Council of the European Union
General Secretariat

PUBLIC

Interinstitutional files:
2025/0555 (COD)

Brussels, 02 October 2025

WK 12881/2025 INIT

LIMITE

COMPET	**ENV**	**JAI**
IND	**CLIMA**	**DIGIT**
MI	**AGRI**	**DATAPROTECT**
CADREFIN	**TRANS**	**FREMP**
FIN	**SAN**	**RELEX**
RECH	**PHARM**	**COPS**
ESPACE	**BIOTECH**	**UD**
CONSOM	**POLMIL**	**AUDIO**
DUAL USE	**POLGEN**	**PROCIV**
EDUC	**ECOFIN**	**IPCR**
TELECOM	**COH**	**MAP**
ENER	**INDEF**	**FISC**
	CULT	**CSC**
	CYBER	**CODEC**

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

WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Ad Hoc Working Party on the Multiannual Financial Framework (AHWP MFF) - European Competitiveness Fund
Subject:	Member States comments on proposal for a Regulation on establishing the European Regulation on establishing the European Competitiveness Fund (ECF), including the specific programme for defence research and innovation activities, repealing Regulations (EU) 2021/522, (EU) 2021/694, (EU) 2021/697, (EU) 2021/783, and amending Regulations (EU) 2021/696, (EU) 2023/588, (EU) [EDIP] - comments from IT, IE, HR, FI, EE, DE, CZ, BG, BE, AT, SE, PL, NL, MT, LT, SK, RO, ES, CY, EL, HU, SI, LV, FR

Proposal for a Regulation establishing the European Competitiveness Fund (doc. 11770/1/25 REV 1) Deadline: ***18 September 2025 COB***
From: IT, IE, HR, FI, EE, DE, CZ, BG, BE, AT, SE, PL, NL, MT, LT, SK, RO, ES, CY, EL, HU, SI, LV, FR **Updated: 26/09/2025 11:22**

PUBLIC

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!

Commission proposal	Drafting Suggestions and Comments
General Comments	FI (Comments): It is imperative to strengthen the clarity of the award criteria in ECF by adding and strengthening clauses on excellence, addressing market failures and ensuring non-distortion on the single market. This approach is pivotal for EU to enhance its global competitiveness and is now practically non-visible throughout the regulation proposal. Finland also highlights the importance of leveraging private financing, implementing funding through open competition and that the MS role needs to be strengthened in the governance and design of the Work Programmes. Structure-wise the contents of the policy windows and the instruments provided by the proposal are not matching. More clarity also in that respect is necessary. These critical aspects cannot be left to be designed at the Work Programme level.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	Scrutiny reservation to the whole proposal. DE (Comments): General scrutiny reservation: We are still in the process of examining the very extensive draft regulation in detail. The following comments are therefore preliminary and we reserve the right to make further comments. The European Competitiveness Fund is a key element in modernizing the MFF and is of great importance to the two core priorities of the German federal government, namely strengthening competitiveness and security/defense readiness in Europe. A modernized MFF must prioritize spending with European added value, including investing in future-, innovation- and transformation-oriented spending, as well as the financing of European public goods. In principle, the ECF is a step in the right direction. In principle, we welcome the following: - Consolidation of overlapping funding programs (to increase the desired synergy effects, it is important in that context that key tasks of these programs will be fulfilled more effectively and efficiently), - better venture-capital funding opportunities for start-ups and scale-ups, - wider availability of banking and financial instruments, - central focus on security and defense, including the security and defense industry and support for dual use and defense applications, as well as digitalization, affordable, secure and climate-friendly energy supplies, including infrastructure and projects with significant cross-border impact; - a strengthened and independent framework program for research and innovation closely linked to the Competitiveness Fund, - the consideration of overarching, general objectives in the ECF. - A climate and biodiversity financing quota could support horizontal MFF objectives. However, a number of aspects need to be improved or important questions arise. Key points for us are:

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	- The issue of a more transparent and clear governance and the involvement of the Council in the ECF is an essential point: MS must play a sufficient role in the strategic management of activities. This concerns the work programs in particular. However, key policy elements of the Fund, such as the selection/award criteria cannot be determined in the comitology and/or annual budget procedures. They must be fundamentally and consistently regulated in the Regulation itself, not only in some of its areas (such as Art. 53). In addition, we will pay attention to competence issues with regard to the actors involved. - In addition, funding must solely follow the principles of competition and excellence principles, and mechanisms to ensure predictable support for key strategic technologies must be strengthened. This must be clearly anchored in the text. - We must ensure coherence of heading 1 and heading 2, i.a. as concerns investment opportunities to strengthen competitiveness, innovation and growth. The interplay must be clearly regulated so that both headings complement each other in the best possible way and in the sense of a European added value. - Since the policy windows also include collaborative research in Horizon Europe, the reference to the Horizon Europe Regulation must either be made more clear or specific R&I objectives must be specified. - We will comment on the policy windows in the next round(s). However, while we welcome the consolidation of programmes, the specificities of the sections on defence industry as well as space need to be taken into account. SE (Comments): Many of our drafting suggestions below are related to the need to reflect on how to ensure that the Fund adds value and supports innovation, productivity and economic growth. It is important that public funds can contribute to addressing market failures. NL (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	These are first comments on the proposal. Based on further internal analysis and clarification form the Commission, on the proposal additional tracks might be submitted later in the process. MT (Comments): **Reasonable Timeframes**: The Presidency rightfully has presented a very ambitious timeframe to discuss the European Competitiveness Fund; however it is essential that there would be enough time for Member State Capitals be able to carry out the necessary interministerial consultations on the dossier. One needs to factor in that 14 EU programmes are being placed under one umbrella. **General Scrutiny:** Given the timeframes set the below remarks remain preliminary in nature as consultation is still ongoing with the various line Ministries involved. The possibility of further input and proposed amendments cannot be excluded. **Proportionality and avoidance of excessive administrative burdens, given limited administrative capacity:** Malta stresses the need for proportionality and the avoidance of excessive administrative burdens, given limited administrative capacity. Important to ensure grants remain available alongside financial instruments, as Malta's market size and underdeveloped capital markets limit access to equity/venture funding. **Geographical balancing mechanism:** There needs to be a geographical balancing mechanism to ensure that enterprises in all EU Member States benefit from the European Competitiveness Fund furthermore it is important that excellence is spread throughout the Union and to reinforce a diverse and dynamically competitive Union. **Simplification and Transparency:** Companies and investors need the ECF to be simple, clear and to minimize administrative hurdles. Simplification, transparency, and flexibility must be central tenets in the ECF's governance and operation. The application processes need to be more

Commission proposal	Drafting Suggestions and Comments
	practical and in the case of grant schemes one needs to consider pre-financing to safeguard liquidity requirements particularly of SMEs. **Faster Processing of Applications**: Fast and predictable application and award processes are vital, especially for SMEs, start-ups, and scale-ups looking to grow into globally competitive players. There needs to be minimum levels of response times in the faster processing of applications by using more digital tools and Artificial Intelligence applications. **Deploy the right instrument:** Utilize a comprehensive range of instruments, including grants, equity, guarantees, loans, and blended finance, applying each where it provides the greatest benefit for specific projects. **Important Projects of Common European Interest (IPCEIs) top up:** Malta supports the inclusion of the Important Projects of Common European Interest (IPCEIs) top up possibility. RO (Comments): 1. EFC is expected to operate within the parameters set by the Performance Regulation, which outlines requirements for performance-based budgeting, monitoring, and reporting. This alignment is crucial for maintaining consistency and coherence across EU funding mechanisms, ensuring that the ECF contributes effectively to the Union's strategic objectives while adhering to established financial management standards. 2. The objectives of the ECF (competitiveness, strategic innovation, green and digital transition) are reflected in the indicators defined under the Performance Regulation, which, however, provides only a general framework for defining indicators and KPIs. The Performance Regulation addresses the management of financial instruments at a general level but does not detail procedures for the involvement of national development banks or intermediary implementing partners. The lack of detail may affect the clarity of responsibilities and the efficiency of ECF implementation, making it necessary to

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	evaluate the impact of this fund, for example, through reporting in relation to other EU funds. 3. **Ensuring geographically balanced participation and fostering integration of stakeholders from all Member States into wider European industrial and innovation value chains, whilst ensuring fair and effective access to support mechanisms within the ECF is therefore a fundamental prerequisite for strengthening the overall competitiveness and resilience of the EU**. CY (Comments): **Third country participation:** When considering the association and/or participation of third countries into the ECF, it would be paramount to make specific reference to the protection of strategic, security, defence and public order interests of the Union and its Member States. **Geographical balancing mechanism**: There needs to be a geographical balancing mechanism to ensure that enterprises in all EU Member States benefit from the European Competitiveness Fund. **SME support**: In order to effectively support SMEs, start ups and scale ups, the application processes would need to be more practical; in the case of grant schemes one could consider pre-financing to look after the liquidity requirements of SMEs. At the same time, fast and predictable application and award processes would be vital. EL (Comments): Our current comments regarding the European Competitiveness Fund are preliminary. More specifically: We welcome the increased ambition of ECF and the introduction of a common toolbox, as well as the emphasis on strategic technology sectors.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	At the same time, we would like to point out the following: **1)** Our concern about the very limited participation of MS in the **governance** of the fund. The ECF must be equipped with clear governance mechanisms, transparent decision-making procedures, and strong monitoring to avoid overlaps, ensure coherence, and guarantee alignment with the Union's long-term strategic objectives, such as the Green Deal, digital transition, and security. **2)** The need to have in place **adequate safeguards** for the participation of **third country entities**, especially in areas related to strategic technologies or to security interests of the MS. **3)** It is vital to **maintain fairness and balance in the geographical distribution of ECF resources**. In particular, caution should be exercised regarding the potential concentration of resources to the disadvantage of smaller MS and less developed regions the consequent broadening of the innovation gap. We should avoid substitution of smaller and simpler projects for major investments of a more strategic orientation, and avoid specific regions to be undermined. **4)** We would like more information on the implementation **procedure** and modalities, as well as on the comitology procedures to be followed for ECF work programmes SI (Comments): Slovenia is outlining its concern regarding the proposal, especially regarding addressing specific funding instrument for the Environment and Climate Action, for the implementation of the EU Green Deal. The proposed structure of the next MFF fails to adequately protect priorities, objectives, and actions in these fields as well as instruments to manage them. As the EU's sole financial instrument devoted exclusively to environmental protection and climate action, LIFE has - for more then 30 years - played a pivotal role in advancing the Union's green transition objectives. LIFE - with its integrated approach to the environment, economy, and society - has supported a broad range of actions from demonstration and best practices to capacity building, governance, coordination, and large-scale Strategic Projects that align with regional, national, and multi-regional strategies. The current proposal, however,

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	dismantles the LIFE's integrity by fragmenting its actions across two broader funding mechanisms: • Pillar I: NRPPs)/EU Facility • Pillar II: ECF. This would have far-reaching and adverse implications and therefore, Slovenia strongly advocates for the continuation of LIFE in its current form. Slovenia also underlines the importance of preserving Integrated LIFE Projects, which have proven to be highly effective drivers of environmental and climate action. They translate strategies into concrete, multi-annual frameworks, ensure continuity across mandates, and are cost-effective by focusing on capacity-building, technical assistance and awareness. Slovenia is concerned that this instrument could disappear and therefore advocates its continuation as a unique tool for implementing EU environmental and climate policies.
	RO (Comments): 4. Preamble 69 refers to Regulation (EU) 2021/253, and it should be 523. 5. Paragraph 70 of the Preamble refers to Article 62(1)(c) of Regulation (EU, Euratom) 2024/2059 and it should be 2021/2509.
Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on establishing the European Competitiveness Fund ('ECF'), including the specific programme for defence research and innovation activities, repealing Regulations (EU) 2021/522, (EU) 2021/694, (EU) 2021/697, (EU) 2021/783, and amending Regulations (EU) 2021/696, (EU) 2023/588, (EU) [EDIP]	IT (Drafting Suggestions): It is necessary to include references to the TFEU in the 'Legal basis' of the Regulation (as also noted by Germany and Sweden). 2. LEGAL BASIS This Regulation lays down an indicative financial envelope for the ECF…. (omissis) Since the ECF constitutes a framework for separate programme basic acts and the concerned policy areas, the proposal relies on a number of separate legal basis, each to be applied to the relevant parts(s) of the ECF: - **Article 146 in relation to activities supporting competitiveness through a skilled and trained workforce and labour market responsive to economic change**

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	- **Article 151 in relation to a proper social protection, the development of human resources and the combating of exclusion** Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on establishing the European Competitiveness Fund ('ECF'), including the specific programme for defence research and innovation activities, repealing Regulations (EU) 2021/522, (EU) 2021/694, (EU) 2021/697, (EU) 2021/783, and amending Regulations (EU) 2021/696, (EU) 2023/588, (EU) [EDIP] IE (Comments): IE would like a specific reference in the text of dedicated funding and supports for SMEs. IE supports the goal of greater flexibility in the MFF but this must be accompanied by strong governance processes to enable MS views to be taken into account. On chapter II, IE preference is for all programmes to be adopted by examination procedure rather than advisory procedure. In order to build on the success of the European Chips Act and its proposed revision (European Chips Act 2.0), the ECF must continue to deliver strategic investments to support Europe's semiconductor manufacturing capabilities, research and development (R&D) and supply chain resilience.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	IE supports the earmarking €51.5 billion for Digital Leadership under the ECF as this will ensure long-term budget predictability for strategic infrastructures such as semiconductors, as well as quantum computing, AI, and high-performance computing. IE supports the ECF aim to support production ramp-up and accelerated competitiveness actions for projects which enhance European open strategic autonomy including those in semiconductor manufacturing ties in with the European Chips Act's role in the EU's broader push for technological autonomy.IE hopes that the new ECF will go some way to address these challenges in the funding aspect of the European Chips Act, identified in the recent European Court of Auditors (ECA) special report on the European Chips Act
Chapter I	

PUBLIC

Commission proposal	Drafting Suggestions and Comments
General Provisions	SI (Drafting Suggestions): **<u>Transfers of funds between the specific pillars of this fund shall not be permitted.</u>** SI (Comments): The decarbonisation of the EU economy ensures its global competitiveness, contributes to strategic autonomy, and enables social justice. Decarbonisation must therefore remain the central priority of the ECF, which is why the resources from existing funds that feed into this pillar must be preserved or increased. We strongly oppose any reallocation of resources from the decarbonisation pillar to the other pillars
	SI (Drafting Suggestions): **<u>The distribution of funds from the European Competitiveness Fund should follow the principles of geographical balance, while ensuring equal opportunities for access for projects from all Member States</u>** SI (Comments): The distribution of funds from the European Competitiveness Fund must follow the principles of geographical balance and dual use, while guaranteeing equal access for projects from all Member States. This is essential to prevent deepening regional disparities, to ensure that the green and digital transitions benefit the entire Union, and to mobilise innovation capacity across Europe. Supporting dual-use technologies maximises the impact of public investment by creating both civilian and defence benefits, while fair access allows smaller Member States and their companies to participate effectively. Together, these principles strengthen EU cohesion, resilience, and strategic autonomy.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
SECTION 1	
OBJECTIVES AND STRUCTURE OF THE FUND	BG (Comments): It is necessary to provide a clearer designation of the governance mechanisms, the allocation of funds and the support instruments, in order to ensure that the general objectives of the EU will be implemented in an inclusive and balanced manner, avoiding fragmentation and guaranteeing equal access for all Member States as well as a fair distribution among all categories of micro-, small and medium-sized enterprises, and mid-caps HU (Comments): General comment: Previously self-standing policies and programs (e.g. EU4Health, etc) contributing to the competitiveness of the Union should be maintained. Hungary does not support the integration of the programs into one single Fund. The ECF shall be well-designed and targeted to added value at European level beyond existing instruments.
	IT (Drafting Suggestions): [**Art. 1**: 3. The Regulation also sets up a legal framework aiming at ensuring security of supply, removing investment obstacles, **skills gap**, and production bottlenecks and supporting the competitiveness of the Union's industrial base.]

PUBLIC

Commission proposal	Drafting Suggestions and Comments
Article 3	SE (Comments): The article includes many terms where there may be disagreement on definitions. For example, how will it be decided what is to be considered "strategic" in various terms? There may be a need to further define some basic concepts. "Strategic" needs to be defined in this regulation. The definition needs to be based on productivity, have a neutral approach and be horizontal to not distort competition between companies and sectors, rather than "selecting the winners", i.e. define strategic through a specific list of sectors. SI (Comments): SI would like to underline the importance of ensuring that competitiveness objectives do not undermine the principles of accessibility, equity and inclusion, particularly in the public health and social sectors We recommend that the Regulation explicitly integrates horizontal principles such as gender equality, social inclusion, and non-discrimination across all policy windows. Furthermore, the Fund should support the development of skills and employment opportunities in sectors undergoing green and digital transitions, with particular attention to vulnerable groups and regions. Digital transformation actions should ensure accessibility for all, including persons with disabilities and older persons, and promote inclusive digital public services."

PUBLIC

Objectives	DE (Comments): The orientation of the ECF, including the four windows, seems to be very suitable to us in principle. However, we miss clear targets that ensure that excellence, competitiveness and actual key technologies are promoted in a sustained manner. The objectives should therefore be clarified. Must ensure the necessary balance between flexibility and planning security in the selection of areas of activity/key technologies, and in particular in the allocation of funds. Fundamental selection/award criteria which concern the objectives in Art. 3 (such as excellence and competition) must be defined in the Regulation itself for all areas, not only for some areas (e.g. Art. 53). This must not be reserved for the work programs. Since the policy windows also include collaborative research in Horizon Europe, the reference to the Horizon Europe Regulation must either be made more clear or specific R&I objectives must be specified (such as advance scientific excellence, generate knowledge, create a pan-European research and innovation ecosystem etc.). We welcome the link made between the general objectives and the specific policy windows. RO (Comments): Although understanding the intentions behind establishing the Strategic Stakeholders Board, it is still unclear how specific eligibility conditions for strategic sectors and technologies—including the associated value chains, critical Union infrastructures, and essential capabilities—will be established in practice. Additionally, it is not specified how these eligibility criteria will be adapted over time to reflect technological developments and evolving strategic priorities. EL (Comments): With respect to the objectives, we consider that that there should be a discrete objective for the implementation of **EU SME policy** with specific budget line. Concerning SMEs, in recital 78,

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	we should not limit the scope only to scaling firms, but we should include all SMEs. In this line we should make explicit reference to EU SME policy documents: COM(2008) 394 Think small first A small business act for Europe, COM(2020)103 An SME Strategy for a sustainable and digital Europe, COM(2023)535 SME Relief Package. Moreover, we consider that there should be a discrete objective for the implementation of **Chips Act Regulation** (EU) 2023/1781 with a specific budget line. The same applies for the **Net-Zero Industry Act Regulation** (EU) 2024/1735, as well as for the **Critical Raw Materials Act Regulation** (EU) 2024/1252, and other sectoral legislative frameworks with direct impact on EU strategic autonomy. **We should build on existing legislative frameworks, link budget lines with concise agreed objectives, in order to achieve fast results in implementing EU industrial policy, and fostering EU competitiveness.** HU (Comments): More emphasis is needed on supporting the European car industry – as one of the traditionally leading sectors of our economy, current competitiveness challenges should be addressed to reestablish its historical success. FR (Comments): La Commission peut-elle préciser la nomenclature budgétaire associée au Fonds de compétitivité et la programmation financière envisagée ?

PUBLIC

Commission proposal	Drafting Suggestions and Comments
1. The general objective of the ECF is to increase European competitiveness, notably in strategic sectors and technologies along the investment journey by:	IT (Drafting Suggestions): The general objective of the ECF is to increase European competitiveness, notably in strategic sectors and technologies along the investment **cycle** ~~journey~~ by: IT (Comments): It aligns the terminology with standard EU legal usage, ensuring consistency with other regulations and official documents FI (Drafting Suggestions): 1. The general objective of the ECF is to increase ~~European~~ **EU's global** competitiveness, notably in strategic sectors and technologies along the investment journey by: FI (Comments): This is or utmost importance. All funding would need to contribute to EU's global competitiveness not only European competitiveness. CZ (Comments): CZ believes that it is essential to ensure and subsequently uphold that the European Competitiveness Fund (ECF) is not solely focused on innovative solutions, but also facilitates, for instance within the framework of industrial (clean) transformation, the support for the implementation of available measures and technologies. This should apply regardless of the size of the business, and should contribute to achieving the European goals. The Czech Republic recognizes the critical situation of the European (especially energy-intensive) industry, which, on one hand, faces very limited technological options for significant emission reductions, while, on the other hand, is under significant legislative pressure for rapid environmental and climate

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	transformation. Therefore, the ECF should enable the expansion and appropriate complementing of the current funding opportunities. AT (Comments): Objective: it is important (esp. for SMES) to reduce bureaucratic burdens SE (Drafting Suggestions): The general objective of the ECF is to increase European competitiveness **through innovation, productivity and economic growth, notably** in **[strategic]** sectors and technologies along the investment journey by: SE (Comments): The focus of the ECF should be on promoting innovation, productivity and growth, in order to increase European competitiveness. SE considers that well-functioning markets with effective competition are what make companies competitive; it is important that support does not distort the market and competition between sectors or companies. Need further discussions on the meaning of "strategic technologies". See brackets. PL (Drafting Suggestions): Additional provision: **"The implementation of the ECF objectives must contribute to geographically balanced development across the Union, in particular by ensuring the adequate participation to the**

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	funds of entities from Members States which GNI per capita indicator remains below the EU average The general objective of the ECF is to increase European competitiveness across all EU countries and regions, notably in strategic sectors **and technologies, while fully taking into account regional and local potentials and absorption capacities across the Union,** along the entire investment journey by: PL (Comments): In order to prevent the concentration of resources in a few countries, we propose explicitly including geographical balance as an objective of the fund. The European Competitiveness Fund should be designed and implemented with due regard for the objective of the Union's economic, social, and territorial cohesion. Strengthening the EU's competitiveness must mean enhancing the competitiveness of all its parts, and EU policies, including the proposed European Competitiveness Fund, must support all regions, regardless of their level of development, as each region has its own growth factors. Fair access to financial resources is essential to ensure that all EU regions have the opportunity to develop and to achieve the thematic objectives of the Fund. We emphasize that excessively limiting the sectoral scope of the European Competitiveness Fund to a narrow group of sectors considered strategic from the perspective of the entire EU, which are concentrated only in certain EU regions, would represent an approach that narrows the developmental potential of regions and fails to address the Union's diverse territorial challenges. It is therefore essential to maintain adequate flexibility of this fund, so as to enable the implementation of projects based on renewed smart specialisations relevant to individual countries and regions, while fully leveraging their local resources and absorption capacities.F

