comment to paragraph 8.</p> <p>The support to ESNA was given by: <a href="#">Grant agreement ID: 101072644</a>; and <a href="#">Grant agreement ID: 101200215</a>.</p>
<p>21. [previous para 20] CALLS for a revision of the format and mandate of the EIC Forum to be able to take over <del>a</del> <b><u>the proposed</u></b> coordination and</p>	<p>FR (Drafting Suggestions):</p>

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
<p>monitoring role for the startup and scaleup strategy with the possibility to extend to innovation policy as a whole. <b><u>INVITES the Commission to duly inform the Member States about the implementation of the strategy.</u></b></p>	<p>21. [previous para 20] <del>CALLS for a revision of the format and mandate of the EIC Forum to be able to take over a <b>the proposed</b> coordination and monitoring role for the startup and scaleup strategy with the possibility to extend to innovation policy as a whole. <b><u>INVITES the Commission to duly inform and consult the Member States about the implementation of the strategy.</u></b></del></p> <p>FR (Comments):</p> <p>Since most measures announced in the EC strategy are in the hands of the Commission, we need to understand what would be the added value of the EIC Forum (or any other instance if not the EIC Forum) in terms of coordination and monitoring. While we agree on the need for a strong monitoring of the implementation of the strategy, without any further information on what will be exactly expected for Member States, France cannot support this first sentence. If monitoring is just about Member States providing data and the Commission reporting on its progress in implementing the initiatives announced in its strategy, there is no need for a specific group. Regular updates from the Council should be sufficient. Especially since today the EIC Forum is merely a top-down body where the Commission simply makes presentations to Member States, who no longer even bother to attend in person.</p> <p>IE (Drafting Suggestions):</p> <p>21. [previous para 20] CALLS for a revision of the format and mandate of the EIC Forum to be able to take over <del>a</del> <b><u>the proposed</u></b> coordination and monitoring role for the startup and scaleup strategy with the possibility to extend to innovation policy as a whole. <b><u>INVITES URGES the Commission to duly inform consult the Member States about the implementation of the strategy.</u></b></p> <p>IE</p>

**Draft Council conclusions on the importance of R&I for the EU startup and scaleup strategy**

**From: AT, BE, CZ, DE, EE, EL, ES, FI, FR, HR, IE, IT, LT, MT, NL, PL, PT, SE**

Deadline: *20 August 2025*

Updated: 25/08/2025 15:02

Presidency text (doc. 11624/25)	Drafting Suggestions and Comments
	<p><b>(Comments):</b></p> <p>It is important that MS have a central role in the implementation of R&amp;I policy, including the R&amp;I dimension of the startup and scaleup strategy, particularly given the close interlinkages with the implementation of the ERA priorities.</p> <p>PT</p> <p><b>(Comments):</b></p> <p><b>PT</b> - in addition to the importance of clarifying whether the EIC Forum is the appropriate mechanism to define the implementation of the monitoring framework of the strategy, it is necessary to promote further coordination between the monitoring role of the EIC Forum and the ongoing work on the actions of the European Research Area, including through the ERA Forum or, where appropriate, with the ERA European Research and Innovation Area Committee.</p>