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	NL (Drafting Suggestions): The general objective of the ECF is to ~~increase~~ **strengthen** European competitiveness, ~~notably~~ **focusing especially** ~~in~~ **on** strategic sectors and technologies along the investment journey by: NL (Comments): To extra emphasize the main focus of ECF on strategic technologies/markets MT (Drafting Suggestions): 1.The general objective of the ECF is to **further** ~~increase~~ **strengthen** European competitiveness, notably in strategic sectors and technologies along the investment journey by: MT (Comments): Malta believes that using the wording ***further strengthen*** is more politically correct and illustrate that reality on the ground. LT (Drafting Suggestions): 1. The general objective of the ECF is to increase European competitiveness, notably in strategic sectors and technologies **across the Union and** along the investment journey by: LT (Comments): Lithuania considers that ECF should acknowledge and address the existing national and regional disparities in the European Union.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	SK (Comments): 1. While respecting the principle of excellence, we would like to reiterate the main goal of the European Competitiveness Fund, i.e to increase the overall competitiveness of the EU. It is therefore necessary to ensure geographically balanced participation that will leave no Member State behind. 2. Together with most of the Member States we support the strengthening of the role of the Member States in the decision making and implementation of the ECF. The use of advisory procedure instead of consultative procedure for most of the ECF policy windows goes against this principle. 3. We strongly support the option of alternative, cumulative and combined funding which synergy of the ECF with other sources of funding. 4. We welcome the proposed instruments, ranging from grants to guarantees for beneficiaries, but the proposed instruments must provide for the possibility of securing OpEX costs, which are just as important as CaPEX in decarbonization solutions. RO (Drafting Suggestions): The general objective of the ECF is to ~~increase~~ **strengthen the Union's** competitiveness **and resilience, in particular** in strategic sectors and technologies, **by supporting the entire investment journey from research and innovation to scale-up, industrial deployment and market uptake, through the following specific objectives:** ES (Drafting Suggestions):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	1. The general objective of the ECF is to increase European competitiveness, ~~notably~~ in strategic sectors and technologies along the investment journey by: CY (Drafting Suggestions): The general objective of the ECF is to increase European competitiveness, notably in strategic sectors and technologies along the investment journey, while ensuring no region is left behind, by SI (Drafting Suggestions): 1. The general objective of the ECF is to increase European competitiveness, notably in strategic sectors**, <u>defined by the policy windows, in knowledge production</u>** and technologies along the investment journey by: SI (Comments): We suggest ading a clarification of strategic sectors the EFC is dedicated to If the investment journey is defined to include fundamental science it is not clear why only technologies are exemplifed here. LV (Comments): Considering that Article 3 is essentially a general condition, Latvia would like to aske clarify the words used in Article (and in all Regulation) so as not to complicate the selection of projects or fulfillment of requirements. Detailed conditions can be included in support programs that will be developed later, but please avoid wording within the framework of the general regulation that may create additional requirements for the fulfillment of the conditions, for example, "significant" or "strategic" wher in Regulatin is no explanation about use and understanding of these words within the framework of the regulation is not stipulated. FR

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Drafting Suggestions): The general objective of the ECF is to increase European competitiveness **defined as the EU's capacity to raise productivivity growth, high living standards and strategic autonomy in a rapidly evolving global landscape. This general objective extends beyond the traditionnal cost-based competition, emphasing innovation**, notably in strategic sectors, **including in terms of sovereignty,** and technologies, **resilience and industrial strengtht** along the investment journey by: FR (Comments): While European competitiveness is a crucial issue, EU sovereignty remains a major factor to be taken into account for certain strategic sectors.
(a) delivering technological, economic and environmental impact from the Union's investments, including by developing disruptive and incremental innovation, and emerging, cutting-edge, dual-use, and strategic technologies with significant economic potential, including by developing and accelerating their manufacturing and industrial deployment;	IE (Comments): IE welcomes the commitment to support the development of "disruptive and incremental innovation" as well as "emerging, cutting edge" technologies with significant economic potential. IE: (1a) Would appreciate more detail on what the Commission envisages under "….including by developing and accelerating their manufacturing and industrial development" FI (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	It is likely desirable that, in the current security policy environment, the defence industry is also in focus—not only dual-use technologies. It must be ensured that regulation does not make this practically impossible. Financing the defence industry in general should be possible. CZ (Drafting Suggestions): a) delivering technological, economic and environmental impact from the Union's investments, including by developing disruptive and incremental innovation, and emerging, cutting-edge, dual-use, and strategic technologies with significant economic potential, including by developing and accelerating their manufacturing, **commercionalization** and industrial deployment; CZ (Comments): CZ believes that turning innovations into real, market-ready products and services is of the utmost importance. The EU shall increasingly focus its efforts on supporting the commercialization and scale-up of innovation. Therefore, we would also like to add it to the text. SE (Drafting Suggestions): (a) delivering technological, economic, **social** and environmental impact from the Union's investments, including by developing disruptive and incremental innovation, and emerging, cutting-edge, dual-use, and **[strategic]** technologies with significant **productive** ~~economic~~ potential, including by developing ~~and accelerating their~~ **innovative** manufacturing and industrial deployment; SE (Comments): The societal and social aspect of sustainable development should be emphasized.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	Is "incremental" innovation as relevant as "disruptive"? What is the role of incremental innovation in strengthening competitiveness and does it merit public funding (under what conditions)? Need further discussions on the meaning of "strategic technologies". See brackets. MT (Drafting Suggestions): (a) delivering technological, economic and environmental impact from the Union's investments, including by developing disruptive and incremental innovation, and emerging, cutting-edge, dual-use, and strategic technologies with significant economic potential, including by developing and accelerating their manufacturing**,** **commercialisation** and industrial deployment; MT (Comments): Malta would also like to add ***commercialization*** to the text. RO (Drafting Suggestions): (a) delivering technological, economic, **societal** and environmental impact from the Union's investments, including by developing disruptive and incremental innovation, and emerging, cutting-edge, dual-use, and strategic technologies with significant economic potential, including ~~by~~ **creating**, developing and accelerating their manufacturing and industrial deployment; RO (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	The societal impact of Union competitiveness is currently not explicitly reflected. Given that such dimensions are often considered in the cost-benefit analysis (CBA) of projects, their inclusion could strengthen the coherence of the objectives with wider Union policy priorities, such as social resilience and inclusiveness. ES (Drafting Suggestions): (a) delivering technological, economic and environmental impact from the Union's investments, including by developing disruptive and incremental innovation, and emerging, cutting-edge, dual-use, and strategic technologies with significant economic potential, including **by research and innovation collaboration actions and** developing and accelerating their manufacturing and industrial deployment; ES (Comments): The role of collaborative actions and programs developed under pilar II of the HE should be included. SI (Drafting Suggestions): (a) delivering **know-how,** technological, economic and environmental impact from the Union's investments, including **by supporting research and innovation and** developing disruptive and incremental innovation, **based on underlying research,** and emerging, cutting-edge **knowledge as well as**, dual-use, and strategic technologies with significant **societal and** economic potential, including by developing and accelerating their manufacturing and industrial deployment **without crowding out private investors and initiatives;** SI (Comments): Without long-term support to research and cutting-edge knowledge there can be no disruptive innovation or technological breakthroughs.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	The position of research and innovation as drivers of European competitiveness should be much more emphasized, as well as the promotion of collaborative research. LV (Drafting Suggestions): (a) delivering technological, economic and environmental impact from the Union's investments, including by developing disruptive and incremental innovation, and emerging, cutting-edge, dual-use, **defence** and ~~strategic~~ technologies with ~~significant~~ economic potential, including by developing and accelerating their manufacturing and industrial deployment; LV (Comments): We invite to include Article 3 (1) point (a) with the areas of defence, taking into account that “dual-use” is mentioned. We invite to delete the word "significant", given that innovations and also scale-up activities can promote competitiveness and export, the words "significant economic potential" can create different understandings of its meaning. Delete the word “strategic” in Article 3 (1) point (a), which in this case refers to “strategic companies”. FR (Drafting Suggestions): (a) delivering technological, economic and environmental impact from the Union's investments, including by **supporting excellent research**, developing disruptive and incremental innovation, and emerging, cutting-edge, dual-use, and strategic technologies with significant economic potential, including by developing and accelerating their manufacturing and industrial deployment; FR

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Comments): Since collaborative research will be part of ECF WPs, the programme should aim at supporting excellent research which can be translated into innovative solutions brought to the market at a later stage. It is also important to highlight the role of research since ECF objectives apply to the Framework Programme for Research and Innovation.
(b) reducing or preventing the Union's strategic dependencies, and reinforcing the Union's resilience, and economic security, including through diversifying sources and markets, support to ramp up of European production of strategic technologies and creating, strengthening and protecting critical Union value chains and infrastructure;	IT (Drafting Suggestions): reducing or preventing the Union's strategic dependencies, and reinforcing the Union's**,** resilience, and economic security, including through diversifying sources and markets, support **for scale-up** ~~to ramp up~~ of European production of strategic technologies and creating, strengthening and protecting critical Union value chains and infrastructure; IT (Comments): Clearer and more formal drafting FI (Comments): Resilience and its promotion are very well included and mentioned many times in the text, and rightly so. Unfortunately, the same cannot be said for hybrid threats. When they are rarely mentioned, they are only linked to terrorism. SE (Drafting Suggestions): Reducing ~~or preventing~~ the Union's strategic dependencies, and reinforcing the Union's resilience, and economic security, including through diversifying sources and markets, support to ramp up of European **innovative** production of **[strategic]** technologies and creating, strengthening and **safeguarding** ~~protecting~~ critical Union value chains and infrastructure;

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	SE (Comments): Protecting would seem to imply market protection Preventing the dependencies should be done with market-oriented solutions, including new free trade agreements, should be sought as far as possible in order to limit these dependencies. Need further discussions on the meaning of "strategic technologies". See brackets. PL (Drafting Suggestions): „(b*) reducing or preventing the Union's strategic dependencies, and reinforcing the Union's resilience,* ***food*** *and economic security, including through diversifying sources and markets, support to ramp up of European production of strategic technologies and creating, strengthening and protecting critical Union value* ***and delivery*** *chains and infrastructure";* PL (Comments): There is need to underline the support of supply chains, including the agri-food sector. This is important for strengthening agri-food processing connected with building the value chain in this sector, given Poland's significant agricultural production and taking into account that PL is a neighbour of Ucraine, that is a major exporter of unprocessed agricultural products. NL (Drafting Suggestions): (b) reducing or preventing the Union's **most high-risk** strategic dependencies, and reinforcing the Union's resilience, and economic security, including through diversifying **and circular use of (re)**sources and markets, support to ramp up of European production of strategic

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	technologies and creating, strengthening and protecting critical Union value chains and infrastructure; NL (Comments): More emphasis on circular use of products and materials and good to focus on those most high-risk strategic dependencies LT (Drafting Suggestions): b) reducing or preventing the Union's strategic dependencies, and reinforcing the Union's resilience, and economic security, including through diversifying sources and markets, support to ramp up of European production of strategic technologies and creating, strengthening and protecting critical Union value chains and infrastructure, particularly from physical and cyber threats; LT (Comments): LT would like to highlight the importance of protection from physical and cyber threats. RO (Drafting Suggestions): reducing or preventing the Union's strategic dependencies, and reinforcing the Union's resilience, and economic security, including through diversifying sources and markets, support to ramp up of European production, **in particular** of strategic technologies, and creating, strengthening and protecting critical Union value chains and infrastructure; RO (Comments): The Fund should clearly support the full development cycle of strategic technologies — from creation and research, through development and demonstration, to manufacturing, deployment,

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	and integration into new innovative products and services — ensuring continuity across all stages of the investment journey. ES (Drafting Suggestions): (b) reducing or preventing the Union's strategic dependencies, and reinforcing the Union's resilience, and economic security, including through diversifying sources and markets, support to ramp up ~~of~~ European **industrial manufacturing capacities, in particular in industrial priority sectors subject to modernization or transformation, and the** production of strategic technologies and creating, strengthening and protecting critical Union value chains and infrastructure; FR (Drafting Suggestions): b) reducing or preventing the Union's strategic dependencies, and reinforcing the Union's resilience, **sovereignty** and economic security, including through diversifying sources and markets, support to ramp up of European production of strategic technologies and creating, strengthening and protecting critical Union value chains and infrastructure;
	SI (Comments): Slovenia support BE proposal to add promotion of public health, strengthening health systems and enhancing health security among the objectives of this article
(c) addressing market failures and suboptimal investment situations, including by crowding in private capital and institutional investors as well as public funding in a proportionate manner, while avoiding duplication and without crowding out private investors; serving as an integrated platform for delivering targeted financial support to companies across all development phases start-ups, scale-ups, and strategic companies, including those	FI (Comments): If industrial-scale investments are to be targeted, the financial volumes must reflect that, and for example, the RPA must support this. Currently, the dozens of different thresholds in section 16 of the RPA (support for InvestEU financing) are difficult and partly too small for industrial-scale investments.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
actively pursuing manufacturing, industrial and market deployment;	BE (Drafting Suggestions): (c) addressing market failures and suboptimal investment situations, including by crowding in private capital and institutional investors as well as public funding in a proportionate manner, while avoiding duplication and without crowding out private investors; serving as an integrated platform for delivering targeted financial support to companies across all development phases **such as** start-ups, scale-ups, and strategic companies, including those actively pursuing manufacturing, industrial and market deployment; BE (Comments): Textual adjustment AT (Drafting Suggestions): (c) addressing market failures and suboptimal investment situations, including by crowding in private capital and institutional investors ~~as well as public funding in a proportionate manner~~, **ensuring additionality**, while avoiding duplication and ~~without~~ crowding out private **or other public** investors; serving as an integrated platform for delivering targeted financial support to companies across all development phases start-ups, scale-ups, and strategic companies, including those actively pursuing manufacturing, industrial and market deployment; AT (Comments): Additionality should always be ensured in interventions where EU resources are involved. When and where will additionality be defined?

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	Crowding in of private and public sources should not be treated equally – we have to focus on the mobilisation of private capital. How will it be ensured that the mobilisation of private capital is the main objective? What do you understand by an "integrated platform"? SE (Drafting Suggestions): addressing market failures **that cannot be mitigated in a more efficient manner** ~~and suboptimal investment situations~~, ~~including by crowding in private capital and institutional investors as well as public funding in a proportionate manner, while avoiding duplication and without crowding out private investors~~; serving as an integrated platform for delivering targeted financial support to companies, across all development phases start-ups, scale-ups, ~~and strategic companies,~~ including those actively pursuing **innovative** manufacturing, industrial and market deployment; **crowding in private investments and institutional investors as well as public funding in, while avoiding duplication and without crowding out private investors;** SE (Comments): "Manufacturing" and "production" seem to be used interchangeably. Should be clarified whether there is a difference, alternatively text should be harmonised. Support can be justified if it deals with a clear market failure that cannot be adressed in a more efficient manner. This does not include supoptimal investment situations. Financial support should not be given to established manufacturing processes, as it risks counteracting the necessary adjustment of the economy. Crowding in private investments should be an objective in itself.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	PL (Drafting Suggestions): *(c) addressing market failures and suboptimal investment situations, including by crowding in private capital and institutional investors as well as public funding in a proportionate manner, while avoiding duplication and without crowding out private investors; serving as an integrated platform for delivering targeted financial support to companies across all development phases start-ups, scale-ups, and strategic companies, including those actively pursuing manufacturing,* ***including agri-food processing****, industrial and market deployment;* PL (Comments): There is need to emphasize the importance of agri-food processing in the context of, among others, food security and building the value chain. NL (Drafting Suggestions): (c) addressing market failures, **including transition failures**, and suboptimal investment situations, including by crowding in private capital and institutional investors as well as public funding in a proportionate manner, while avoiding duplication and without crowding out private investors; serving as an integrated platform for delivering targeted financial support to companies across all development phases start-ups, scale-ups, and strategic companies, including those actively pursuing manufacturing, industrial and market deployment; NL (Comments): To specificy transition failures and their role. RO (Drafting Suggestions):

Commission proposal	Drafting Suggestions and Comments
	addressing market failures and ~~suboptimal~~ **investment gaps** ~~situations~~ by ~~crowding in~~ **mobilising** private ~~capital~~ and institutional **investors** ~~as well as~~ **alongside public funding**~~, in a proportionate manner~~, while ensuring **proportionality,** avoiding duplication and without crowding out private investors **and** serving as an integrated platform for targeted financial support to companies across all development phases start-ups, scale-ups, and strategic companies, including those actively pursuing manufacturing, industrial and market deployment; RO (Comments): Strategic companies should be defined SI (Drafting Suggestions): (c) addressing market failures and suboptimal investment situations, including by crowding in private capital and institutional investors as well as public funding in a proportionate manner, while ~~avoiding~~ **preventing** duplication and without crowding out private investors; serving as an integrated platform for delivering targeted financial support to companies across all development phases start-ups, scale-ups, and strategic companies, including those actively pursuing manufacturing, industrial and market deployment **with Union added value;** SI (Comments): It is not enough to try and avoid duplication. Duplication needs to be prevented. What will be the main driver for funding decisions under ECF that will ensure EAV, like pan-European collaboration is for FP? Who will select or determine strategic companies and based on what criteria?

PUBLIC

Commission proposal	Drafting Suggestions and Comments
(d) furthering the integration of Union capital markets in alignment with the objective of delivering Savings and Investment Union, including solutions to address the fragmentation of Union capital markets, eliminate barriers and create incentives for private investments and diversify and reinforce the sources of financing for Union enterprises in all the Member States, including those with less developed capital markets;	IT (Drafting Suggestions): (d) furthering the integration of the Union capital markets in alignment with the objective of delivering Savings and Investment Union, including **measures** ~~solutions~~ to address the fragmentation of Union capital markets, eliminate barriers and create incentives for private investments and diversify and reinforce the sources of financing for Union enterprises in all the Member States, including those with less developed capital markets; IT (Comments): Strengthens the legal tone and makes the wording more precise and actionable NL (Drafting Suggestions): (d) furthering the integration of Union capital markets in alignment with the objective of delivering Savings and Investment Union, including solutions to address the fragmentation of Union capital markets, **stimulate and improve access to finance in the market**, eliminate barriers and create incentives for private investments and diversify and reinforce the sources of financing for Union enterprises in all the Member States, including those with less developed capital markets; NL (Comments): Barriers are not only an internal matter, companies also experience obstacles when entering the EU internal market. RO (Drafting Suggestions): furthering the integration of Union capital markets in alignment with the objectives of the Savings and Investment Union and **the Capital Markets Union**, ~~including solutions to address~~

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	address**ing** fragmentation, **removing** barriers and creat**ing** incentives ~~and~~ **to** diversify and reinforce sources of financing for Union enterprises in all the Member States, including those with less developed capital markets; RO (Comments): Explicitly links to Capital Markets Union, a flagship EU initiative and clarifies purpose: deepening integration and reducing fragmentation.
(e) aligning research, innovation and industrial policy support to translate Union's research excellence into Union industrial strength on global markets and securing the future of manufacturing in Europe;	IE (Comments): IE welcomes the reference to "research excellence", and note the importance of knowledge valorisation CZ (Comments): CZ - Note that, in relation to this objective, Article 7 would benefit substantially from a stronger articulation of its complementarities with FP10, as well as from a clearer explanation of the Competitiveness Coordination Tool. We would also kindly request these issues being clarified in written response to our comments. SE (Drafting Suggestions): (e) ~~aligning research, innovation and industrial policy support to~~ translat**eing** Union's research excellence into Union **prosperity, including** industrial strength on global markets and securing the future of manufacturing in Europe;

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	aligning research, innovation and industrial policy support to translate Union's research excellence into Union industrial strength on global markets and ~~securing~~ **promoting** the future of manufacturing in Europe; SE (Comments): Focus on the objective rather than the means for reaching the objective as all necessary policy areas cannot be listed. The proposed objective is too narrow in relation to the benefits of excellent science. European manufacturing should be promoted through research, innovation and industrial policy. LT (Drafting Suggestions): aligning research, innovation and industrial policy support **and reducing national and regional disparities** to translate Union's research excellence into Union industrial strength on global markets and securing the future of manufacturing in Europe; LT (Comments): As indicated above, Lithuania considers that ECF should acknowledge and address the existing national and regional disparities in the European Union. Is the suggestion is too strict we could stay within this: "pooling resources of all MS and aligning". RO (Drafting Suggestions): aligning research, innovation and industrial policy **and financial** support to translate Union's research excellence and **knowledge** into Union industrial strength on global markets, securing

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	the future of manufacturing in Europe **and exploiting the potential of higher education partnerships, including European University Alliances;** RO (Comments): Adds knowledge valorisation in a competitive context. We appreciate a reference to higher education partnerships shoul be included ES (Drafting Suggestions): (e) aligning research, innovation and industrial policy support to **systematically** translate **the** Union's research **funding and** excellence into Union industrial **deployment and** strength on global markets and securing the future of manufacturing in Europe; ES (Comments): Strengthens the necessary link between the transfer of applied knowledge from research and development to manufacturing industry in the EU. SI (Drafting Suggestions): (e) **combining and** aligning research, innovation and industrial policy support to **support** ~~translate~~ Union's research excellence **and translate it** into Union industrial strength **and knowledge capacity** on global markets and securing the future of **the broader innovation-to-market ecosystem as well as of** manufacturing in Europe; SI (Comments): We should support research excellence and therby enable its translation into concrete results that have global impact.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
(f) developing Union cross-border and critical infrastructure key to the Union's competitiveness, and strategic independence in particular energy and transport, digital and security, defence and space infrastructure as well as social infrastructure and related data and services;	IT (Drafting Suggestions): (f) developing Union cross-border and critical infrastructure **essential for** ~~key to~~ the Union's competitiveness~~,~~ and strategic independence in particular **for** energy and transport, digital and security, defence and space infrastructure as well as social infrastructure and related data and services; IT (Comments): smoother drafting IE (Drafting Suggestions): developing Union cross-border and critical infrastructure key to the Union's competitiveness, and strategic independence in particular energy and transport, digital and security, defence and space infrastructure as well as **shared research infrastructures,** social infrastructure and related data and services; IE (Comments): IE suggest this point could benefit from an explicit reference to shared research infrastructures? (S3 Unit) CZ (Comments): CZ - What is the meaning of social infrastructure in this case? BE (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	How is this aligned with CEF and its objectives? Please clarify in the corresponding recital what exactly will be financed through ECF and what through CEF. AT (Drafting Suggestions): (f) developing Union cross-border and critical infrastructure key to the Union's competitiveness, and strategic independence in particular energy and transport, digital and security, defence **as well as** ~~and~~ space infrastructure ~~as well as~~ **and** social infrastructure and **their** related data and services; AT (Comments): To make sure that besides space infrastructure, space data and services are also mentioned NL (Drafting Suggestions): (f) developing Union **cooperation and development** on cross-border and critical infrastructure key to the Union's competitiveness, and strategic independence in particular energy and transport, digital and security, defence and space infrastructure as well as social infrastructure and related data and services; NL (Comments): To what extent does this overlap with the objectives of CEF? How can the use of funding simultaneously stimulate cross border cooperation between member states and motivate them to align, for example, permitting procedures? LT (Drafting Suggestions): (f) developing and strengtehning Union cross-border and critical infrastructure key to the Union's competitiveness, ~~and~~ strategic independence and resilience in particular energy and

Commission proposal	Drafting Suggestions and Comments
	transport, digital and security, defence and space infrastructure as well as social infrastructure and related data and services including through enhanced physical protection, preparedness and cybersecurity measures, with a view to ensuring the Union's security, the continuity of supply chains, and enhancing the ability to prevent, withstand and recover from disruptions and threats, including those of a hybrid nature ; LT (Comments): Russia's continuing attacks on Ukrainian energy infrastructure, recent accidents of Russia's drones entering Lithuanian and Polish airspace once again demonstrate urgent need to be prepared to withstand threats for our critical energy security. Assets like pipelines, LNG terminals, interconnections and substations are now strategic targets, requiring urgent protection to ensure energy security and EU competitiveness. RO (Drafting Suggestions): Developing Union **interoperable,** cross-border and critical infrastructures key to the **Union's competitiveness** and strategic independence, in particular in energy, transport, digital, security, defence, space infrastructure, as well as social infrastructure and related data and services. SI (Drafting Suggestions): (f) developing Union cross-border and critical infrastructure key to the Union's **research excellence,** competitiveness, and strategic independence in particular energy and transport, digital and security, defence and space infrastructure as well as social infrastructure and related data and services; FR (Drafting Suggestions): (f) developing Union cross-border and critical infrastructure key to the Union's competitiveness, and strategic independence in particular energy and transport, digital and

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	security, defence and space infrastructure as well as social infrastructure and related data and services; FR (Comments): It seems necessary to clarify the interactions between the ECF, the PNRP and the Connecting Europe Facility on transports and energy cross-border infrastructure, in order to better understand how those funds could be mobilise and for which part of future and current projetcs.
(g) strengthening the competitiveness of SMEs and small mid-cap companies established in the Union and their ability to grow and scale up, in particular by improving their access to finance, including private investment, micro-finance and support to social enterprises as facilitating access to Union funding, through faster, simplified and harmonised procedures; reducing and ensuring a proportionate reporting burden;	IT (Drafting Suggestions): (g) strengthening the competitiveness of SMEs and small mid-cap companies established in the Union and their ability to grow and scale up, in particular by improving their access to finance, including private investment, micro-finance and support to social enterprises **by** ~~as~~ facilitating access to Union funding, through faster, simplified and harmonised procedures; reducing and ensuring a proportionate reporting burden; IT (Comments): grammatical clarity HR (Drafting Suggestions): strengthening the competitiveness of SMEs and small mid-cap companies established in the Union and their ability to grow and scale up, in particular by improving their access to finance, including private investment, micro-finance and support to social enterprises as facilitating access to Union funding, through faster, simplified and harmonised procedures; ~~reducing and ensuring a proportionate reporting burden~~; **avoiding disproportionate administrative burden and complexity.**

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	HR (Comments): Simplify procedures and administrative requirements, making ECF funding more accessible to smaller companies. FI (Comments): It should be recognized here that generic SME support is not purposeful, especially if the fund size will be smaller. Support should always address a clearly identified market failure. Poorly targeted public support is essentially bank support, which distorts the market and does not allocate resources toward growth. BG (Drafting Suggestions): (g) strengthening the competitiveness of SMEs established in the Union, improving their access to finance, in particular to micro-finance, and supporting social enterprises, as well as facilitating access to Union funding; (gg) providing opportunities for growth and scaling up of the SMEs and small midcaps, in particular by facilitating their access to finance including private investment, through faster, simplified and harmonised procedures; reducing and ensuring a proportionate reporting burden; BG (Comments): In order to ensure broad accessibility for SMEs, it is necessary to establish a separate general objective related to access to finance and support for SME competitiveness, as well as the inclusion of specific measures within the Fund's specific objectives. The definition of a small mid-cap enterprise should refer to Regulation 651/2014 in order to ensure legal certainty and compliance with State aid rules. PL

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Drafting Suggestions): (g) *strengthening the competitiveness of SMEs (**also understood as farmers in the agri-food sector)** and small mid-cap companies established in the Union and their ability to grow and scale up, in particular by improving their access to finance, including private investment, micro-finance and support to social enterprises as facilitating access to Union funding, through faster, simplified and harmonised procedures; reducing and ensuring a proportionate reporting burden;* (g) strengthening the competitiveness of SMEs **as a priority** and **also including** small mid-cap companies established in the Union and their ability to grow and scale up, in particular by improving their access to finance, including private investment, micro-finance and support to social enterprises as facilitating access to Union funding, through faster, simplified and harmonised procedures; reducing and ensuring a proportionate reporting burden; PL (Comments): It should be emphasized that farmers can also use the above-mentioned instruments. It is worth highlighting that, in accordance with the "Think Small First" principle set out in the SBA, the specific needs of SMEs should be duly taken into account. Given the specific characteristics of SMEs, in particular the structural limitations in terms of human and financial resources, which may impede their access to funds from the ECF, it is proposed that the relevant provisions be amended so as to expressly reflect the necessity of granting SMEs preferential treatment in comparison to other categories of enterprises, such as SMCs. NL (Drafting Suggestions): (g) strengthening the competitiveness of SMEs and small mid-cap companies established in the Union and **especially** their ability to grow and scale up, in particular by improving their access to finance, including private investment, micro-finance and support to social enterprises

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	as facilitating access to Union funding, through faster, simplified and harmonised procedures; reducing and ensuring a proportionate reporting burden; SI (Drafting Suggestions): (g) strengthening the competitiveness of SMEs and small mid-cap companies established in the Union and their ability to grow and scale up, in particular by **strengthening entrepreneurial support environment as well as by** improving their access to finance, including **public and** private investment, micro-finance and support to social enterprises as facilitating access to Union funding, through faster, simplified and harmonised procedures; reducing and ensuring a proportionate reporting burden; SI (Comments): Entrepreneurial support environment, such as networking, promotional, advisory…activities are as important as access to finance in order to strengthen the competitiveness of SMEs and therefore we suggest a reference in this objective.. LV (Drafting Suggestions): (g) strengthening the competitiveness of **companies, including** SMEs and small mid-cap companies established in the Union and their ability to grow and scale up, in particular by improving their access to finance, including private investment, micro-finance and support to social enterprises as facilitating access to Union funding, through faster, simplified and harmonised procedures; reducing and ensuring a proportionate reporting burden; OR (g) strengthening the competitiveness of ~~SMEs and small mid-cap~~ companies established in the Union and their ability to grow and scale up, in particular by improving their access to finance, including private investment, micro-finance and support to social enterprises as facilitating access to Union funding, through faster, simplified and harmonised procedures; reducing and ensuring a proportionate reporting burden;

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	LV (Comments): In order not to create the impression that the ECF does not support large enterprises and small and medium-sized companies, we request that Article 3, paragraph 1 (g), be supplemented by clearly stating that companies are supported regardless of size. If Article 3, paragraph 1 (g) is understood as specific support only for "SMEs and small mid-cap companies", we request that an additional point be included with support for large enterprises and medium-cups companies.
(h) addressing shortages of skills critical to all kinds of quality jobs in strategic sectors for EU competitiveness, through both horizontal and specific skills investment, contributing to the availability of skills in future emerging technologies, and by pursuing to accompany investments with skills investment and indicate when it is included;	IT (Drafting Suggestions): (h) addressing shortages of skills critical to all kinds of quality jobs in strategic sectors for EU competitiveness, through both horizontal and specific skills investment, contributing to the availability of skills in future emerging technologies, and **ensuring that** ~~by pursuing~~ ~~to accompany~~ investments **are accompanied by** ~~with~~ skills investment indicat**ing**~~e~~ when **such investment** ~~it~~ is included; IT (Comments): Clarifies that skills investment should accompany relevant projects and specifies when such investment is included, improving clarity and enforceability CZ (Comments): CZ -On what level of education system will the investments take place? NL (Comments): Could you please clarify what is meant by 'all kinds of quality jobs'? In particular, how do you define or frame the notion of quality in this context?

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	RO (Drafting Suggestions): addressing shortages of skills, **including basic skills** level, critical ~~to~~ **for** all **to** ~~kinds of~~ quality jobs in strategic sectors for EU competitiveness, through both horizontal and **sector-**specific skills investment, **including green jobs, in line with the Union of Skills initiative**, contributing to the availability **and mobility** of competences for emerging technologies, ~~and by pursuing to accompany investments with skills investment and indicate when it is included;~~ RO (Comments): Clearer and stronger link with the *Union of Skills*, availability to skills to all individuals. Pursuing to accompany investments with skills investment and indicate when it is included should be a matter of conditions in the award procedures and progress reporting format SI (Drafting Suggestions): (h) addressing **current as well as future** shortages of skills critical to all kinds of quality jobs in strategic sectors for EU competitiveness, through both horizontal and specific skills investment, contributing to the availability of skills in future emerging technologies, and by pursuing to accompany investments with skills investment and indicate when it is included; SI (Comments): We need to address not only current shortages but also foresee and address future trends and skills shortages. LV (Drafting Suggestions): (h) addressing shortages of skills critical to all kinds of quality jobs ~~in strategic sectors for EU competitiveness~~, through both horizontal and specific skills investment, contributing to the

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	availability of skills in future emerging technologies, and by pursuing to accompany investments with skills investment and indicate when it is included; LV (Comments): Skills development is important horizontally and should be limited to specific areas. So Latvia invite to delete within the framework of Article 3 wording *"in strategic sectors for EU competitiveness"*, the current wording is a restrictive condition, given that the Regulation does not define strategic sectors, but rather general objectives within the framework of Article 3. FR (Drafting Suggestions): addressing **social investment needs which compromises social enterprise finance and measures to develop and consolidate social investment market** and shortages of skills critical to all kinds of quality jobs in strategic sectors for EU competitiveness **and sovereignty**, through both horizontal and specific skills investment, contributing to the availability of skills in future emerging technologies **and skills to address climate and environmental transitions**, and by pursuing to accompany investments with skills investment and indicate when it is included FR (Comments): Mention reprise du règlement Invest EU afin d'inclure dans les acteurs économiques le marché de l'innovation sociale. The attractiveness of certain professions and the ability of new generations to acquire skills to address climate and environmental transitions is a crucial issue for some of the EU's strategic sectors.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
(i) ensuring the integration of the Single Market, including by supporting initiatives at any stage of the investment journey with positive spill-over effects for the Single Market and resilience of its value chains;	IT (Drafting Suggestions): (i) ensuring the integration of the Single Market, including by supporting initiatives at any stage of the investment **cycle** ~~journey~~ with positive spill-over effects for the Single Market and resilience of its value chains; IT (Comments): It aligns the terminology with standard EU legal usage, ensuring consistency with other regulations and official documents SE (Drafting Suggestions): ensuring the **further** integration of the Single Market, including by supporting **innovative** initiatives at any stage of the investment journey with positive spill-over effects for the Single Market, **with potential to increase productivity and** resilience of its **value** chains, **when support does not risk crowding out private investments;** SE (Comments): It is important to emphasize the continued development of the single market. Important to stress that all initiatives need to be productive. RO (Drafting Suggestions): ensuring **full** ~~the~~ integration of the Single Market, including by supporting initiatives at any stage of the investment journey with positive spill-over effects for the Single Market and resilience of its value chains

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	FR (Drafting Suggestions): ensuring the integration of the Single Market, **in particular through the financing of market surveillance activities to prevent dangerous or non-compliant products and services from being made available in the single market and ensure a level playing field,** including by supporting initiatives at any stage of the investment journey with positive spill-over effects for the Single Market and resilience of its value chains; FR (Comments): France strongly supports this point and that this programme must be maintained and even increased in view of the challenges associated with the development of e-commerce. It's crucial to strengthen the means for controls on products sold online. This is essential in order to ensure consumer safety, as well as a level playing field and, therefore, the competitiveness of the european enterprises. In view of these challenges, this programme must not only be maintained, but also strengthened.
	SI (Drafting Suggestions): l**) protecting, restoring and improving the quality of the environment, reducing pollution, halting and reversing biodiversity loss and tackling the degradation of terrestrial and marine ecosystems.** SI (Comments): Recital 23 should be reflected in the legal text, to ensure its applicability.
(j) supporting actions for the development, implementation, and monitoring of relevant Union legislation and policy;	DE (Comments):

Commission proposal	Drafting Suggestions and Comments
	In which areas does COM intend to fund the development, implementation and monitoring of EU legislation with the ECF? When this is linked to the consolidation of various funding programs, which we welcome in principle, it is important that key tasks of these programs are fulfilled more effectively and more efficiently by the ECF in order to leverage synergies. If this objective concerns administrative action of the COM, this should be reflected in the administrative expenditures in heading 4 of the MFF. RO (Comments): This is a very wide objective, if legislation and policy regards the Single Market then it should be integrated with point (i) above
(k) ensuring a just transition to a sustainable, decarbonised and digital economy that is fair and supporting workers and communities.	IT (Drafting Suggestions): (k) ensuring a just transition to a sustainable, decarbonised and digital economy that is fair and supporti**ve**~~ng~~ **of** workers and communities. IT (Comments): smoother legal drafting CZ (Comments): CZ - What is the real meaning of just transition in this context? Is it still, as for now, related just to coal regions? SE (Drafting Suggestions):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(l) Ensuring added value to enhance the EU's competitiveness by promoting innovation, productivity and economic growth SE (Comments): Suggesting an additional objective. This should be horizontal across the other objectives. NL (Drafting Suggestions): (k) ensuring ~~a just~~ **the twin** transition to a sustainable, decarbonised and digital economy that is fair and supporting workers and communities. NL (Comments): More fitting given the objectives of the ECF LT (Drafting Suggestions): k) ensuring a just transition to a sustainable, decarbonised and digital economy that is fair and supporting workers~~, and~~ communities and businesses. LT (Comments): LT suggest adding businesses to emphasize their role in the green transition and necessary support. RO (Drafting Suggestions): ensuring a just transition to a sustainable, decarbonised and digital economy that is fair and supporting workers and communities, **while actively mitigating negative impacts on workers and communities, focusing on creating decent jobs, providing social protection, ensuring**

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	widespread access to opportunities, and offering resources for affected populations and regions. RO (Comments): Insertion made to stress the key principles of JT (fairness for workers, community support, inclusive growth, social dialogue) SI (Comments): Strong support to this objective. LV (Drafting Suggestions): (k) ensuring a just transition ~~to a sustainable, decarbonised and digital economy~~ that is fair and supporting workers and communities. LV (Comments): We invite to delete the word *"sustainable, decarbonisation and digital economy"* in Article 3 (1) point (k), which are the limiting conditions, because promoting competitiveness would also be possible in other areas (for example, electronics). FR (Drafting Suggestions): ensuring a just transition to a sustainable, **resilient,** decarbonised ~~and~~ digital **and nature-positive** economy that is fair and ~~supporting~~ **providing** workers **with a fair standard of living** and **supporting** communities FR (Comments):

Commission proposal	Drafting Suggestions and Comments
	Resilience is a major challenge for UE's economic sectors and societies (cf COM vision for agriculture and food, 19/02/2025). The transition should contribute to solve the attractivity problem that some strategic sectors are facing, by rewarding the workers that engage in it , not only supporting them.
	IT (Drafting Suggestions): **l) protecting, restoring and improving the quality of the environment, including water, coast, sea and soil, reducing pollution, halting and reversing biodiversity loss and tackling the degradation of terrestrial and marine ecosystems.** IT (Comments): Preambular para n. 23 is to be reflected in the legal text, to ensure its applicability. This objective reflects the Union's commitments to halting biodiversity loss, restoring ecosystems and improving environmental quality, while delivering co-benefits for competitiveness and public health. CZ (Drafting Suggestions): **(l) safeguarding balanced distribution of opportunities across the Union to unlock the full potential of all regions and ensuring that less-developed regions are effectively connected to EU value chains.** CZ (Comments): CZ - Although CZ recognize the importance of supporting excellence within the ECF, we believe that no Member State can be left behind. Moreover, further widening of disparities between Member States must be avoided. Ensuring geographically balanced participation and fostering integration of stakeholders from all Member States into wider European industrial and innovation

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	value chains, whilst ensuring fair and effective access to support mechanisms within the ECF is therefore a fundamental prerequisite for strengthening the overall competitiveness and resilience of the EU. Thus, we propose to add new par. (l). PL (Drafting Suggestions): **(l) promoting balanced and inclusive growth across all Member States, ensuring that the allocation of resources under the Fund contributes to cohesion and convergence within the Union by fostering competitiveness and innovation in regions with less developed economies, reducing disparities between Member States, and guaranteeing that enterprises and strategic projects in all parts of the Union can access funding on fair and equitable terms; thereby strengthening the overall resilience and unity of the Union.** PL (Comments): Adding this objective is essential to ensure the European Competitiveness Fund (ECF) delivers on the Union's Treaty- based goals of economic, social and territorial cohesion (Article 174 TFEU), by reducing development gaps between regions and avoiding concentration of resources in already advanced Member States. It reflects long-standing EU strategies such as Cohesion Policy 2021-2027, the European Pillar of Social Rights, the New European Innovation Agenda, and the Report Much More Than a Market: Re-thinking the Single Market for a Fair, Green and Digital Union, which introduces the idea of "freedom to stay". NL (Drafting Suggestions): **(l) increasing productivity growth of the EU as the core element of EU competitiveness, through capital deepening and improving product factor allocation.**

Commission proposal	Drafting Suggestions and Comments
	(m) strengthening the competitiveness of the Union's strategic industrial base and industrial ecosystems, including by reinforcing production capacity in strategic sectors, fostering the industrial uptake and large-scale deployment of advanced and emerging technologies, and ensuring the long-term resilience of European industry in the face of global challenges **(n) stimulating decarbonization, circular economy and clean production of the Union's (energy intensive) industrial base, while stimulating and developing new green innovative lead markets.** NL (Comments): In line with, e.g., the analysis in the Draghi-report, improving productivity growth is central to enhancing EU competitiveness and the most important source of future economic growth. It is important ECF support is targeted with this goal in mind.
2. Under the general objectives set out in paragraph 1, the ECF shall in particular pursue the following specific objectives:	FI (Comments): We will provide comments to this para (Art. 3.2.) in conjunction with the comments for the policy windows by Sep 30 as these are deeply interconnected. DE (Comments): We will send comments on the objectives for the policy windows in the second call for comments (deadline 30 September). SE (Comments): How come SME support is not mentioned under all policy windows? Innovation in SMEs should be promoted across this instrument

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	NL (Comments): We notice that the scope of the ECF is very wide, and should instead focus on the most strategic technologies and sectors, in line with article 3(1). Acoording to the NL, this should be sharply prioritized based on four criteria: (i) impact on geo-economic seucrity of the EU, (ii) contribution to the European economy and growth potential, (iii) contribution to urgent societal challenges, and (iv) current position of the EU, such as market share or technlogical readiness level.
(a) For support to Clean Transition and Industrial Decarbonisation, the specific objectives of support to decarbonisation of European industry, including SMEs and energy intensive industries, clean tech manufacturing and its supply chains, and contributing to the shift towards a sustainable, circular, energy-, water- and resource-efficient, climate-neutral and resilient economy. This includes the uptake by industries of decarbonisation technologies and other solutions for their industrial processes and activities, as well as the decarbonisation of energy supply, promotion of energy efficiency, the uptake of renewable and clean energy solutions, the development of energy system flexibility, the uptake of lead markets for clean products , the development, resilience, integration and digitalisation of the energy and transport infrastructures and systems, boosting smart mobility and sustainable alternative fuels, as well as boosting the sustainable blue economy, the development of innovative nature-based business models and demand side solutions for clean and decarbonised buildings, transport and	IT (Drafting Suggestions): (a) For support to Clean Transition and Industrial Decarbonisation, the specific objectives ~~of~~ **are to** support ~~to~~ **the** decarbonisation of European industry, **in compliance with the principle of technology neutrality**, including SMEs and energy intensive industries, **automotive sector**, clean tech manufacturing and its supply chains, and contributing to the shift towards a sustainable, circular, energy-, water- and resource-efficient, climate-neutral and resilient economy. IT (Comments): Improves readability by correcting the introductory phrase. We should ensure that the decarbonisation process is based on the principle of technology neutrality, which was already included in the European Council conclusions.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
industry, and production ramp up contributing to Europe's strategic autonomy.	The transition of the automotive sector should be accompanied by an adequate amount of financial resources, to be paired with/to national ones. This to support the demand and the supply side of this sector, with a special focus on the needs of all actors of the automotive value chain. IE (Comments): IE is supportive of this article. IE note that space assets and industries can contribute to these activities CZ (Drafting Suggestions): For support to Clean Transition and Industrial Decarbonisation, the specific objectives of support to decarbonisation of European industry, including SMEs and energy intensive industries, clean tech manufacturing and its supply chains, and contributing to the shift towards a sustainable, circular, energy-, water- and resource-efficient, climate-neutral and resilient economy. This includes the uptake by industries **of** decarbonisation technologies**, including in the transport sector,** and other solutions for their industrial processes and activities, as well as the decarbonisation of energy supply, promotion of energy efficiency, the uptake **and development** of renewable and **clean energy solutions, including nuclear energy,** the development of energy system flexibility, the uptake of lead markets for clean products, the development, resilience, integration and digitalisation of the energy and transport infrastructures and systems, boosting smart mobility and sustainable alternative fuels, as well as boosting the sustainable blue economy, the development of innovative nature-based business models, and demand side solutions for **ecosystem and climate resilience**, clean and decarbonised buildings, transport and industry, and production ramp up contributing to Europe's **open** strategic autonomy. CZ (Comments):

Commission proposal	Drafting Suggestions and Comments
	CZ - It remains unclear whether this window and the subsequent work programmes are intended to enhance competitiveness and resilience solely through the uptake of existing technologies, or also through the development of new, innovative solutions. This is particularly relevant for renewable and clean energy technologies, which advance continuously. Czechia requests the explicitly list nuclear energy among the clean energy solution objectives under this window. Czechia also proposes a broader inclusion of LIFE program topics in the clean transition window, since there is no justification in the draft Regulation for excluding some of thematic areas currently supported by the LIFE programme. While the Clean Transition and Industrial Decarbonisation window is framed mainly around green transition and industrial decarbonisation, LIFE has also supported biodiversity protection, nature and landscape conservation, and climate change adaptation — here proposed collectively as solutions for ecosystem and climate resilience — which merit explicit mention beyond "innovative nature-based business models". Note that para 2(b)(4) links these/similar areas too narrowly to agriculture and food. We would also kindly request these issues being clarified in written response to our comments, in particular should our proposed amendments not be reflected. With regard to LIFE's areas of *"biodiversity protection, nature and landscape conservation, and climate change adaptation"*, should these not be encompassed within the ECF, the question arises as to how the European Commission intends to ensure continued and adequate support for these domains. We would appreciate receiving written clarification on this matter. AT (Drafting Suggestions): For support to Clean Transition and Industrial Decarbonisation, the specific objectives of support, **including the support of excellent collaborative research and innovation activities integrating also social sciences and humanities,** to decarbonisation of European industry, including SMEs and energy intensive industries, clean tech manufacturing and its supply chains and **advanced and raw materials**, and contributing to the shift towards a towards a sustainable, circular, energy-, water- and resource-efficient, climate-neutral and resilient

Commission proposal	Drafting Suggestions and Comments
	economy. **For support to resilience of supply chains, the specific objectives of reinforcing Europe's resilience by strengthening the Union capacity in exploration, extraction, processing and recycling of raw materials and diversifying supply sources and markets, and improving the timely availability of such products, including through the reduction of their delivery lead time, reservation of manufacturing slots or stockpiling of products, intermediate products or raw materials.** This includes the uptake by industries of decarbonisation technologies and other **circular** solutions for their industrial processes **and production systems** and activities, **as well as the support to the diversification of European industries, manufacturers and value chains to enter into cutting edge, high-value-added, high potential clean tech and clean energy technology manufacturing value chains** as well as the decarbonisation of energy supply, promotion of energy efficiency, the uptake of renewable and clean energy solutions, the development of energy system flexibility, the uptake of lead markets for clean products , the development, resilience, integration and digitalisation of the energy and transport infrastructures and systems, boosting smart mobility and sustainable alternative fuels, as well as boosting the sustainable blue economy, the development of innovative nature-based business models and demand side solutions for clean and decarbonised buildings **and neighborhoods,** transport and industry, and production ramp up contributing to Europe's strategic autonomy. AT (Comments): The industry topic of Horizon Europe cluster 4 will be integrated in this policy window, so it would be important to make this more clear. It is also rather unclear to us why raw materials are not included here, and why this is dealt with in the policy window resilience. Raw and advanced materials need to be thought together: on the primary side you have exploration and on the secondary site substitution of raw by advanced materials, recycling and production of raw materials Strengthening Europe's strategic autonomy by quickly ramping up production of clean tech solutions, particularly cutting edge clean energy solutions, will need to be based on current European fields of manufacturing strength and ecosystems (incl. expertise, facilities, and

Commission proposal	Drafting Suggestions and Comments
	infrastructure) that are not yet part of clean energy technology value and supply chains but could, with innovation, up-/re-skilling, adapted and/or innovative production processes and production systems, (quickly) diversify and expand into these new to them product and business fields. Therefore, this policy window should explicitly address the promotion of diversification of European industries and manufacturers into (more) innovative, high value-added, high-potential clean tech sectors (especially in the fields of renewable energy technologies, energy efficiency, and energy systems). SE (Drafting Suggestions): For support to Clean Transition and Industrial Decarbonisation, the specific objectives of support to decarbonisation of European industry, including SMEs and energy intensive industries, **innovative** clean tech manufacturing and its supply chains, and contributing to the shift towards a sustainable, circular, energy-, water- and resource-efficient, climate-neutral and resilient economy. This includes the uptake by industries of decarbonisation technologies ~~and other solutions for their industrial processes and activities~~, as well as the decarbonisation of energy supply, promotion of energy efficiency, the uptake of renewable and clean energy solutions, the development of energy system flexibility, the uptake of lead markets for clean products , the development, resilience, integration and digitalisation of the energy and transport infrastructures and systems, boosting smart mobility and sustainable alternative fuels, as well as boosting the sustainable blue economy, the development of innovative nature-based business models and demand side solutions for clean and decarbonised buildings, transport and industry, and **ramp up innovative** production ~~ramp up~~ contributing to Europe's **open** strategic autonomy. SE (Comments): Need clarification on what"clean tech manufacturing" and "sustainable alternative fuels" are in this context. PL

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Comments): The development of research and innovation (R&D) in areas that support the transition to a climate-neutral economy is crucial for the long-term success of the energy transition. Investments in R&D of new technologies are essential. An effective energy transition requires the development of a broad spectrum of innovative technologies. Without investing in and leveraging R&D results, we will not have a competitive, sustainable, and resilient industrial sector, which will be the pillar of the future of the European economy, capable of competing in the global market. Research and innovation strengthen resilience and increase the EU's global competitiveness. They are crucial for developing innovative and groundbreaking technological solutions necessary for an effective economic and energy transition, including those contributing to the achievement of the goals of strategic European initiatives such as the Clean Industry Deal. R&D are essential for achieving the EU's resource and technological autonomy. The Draghi Report and other expert reports confirm the need to narrow the innovation gap in research and innovation between Europe and global competitors such as the US and China. Reducing this innovation gap is crucial to increasing the competitiveness of the European Union. To close the research and innovation divide, the innovation gap within the EU must also be bridged. The goal of EU member states spending at least 3% of GDP on R&D investments should be the result of an even more ambitious pan-European budget for the research and innovation sector. In this context, the plans to at least double the budget of the next 10th Framework Programme for Research and Innovation for 2028-2034, the successor to Horizon Europe 2021-2027, should be considered positive. The 10th Framework Programme should be the core of the ECF. NL (Drafting Suggestions): (a) For support to Clean Transition and Industrial Decarbonisation, the specific objectives of support to decarbonisation of European industry, including SMEs and energy intensive industries, clean tech manufacturing and its supply chains, and contributing to the shift towards

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	a sustainable, circular, energy-, water- and resource-efficient, climate-neutral and resilient economy. This includes the uptake by industries of decarbonisation technologies and other solutions for their industrial processes and activities, as well as the decarbonisation of energy supply, promotion of energy efficiency, the uptake of renewable and clean energy solutions, the development of energy system flexibility, the uptake of lead markets for clean products , the development, resilience, integration and digitalisation of the energy and transport infrastructures and systems, boosting smart mobility and sustainable alternative fuels, as well as boosting the sustainable blue economy, the development of innovative nature-based business models and demand side solutions for clean and decarbonised buildings, transport and industry, and, **where proportionate,** production ramp up contributing to Europe's strategic autonomy. NL (Comments): To what extent does *the development, resilience, integration and digitalisation of the energy and transport infrastructures and systems* overlap with the objectives of CEF? Does "alternative fuels" include the roll-out of of charging infrastructure along the TEN-T corridors? Is funding for that purpose both possible from CEF and ECF? Need te be more carefull with production support given their more market distorting effects MT (Drafting Suggestions): (a)For support to Clean Transition and Industrial Decarbonisation, the specific objectives of support to decarbonisation of European industry, ~~including~~ **with a particular emphasis on** SMEs and energy intensive industries, clean tech manufacturing and its supply chains, and contributing to the shift towards a sustainable, circular, energy-, water- and resource-efficient, climate-neutral and resilient economy. This includes the uptake by industries of decarbonisation technologies and other solutions for their industrial processes and activities, as well as the decarbonisation of energy **and water** supply, promotion of energy efficiency, the uptake of renewable and clean energy solutions, the

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	development of energy system flexibility, the uptake of lead markets for clean products , the development, resilience, integration and digitalisation of the energy and transport infrastructures and systems, boosting smart mobility and sustainable alternative fuels **industrial production ramp up, storage and deployment**, as well as boosting the sustainable blue economy, the development of innovative nature-based business models and demand side solutions for clean and decarbonised buildings, transport and industry, and production ramp up contributing to Europe's strategic autonomy. MT (Comments): Malta also wants to add **with a particular emphasis on** SMEs. **Tangible Measures for Small and Medium-Sized Enterprises (SMEs):** Malta would like to see more measures to be taken and implemented for SMEs. The more measures, initiatives and ring fencing of funds for SMEs is highly recommended by Malta. There need to be clear targets indicating the amount of funding that would be made available solely for SMEs. In water constrained countries, the production of water is an energy intensive sector which plays in important role both in serving the whole economy but also as a major energy consumer. In relation to sustainable alternative fuels, Malta would like to add **industrial production ramp up, storage and deployment**. LT (Drafting Suggestions): a) For support to Clean Transition and Industrial Decarbonisation, the specific objectives of support to decarbonisation of European industry, including SMEs and energy intensive industries, clean tech manufacturing and its supply chains, and contributing to the shift towards

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	a sustainable, circular, energy-, water- and resource-efficient, climate-neutral and resilient economy. This includes the uptake by industries of decarbonisation technologies and other solutions for their industrial processes and activities, as well as the decarbonisation of energy supply, promotion of energy efficiency, the uptake of renewable and clean energy solutions, the development of energy system flexibility, the uptake of lead markets for clean products , the development, resilience, integration and digitalisation of the energy and transport infrastructures and systems, boosting smart mobility and sustainable alternative fuels, as well as boosting the sustainable blue economy, the development of innovative nature-based business models and demand side solutions for clean and decarbonised buildings, transport and industry, and production ramp up contributing to Europe's strategic autonomy, while reflecting specific national and regional contexts, including the role of SMEs and industrial ecosystems in the transition, and their contribution to strengthening the resilience and security of energy systems and the economy as a whole. RO (Drafting Suggestions): *Support to the Clean Transition and Industrial Decarbonisation, with a focuss on fostering the competitiveness and resilience of European industry, including SMEs and energy-intensive sectors, by accelerating the deployment and uptake of clean and decarbonisation technologies - promoting energy efficiency and security, renewable and clean energy solutions, sustainable alternative fuels and smart mobility. It shall also support the modernisation, integration and digitalisation of energy and transport infrastructures, the scale-up of clean technology manufacturing and related supply chains, the promotion of circular and nature-based business models, and the sustainable blue economy. These actions shall contribute to Europe's open strategic autonomy and to the transition towards a climate-neutral, resource-efficient and resilient economy* RO (Comments):

Commission proposal	Drafting Suggestions and Comments
	It should be streamlined, as there are too many concepts and nuances to take into account for the financial lines, which may also cause overlaps with the NRPP. As well, the role of education in achieveing Clean Transition should be highlighted. Complete rephrasing should be considered. ES (Drafting Suggestions): (a) For support to Clean Transition and Industrial Decarbonisation, the specific objectives of support to decarbonisation of European industry, including SMEs and energy intensive industries, clean tech manufacturing and its supply chains, and contributing to the shift towards a sustainable, circular, energy-, water- and resource-efficient, climate-neutral and resilient economy. This includes the uptake by industries of decarbonisation technologies and other solutions for their industrial processes and activities, as well as the decarbonisation of energy supply, promotion of energy efficiency, the uptake of renewable and clean energy solutions, the development of energy system flexibility, the uptake of lead markets for clean products , the development, resilience, integration and digitalisation of the energy and transport infrastructures and systems, boosting smart mobility and sustainable alternative fuels, as well as boosting the sustainable blue economy, the development of innovative nature-based business models and demand side solutions for clean and decarbonised buildings, transport and industry, and production ramp up **with prioritisation of industrial production capacities inside the Union, including through dedicated funding lines,** contributing to Europe's strategic autonomy. CY (Drafting Suggestions): (…) including SMEs, start ups and scale ups and energy intensive industries (…) EL (Drafting Suggestions): This includes the uptake by industries of decarbonisation technologies and other solutions for their industrial processes and activities, as well as the decarbonisation of energy supply,

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	promotion of energy efficiency, the uptake of renewable and clean energy solutions, the development of energy system flexibility, the uptake of lead markets for clean products , the development, resilience, integration and digitalisation of the energy and transport infrastructures and systems, boosting smart mobility and sustainable alternative fuels, as well as boosting the sustainable blue economy, the development of innovative nature-based business models and demand side solutions for clean and decarbonised buildings, transport and industry, and production ramp up contributing to Europe's strategic autonomy. **In addition, it includes the manufacturing of critical raw materials, which are essential for the creation of products that contribute to the swift to climate-neutral economy**. EL (Comments): **The manufacturing of critical raw materials is pivotal for the shape of state-of-the-art products, like chips and batteries. This is why, we deem important to include such a reference.** SI (Drafting Suggestions): (a) For support to Clean Transition and Industrial Decarbonisation, the specific objectives of **research and innovation as well as** support to decarbonisation of European industry, including ~~SMEs and~~ energy intensive industries, clean tech manufacturing and its supply chains **as well as SMEs**, and contributing to the shift towards a sustainable, circular, energy-, water- and resource-efficient, climate-neutral and resilient **society and** economy **while ensuring geographical balance of tehcnological development, partly through creation of national envelopes**. This includes the uptake by industries of decarbonisation technologies – **both innovative and developed disruptive technologies** and other solutions for their industrial processes and activities, as well as the decarbonisation of energy supply, promotion of energy efficiency, the uptake of renewable and clean energy solutions, the development of energy system flexibility, the uptake of lead markets for clean products , the development, resilience, integration and digitalisation of the energy and transport infrastructures and systems, boosting **sustainable and** smart mobility and ~~sustainable~~ alternative fuels, as well as boosting the

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	sustainable blue economy, the development of innovative nature-based business models and demand side solutions for clean and decarbonised buildings, transport and industry., and production ramp up contributing to Europe's strategic autonomy. SI (Comments): All four policy windows are connected to pillar II.of Horizon Europe and this should be reflected in the text. Ensuring a balanced geographical development of decarbonisation technologies across the EU is crucial for several reasons. First, climate neutrality can only be achieved if all MS contribute, not just a few industrial leaders. If decarbonisation efforts are concentrated in certain regions, this risks creating technological and economic divides within the EU, undermining both cohesion and solidarity. A fair distribution of technological deployment also strengthens the resilience of the single market by ensuring that every country benefits from the green transition. At the same time, EU funding mechanisms must support both innovative technologies and the scale-up of already proven solutions. Innovation is essential to secure EU's technological leadership and competitiveness in the long term. However, many smaller MS face structural disadvantages: their companies often lack the financial and institutional capacity to compete successfully in highly competitive EU calls, meaning they cannot access funds for large-scale deployment. This creates a situation where only well-established actors in larger MS benefit from EU resources. By financing the scale-up of proven, market-ready technologies, the EU can ensure that smaller companies and MS are not excluded from the transition. This approach allows them to deploy solutions that are already viable, while still leaving room for innovation funding at the frontier of technology. Together, this dual approach – fostering innovation while scaling up existing solutions – ensures that the green transition is inclusive, economically efficient, and geographically balanced across the EU.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	Important to emphasize the need for investments into development of sustainable transport. Alternative fuels are by definition already more sustianable then fossil fuels. Please elaborate what is meant by innovative nature-based business models Production ramp up is rather a tool and cannot be an objective. LV (Drafting Suggestions): For support to Clean Transition and Industrial Decarbonisation, the specific objectives of support to decarbonisation of European industry, including SMEs and energy intensive industries, clean tech manufacturing and its supply chains, and contributing to the shift towards a sustainable, circular, energy-, water- and resource-efficient, climate-neutral and resilient economy **by uptaking, testing or developing new technologies, solutions and business models**. This includes **support to designing policy framework for clean energy transition,** the uptake **and testing** by industries of decarbonisa tion technologies and other solutions for their industrial processes and activities, as well as the decarbonisation of energy supply, promotion of energy efficiency, the uptake **and testing** of renewable and clean energy solutions, the development of energy system flexibility, the uptake of lead markets for clean products, **innovative heating and cooling, energy storage and demand-response,** the development **and testing**~~,~~ resilience, integration and digitalisation of the energy and transport infrastructures and systems, boosting smart mobility and sustainable alternative fuels, as well as boosting the sustainable blue economy, the development of innovative nature-based business models and demand side solutions for clean and decarbonised buildings, transport and industry, and production ramp up contributing to Europe's strategic autonomy. LV (Comments): How will small-scale behaviour-change and market-barrier removal projects (households, SMEs, municipalities) be supported under ECF's industrial framing?

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	FR (Drafting Suggestions): For support to Clean Transition and Industrial Decarbonisation, the specific objectives of support to decarbonisation of European industry, including SMEs and energy intensive industries, clean tech manufacturing and its supply chains, and contributing to the shift towards a sustainable, circular, energy-, water- and resource-efficient, climate-neutral**, nature-positive** and resilient economy **through environmental policy implementation with a technology neutral approach**. This includes the uptake by industries of decarbonisation technologies and other solutions for their industrial processes and activities, as well as the decarbonisation of energy supply, promotion of energy efficiency, the uptake of renewable and clean energy solutions, the development of energy system flexibility, the uptake of lead markets for clean products , the development, resilience, integration and digitalisation of the energy and transport infrastructures and systems, boosting smart mobility and sustainable alternative fuels, as well as boosting the sustainable blue economy, **the circular economy**, **water-efficiency and resilience solutions, environment protection, restoration and improvement including nature-based solutions to halt and reverse biodiversity loss**, the development of innovative nature-based business models and demand side solutions for clean and decarbonised buildings, transport and industry, **as well as research in amount to ensure long term strategies and an healthy and secure environment for industries** and production ramp up contributing to Europe's strategic autonomy. FR (Comments): **This paragraph should include a clear reference to the principle of technological neutrality.**. Chapter IV, Article 33 (i) includes many elements related to natural resources, ocean health, biodiversity and ecosystems: these elements also need to appear here to ensure they are well taken into account.We suggest to add within this paragraph the concept of nature-based solutions

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	as key solutions to address societal challenges. NbS could also be added within Chapter IV, Article 33 (i). The support to clean transition and industrial decarbonisation also needs to cover the implementation of environmental policy. What does the Commission mean by the development of innovative nature-based business models? Does this refer to nature-based solutions? What types of projects could be funded in terms of Technology Readiness Level? The French authorities want to ensure that the term "sustainable alternative fuels" is correctly described in this section. The definition suggested is as follows: "*as far as Sustainable Aviation Fuels (SAF) are concerned, 'sustainable alternative fuels' means sustainable aviation fuels, synthetic low- carbon aviation fuels or hydrogen for aviation as defined in Article 3, point (7), (13) or (17) of Regulation (EU) 2023/2405 destined for the aviation sector*."
(b) For support to Health, Biotechnology, Agriculture and Bioeconomy:	IE (Comments): IE note that space assets and industries can contribute to these activities CZ (Comments): CZ - We request a written explanation as to whether, and in what manner, the forthcoming EU Bioeconomy Strategy (scheduled for publication in the fourth quarter of 2025) has been duly taken into account in the design of this thematic window.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	We would also like to draw attention to the fact that many medicinal products are produced synthetically, and that pharmaceutical development often involves formulation challenges (e.g., controlled or targeted release), which are not necessarily biotechnological in nature. A similar situation applies to certain medical devices, as not all of them are bio-based. Is the support for all medical products and devices considered, or only those that are being bio-based under paragraph 2(b)(2)? We would appreciate receiving written clarification on this matter. MT (Comments): **Agriculture and Fisheries:** While the document does not directly address agriculture, fisheries, or the CAP, the proposed Competitiveness Fund could still hold indirect relevance for Malta in these areas. If projects within the agricultural and fisheries sectors are framed under EU priorities for industrial innovation and the green transition, they may benefit from this instrument. Potential opportunities include investments in agri-tech, food processing, the digitalisation of farming and fisheries, and sustainability initiatives such as the decarbonisation of fishing fleets or the use of renewable energy in agriculture. The Fund's emphasis on supporting SMEs and start-ups is particularly important for Malta, given the small-scale nature of many of its agri-food and fisheries businesses. Moreover, there is scope to explore synergies with existing CAP and EMFAF funding, provided initiatives are aligned with wider EU competitiveness objectives SI (Comments): Slovenia support BE proposal do devide para (b) into 2 separate chapters: support to health and biotechnology and support to agriculture and bioeconomy.
(1) For support to health, the specific objectives of fostering innovation and competitiveness of the health sector while ensuring supply security and the industrial capacity and capability to manage future serious cross-	IT (Drafting Suggestions):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
border threats to health; improving and protecting public and population health, by prioritising health promotion and disease prevention across the life span through a health-in-all and One Health policies approach, and by strengthening innovation and resilience of health systems.	For support to health, the specific objectives ~~of~~ **are to** foster~~ing~~ innovation and competitiveness of the health sector while ensuring supply security and the industrial capacity and capability to manage future serious cross-border threats to health; improv~~ing~~ and protect~~ing~~ public and population health by prioritising health promotion and disease prevention across the life span through a health-in-all and One Health policies approach**; harnessing the potential of digital health, health data and new technologies to accelerate transformation**; and strengthening innovation, sustainability and resilience of health systems. IT (Comments): It improves clarity by aligning grammar with standard EU legal drafting, and simplifying wording for better readability. IE (Comments): IE welcome the specific objective of fostering innovation and competitiveness within the health sector. AT (Drafting Suggestions):) For support to health, the specific objectives of fostering innovation and competitiveness of the health sector while ensuring supply security and the industrial capacity and capability to manage future serious cross-border threats to health; improving and protecting public and population health, by prioritising health promotion and disease prevention across the life span through a health-in-all and One Health policies approach, and by **supporting structural reforms,** strengthening innovation and resilience of health systems. NL (Drafting Suggestions):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(1) For support to health, the **primary** ~~specific~~ objectives of fostering innovation and competitiveness of the health sector **and** ~~while~~ ensuring supply security and the industrial capacity and capability ~~to manage future serious cross-border threats to health~~, **contributing to** improving and protecting public and population health, by prioritising health promotion and disease prevention across the life span through a health-in-all and One Health policies approach, and by strengthening innovation and resilience of health systems. NL (Comments): To better focus and align with general ECF objectives MT (Comments): Why does access to medicine feature in point 2 and not 1? How do the two interact? HU (Comments): The specific objectives defined in the section – particularly the role of the healthcare sector in innovation and supply security, as well as support for the bioeconomy, biotechnology, and agriculture – make it clear that EU4Health is not only a health policy tool but also an economic strategy instrument. Strengthening the links between health, biotechnology, and agriculture creates an opportunity for health policy interventions to generate long-term economic growth and sustainability. However, we do not agree with merging the EU health programme – which has existed separately for the past 20 years – into a large competitiveness fund, where it is not defined, for example, how much of the €20.393 billion earmarked in Article 3(2)(b) for health, biotechnology, agriculture, and bioeconomy objectives will actually be allocated to healthcare developments, compared to the current EU4Health programme's budget of €4.4 billion within the planned overall budget of €234.3 billion.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	SI (Drafting Suggestions): (1) For support to health, the specific objectives of fostering **research and** innovation and ~~competitiveness~~ **development** of **the public as well as private** health sector while ensuring supply security and the industrial capacity and capability to manage future serious cross-border threats to health; improving and protecting public and population health, by prioritising health promotion and disease prevention across the life **course, managing cronic diseasess through the introduction of open interface for remote motintoring sensors of different providers (i.e. establishing ''European standard'' for connectivity of sensors), applying** span through a health-in-all and One Health policies approach, and by strengthening innovation, **quality, accessibility** and resilience of health systems. SI (Comments): In particular public health sectors should not be bound to the characteristics of competitiveness. All four policy windows are connected to pillar II.of Horizon Europe and this should be reflected in the text. In this context managing chronic diseases is one of key priorities, as those deseases represent a persistent challenge for healthcare systems. The support for establishing EU level open source interfaces that would enable connection of different sensors that enable remote monitoring of vitals signs for chronic patients at home would decrease costs of development of such tools on national levels and decrease the power of certain medical devices manufacturers. That would shorten the development time to a full digital support for self-management of conditions, enhance access to care, improve patients' quality of life, and reduce the burden on healthcare facilities. These innovations would contribute to greater system resilience and enable more proactive and personalized healthcare delivery. Additonally Slovenia agrees with Belgium's proposal in this part of the text.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	FR (Drafting Suggestions): For support to health, the specific objectives of fostering innovation and competitiveness of the health sector while ensuring supply security and the industrial capacity and capability to manage future serious cross-border threats to health; improving and protecting public and population health, **as well as plant and animal well-being**, by prioritising health promotion and disease prevention across the life span through a health-in-all and **protecting plant, animal and environmental health by** One Health policies approach, **including all ecosystems,** and by strengthening innovation and resilience of health systems. FR (Comments): In a context of increasing zoonoses, it is important for health systems to take fully into account the plant, animal and environmental health, and to increase the capacity of all relevant actors, in particular in the agricultural sector, to address cross-border threats to health. The description of specific activities in Chapter V, Article 37, should give more precision on One Health policies because they cover a wide range of areas from animal health to ecosystem restoration and health monitoring systems.
(2) For support to biotechnology, the specific objectives of contributing to the development and scalable production and uptake, availability and accessibility of medicinal products, medical devices, diagnostics and other medical countermeasures.	IT (Drafting Suggestions): For support to biotechnology, the specific objectives ~~of~~ **are to** contribut~~eing~~ to the development, ~~and~~ scalable production, ~~and~~ uptake, availability and accessibility of medicinal products, medical devices, diagnostics and other medical countermeasures. IT (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	Better readability IE (Drafting Suggestions): IE suggest a revision of the objective to read: 'contributing to the development, scalable production, uptake, availability and accessibility of medicinal products, medical devices, diagnostics, **critical medicines**, and other medical countermeasures' IE (Comments): IE suggest that the term 'Biotechnology' should be defined. CZ (Comments): CZ - The current drafting of the Regulation explicitly refers to biotechnology only in the context of medical and pharmaceutical applications, thereby creating a potentially misleading and unduly narrow definition of the field. This wording may give rise to the interpretation that Article 37(1)(d) applies solely to medicine and pharmacy, which was presumably not the intention of the Commission. We kindly request that this issue be clarified in a written response to our comments, and, if the Commission shares this assessment, reflected in a revision of the draft Regulation. SE (Drafting Suggestions): (2) For support to biotechnology, the specific objectives ~~of~~ **to foster the cross-sectorial and innovative use of biotech as well as** contributing to the development and scalable production and uptake, availability and accessibility of medicinal products, medical devices, diagnostics and other medical countermeasures. SE (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	Biotechnology, an essential tool to progress knowledge in life sciences, is also seen as a sector in itself, covering many application areas. To promote the cross-sectoral applications , it could be a specific objective, and not just for medicinal or bioeconomy purposes. PL (Comments): the main emphasis was placed on health biotechnology, ignoring other aspects such as industrial, environmental or agricultural biotechnology. we propose to specify the phrase "medicinal products" by introducing a more detailed record " medicinal products (including Critical Medicines and API) SI (Drafting Suggestions): (2) For support to biotechnology, the specific objectives of contributing **to research and innovation and** the development and scalable production and uptake, availability and accessibility of medicinal products, **including critical medicines and Active Pharmaceutical Ingredients (APIs),** medical devices, diagnostics and other medical countermeasures, **including investments in healthcare infrastructure.** SI (Comments): All four policy windows are connected to pillar II.of Horizon Europe and this should be reflected in the text. Funding needs to be secured for the implementation of the Critical Medicines Act. Please see recital 59. Investing in health infrastructure is essential for a modern, accessible and resilient health system. European funds enable countries to invest faster and more extensively, foster cooperation and reduce disparities between regions and Member States.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	LV (Drafting Suggestions): (2) For support to biotechnology, the specific objectives of contributing to the development and scalable production and uptake, availability and accessibility ~~of medicinal products~~, medical devices, diagnostics and other medical countermeasures. LV (Comments): We propose to delete the words *"of medical products"*, taking into account that biotechnology is related not only to the medical industry (for example, in food or industry in the development of natural dyes). FR (Drafting Suggestions): For support to biotechnology, the specific objectives of contributing to the development, **advanced clinical and industrial scale-up** and scalable production and uptake, availability and accessibility of medicinal products, medical devices, diagnostics and other medical countermeasures, **including advanced therapy medicinal products and other breakthrough biotechnologies ; of developing generic cutting-edge scientific tools; of proposing innovative solutions to the adaptation to climatic and environmental challenges** FR (Comments): Actions under this point shall support projects that enhance Europe's capacity to bring biotechnological innovations from research to market, and shall complement Union regulatory frameworks aimed at streamlined and predictable authorisation pathways Biotechnology should not be limited to the health sector, but should also be considered for scientific developments (the UE should be able to develop future powerful research and

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	innovation tools, cf "crispr"s) and for adapting economic sectors, such as agriculture, and environment to climatic and environmental challenges (NGT, biocontrol, precision agriculture…)
(3) For support to bioeconomy policy, the specific objectives of fostering an innovative and competitive bioeconomy in the Union, including in the areas of biobased materials and products, biomanufacturing, innovative food products and biochemicals; including support to SMEs, start ups and scaleups, contribute to the development and scalable production and uptake, availability and accessibility of bioeconomy innovations, including those based on cross-sectoral cutting-edge biotechnology; strengthen supply chains and increase their resilience.	IT (Drafting Suggestions): For support to bioeconomy policy, the specific objectives ~~of~~ **are to** foster~~ing~~ an innovative and competitive bioeconomy in the Union, including in the areas of biobased materials and products, biomanufacturing, innovative food products and biochemicals; ~~including~~ **to** support ~~to~~ SMEs, start- ups and scale-ups**; to** contribute to the development, ~~and~~ scalable production, ~~and~~ uptake, availability and accessibility of bioeconomy innovations, including those based on cross-sectoral cutting-edge biotechnology; **and to** strengthen supply chains and increase their resilience. IT (Comments): It improves legal clarity by ensuring consistent wording for better readability and alignment with standard EU drafting style. IE (Comments): IE welcome the fostering of an innovative and competitive bioeconomy in the Union. CZ (Comments): CZ - We note that the concept of the "bioeconomy" is currently defined in vague terms, and that greater terminological precision is required, particularly with regard to the expected coverage of the various (bio)technologies. In this context, we request a clearer definition of *bioeconomy* in the Regulation, e.g. in Article 2.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	While the Objectives section refers to *innovative food products* and the ECF mentions food security among its aims, Chapter V does not include food production within the scope of specific activities under this window. We therefore highlight the need to fix the problem in the Article 37 and we wish to signal that the Czechia will request the inclusion of food production when commenting to Art. 37. We kindly request that these issues be clarified in a written response to our comments, and, if the Commission shares this assessment, reflected in a revision of the draft Regulation. SE (Drafting Suggestions): For support to bioeconomy policy, the specific objectives of fostering an innovative and competitive bioeconomy in the Union, including in the areas of biobased materials and products, biomanufacturing, innovative food products and biochemicals; including support to SMEs, start ups and scaleups, contribute to the development **of innovative,** ~~and~~ scalable production ~~and uptake~~, availability and accessibility of bioeconomy innovations, including those based on cross-sectoral cutting-edge biotechnology; strengthen supply chains and increase their resilience. PL (Comments): the document emphasizes the importance of biocomponents, innovative and biochemical products - attention should also be paid to innovative solutions in the area of storage, processing and packaging of food while maintaining key nutrients. It would be more appropriate to add the adjectives circular or sustainable to the word "bioeconomy", which would emphasize the need to run a sustainable economy in the face of the climate changes and the biodiversity crisis EL (Drafting Suggestions):

Commission proposal	Drafting Suggestions and Comments
	(3) For support to bioeconomy policy, the specific objectives of fostering an innovative and competitive bioeconomy in the Union, including in the areas of biobased materials and products, biomanufacturing, innovative food products and biosealcals; including support to SMEs, start ups and scaleups, contribute to the development and scalable production and uptake, availability and accessibility of bioeconomy innovations, including those based on cross-sectoral cutting-edge biotechnology; strengthen supply chains and increase their resilience. **Relevant frameworks need to give robust assurances to citizens about responsible use, safety and sustainability.** EL (Comments): We propose to align the provision with the Communication (COM/2024/137) Building the future with nature: Boosting Biotechnology and Biomanufacturing in the EU, page 8, in order to provide the necessary safeguards to EU citizens. FR (Drafting Suggestions): For support to bioeconomy policy, the specific objectives of fostering an innovative, **sustainable**, **water-smart, nature-positive** and competitive bioeconomy in the Union, including in the areas of biobased materials and products, biomanufacturing, innovative food products and biochemicals; **ensuring science and evidence-based food safety and standard-setting** ; including support to SMEs, start ups and scaleups, contribute to the development and scalable production and uptake, availability and accessibility of bioeconomy innovations, including those based on cross-sectoral cutting-edge biotechnology; strengthen supply chains and increase their resilience. FR (Comments): Many bioeconomy developments are subject to international scientific and evidence-based standard-setting, in particular from a sanitary (IPPC for plant health, Codex alimentarius for food safety, OMSA for animal safety), or precautionary point of view. Ensuring that the EU's

Commission proposal	Drafting Suggestions and Comments
	positions in these standard setting organisations are based on sound science and evidence is crucial for aligning these international standards with UE's production practices, and eventually for maintaining and developing EU's market shares abroad.
(4) For support to the agriculture and food security, the specific objective of fostering the competitiveness, sustainability, and resilience of the agriculture, fisheries and aquaculture, forestry and rural and coastal areas and their role in the transition to a climate-neutral climate-resilient, water-smart, nature-positive economy and the protection of natural resources biodiversity while contributing to long term food security in the Union.	IT (Drafting Suggestions): For support to ~~the~~ agriculture and food security, the specific objective ~~of~~ **is to** foster~~ing~~ the competitiveness, sustainability, and resilience of ~~the~~ agriculture, fisheries, ~~and~~ aquaculture, forestry, and rural and coastal areas and their role in the transition to a climate-neutral, climate-resilient, water-smart, nature-positive economy, and the protection of natural resources biodiversity while contributing to long-term food security in the Union. IT (Comments): It clarifies the introductory phrase, improving readability CZ (Comments): CZ - We wish to signal that the Czechia will request the inclusion of *food waste valorisation* under Article 37(f). SE (Drafting Suggestions): (4) For support to the agriculture and food security, the specific objective of fostering the competitiveness, sustainability, and resilience of the agriculture, fisheries and aquaculture, forestry and rural and coastal areas and their role in the transition to a climate-neutral, climate-resilient, water-smart, nature-positive economy, and the protection of natural resources and biodiversity, while contributing to long term food security in the Union. SE

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Comments): Editorial changes. PL (Drafting Suggestions): *"(4) For support to the agriculture,* ***processing and marketing of agricultural products and food security in the value chain****, the specific objective of fostering the competitiveness, sustainability, and resilience of the agriculture, fisheries and aquaculture, forestry and rural and coastal areas and their role in the transition to a climate, neutral climate-resilient, water-smart, nature-positive economy and the protection of natural resources biodiversity while contributing to long term food security in the Union"* PL (Comments): the need to add a reference to the agricultural products processing and marketing sector within the value chain NL (Drafting Suggestions): (4) For support to ~~the~~ agriculture ~~and food security~~, the specific objective of fostering the competitiveness, **innovation**, sustainability, and resilience of the agriculture, fisheries and aquaculture **sectors**~~, forestry and rural and coastal areas~~ and their role in the transition to a climate-neutral climate-resilient, water-smart, nature-positive economy**, in complementarity with the objectives under [NRPP regulation], thereby also contributing to food security**. ~~and the protection of natural resources biodiversity while contributing to long term food security in the Union.~~ NL (Comments): Stronger focus on competitiveness and innovation

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	MT (Drafting Suggestions): (4)For support to the agriculture and food security, the specific objective of fostering the competitiveness, sustainability, and resilience of the agriculture, fisheries and aquaculture, forestry and rural and coastal areas and their role in the transition to a climate-neutral climate-resilient, water-smart, nature-positive economy and the protection of natural resources biodiversity while contributing to long term food **and water** security in the Union, inlcu. MT (Comments): Malta would like to add water production as this is a significant competitiveness challenge for MSs found in the South of the EU particular during the summer period. LT (Comments): We would like to inquire about the form in which funding to support agriculture and food security would be provided — whether through grants or financial instruments (e.g., loans, equity and quasi-equity, guarantees). Would this include only financing delivered via the European Investment Bank Group, or would other mechanisms be available as well? How will Member States be able to access these funds? There is concern about the extent to which smaller Member States will have effective access to such funding. SI (Drafting Suggestions): (4) For support to the agriculture and food security, the specific objective of fostering the competitiveness sustainability, and resilience of the agriculture, fisheries and aquaculture, forestry**,** ~~and~~ rural and coastal areas **with the support of research and innovation,, while**

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	strengthening ~~and~~ their role in the transition to a climate-neutral climate-resilient, water-smart, nature-positive economy and the protection of natural resources biodiversity while contributing to long term food security in the Union. SI (Comments): Research and innovation is an important tool for fostering competitiveness of any sector. FR (Drafting Suggestions): For support to the agriculture and food security, the specific objective **of putting research, innovation, knowledge and skills at the heart of Europe's agri-food economy, to** foster~~ing~~ the competitiveness, sustainability, ~~and~~ resilience **and attractivity** of the agriculture, fisheries and aquaculture and forestry ~~and~~, **sustain vibrant and economically prosperous** rural and coastal areas, ~~and~~ **support** their role in **the climate and environmental transitions, while contributing to long term food security in the Union; the specific objective of preserving the environmental weath of the Union shall include research and innovation related to** the transition to a climate-neutral climate-resilient, water-smart, nature-positive economy and **in** the protection, **restoration and enhancement** of natural resources, biodiversity~~,~~ increasing **and increase the skills of farmers, fishermen and rural actors to ensure a healthy and secure environment for industries and people.** FR (Comments): Additions copied from the Commission's vision for agriculture (COM(2025)75 final, 19/02/2025); the central role of research, innovation, knowledge and skills for agriculture is of particular relevance for this regulation and should be explicitely recalled. Considering the huige challenge of generational renewal in agriculuture, the issues of skills and of attractivity are crucial for Europe's agricultural competitiveness and food sovereignty.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	Biodiversity is mentioned here although it does not appear later in Chapter V, Article 37, which describes the specific activities in support for Health, Biotech, Agriculture and Bioeconomy. As a result, we suggest that biodiversity activities should also be included within Article 37.
(c) For support to Digital Leadership policy, the specific objectives of fostering innovation and competitiveness of digital sector for a competitive and secure Union and bringing its benefits to citizens and society, public administrations and businesses across the Union. This shall include, but not be limited to, supporting the entire digital value- and supply-chains and activities including support to start-ups, scale-ups and SMEs, in particular along the following dimensions: Achieving leadership in digital and AI technologies, including through technology transfer and innovation, and through cutting-edge infrastructures such as AI-powered digital twins; Achieving technological sovereignty by building resilient digital ecosystems and ensuring a high-level of cybersecurity in the Union; Enabling the power of digital for businesses and citizens by deploying advanced digital applications and services, infrastructures, capacities and capabilities and by reinforcing interoperability across the Union, Including support to digitalisation of companies, including SMEs, small mid-cap companies, start-ups and scale-ups; Supporting the digital transformation and interoperability of public and private sectors through the rapid uptake of AI, the wallet technologies, such as EU Digital Identity Wallets and trust services established pursuant to Regulation (EU) No 910/2014 and the forthcoming European Business Wallets and other digital	IT (Drafting Suggestions): (c) For support to Digital Leadership policy, the specific objectives of fostering innovation and competitiveness of digital sector for a competitive and secure Union and bringing its benefits to citizens and society, public administrations and businesses across the Union. This shall include, but not be limited to, supporting the entire digital value- and supply-chains and activities including support to start-ups, scale-ups and SMEs, in particular along the following dimensions: Achieving leadership in digital and AI technologies, including through technology transfer and innovation, and through cutting-edge infrastructures such as AI-powered digital twins; Achieving technological sovereignty by building resilient digital ecosystems and ensuring a high-level of cybersecurity in the Union; Enabling the power of digital for businesses and citizens by deploying advanced digital applications and services, infrastructures, capacities and capabilities and by reinforcing interoperability across the Union, Including support to digitalisation of companies, including SMEs, small mid-cap companies, start-ups and scale-ups; Supporting the digital transformation and interoperability of public and private sectors through the rapid uptake of AI, the wallet technologies, such as EU Digital Identity Wallets and trust services established pursuant to Regulation (EU) No 910/2014 and the forthcoming European Business Wallets and other digital innovative solutions, support**ing the competiveness of EU** cultural and creative industries - **including audiovisual, news media music and publishing sectors**, complementing the AgoraEU programme. IT (Comments): The AgoraEU proposal contains a provision for a specific, distinct objective regarding the news sector.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
innovative solutions. Support to cultural and creative industries, complementing the AgoraEU programme.	Current funding programmes have struggled to address the emerging challenges faced by news media outlets and quality journalism. These challenges have dramatically scaled since such programs were conceived. Moreover, Italy strongly supports the inclusion of cultural and creative industries, considering their strategic importance and the impact of the digital transition in all steps of their value chains. Enhancing their competitiveness in a global market influenced by large non-EU players can bolster regional growth and create jobs opportunities. The specific needs of European cultural and creative sectors in the digital environment, notably on access to finance, entrepreneurship and innovation, sustainability, digitalisation, Intellectual Property, skills, should continue to be clearly targeted through dedicated measures to maximise the generation of economic wealth. We suggest to include and expressly mention the audiovisual sector, which is essential for European competitiveness. Italy believes that enhancing the economic sustainability of the news media sector through financial support is urgent. A strong, plural, free and independent media system, together with quality journalism, rely on the sustainability of the sector. For this reason, we believe it is important to make a clear reference to the news sector in this paragraph Furthermore, Artificial Intelligence (AI), when integrated into creative processes, proves to be an extraordinary tool for interpreting and representing the complexity of the contemporary world, opening up new perspectives in key sectors of Cultural and Creative Industries (CCIs) such as music and publishing. These fields, rooted in creativity and the production of culturally valuable content, are undergoing a profound transformation thanks to AI, which enhances their expressive, productive, and distributive capabilities. IE (Comments): IE welcome the specific objective of fostering innovation and competitiveness within the digital sector.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	IE:note that space assets and industries can contribute to all of these activities CZ (Comments): CZ - We wish to signal that the Czechia will request the inclusion of o *DLT and blockchain technologies* in the list of technologies supported by the ECF under Article 37(f), o specific activities in digital applications related to smart mobility as a significant enabling application area. o Additionally, we recommend clarifying the concept of "technological sovereignty," emphasizing the support for the development of digital skills for citizens, including disadvantaged groups, expanding the list of key digital infrastructures, and specifying support for cultural and creative industries with links to existing programs. We also highlight the importance of cross-border and regional cooperation in digitalization within the EU, particularly in Central and Eastern Europe. AT (Drafting Suggestions): (c) For support to Digital Leadership policy, the specific objectives of fostering innovation and competitiveness of the digital sector for a competitive and secure Union and bringing its benefits to citizens and society, public administrations and businesses across the Union. This shall include, but not be limited to, supporting the entire digital value- and supply-chains and activities including support to start-ups, scale-ups and SMEs, in particular along the following dimensions: Achieving leadership in digital and AI technologies, including through technology transfer**, collaborative research** and innovation, and through cutting-edge infrastructures such as AI-powered digital twins; Achieving technological sovereignty by building resilient digital ecosystems and ensuring a high-level of cybersecurity in the Union; **In this context, digital technologies shall be fostered as integral enablers across Europe's key technology priorities, in particular Artificial Intelligence (AI), Chips and Semiconductors, Manufacturing (including Automation and Robotics), Quantum Technologies (including Photonics), and Advanced Materials.** Enabling the power of digital for businesses and

Commission proposal	Drafting Suggestions and Comments
	citizens by deploying advanced digital applications and services, infrastructures, capacities and capabilities and by reinforcing interoperability across the Union, Including support to digitalisation of companies, including SMEs, small mid-cap companies, start-ups and scale-ups; Supporting the digital transformation and interoperability of public and private sectors through the rapid uptake of AI, the wallet technologies, such as EU Digital Identity Wallets and trust services established pursuant to Regulation (EU) No 910/2014 and the forthcoming European Business Wallets and other digital innovative solutions. Support to cultural and creative industries, complementing the AgoraEU programme. SE (Drafting Suggestions): (c) For support to Digital Leadership policy, the specific objectives of fostering innovation and competitiveness of digital sector for a competitive and secure Union and bringing its benefits to citizens and society, public administrations and businesses across the Union. This shall include, but not be limited to, supporting the entire digital value- and supply-chains and activities including support to start-ups, scale-ups and SMEs, in particular along the following dimensions: Achieving leadership in digital and AI technologies, including through technology transfer and innovation, and through cutting-edge infrastructures ~~such as AI-powered digital twins~~; Achieving technological sovereignty by building resilient digital ecosystems and ensuring a high-level of cybersecurity in the Union; Enabling the power of digital for businesses and citizens by deploying advanced digital applications and services, infrastructures, capacities and capabilities and by reinforcing interoperability across the Union, Including support to digitalisation of companies, including SMEs, small mid-cap companies, start-ups and scale-ups; Supporting the digital transformation and interoperability of public and private sectors through the rapid uptake of AI, **AI and robotics testing and experimentation facilities**, the wallet technologies, such as EU Digital Identity Wallets and trust services established pursuant to Regulation (EU) No 910/2014 and the forthcoming European Business Wallets and other digital innovative solutions. Support to cultural and creative industries, complementing the AgoraEU programme. SE

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Comments): No need for such specific example as "AI powered digital twins". Given that full independence and sovereginty is unrealistic, this paragraph should also reflect and mention strategic partnerships and international alliances with likeminded countries PL (Drafting Suggestions): *(c) For support to Digital Leadership policy, the specific objectives of fostering innovation, and competitiveness of digital sector* ***and deployment of digital solutions in SME sector*** *for a competitive and secure Union and bringing its benefits to citizens and society, public administrations and businesses across the Union. This shall include, but not be limited to, supporting the entire digital value- and supply-chains and activities including support to start-ups, scale-ups and SMEs, in particular along the following dimensions: Achieving leadership in digital and AI technologies, including through technology transfer and innovation, and through cutting-edge infrastructures such as AI-powered digital twins; Achieving technological sovereignty by building resilient digital ecosystems and ensuring a high-level of cybersecurity in the Union; Enabling the power of digital for businesses and citizens by deploying ~~advanced~~ digital applications and services, infrastructures, capacities and capabilities and by reinforcing interoperability across the Union, Including support to digitalisation of companies, including SMEs, small mid-cap companies, start-ups and scale-ups; Supporting the digital transformation and interoperability of public and private sectors through the rapid uptake* ***of digital technologies*** *and AI* ***in particular****, the wallet technologies, such as EU Digital Identity Wallets and trust services established pursuant to Regulation (EU) No 910/2014 and the forthcoming European Business Wallets and other digital innovative solutions. Support to cultural and creative industries, complementing the AgoraEU programme.* PL (Comments):

Commission proposal	Drafting Suggestions and Comments
	It is equally essential to invest in the use of digital technologies, at all levels of advancement, by both businesses and citizens. The competitiveness of the Union's economy is determined not only by investments in the ICT sector and the development of future-oriented technologies, but also by the adoption of digital solutions within enterprises, which accelerates and enhances their productivity. Excessive emphasis on breakthrough technologies and support for innovation, accompanied by limited efforts to strengthen the level of basic digitalisation, may lead to further polarisation of the economy in terms of digital transformation and to disruptions in the value chain. It is therefore crucial to preserve the Union's competitive position while ensuring convergence of digital intensity indicators across the various sectors of the economy. It is worth highlighting that, in accordance with the "Think Small First" principle set out in the SBA, the specific needs of SMEs should be duly taken into account. Given the specific characteristics of SMEs, in particular the structural limitations in terms of human and financial resources, which may impede their access to funds from the ECF, it is proposed that the relevant provisions be amended so as to expressly reflect the necessity of granting SMEs preferential treatment in comparison to other categories of enterprises, such as SMCs. NL (Drafting Suggestions): (c) For support to Digital Leadership policy, the specific objectives of fostering innovation and competitiveness of digital sector for a competitive and secure Union and bringing its benefits to citizens and society, public administrations and businesses across the Union. This shall include, ~~but not be limited to,~~ supporting the entire digital value- and supply-chains and activities including support to start-ups, scale-ups and SMEs, **in particular in semiconductors, quantum, AI, network technology, cloud, and cybersecurity,** along the following dimensions: Achieving leadership in digital ~~and AI~~ technologies, including through technology transfer and innovation, and through cutting-edge **digital** infrastructures ~~such as AI-powered digital twins~~; Achieving technological sovereignty by building resilient digital ecosystems and ensuring a high-level of cybersecurity in the Union; Enabling the power of digital for businesses and citizens by deploying advanced digital applications and services, infrastructures, capacities and capabilities and by reinforcing interoperability across the Union, Including

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	support to digitalisation of companies, including SMEs, small mid-cap companies, start-ups and scale-ups **and promoting the industrial-scale deployment and adoption of digital technologies**; Supporting the digital transformation and interoperability of public and private sectors through the rapid uptake **and developments** of AI~~, the wallet technologies, such as EU Digital Identity Wallets and trust services established pursuant to Regulation (EU) No 910/2014 and the forthcoming European Business Wallets~~ and other digital innovative solutions. ~~Support to cultural and creative industries, complementing the AgoraEU programme.~~ NL (Comments): The list of specific objectives that can be supported under this window is too broad. In our view, six digital key technologies should be prioritized: semiconductors, quantum, AI, network technology, cloud, and cybersecurity. In addition, priority should be given to digital infrastructure, including submarine cables. Primarily focusing on these key technologies could also contribute to digital leadership in the public sector. MT (Drafting Suggestions): (c) For support to Digital Leadership policy, the specific objectives of fostering innovation and competitiveness of digital sector for a competitive and secure Union and bringing its benefits to citizens and society, public administrations and businesses across the Union. This shall include, but not be limited to, supporting the entire digital value- and supply-chains and activities including support to start-ups, scale-ups and SMEs, in particular along the following dimensions: Achieving leadership in digital, **semiconductors** and AI technologies, including through technology transfer and innovation, and through cutting-edge infrastructures such as AI-powered digital twins; Achieving technological sovereignty by building resilient digital ecosystems and ensuring a high-level of cybersecurity in the Union; Enabling the power of digital for businesses and citizens by deploying advanced digital applications and services, infrastructures, capacities and capabilities and by reinforcing interoperability across the Union, Including support to digitalisation of

Commission proposal	Drafting Suggestions and Comments
	companies, including SMEs, small mid-cap companies, start-ups and scale-ups; Supporting the digital transformation and interoperability of public and private sectors through the rapid uptake of AI, the wallet technologies, such as EU Digital Identity Wallets and trust services established pursuant to Regulation (EU) No 910/2014 and the forthcoming European Business Wallets and other digital innovative solutions. Support to cultural and creative industries, complementing the AgoraEU programme. MT (Comments): Malta would like to add semiconductors particularly account of the upcoming EU Chips Act II and the anticipated third IPCEI on semiconductors particularly on advanced packaging. RO (Drafting Suggestions): The specific objectives are to foster innovation and competitiveness in the digital sector, ensuring a competitive and secure Union while delivering benefits to citizens, society, public administrations, and businesses across the Union. This includes, but is not limited to, support for the entire digital value and supply chains, as well as start-ups, scale-ups, and SMEs. Key priorities include achieving leadership in digital and AI technologies through technology transfer, innovation, and cutting-edge infrastructures such as AI-powered digital twins; ensuring technological sovereignty by building resilient digital ecosystems and high levels of cybersecurity; enabling the power of digital for businesses and citizens by deploying advanced digital applications, services, infrastructures, capacities, and capabilities, while reinforcing interoperability across the Union and supporting the digitalisation of SMEs, small mid-cap companies, start-ups, and scale-ups; supporting the digital transformation and interoperability of public and private sectors through rapid uptake of AI, wallet technologies (including EU Digital Identity Wallets and trust services under Regulation (EU) No 910/2014), forthcoming European Business Wallets, and other innovative digital solutions; supporting cultural and creative industries, complementing the AgoraEU programme; and support for advanced digital skills development and STEM education programmes.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	RO (Comments): The text needs to be reformulated to be clearer, more concise, and easier to follow, by structuring the objectives into clear and coherent points. Complete rephrasing should be considered. SI (Drafting Suggestions): (c) For support to Digital Leadership policy, the specific objectives of fostering **research excellence** innovation and competitiveness of digital sector for a competitive and secure Union and bringing its benefits to citizens and society, public administrations and businesses across the Union. This shall include, but not be limited to, supporting the entire digital value- and supply-chains and activities including support to start-ups, scale-ups, ~~and~~ SMEs **and small mid-cap companies**, in particular along the following dimensions: Achieving leadership in digital, ~~and~~ AI **and other** technologies, including through **research,** technology transfer and innovation, and through cutting-edge infrastructures ~~such as AI-powered digital twins~~; Achieving technological sovereignty by building resilient digital ecosystems and ensuring a high-level of cybersecurity in the Union; Enabling the power of digital for businesses and citizens by deploying advanced digital applications and services, infrastructures, capacities and capabilities and by reinforcing interoperability across the Union, Including support to digitalisation of companies, including SMEs, small mid-cap companies, start-ups and scale-ups; Supporting the digital transformation and interoperability of public and private sectors through the rapid uptake of AI, the wallet technologies, such as EU Digital Identity Wallets and trust services established pursuant to Regulation (EU) No 910/2014 and the forthcoming European Business Wallets and other digital innovative solutions. Support to cultural and creative industries, complementing the AgoraEU programme. SI (Comments): The investment journey begins with excellent research.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	While we fully acknowledge the value of AI-powered digital twins, it is only one of many examples of AI use in the field and we do not see the added value of examplifying one over the others. All four policy windows are connected to pillar II.of Horizon Europe and this should be reflected in the text. Funds from the Competitiveness Fund should be directed towards strengthening EU digital sovereignty by investing in its own digital infrastructure (HPC, 5G/6G networks, IoT) and promoting European production and development of key technologies such as AI, quantum computing and semiconductors. FR (Drafting Suggestions): For support to Digital Leadership policy, the specific objectives of fostering innovation and competitiveness of digital sector for a competitive and secure Union and bringing its benefits to citizens and society, public administrations and businesses across the Union. This shall include, but not be limited to, supporting the entire digital value- and supply-chains and activities including support to start-ups, scale-ups and SMEs, in particular along the following dimensions: Achieving leadership in digital and AI technologies, including through technology transfer and innovation, and through cutting-edge infrastructures such as AI-powered digital twins; **Sovereign immersive technologies**; Achieving technological sovereignty by building resilient **and sustainable** digital ecosystems and ensuring a high-level of cybersecurity in the Union; Enabling the power of digital for businesses and citizens by deploying advanced digital applications and services, infrastructures, capacities and capabilities and by reinforcing interoperability across the Union, Including support to digitalisation of companies, including SMEs, small mid-cap companies, start-ups and scale-ups; Supporting the digital transformation and interoperability of public and private sectors through the rapid uptake of AI, the wallet technologies, such as EU Digital Identity Wallets and trust services established pursuant to Regulation (EU) No 910/2014 and the forthcoming European Business Wallets and other

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	digital innovative solutions. Support to **Europe's media sector** and cultural and creative industries, complementing the AgoraEU programme.
(d) For support to 'Resilience and Security, Defence Industry and Space' policy, respectively the specific objectives of:	CZ (Comments): CZ - *General comment and question to adjust our position to Chapter VII, Section 2*: Czechia would appreciate clarification on whether the objectives in Art. 3 (d)(2) ant the respective implementation will build on the positive experience of programmes such as EDF, EDIRPA, ASAP and PESCO. In particular, it is important to understand how the design will ensure the avoidance of inefficiencies, including complex procurement procedures, excessive administrative burden, overlaps between instruments, lengthy approval processes and overly restrictive participation criteria.
(1) For support to resilience of supply chains, the specific objectives of reinforcing Europe's resilience by strengthening the Union capacity in exploration, extraction, processing and recycling of raw materials and diversifying supply sources and markets, and improving the timely availability of such products, including through the reduction of their delivery lead time, reservation of manufacturing slots or stockpiling of products, intermediate products or raw materials.	IT (Drafting Suggestions): For support to resilience of supply chains, the specific objectives ~~of~~ **are to** reinforc~~ing~~**e** Europe's resilience by strengthening the Union capacity in exploration, extraction, processing and recycling of raw materials and diversifying supply sources and markets, and improving the timely availability of such products, including through the reduction of their delivery lead time, reservation of manufacturing slots, or stockpiling of products, intermediate products, or raw materials. IT (Comments): It improves readability IE (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	IE: Would appreciate more detail on what is intended under this paragraph – exploration/ extraction etc across EU, Europe, Global, Moon and beyond. "stockpiling" can be extremely expensive (including storage and disposal of stock not called off before expiry) – will the Commission provide any assistance to meet these financial costs? CZ (Drafting Suggestions): (1) For support to resilience of supply chains, the specific objectives of reinforcing Europe's resilience by strengthening the Union capacity in exploration, extraction, processing and recycling of raw materials and diversifying supply sources and markets, and improving the timely availability of **and access to** such products **and raw materials**, including through the reduction of their delivery lead time, reservation of manufacturing slots or stockpiling of products, intermediate products or raw materials. CZ (Comments): CZ - EU has relatively limited access to raw materials and other essential components from outside its borders. The objective should therefore also encompass strengthening the Union's access to such raw materials, which constitutes a necessary prerequisite for the diversification of supply sources and markets. This approach would be consistent with other Union initiatives, including the Critical Raw Materials Act. AT (Drafting Suggestions): ~~(1) For support to resilience of supply chains, the specific objectives of reinforcing Europe's resilience by strengthening the Union capacity in exploration, extraction, processing and recycling of raw materials and diversifying supply sources and markets, and improving the timely availability of such products, including through the reduction of their delivery lead time, reservation of manufacturing slots or stockpiling of products, intermediate products or raw materials.~~

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	AT (Comments): Raw and advanced materials have to be together -within one supply chain. The value chain for raw materials includes the primary side such as raw material extraction and processing and extends into the secondary side, such as industrial processing into semi-finished products (e.g. steel from iron ore, or plastic from crude oil), production (from aluminum to car parts) and recycling (reutilization of secondary raw materials from old products). Advanced materials play a significant role on the secondary side of the raw materials value chain (substitution, design, recycling, production, circular economy, and thus also cross-cutting issues such as business models, social innovations, environmental impacts, etc.). Therefore the policy window "Resilience" should be integrated in "Industrial decarbonisation" SE (Comments): Does this inlude chemicals, precursors, substrates and reagents necessary for medical products and the chemical industry? To what extent will Union-based value chains be a priority? It is important that the ECF safeguards openness towards the rest of the world and does not foster inhouse production where open, rules-based trade is more efficient. PL (Drafting Suggestions): 1) *For support to resilience of supply chains, the specific objectives of reinforcing Europe's resilience by strengthening the Union capacity in exploration, extraction, processing and recycling of raw materials (**including agricultural products)** and diversifying supply sources and markets, and improving the timely availability of such products, including through the reduction of their delivery lead time, reservation of manufacturing slots or stockpiling of products*, intermediate products or raw materials.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	PL (Comments): within the framework of raw materials, agricultural products should be mentioned – in the context of food security SI (Drafting Suggestions): (1) For support to resilience of supply chains, the specific objectives of reinforcing Europe's resilience by strengthening the Union capacity in exploration, extraction, processing, **substitution** and recycling of raw materials **in particular critical raw materials in accordance with CRMA,** ~~and~~ diversifying supply sources and markets, and improving the timely availability of such products, including through the reduction of their delivery lead time, reservation of manufacturing slots or stockpiling of products, intermediate products or raw materials. SI (Comments): In addition to raw matereials in general we should add reference to CRM that are indespensable for the resilience of the EU economy.
(2) For support to EU defence industry. the specific objectives of promoting defence industrial readiness of the Union and its Member States through the strengthening of the competitiveness, responsiveness and ability of the European Defence Technological and Industrial Base (EDTIB), including support to start-ups, scale-ups and SMEs, fostering an innovative EU defence ecosystem; Collaborative research and development of defence products and technologies, including disruptive	IT (Drafting Suggestions): For support to EU defence industry~~.~~, the specific objectives ~~of~~ **are to** promot**e**~~ing~~ defence industrial readiness of the Union and its Member States through the strengthening of the competitiveness, responsiveness**,** and ability of the European Defence Technological and Industrial Base (EDTIB), including support to start-ups, scale-ups and SMEs, fostering an innovative EU defence ecosystem; Collaborative research and development of defence products and technologies, including disruptive technologies for defence; cooperation throughout the

Commission proposal	Drafting Suggestions and Comments
technologies for defence; Cooperation throughout the life-cycle of defence equipment, in particular in defence procurement and for the development of European defence projects of common interest; Adjustment of industry to structural changes.	life-cycle of defence equipment, in particular in defence procurement and for the development of European defence ~~p~~**P**rojects of e**C**ommon ~~i~~**I**nterest; Adjustment of industry to structural changes. IT (Comments): It improves readability CZ (Drafting Suggestions): (2) For support to EU defence industry. the specific objectives of promoting defence industrial readiness of the Union and its Member States through the strengthening of the competitiveness, responsiveness and ability of the European Defence Technological and Industrial Base (EDTIB), including support to start-ups, scale-ups and SMEs, fostering an innovative EU defence ecosystem; Collaborative research and development of defence products and technologies, including disruptive technologies for defence; Cooperation throughout the life-cycle of defence equipment, in particular in defence procurement and for the development of European defence projects of common interest; Adjustment of industry to structural changes**, <u>while duly taking into account geopolitically driven defense requirements concerning the geographical distribution of resources.</u>** CZ (Comments): CZ - The aim of the ECF needs to be competitiveness of the EU as a whole. The persistant threat on the eastern borders requires major funding to reach the desired level of deterrence capability. Therefore, resources from EU need to be distributed geographically, with particular attention to the specific defense needs of the CEE EU countries and the strengthening of the EU's eastern border. We kindly request this issue being addressed in written response, in particular should our proposed amendment not be reflected**.**

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	NL (Drafting Suggestions): (2) For support to EU defence industry. the specific objectives of promoting defence industrial readiness of the Union and its Member States through the strengthening of the competitiveness, responsiveness and ability of the European Defence Technological and Industrial Base (EDTIB), ~~including~~ **in particular** support to start-ups, scale-ups and SMEs, fostering an innovative EU defence ecosystem **and Europeanization and integration of defence supply chains in the EU**; Collaborative research and development of defence products and technologies, including disruptive technologies for defence; Cooperation throughout the life-cycle of defence equipment, in particular in defence procurement and for the development of European defence projects of common interest; Adjustment of industry to structural changes. RO (Comments): The terms “disruptive technologies” and “cutting-edge technologies” should be formally defined within the regulation or linked to refrences to formal acts. Furthermore, considering that innovation is often a transformative and incremental process, certain types of incremental innovation may contribute to the development of disruptive and cutting-edge technologies. In this context, consideration should be given if such innovations in specific fields are to be excluded (or not), given the broader innovation journey and the Technology Readiness Level (TRL) steps involved. HU (Drafting Suggestions): For support to EU defence industry, ***in line with the respective competences conferred by the Treaties,*** the specific objectives of promoting defence industrial readiness of the Union and its Member States through the strengthening of the competitiveness, responsiveness and ability of the European Defence Technological and Industrial Base (EDTIB), including support to start-ups, scale-ups and SMEs, fostering an innovative EU defence ecosystem; Collaborative research and development of defence products and technologies, including disruptive

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	technologies for defence; Cooperation throughout the life-cycle of defence equipment, in particular in defence procurement and for the development of European defence projects of common interest; Adjustment of industry to structural changes. HU (Comments): In order to strengthen consistency with the related EUCO conclusions, incorporating agreed language (adopted by EUCO 6/25). SI (Drafting Suggestions): (2) For support to EU defence industry. the specific objectives of promoting defence industrial readiness of the Union and its Member States through the strengthening of the competitiveness, responsiveness and ability of the European Defence Technological and Industrial Base (EDTIB), **support for promotion in the search for new supply chains a and strenghtening the existing supply chains for comopnents and CRM critical for defence industry** including support to start-ups, scale-ups, ~~and~~ SMEs **and small mid-cap companies**, fostering an innovative EU defence ecosystem, **giving priority also to low-carbon technologies and products as well as considering the principle of dual use of funds**; Collaborative research and development of defence products and technologies, including disruptive technologies for defence; Cooperation throughout the life-cycle of defence equipment, in particular in defence procurement and for the development of European defence projects of common interest; Adjustment of industry to structural changes **and also to the EU's climate goals.** SI (Comments): We believe that, within the framework of specific objectives for promoting the defense industry, it would be necessary to add the strengthening of supply chains for components and other raw materials such as CRM which are critical for defence industry, as well as the

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	strengthening and search for new supply chains for components and raw materials such as CRM, critical for defence industry. It is essential that funds dedicated to strengthening defence and military capabilities are also directed primarily towards low-carbon technologies and projects, while at the same time ensuring their dual use. This approach serves several purposes: 1. Climate objectives: by investing also in low-carbon solutions (such as renewable energy, energy efficiency, green fuels, advanced materials), defence spending contributes to the EU's broader decarbonisation goals instead of locking in fossil-fuel dependence. 2. Operational resilience: armed forces that rely on cleaner and more autonomous energy systems (e.g. renewables, storage, hydrogen) are less vulnerable to supply chain disruptions and fuel price volatility. 3. Dual-use benefits: technologies developed with defence funds can simultaneously support civilian needs, for instance renewable micro-grids that serve both military bases and local communities, or advanced materials that can be applied in transport, construction, and energy sectors. 4. Economic competitiveness: focusing defence budgets on innovative, low-carbon technologies stimulates industrial leadership, creates skilled jobs, and strengthens Europe's technological sovereignty. 5. Efficient public spending: ensuring dual use means taxpayers' money generates not only military capabilities but also broader social and economic value, increasing the legitimacy of such expenditures. FR (Drafting Suggestions):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	For support to EU defence industry, the specific objectives of promoting defence industrial readiness of the Union and its Member States **and European preference** through the strengthening of the competitiveness, responsiveness and ability of the European Defence Technological and Industrial Base (EDTIB), including support to start-ups, scale-ups and SMEs, fostering an innovative EU defence ecosystem **and ensuring the Union's strategic autonomy through ambitious eligibility criteria for the development of such capacities**; Collaborative research and development of defence products and technologies, including disruptive technologies for defence ; Cooperation throughout the life-cycle of defence equipment, in particular in defence procurement ~~**and for the development of European defence projects of common interest**~~ ; Adjustment of industry to structural changes. FR (Comments): This paragraph should mention the political priority of the Union's strategic autonomy, combined with ambitious eligibility criteria. Deletion of the reference to EDPCIs, too specific in an article of general scope.
(3) For the implementation of EU space systems and space policy, the specific objectives of developing, maintaining and operating space systems, providing cutting-edge space-based information, data and services supporting Union policies, notably in the area of security, defence, sustainable growth, environment protection and climate resilience, global engagement and strategic independence; Maximising the socio-economic benefits of space-based activities, in particular by fostering the development of an innovative and competitive Union space economy and supporting the development of a genuine Single Market for space activities, including collaborative research and innovation for space products	IT (Drafting Suggestions): For the implementation of EU space systems and space policy, the specific objectives ~~of~~ **are to** develop~~ing~~, maintain~~ing~~ and operat~~ing~~ space systems, **and to** provid~~eing~~ cutting-edge space-based information, data, and services supporting Union policies, notably in the area of security, defence, sustainable growth, environment**al** protection, ~~and~~ climate resilience, global engagement and strategic independence; to~~M~~**m**aximi~~sing~~ the socio-economic benefits of space-based activities, in particular by fostering the development of an innovative and competitive ~~Union~~ **European** ~~s~~**S**pace ~~e~~**E**conomy and supporting the development of a genuine Single Market for space activities, including collaborative research and innovation for space products and technologies and support to SMEs; **to** ~~E~~**e**nhanc**e**~~ing~~ the safety, security and

PUBLIC

Commission proposal	Drafting Suggestions and Comments
and technologies and support to SMEs; Enhancing the safety, security and sustainability of all outer space activities; Promoting the role of the Union as a global actor in the space sector.	sustainability of all outer space activities; to ~~P~~**p**romote~~ing~~ the role of the Union as a global actor in the space sector. IT (Comments): Improves legal clarity by aligning the introductory phrase ("are to develop…") with standard EU drafting, capitalising **European Space Economy** to reflect its recognition as a policy concept (see European Commission vision on the European Space Economy), and using parallel verbs ("to maximise", "to enhance", "to promote") for a consistent structure. IE (Comments): IE welcome the commitment to maximise the socio-economic benefits of space-based activities by fostering the development of an innovative and competitive Union space economy. FI (Drafting Suggestions): For the implementation of EU space systems and space policy, the specific objectives of developing, maintaining and operating space systems, providing cutting-edge space-based information, data and services supporting Union policies, notably in the area of security, defence, sustainable growth, environment protection and climate resilience, global engagement and strategic independence; Maximising the socio-economic benefits of space-based activities, in particular by fostering the development of an innovative and competitive Union space economy and supporting the development of a genuine Single Market for space activities~~,~~ ~~including~~ **particularly by strengthening excellence-based** collaborative research and innovation for space products and technologies and support to SMEs; Enhancing the safety, security and sustainability of all outer space activities; Promoting the role of the Union as a global actor in the space sector. CZ (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	CZ - *General comment:* Czechia stresses that the construction, operation, and development of EU space systems require a stable environment, supported by clear legislative and financial instruments, as these systems already serve critical applications. From this perspective, the question arises as to whether it is appropriate to subsume the EU Space Programme under a general ECF regulation. Should the answer be affirmative, all space activities must nevertheless be framed as part of the EU Space Programme, ensuring continuity with Regulation (EU) 2021/696. We kindly request the issue being clarified in written response to this comment. AT (Drafting Suggestions): (3) For the implementation of EU space systems and space policy, the specific objectives of developing, maintaining**, ~~and~~** operating **and improving** space systems, providing cutting-edge space-based information, data and services supporting Union policies, ~~notably~~ **inter alia** in the area of security, defence, sustainable growth, environment protection and climate resilience, **telecommunication, transport, agriculture, disaster management,** global engagement and strategic independence; Maximising the socio-economic benefits of space-based activities, in particular by fostering the development of an innovative and competitive Union space economy and supporting the development of a genuine Single Market for space activities, including collaborative research and innovation for space products and technologies and support to SMEs; Enhancing the safety, security and sustainability of all outer space activities; Promoting the role of the Union as a global actor in the space sector. AT (Comments): The evolution/improvement of the various space components is very important. The main focus should not be limited to security and defence as space is much broader. NL (Drafting Suggestions):

Commission proposal	Drafting Suggestions and Comments
	(3) For the implementation of EU space systems and space policy, the specific objectives of developing, maintaining and operating space systems, providing cutting-edge space-based information, data and services supporting Union policies, notably in the area of security, defence, sustainable growth, environment protection and climate resilience, global engagement and strategic independence; Maximising the socio-economic benefits of space-based activities, in particular by fostering the development of an innovative and competitive Union space economy and supporting the development of a genuine Single Market for space activities, including collaborative research and innovation for space products and technologies and support to SMEs; Enhancing the safety, security and sustainability of all outer space activities; Promoting the role of the Union as a global actor in the space sector. SI (Drafting Suggestions): (3) For the implementation of EU space systems and space policy, the specific objectives of **conducting research and innovation and transfer them in the economy, as well as** developing, maintaining and operating space systems, providing cutting-edge space-based information, data and services supporting Union policies, notably in the area of security, defence, sustainable growth, environment protection and climate resilience, global engagement and strategic independence; Maximising the socio-economic benefits of space-based activities, in particular by fostering the development of an innovative and competitive Union space economy and supporting the development of a genuine Single Market for space activities, including collaborative research and innovation for space products and technologies and support **to start-ups, scale-ups, SMEs and small-mid cap companies.-**; Enhancing the safety, security and sustainability of all outer space activities; Promoting the role of the Union as a global actor in the space sector. SI (Comments): All four policy windows are connected to pillar II.of Horizon Europe and this should be reflected in the text.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	LV (Comments): The proposal only briefly refers to "enhancing climate and water resilience." LIFE CLIMA supports adaptation projects, city adaptation plans, flood/drought/fire risk management, and nature-based solutions. How will such adaptation and resilience actions be accommodated under ECF? In its current form, the ECF emphasises climate mitigation only. FR (Drafting Suggestions): (3) For the implementation of EU space systems and space policy, the specific objectives of **ensuring EU strategic autonomy through and in space, by** developing, maintaining and operating space systems, providing cutting-edge space-based information, data and services supporting Union policies, notably in the area of security, defence, sustainable growth, environment protection, **climate change and** climate resilience, **marine and maritime, transport**, global engagement and strategic independenc, **with due respect to the dual nature of the EU Space Program and thus providing for adequate governance schemes**; Maximising the socio-economic benefits of space-based activities, in particular by fostering the development of an innovative and competitive Union space economy and supporting the development of a genuine Single Market for space activities, including collaborative research and innovation for space products and technologies and support to SMEs; Enhancing the safety, security and sustainability of all outer space activities; Promoting the role of the Union as a global actor in the space sector. FR (Comments): This article does not contain all the policies to which space policy also contributes, in particular the observation of climate change (Copernicus) or air navigation and martime in the transport sector.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	Proposal to ensure that the first objective of the Space Programme is to allow for European strategic autonomy through and in space; Proposal to ensure that the duality of the EU Space Programme be taken into account, including with an adapted governance scheme;
(4) For support to civil industrial security, the specific objectives of strengthening the competitiveness and responsiveness of the European civil security industry, in the application areas of security, resilience of critical and dual-use infrastructures, technologies including critical energy infrastructure, and solutions for the control of goods and persons at borders, the protection of borders, maritime security, customs security and civil preparedness against security threats, as well as reinforcing the capabilities of the relevant end-users in the civil security sector.	IT (Drafting Suggestions): For support to civil industrial security, the specific objectives ~~of~~ **are to** strengthen~~ing~~ the competitiveness and responsiveness of the European civil security **products and services** industry, in the application areas of security, resilience of critical and dual-use infrastructures, technologies including critical energy infrastructure, and solutions for the control of goods and persons at borders, the protection of borders, maritime security, customs security**,** and civil preparedness against security threats, as well as reinforcing the capabilities of the relevant end-users in the civil security sector. IT (Comments): The revision highlights that the support targets European civil security products and services, clarifying the industry scope and aligning with EU terminology. EE (Drafting Suggestions): For support to civil industrial security, the specific objectives of strengthening the competitiveness and responsiveness of the European civil security industry, in the application areas of security, resilience of critical and dual-use infrastructures such as **electronic communication**…(*list of such infrastructure types*)… , technologies including critical energy infrastructure, and solutions for the control of goods and persons at borders, the protection of

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	borders, maritime security, customs security and civil preparedness against security threats, as well as reinforcing the capabilities of the relevant end-users in the civil security sector EE (Comments): We recommend a more precise definition of "dual-use infrastructures" to ensure effective implementation. This definition must explicitly include electronic communications and digital infrastructure, which are inextricably linked to critical sectors like energy and transport and also has enormous posibilities linked to security and defence. Given the absence of a dedicated CEF Digital program in the new MFF, it is essential that the ECF's security objective (which is the biggest objective in EFC, budget wise) continues to support the development of a secure and resilient digital backbone. CZ (Drafting Suggestions): For support to civil industrial security, the specific objectives of strengthening the competitiveness and responsiveness of the European civil security industry, in the application areas of security, resilience of critical and dual-use infrastructures, technologies including critical energy infrastruc **and military mobility**, and solutions for the control of goods and persons at borders, the protection of borders, maritime security, customs security and civil preparedness against security threats, as well as reinforcing the capabilities of the relevant end-users in the civil security sector. CZ (Comments): CZ - Including *military mobility* here ensures coherence between civil security objectives and dual-use infrastructure, thereby strengthening the Union's capacity to respond effectively to crises. The relevance of our insertion is further underlined by the Military Mobility Package, which integrates these aspects into the broader EU security framework.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	AT (Drafting Suggestions): For support to civil industrial security, the specific objectives of strengthening the competitiveness, **innovation capability** and responsiveness of the European civil security industry, in the application areas of security, resilience of critical and dual-use infrastructures, technologies including critical energy infrastructure, and solutions for the control of goods and persons at borders, the protection of borders, maritime security, customs security and civil preparedness against security threats, as well as reinforcing the capabilities of the relevant end-users in the civil security sector.4) AT (Comments): Only the capability to innovate allows for sustainable competitiveness and quick responsiveness of the civil security industry. Whether this innovation will ultimately be funded within a genuine civil security research programme in FP10 or in a joint action between the EFC and FP10, a reference to **innovation capability** should in any case be inserted into this paragraph. NL (Drafting Suggestions): (4) For support to civil industrial security, the specific objectives of strengthening the competitiveness and responsiveness of the European civil security industry, in the application areas of security, resilience of critical and dual-use infrastructures, technologies including critical energy infrastructure**.** ~~and solutions for the control of goods and persons at borders, the protection of borders, maritime security, customs security and civil preparedness against security threats, as well as reinforcing the capabilities of the relevant end-users in the civil security sector.~~ NL (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	To better align with the ECF objectives FR (Drafting Suggestions): For support to civil industrial security, the specific objectives of strengthening the competitiveness and responsiveness of the European civil security industry, in the application areas of security, resilience of critical and dual-use infrastructures **in complementarity with the CEF**, technologies including critical energy infrastructure, and solutions for the control of goods and persons at borders, the protection of borders, maritime security, customs security and civil preparedness against security threats, as well as reinforcing the capabilities of the relevant end-users in the civil security sector **especially for the prevention of and response to crime, in particular terrorism and violent extremism, organised crime and cyber-enabled crime.** FR (Comments): Ce paragraphe devrait inclure une référence au programme MIE.
	EE (Drafting Suggestions): e) For support to 'Cybersecurity' the specific objectives of: (1) For support to ensuring an up-to-date threat landscape, including the identification of security vulnerabilities, log analysis, as well as the monitoring and prevention of incidents. To enhancing the resilience of essential services, including testing, training and exercises, the development of a cyber defence training, the preparation of guidelines, and a sector-specific approach in alignment with EU directives. It is essential that the information security standard is implemented across the public, private, and the third sectors, along side the replacement of legacy software. (2) For support to strengthen cybersecurity cooperation among EU Member States, it is essential to conduct joint cyber exercises and to establish a shared situational awareness – this

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	includes threat assessments, attribution, the exchange of forensic information, and the other relevant activities. (3) For support to research and development to address emerging technologies and cybersecurity trends in order to strengthen overall cyber resilience. This includes the development of protection systems against AI-based attacks, quantum computing, post-quantum cryptography, the implementation of Zero Trust Architecture as a security principle, the enhancement of supply chain security, applying security-by-design principles, integrating non-functional security requirements in service development, ensuring the security of IoT systems etc. (4) For support to ensure the next generation of cybersecurity specialists, it is essential to integrate more in-depth cybersecurity education into both general education school and universities. EE (Comments): **We propose that cybersecurity be explicitly included as a distinct objective within the goals of the Competitiveness Fund, rather than remaining under the general umbrella of "security" as it has been thus far.** In today's world, everything is digital—ranging from agriculture to the creative industries, and from defence to healthcare. Therefore, cybersecurity must be recognised as a key priority across all sectors, as it plays a crucial role in ensuring the resilience and trustworthiness of digital systems and services. PL (Drafting Suggestions): Article 4— Suggested Addition to Point (a): "**This allocation shall also support the development of regional innovation ecosystems, including innovation hubs in less-developed areas, and targeted instruments for scale-up support and dual-use technologies, in line with Member States' smart specialization strategies. Expenditures may support the development of regional innovation ecosystems,**

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	including hubs in less-developed areas. Funds may be used to establish national advisory points for ECF, IPCEI, and Horizon Europe applicants.*"* PL (Comments): No reference to institutional support for applicant, like facilitates access for SMEs and research institutions to complex EU funding instruments. LT (Drafting Suggestions): (5) For support to investment in the protection and resilience of existing and planned critical energy infrastructure, including through enhanced physical protection, preparedness and cybersecurity measures, with a view to strengthening the Union's energy security, ensuring the continuity of energy supply, and enhancing the ability to prevent, withstand and recover from disruptions and threats, including those of a hybrid nature, with a particular focus on cross-border and regionally significant assets, including interconnectors and transmission systems; LT (Comments): Volatile and tense geopolitical situation in Europe demands us to devote necessary resources and efforts to ensure the protection of critical energy infrastructure. Dedicated funding for the protection of critical energy infrastructure should be one of the main priorities in the next MFF. SI (Drafting Suggestions): **(5) The research and innovation activities under the policy windows shall aim to foster scientific excellence, advance the creation and dissemination of high-quality knowledge, technologies, and solutions, and support the mobility and engagement of researchers, while attracting talent at all levels to actions under the Programme; generate and apply knowledge to support Union policies and boost access to innovative solutions in European**

Commission proposal	Drafting Suggestions and Comments
	industry, particularly SMEs, to tackle global challenges; enhance knowledge, skills, and career opportunities for researchers and contribute to the European Research Area (ERA); promote EU-wide and international collaboration, knowledge sharing, and valorisation of research; reduce disparities in research and innovation capacities across Member States and regions; mobilise public and private investment in research and innovation, aiming to reach 3% of Union GDP in research and development. **5. For support to "Environment, Nature and Biodiversity" policy, the specific objectives of protecting, restoring and improving the quality of the environment, including water, coast, sea and soil, reducing pollution, halting and reversing biodiversity loss and tackling the degradation of terrestrial and marine ecosystems.** SI (Comments): Due to the link between Horizon Europe and ECF, we suggest to mirror their goals, similarly as in FP10 regulation. In line with its inclusion in Article 3(1)(l), Slovenia considers that, given the ECF's scope and the competing priorities across clean transition, digital, security and defence, the establishment of a dedicated policy window for "Environment, Nature and Biodiversity" is essential. Without a separate window, these actions risk being deprioritised or underfunded when merged with other windows, undermining the Union's ability to meet its legal obligations on biodiversity, nature restoration and pollution, and to deliver the environmental resilience that underpins long-term competitiveness.
SECTION 2	

PUBLIC

Commission proposal	Drafting Suggestions and Comments
SINGLE RULEBOOK	IT (Comments): We believe it would be appropriate to have further clarification on the effective implementation of the single rulebook. DE (Comments): We welcome the single rulebook in principle since receipients of funding only have to meet a single set of requirements. This leads to a reduction of bureaucracy. However, the exact details are unclear to us yet. Efficiency benefits in practice will depend on how often case-by-case rules will be needed. Research-related needs must be clearly taken into account for the research components of the policy windows. Currently, many rules are contained in both the ECF Regulation and the Horizon Europe Regulation. If the rules of the ECF Regulation are to apply to collaborative research, they have to be significantly expanded to cover R&I-specific needs, or reference would have to be made to the Horizon Europe Regulation. This applies, for example, to rules for calls for proposals, award criteria, evaluation committees, advisory boards, rules for European partnerships and missions, association of third countries, and reimbursement of costs.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
Article 5	IT (Comments): With regard to Articles 5 to 8, the issue arises of a possible relationship between the Competitiveness Fund and the National Single Fund/NRP, which should ideally be guided by a logic of reciprocity. MT (Comments): Malta stresses the need for proportionality and avoidance of excessive administrative burdens, given limited administrative capacity. Important to ensure grants remain available alongside financial instruments, as Malta's market size and underdeveloped capital markets limit access to equity/venture funding.
Additional resources	DE (Comments): In view of any existing state aid requirements, we should ensure a procedure that is as simple as possible and – if feasible – includes a parallel COM decision that includes the state aid approval. This can ensure that there are no delays in the implementation and no increase of complexity in procedures.
1. Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or other third parties, may make additional financial or non-financial contributions available to the ECF, or any of its specific activities or objectives referred to in Article 3(2), including specific contributions to the ECF InvestEU Instrument budgetary guarantee and financial instruments	IT (Drafting Suggestions): Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or other third parties, may make additional financial or non-financial contributions available to the ECF, or **to** any of its specific activities or objectives referred to in Article 3(2), including specific contributions to the ECF InvestEU Instrument budgetary guarantee and financial instruments as referred to in Article 21.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
as referred to in Article 21. Additional financial contributions shall constitute external assigned revenue within the meaning of Article 21(2), points (a), (d), or (e) or Article 21(5) of Regulation (EU, Euratom) 2024/2509.	Additional financial contributions shall constitute external assigned revenue within the meaning of Article 21(2), points (a), (d), or (e), or Article 21(5) of Regulation (EU, Euratom) 2024/2509. IT (Comments): Grammatical correction HR (Drafting Suggestions): Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or other third parties, may make additional financial or non-financial contributions available to the ECF, or any of its specific activities or objectives referred to in Article 3(2), including specific contributions to the ECF InvestEU Instrument budgetary guarantee and financial instruments as referred to in Article 21, **ensuring that such contributions do not undermine the balanced functioning of the Fund across all Member States**. Additional financial contributions shall constitute external assigned revenue within the meaning of Article 21(2), points (a), (d), or (e) or Article 21(5) of Regulation (EU, Euratom) 2024/2509. HR (Comments): HR proposes this addition to safeguard against the risk that voluntary contributions could distort the Fund in favour of more advanced Member States, ensuring fair access for all. CZ (Drafting Suggestions): Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or other third parties, may make additional financial or non-financial contributions available to the ECF, or any of its specific activities or objectives referred to in Article 3(2), including specific contributions to the ECF InvestEU

Commission proposal	Drafting Suggestions and Comments
	Instrument budgetary guarantee and financial instruments as referred to in Article 21. Additional financial contributions shall constitute external assigned revenue within the meaning of Article 21(2), points (a), (d), or (e) or Article 21(5) of Regulation (EU, Euratom) 2024/2509. **Resources transfered by Member States shall be used for the benefit of the Member State concerned.** CZ (Comments): CZ - With regard to the mechanism for contributing to the EFK from various sources pursuant to Article 5(1) of the draft Regulation, the Czech Republic requests that the national envelope for such contributions be maintained so that funds from the budget of one Member State are used for projects in that Member State. This is clearly addressed for funds under shared management (Article 5(2)), but not for other sources. Does revolving also belong among the instruments that can be transferred to the ECF? SE (Comments): How will MS contributions lead to increased control over ECF priorities? PL (Drafting Suggestions): Suggested Addition to Point: **Member States may earmark resources under shared management for regional innovation priorities, focusing on strenghtening their innovation policies especially with regard to support for deep-tech startups and scaleups, dual-use applications, and the development of local innovation infrastructure adressing the challenges and opportunities of the innovation potential of the regional and macroregional strategies. Resources may be allocated to increase Member States' participation in IPCEI and Horizon Europe projects. Cumulative funding should support strategic sectors, including dual-use technologies, scale-ups, and**

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	RIS3 priorities. The Commission may establish mechanisms to encourage Member States with low absorption rates to increase participation in the ECF." PL (Comments): Regional disparities Poland's and Europe's's innovation activity is concentrated in a few metropolitan areas. Explicit support for regional hubs would help unlock talent and capacity in eastern and northern regions. Scale-up gap: Polish startups often fail to scale due to limited access to growth capital and internationalization support. Dedicated instruments would help bridge this gap. Dual-use potential: Poland has strategic interest in technologies with both civilian and defense applications (e.g. drones, cybersecurity). Clear budgetary support would accelerate development and commercialization. Smart specialization: Poland's smart specializations catalogue as well as regional innovation strategies (RIS3) identify priority sectors. Aligning ECF funding with these strategies would improve coherence and impact. No mechanism linking to IPCEI and Horizon Europe. Poland has low participation in IPCEI and Horizon Europe—dedicated support and coordination are needed. No reference to strategic use of cumulative funding which enables better use of funds in high-potential areas aligned with Poland's national innovation strategy. No incentives for low-absorption Member States. Poland needs institutional and advisory support to improve participation in ECF-funded projects RO (Comments): It should be better explained to what extent will the Commission delegate the management of ECF guarantees and how will transparency for Member States be ensured. Also details and clearer indications should be provided by the Regulation on: a) how will the contingent liabilities associated with the unified budget guarantee be managed; b) how coherence between the separate ceilings per window is to be ensured.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	ES (Drafting Suggestions): Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or other third parties, may make additional financial or non-financial contributions available to the ECF, or any of its specific activities or objectives referred to in Article 3(2), including specific contributions to the ECF InvestEU Instrument budgetary guarantee and financial instruments as referred to in Article 21. Additional financial contributions shall constitute external assigned revenue within the meaning of Article 21(2), points (a), (d), or (e) or Article 21(5) of Regulation (EU, Euratom) 2024/2509**, subject to transparent reporting and safeguards**. FR (Comments): The possibility given to Member States to provide additional resources must not be used to circumvent the ceilings of the multiannual financial framework by requesting additional contributions from Member States during the programming period].
2. Resources allocated to Member States under shared management may, at their request, in accordance Article X of Regulation (EU) [XXX][*NRPF regulation*], be made available to the ECF. The Commission shall implement those resources directly or indirectly in accordance with Article 62(1), point (a) or (c) of Regulation, (EU, Euratom) 2024/2509. They shall be additional to the amount referred to in Article 4. Those resources shall be used for the benefit of the Member State concerned. Where the Commission has not entered into a legal commitment under direct or indirect management for additional amounts thus made available to the ECF, the	IT (Drafting Suggestions): Resources allocated to Member States under shared management may, at their request, in accordance **with** Article X of Regulation (EU) [XXX][*NRPF regulation*], be made available to the ECF. The Commission shall implement those resources directly or indirectly in accordance with Article 62(1), point (a) or (c) of Regulation~~,~~ (EU, Euratom) 2024/2509. ~~They~~ **These resources** shall be additional to the amount referred to in Article 4 and used **exclusively** for the benefit of the **requesting** Member State. Where the Commission has not entered into a legal commitment under direct or indirect management for additional amounts thus made available to the ECF, the corresponding uncommitted amounts may, at the request of the Member State

PUBLIC

Commission proposal	Drafting Suggestions and Comments
corresponding uncommitted amounts may, at the request of the Member State concerned, be transferred back to one or more respective chapters of the Plan or their successors.	concerned, be transferred back to one or more respective chapters of the Plan, or their successors. IT (Comments): It clarifies that the resources are used *exclusively* for the Member State that requested it, and slightly simplifies wording without altering legal meaning.. FI (Drafting Suggestions): 2. Resources allocated to Member States under shared management may, at their request, in accordance Article X of Regulation (EU) [XXX][*NRPF regulation*], be made available to the ECF. The Commission shall implement those resources directly or indirectly in accordance with Article 62(1), point (a) or (c) of Regulation, (EU, Euratom) 2024/2509 and **while respecting the Rule of Law conditionality and state aid rules**. They shall be additional to the amount referred to in Article 4. Those resources shall be used for the benefit of the Member State concerned. Where the Commission has not entered into a legal commitment under direct or indirect management for additional amounts thus made available to the ECF, the corresponding uncommitted amounts may, at the request of the Member State concerned, be transferred back to one or more respective chapters of the Plan or their successors. FI (Comments): Absolutely essential aspects to be added. EE (Comments): • A Member State must have a firm right to design solutions to overcome its country's specific market failures and local needs.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	• Contribution from a Member State to the ECF (Art. 5 para. 2) – Is there a maximum or minimum restriction on the allocation of finances to the Member State's shared management (SF) to the Fund or not? SE (Drafting Suggestions): Resources allocated to Member States under shared management may, at their request, in accordance Article X of Regulation (EU) [XXX][*NRPF regulation*], be made available to the ECF. The Commission shall implement those resources directly or indirectly in accordance with Article 62(1), point (a) or (c) of Regulation, (EU, Euratom) 2024/2509 and **while respecting the Rule of Law conditionality and state aid rules**. They shall be additional to the amount referred to in Article 4. Those resources shall be used for the benefit of the Member State concerned. Where the Commission has not entered into a legal commitment under direct or indirect management for additional amounts thus made available to the ECF, the corresponding uncommitted amounts may, at the request of the Member State concerned, be transferred back to one or more respective chapters of the Plan or their successors. SE (Comments): Would like clarifications on how this relates to the state aid framework, which should apply. PL (Drafting Suggestions): "*Those resources shall be used for the benefit of the Member State concerned,* ***meaning that they shall be obligatorily allocated to projects implemented on the territory of that Member State or to projects in which it has a significant participation"*** PL (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	It is essential to clarify the principle of 'for the benefit of the Member State concerned' (Those resources shall be used for the benefit of the Member State concerned) — meaning the mandatory allocation of these resources to projects located on the territory of that Member State or with its significant participation." The provision puts into question the different aim, objectives and logic of the different EU programmes. We still have different management systems for centrally managed programmes and funds in shared management. Moreover, the process of funds transfer itself is a complicated and long-lasting and not popular as for now. We understand the need for flexibility in managing the EU budget, but at the same time the Commission shall justify and sustain the logic of the different programmes and make available tools that are easy to be implemented. RO (Comments): There is a need to clarify whether there are any upper limits on the resources that can be made available to the EC and the criteria for such limitations. We understand that these resouces transferred shall be used for the benefit of the Member State concerned, while the financial products could be taillored acording to each MS needs. Are there minimum requirements for an agreement between COM and MS to be provided or could this agreement be tripartite so that it will facilitate a more direct formal and informal relationship between the MS and the implementing partner? ES (Drafting Suggestions): Resources allocated to Member States under shared management may, at their request, in accordance Article X of Regulation (EU) [XXX][*NRPF regulation*], be made available to the ECF. The Commission shall implement those resources directly or indirectly in accordance with Article 62(1), point (a) or (c) of Regulation, (EU, Euratom) 2024/2509. They shall be additional to the amount referred to in Article 4. Those resources shall be used for the benefit of the Member State concerned. Where the Commission has not entered into a legal commitment under direct or indirect management for additional amounts thus made available to the ECF, the corresponding uncommitted amounts may, at the request of the Member State concerned, be

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	transferred back to one or more respective chapters of the Plan or their successors**, consistent with the general objectives, avoiding fragmentation, and including bridging and continuity mechanisms to preserve ongoing industrial transformations initiated under Next Generation instruments**. ES (Comments): It helps to ensure continuity post NextGenEU. SI (Comments): The article is not clear in part "Those resources shall be used for the benefit of the Member State concerned". Does this mean only for the beneficiaries of the country concerned? Will the cases be further clarified?
	FR (Drafting Suggestions): The resources allocated to the Fund under this article are subject of an estimate within the draft annual budget, separate from the budget appropriations and broken down by type of resource. They are taken into account in the budgetary management of the Fund. FR (Comments): The French authorities believe that, given their importance, earmarked revenues should be taken into account more fully in the annual budgetary procedure. More consolidated information should be provided to the budgetary authority.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
Article 6	IT (Comments): Article 11 of COM(2025) 565 (Additional resources and use of resources) provides both for the possibility that the Single Fund may also be financed with additional resources coming from EU institutions (para. 1), and for the possibility that National Plans may transfer resources to EU directly managed programmes (para. 2). Article 64, para. 5 provides that the European Commission and the Member States shall ensure coordination, coherence and synergies between the Single Fund and other Union programmes and instruments. To this end, operations may receive support from other Union programmes and instruments, provided that such support does not cover the same costs. Considering this, it seems appropriate that the text make explicit the principle of reciprocity and the bidirectional flow of resources, in order to maximise the territorial impact of EU funding. In particular, the possibility that resources from the Competitiveness Fund may be transferred to National Plans or used to finance national projects in overbooking could be explicitly provided for either in Article 6 or in Article 7.
Alternative, combined and cumulative funding	FI (Comments): Scrutiny reservation.
1. The ECF shall be implemented in synergy with other Union programmes. An action that has received a Union contribution from another programme may also receive another contribution under the ECF. The rules of the relevant Union programme shall apply to the corresponding contribution or a single set of rules may be applied to all contributions and a single legal commitment	IT (Drafting Suggestions): The ECF shall be implemented in synergy with other Union programmes. An action that has received a Union contribution from another programme may also receive another contribution under the ECF. The rules of the relevant Union programme shall apply to the corresponding contribution**,** or**,** **<u>where appropriate,</u>** a single set of rules may be applied to

PUBLIC

Commission proposal	Drafting Suggestions and Comments
may be concluded. If the Union contribution is based on eligible costs, the cumulative support from the Union budget shall not exceed the total eligible costs of the action and may be calculated on a pro-rata basis in accordance with the documents setting out the conditions for support.	all contributions **through a single legal commitment.**~~and a single legal commitment may be concluded~~. If the Union contribution is based on eligible costs, the cumulative support from the Union budget shall not exceed the total eligible costs of the action and may be calculated on a pro-rata basis in accordance with the documents setting out the conditions for support. IT (Comments): Clarifies that a single set of rules may be applied only where appropriate. We agree with the proposal. The formats of the documents will need to be clarified to better define the cases in which double financing is to be excluded, especially in cases where the used instrument is FNLC (Financing Not Linked to Costs). FI (Comments): Many unclarities: Are the Union programmes referred here meaning only directly managed programmes? Is the single set of rules referring to the single rulebook or some case by case set of rules, or some MFF-level set of rules? What is the single legal commitment referring to? CZ (Comments): CZ - How will the risk of double financing be prevented? BE (Comments): On what basis (which criteria) will it be decided whether the rules of the specific programme apply, or whether the rules of a single rulebook will be used? (Considering different programmes, different objectives, Horizon Europe's excellence principle, etc.) AT (Drafting Suggestions):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	The ECF shall be implemented in synergy with other Union programmes, **especially with a view to the national and regional partnership plans**. An action that has received a Union contribution from another programme may also receive another contribution under the ECF. The rules of the relevant Union programme shall apply to the corresponding contribution or a single set of rules may be applied to all contributions and a single legal commitment may be concluded. If the Union contribution is based on eligible costs, the cumulative support from the Union budget shall not exceed the total eligible costs of the action and may be calculated on a pro-rata basis in accordance with the documents setting out the conditions for support. **Such synergies shall not undermine the predictability and long-term planning security of Union research and innovation activities**. AT (Comments): Ensuring predictability and long-term planning security is crucial for research and innovation activities. Excessive flexibility in fund allocation could undermine the stability needed for R&I activities/programming. Question: FP10 and ECF should have a uniform set of rules – what does the process look like here? The more consistent the rules and the fewer exceptions and options, the easier the implementation for those organizations that frequently participate in the various programs and funding streams. In the latest calls for proposals from Horizon Europe and the Single Market Program/SME strand, “cascade funding” (Financial Support for Third Parties – FSTP) is being used more and more. It is questionable whether this instrument will also be used (more frequently?) in FP10 and ECF in the future. This would increase the workload for consortia in terms of calls and implementation with regard to the transfer of funding to final beneficiaries and would also entail higher supporting efforts. SE (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	Does this mean that it will be possible to use contributions from both the national envelope (I.e. shared management/structural funds) and ECF in for example a national financial instrument? PL (Drafting Suggestions): Additional point: ***"Member States with historically low absorption rates shall be supported through dedicated coordination platforms to facilitate access to cumulative funding. Where applicable, cumulative support shall reflect regional smart specialization strategies and support place-based innovation."*** PL (Comments): No reference to national coordination mechanisms or low-performing Member States. Poland receives <1.5% of Horizon Europe funds; national coordination offices and mentoring are needed to improve participation. Need to ensures that combined funding mechanisms target high-impact areas aligned with EU and Poland's competitiveness goals. No mention of regional innovation priorities or smart specialization. Aligns funding with Poland's RIS3 priorities and addresses regional disparities in innovation capacity NL (Drafting Suggestions): 1. The ECF shall be implemented in synergy with other Union programmes. An action that has received a Union contribution from another programme may also receive another contribution under the ECF. **For contributions made under the ECF, this regulation shall apply**. ~~The rules of the relevant Union programme shall apply to the corresponding contribution or a single set of rules may be applied to all contributions and a single legal commitment may be concluded~~. If the Union contribution is based on eligible costs, the cumulative support from the Union budget shall not exceed the total eligible costs of the action

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	and may be calculated on a pro-rata basis in accordance with the documents setting out the conditions for support. NL (Comments): Will actions that have been supported by other programmes still need to comply with the applicable ECF rules and procedures? Or can ECF budget be allocated to actions under a different set of rules? MT (Comments): The text "The rules of the relevant Union programme shall apply to the corresponding contribution or a single set of rules may be applied to all contributions and a single legal commitment may be concluded." is ambiguous and needs to be amended to clarify the circumstances under which either scenario (the rules of the relevant Union programme applying to the corresponding contribution or a single set of rules applying to all contributions) would be applied. RO (Comments): Although the text allows cumulative funding from several Union programmes, it remains unclear how this mechanism will work in practice, particularly in relation to the performance framework. Clarification is needed on how contributions to indicators will be accounted for and reported when the same action receives support from different sources, in order to avoid both double reporting and the risk of overstating progress towards programme targets. The provision on cumulative funding is useful in ensuring synergies, but further clarification is required. In particular, it should be specified whether this possibility applies exclusively to programmes managed directly or indirectly by the Commission (e.g. Horizon Europe, LIFE, InvestEU, CEF), or whether it also covers funds under the Single Fund/national single plans. Given the proposed rules on avoiding double financing, we consider necessary to clearly delimit the scope of application in order to prevent overlaps and uncertainties in implementation, also taking into

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	account the use of simplified cost options in different programmes. Moreover, it is important to clarify how the costing methodology will be harmonised when cumulative funding is applied. Could the Commission provide more details about the instances when either programme contribution rules or a single set of rules apply? It would be useful that the Commission provides an example of Union contribution that may be combined with ECF contribution. ES (Drafting Suggestions): The ECF shall be implemented in synergy with other Union programmes. An action that has received a Union contribution from another programme may also receive another contribution under the ECF, **and shall facilitate bridging from Next Generation instruments, ensuring continuity of industrial transformations initiated under those programmes without additional administrative layers**. The rules of the relevant Union programme shall apply to the corresponding contribution or a single set of rules may be applied to all contributions and a single legal commitment may be concluded. If the Union contribution is based on eligible costs, the cumulative support from the Union budget shall not exceed the total eligible costs of the action and may be calculated on a pro-rata basis in accordance with the documents setting out the conditions for support. ES (Comments): It helps to ensure continuity post NextGenEU. FR (Drafting Suggestions): The ECF shall be implemented in synergy with other Union programmes. An action that has received a Union contribution from another programme may also receive another contribution under the ECF. The rules of the relevant Union programme shall apply to the corresponding contribution or a single set of rules may be applied to all contributions and a single legal

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	commitment may be concluded. If the Union contribution is based on eligible costs, the cumulative support from the Union budget shall not exceed the total eligible costs of the action and may be calculated on a pro-rata basis in accordance with the documents setting out the conditions for support. **Additional contributions from another Union program that complement the funding granted under the specific objective presented in Article 3(2)(d)(2) (support to the EU defense industry) must meet the specific eligibility criteria defined in Articles 50 and 51.** FR (Comments): Actions related to support to the EDTIB financed under other programmes, such as Horizon Europe, should meet the eligibility criteria as referred to in the specific defence industry chapter. Could the Commission specify how – through which processes and based on which criteria – and who will define the single set of rules? Will it apply to collaborative research?
2. Award procedures under the ECF may be jointly conducted under direct or indirect management with Member States, Union institutions, their departments, bodies and agencies, third countries international organisations, international financial institutions, or other third parties, provided the protection of the financial interests of the Union as well as of the security and defence interests of the Union and its Member States is ensured. Such procedures shall be subject to a single set of rules and lead to the conclusion of single legal commitments. For that purpose, the partners may make resources available to the ECF in accordance with Article	IT (Drafting Suggestions): Award procedures under the ECF may be jointly conducted under direct or indirect management with Member States, Union institutions, their departments, bodies and agencies, third countries**,** international organisations, international financial institutions, or other third parties, provided the protection of the financial interests of the Union as well as of the security and defence interests of the Union and its Member States is ensured. Such procedures shall be subject to a single set of rules and lead to the conclusion of single legal commitments. For that purpose, the partners may make resources available to the ECF in accordance with Article 5 of this Regulation, or, **where applicable,** may be entrusted with the implementation of the award procedure, ~~where applicable~~ in accordance with Article 62(1), point (c), of Regulation (EU,

PUBLIC

Commission proposal	Drafting Suggestions and Comments
5 of this Regulation, or the partners may be entrusted with the implementation of the award procedure, where applicable in accordance with Article 62(1), point (c), of Regulation (EU, Euratom) 2024/2509. In joint award procedures representatives of the partners to the joint award procedure may also be members of the evaluation committee referred to in Article 153(3) of Regulation (EU, Euratom) 2024/2509.	Euratom) 2024/2509. In joint award procedures**,** representatives of the partners to the joint award procedure may also be members of the evaluation committee referred to in Article 153(3) of Regulation (EU, Euratom) 2024/2509. IT (Comments): Clarifies that partners may be entrusted with implementation where applicable FI (Comments): Same questions as above. Does this mean that ECF funding could eventually for example be awarded and distributed via a MS that has made a budget contribution from its NRP to ECF and then it could still be awarding the money in practice and also be part of the evaluation committee where there would not need to be any external evaluators in addition to the MS concerned and the Commission? PL (Drafting Suggestions): Additional point: ***"Joint award procedures may include macroregional innovation platforms such as those under the EU Strategy for the Baltic Sea Region."*** PL (Comments): No reference to macroregional cooperation or Baltic Sea Region platform, which encourages scaling of cross-border innovation projects and strengthens Baltic Sea Region' innovation potential in areas like maritime tech, cybersecurity, and green energy. No mention of regional or sectoral representation: improves legitimacy and responsiveness of funding decisions to local and sector-specific needs. NL

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Drafting Suggestions): 2. Award procedures under the ECF may be jointly conducted under direct or indirect management with Member States, Union institutions, their departments, bodies and agencies, third countries international organisations, international financial institutions, **including the EIB Group**, or other third parties, provided the protection of the financial interests of the Union as well as of the security and defence interests of the Union and its Member States is ensured. Such procedures shall be subject to a single set of rules and lead to the conclusion of single legal commitments. For that purpose, the partners may make resources available to the ECF in accordance with Article 5 of this Regulation, or the partners may be entrusted with the implementation of the award procedure, where applicable in accordance with Article 62(1), point (c), of Regulation (EU, Euratom) 2024/2509. In joint award procedures representatives of the partners to the joint award procedure may also be members of the evaluation committee referred to in Article 153(3) of Regulation (EU, Euratom) 2024/2509. RO (Comments): While the ECF allows joint award procedures with various partners, further clarification is needed on the criteria for selecting entities participating in indirect fund governance, the allocation of roles and responsibilities, and the mechanisms to ensure balanced representation of Member States. Clear rules are essential to avoid overlaps, ensure accountability, and maintain alignment with the performance framework and reporting of indicators. ES (Drafting Suggestions): Award procedures under the ECF may be jointly conducted under direct or indirect management with Member States, Union institutions, their departments, bodies and agencies, third countries international organisations, international financial institutions, or other third parties, provided the protection of the financial interests of the Union as well as of the security and defence interests of the Union and its Member States is ensured. Such procedures shall be subject to a single set of rules and lead to the conclusion of single legal commitments. For that

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	purpose, the partners may make resources available to the ECF in accordance with Article 5 of this Regulation, or the partners may be entrusted with the implementation of the award procedure, where applicable in accordance with Article 62(1), point (c), of Regulation (EU, Euratom) 2024/2509. In joint award procedures representatives of the partners to the joint award procedure may also be members of the evaluation committee referred to in Article 153(3) of Regulation (EU, Euratom) 2024/2509. **In sensitive areas linked to security, defence and critical infrastructure, Member States shall retain a right of scrutiny.** ES (Comments): Preserves Member State sovereignty in strategic areas. SI (Drafting Suggestions): 2. Award procedures under the ECF may be jointly conducted under direct or indirect management with Member States, Union institutions, their departments, bodies and agencies, third countries international organisations, international financial institutions, or other third parties, provided the protection of the financial interests of the Union, **and its values as enshrined in the Treaties respected,** as well as of the security and defence interests of the Union and its Member States is ensured. Such procedures shall be subject to a single set of rules and lead to the conclusion of single legal commitments. For that purpose, the partners may make resources available to the ECF in accordance with Article 5 of this Regulation, or the partners may be entrusted with the implementation of the award procedure, where applicable in accordance with Article 62(1), point (c), of Regulation (EU, Euratom) 2024/2509. In joint award procedures representatives of the partners to the joint award procedure may also be members of the evaluation committee referred to in Article 153(3) of Regulation (EU, Euratom) 2024/2509. SI (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	Can the EC clarify the difference between direct and indirect management with Member States. What third countries international organisations are meant here? FR (Comments): Which kind of 'international financial institutions' or 'third parties' could be in charge of award procedures? What kind of calls could be funded through joint award procedures? How would strategic autonomy be ensured in such cases – not only protection of financial interests or security-related issues?
	SI (Drafting Suggestions): **(New article)** **"European Partnerships"** **1.Where necessary to achieve the objectives set out in Article 3, activities under this Regulation may be implemented through European Partnerships, by default through the work programmes.** **2. European Partnerships shall be based on a Memorandum of Understanding, agreed and signed between the partners, stipulating:** **a) the results to be delivered, which shall be clear, measurable, time-bound;** **b) reporting requirements** **c) the related commitments from all partners;** **d) governance arrangements with a mechanism for partners to discuss and agree on the partnerships' programming and activities.** **3. In duly justified cases European Partnerships will be implemented by entrusting budget implementation tasks from various Union funding programmes to bodies established pursuant to Articles 185 and 187 TFEU, in accordance with Article 62(1), point (c), of Regulation (EU, Euratom) 2024/2509.**

Commission proposal	Drafting Suggestions and Comments
	4. For European Partnerships established pursuant to paragraphs 2 and 3 of this Article, support from the Programme shall be conditional upon efficient use of Union financing, a proportionate financial contribution from other partners at least matching the Union contribution and voting rights for the Union in the governing bodies ensuring protection of the interests of the Union in the partnership. For that purpose, Joint Undertakings shall be established through a single establishing act ensuring harmonised rules. **5. European Partnerships shall:** **a) be established only in cases where Union action alone or other forms of support under the Programme cannot achieve the desired objectives.** **b) be established for the purpose of addressing challenges that require a critical mass of resources and a unified and coordinated approach, both in terms of programming and implementation, across actors.** **c) align with and assist in the implementation of major Union policies and policy initiatives.** **d) be selected in a competitive manner based on a set of quantifiable lifecycle criteria and a strong portfolio approach, resulting in a coherent set of initiatives.** **e) be based on ex ante, long-term and formal commitments from all partners to contribute financially to the resources of the European Partnership, which shall be centrally managed, except in duly justified cases.** **f) require a clear lifecycle approach, including an upfront plan for the implementation of the initiative with a strategy for gradually or fully phasing out from Union funding.** **6. Contributions from Partners other than the Union shall take the following forms:** **a) financial contributions to the operational budget of the initiative;** **b) co-financing by the Partners of their own participation, or that of their members, in projects funded through the initiative.** **7. All Partners other than the Union shall provide information on the structure, membership and activities developed within the partnership. In cases where partnerships are concluded with representative organisations and associations, this shall include regular information on their membership.**

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	SI (Comments): European partnerships should be an important instrument for implementation of ECF's objectives, so we suggest to mirror their provisions to FP10 regulation:
Article 7	
Coordination	DE (Comments): The interplay between the ECF and other programs within heading 2, in particular Horizon Europe, as well as with heading 1/NRPP and heading 3/Global Europe is key. The connection between those must be consistent and coherent while taking into account the specific needs of individual programs. We deem it necessary to specify how this will be designed in practice. An increase in bureaucracy must be avoided. ES (Comments): How will the ECF's coordination with Horizon Europe and the Innovation Fund ensure that the Work Programs prioritize both bottom-up and targeted research, and cover all levels of technological maturity (TRLs)? Given that research and innovation are shared competences with the Member States, how will the Commission guarantee that they have real decision-making power over the Work Programs, when the current ECF proposal foresees only consultation and not examination under the comitology procedure?

PUBLIC

Commission proposal	Drafting Suggestions and Comments
1. The Commission shall ensure the consistent implementation of the European Competitiveness Fund, the Framework Programme for Research and Innovation and the Innovation Fund.	IT (Comments): The connection between Pillar II of Horizon Europe and the four policy windows of the European Competitiveness Fund (ECF) will help ensure that collaborative research supports competitiveness objectives. However, the coordination mechanisms between the existing instruments for financing research and development in enabling technologies remain unclear, particularly the boundaries with Horizon Europe and the Innovation Fund, which is also expected to involve private financing. It will also be important to assess how the connection and shared governance between Horizon Europe and the ECF will be established. Furthermore, the potential impact on initiatives likely to fall within the scope of the fund — notably AI gigafactories and the implementation of the European Quantum Strategy — will need to be carefully examined. HR (Drafting Suggestions): 1. The Commission **and Member States** shall ensure the consistent implementation of the European Competitiveness Fund, the Framework Programme for Research and Innovation and the Innovation Fund. HR (Comments): Clear reference to the inclusion of MS in this coordination would be highly appreciated. CZ (Drafting Suggestions): The Commission**, together with the Member States,** shall ensure the consistent implementation of the European Competitiveness Fund, the Framework Programme for Research and Innovation and the Innovation Fund. CZ

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Comments): CZ is of the opinion that the role of the Member States should be strengthened here. The Member States are crucial actors in the comitology and Programme Committees and shall be seen as an equal partner to the Commission with regard to the implementation of the mentioned programmes. BE (Drafting Suggestions): 1. The Commission shall ensure the consistent implementation of the European Competitiveness Fund, the Framework Programme for Research and Innovation and the Innovation Fund, **while preserving the autonomy of the Innovation Fund to ensure transparency in the use of ETS revenues.** PL (Drafting Suggestions): Additional point: **"*The Commission shall ensure consistency with macroregional strategies, including the EU Strategy for the Baltic Sea Region, and support regional innovation platforms.*"** PL (Comments): No reference to macroregional strategies or regional innovation platforms. Aligns ECF with existing regional frameworks like EUSBSR, which promote innovation, connectivity, and sustainability across 8 Baltic EU countries MT (Drafting Suggestions): The Commission shall ensure the consistent implementation of the European Competitiveness Fund, the Framework Programme for Research and Innovation and the Innovation Fund. **It shall ensure that overlaps between the Competitiveness Fund and Horizon Europe are**

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	avoided, and that the European Competitiveness Fund maintains and enhances cross-border research collaboration under Horizon Europe. MT (Comments): It is important that overlaps between the Competitiveness Fund and Horizon Europe are avoided to ensure synergy and coherence. Moreover, Malta believes that the European Competitiveness Fund should not impinge on Horizon Europe's collaborative research. SI (Drafting Suggestions): 1. The Commission shall ensure the consistent implementation of the European Competitiveness Fund, the Framework Programme for Research and Innovation and the Innovation Fund **in close cooperation with Member States to align national and EU-level efforts**. FR (Drafting Suggestions): 1. The Commission shall ensure the consistent implementation of the European Competitiveness Fund, the Framework Programme for Research and Innovation and the Innovation Fund. FR (Comments): Can the Commission explain how it intends to ensure the consistent implementation of these funds? In order to give a proper opinion on this article, it would be useful that the European Commission provides further details on the coordination between these two programmes (governance, funding, evaluation mechanisms, etc.) and how it ensures the association of the Council to the definition of work programmes and selection processes, including eligibility criteria and budget allocations within the Framework Programme for Research and Innovation.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	Since collaborative research calls will be integrated into ECF , and regarding the objective of aligning R&I and industrial policies, there is a need to define clear governance mechanisms – associating Member States – to ensure concrete synergies between instruments and projects of each programm, thus covering the whole research and innovation value chain.
2. The Commission and Member States shall, in a manner commensurate to their respective responsibilities, facilitate coordination and coherence between European Competitiveness Fund and national and regional partnership plans on common competitiveness priorities in selected key areas and projects deemed of strategic importance and of common European interest.	IT (Drafting Suggestions): The Commission and Member States shall, in a manner commensurate ~~to~~ **with** their respective responsibilities, facilitate coordination and coherence between **the** European Competitiveness Fund and national and regional partnership plans on common competitiveness priorities in selected key areas and projects deemed of strategic importance and of common European interest IT (Comments): **"**the**"** before "European Competitiveness Fund" ensures stylistic consistency with section 1. HR (Drafting Suggestions): The Commission and Member States shall, in a manner commensurate to their respective responsibilities, facilitate coordination and coherence between European Competitiveness Fund and national and regional partnership plans on common competitiveness priorities in selected key areas and projects deemed of strategic importance and of common European interest, **with particular attention to ensuring balanced benefits for all regions and Member States.** HR (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	HR proposes this addition to strengthen the alignment between EU and national strategies, while ensuring that benefits are not concentrated in already advanced hubs. FI (Comments): Strong reservation. This cannot leave to an unbalanced situation where countries with more resources to spend in their NRPs would dominate in selecting the key areas and projects in the Work Programmes. DE (Comments): We must ensure coherence of heading 1 and heading 2, i.a. as concerns investment opportunities to strengthen competitiveness, innovation and growth. The interplay must be clearly regulated so that both headings complement each other in the best possible way and in the sense of a European added value. CZ (Comments): CZ – Does this imply that the NRPPs will be required to earmark a share of their allocation for IPCEI? SE (Drafting Suggestions): The Commission and Member States shall, in a manner commensurate to their respective responsibilities, facilitate coordination and coherence between European Competitiveness Fund and national and regional partnership plans on common competitiveness priorities in ~~selected key~~ areas and projects deemed of ~~strategic~~ importance and of common European interest. SE (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	How will this work in practice and what role will the coming *Competitiveness Coordiation Tool* have in the coordination process? Well-functioning markets with effective competition are what make companies competitive; it is important that support does not distort the market and competition between sectors or companies. PL (Drafting Suggestions): Additional point: *"**Coordination shall reflect Member States' smart specialization strategies and support the development of regional innovation ecosystems, particularly in less-developed areas. Strategic projects may include cross-border innovation initiatives within macroregions such as the Baltic Sea Region, supported by joint governance structures.**"* PL (Comments): No mention of smart specialization or regional innovation ecosystems. Supports Poland's RIS3 priorities and addresses regional disparities in innovation capacity (e.g. Eastern Poland, coastal regions) which encourages transnational cooperation in innovation, aligned with EUSBSR's thematic areas like bioeconomy, energy, security, and overall macroregional innovation policy. No mechanism for identifying or supporting cross-border innovation projects. ES (Drafting Suggestions): 2. The Commission and Member States shall, in a manner commensurate to their respective responsibilities, ~~facilitate~~ **ensure** coordination and coherence between **the** European Competitiveness Fund and national and regional partnership plans on common competitiveness priorities in selected key areas and projects deemed of strategic importance and of common European interest **which should be aligned with national priorities and interests**.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	ES (Comments): Alignment with national competitiveness priorities should be reinforced, also allowing for greater ownership by and decision-making capacity of Member States. SI (Drafting Suggestions): 2. The Commission and Member States shall, **on a voluntary basis, if there is value added for Member States** in a manner commensurate to their respective responsibilities, facilitate coordination and coherence between European Competitiveness Fund and national and regional partnership plans on common competitiveness priorities in selected key areas and projects deemed of strategic importance and of common European interest.
3. The ECF will be implemented in synergy with other Union funds, including the Global Europe Fund, in particular to support global competitiveness, ensure diversified supply sources, and strengthen export potential and opportunities of European companies.	IT (Drafting Suggestions): The ECF will be implemented in synergy with other Union funds, including the Global Europe Fund, in particular to support global competitiveness, ensure diversified supply sources, and strengthen **the** export potential and opportunities of European companies FI (Comments): This should be the primary mandate for the ECF which other programmes complement. BE (Comments): Could the Commission further elaborate on the synergy between programmes, such as the Global Europe Fund ? AT

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Drafting Suggestions): The **Commission and Member States shall ensure that the** ECF will be implemented in synergy with other Union funds, including the Global Europe Fund, in particular to support global competitiveness, ensure diversified supply sources, and strengthen export potential and opportunities of European companies. AT (Comments): Specific language on how the "implementation in synergy" could be achieved is warranted. PL (Drafting Suggestions): Additional point: ***"Implementation may support regional export platforms and innovation diplomacy initiatives, especially in macroregions with strategic industrial clusters."*** PL (Comments): No mention of regional export platforms or innovation diplomacy, which strengthens Poland's and Baltic region's global positioning in sectors like e.g. AI, green tech, maritime innovation, and cybersecurity. NL (Comments): Why are article 7(1) and 7(3) separate? And 1 and 2 state a concrete actor who is responsible (COM and/or MS), but 3 does not? FR (Drafting Suggestions): 3. The ECF will be implemented in synergy with other Union funds, including the Global Europe Fund, in particular to support global competitiveness, ensure diversified supply sources,

Commission proposal	Drafting Suggestions and Comments
	and strengthen export potential and opportunities of European companies. **It should also ensure synergies with Erasmus+ and the Framework Programme for Research and Innovation regarding skills development by contributing to activities aiming at developing skills in the strategic sectors identified by ECF policy windows.** FR (Comments): In relation to art 30 regarding skills development, the ECF should ensure synergies with Erasmus+ and Horizon Europe (in particular MSCA) to support activities targeting strategic sectors linked to ECF policy windows.
	SI (Drafting Suggestions): **(New article)** **"Collaborative research and innovation"** **In supporting collaborative research and innovation, the programme shall:** **1. support the entire value chain, balancing both ends of the TRLs scale, while paying particular attention on strengthening the middle TRL range.** **2. Implement measures to ensure a balanced geographical coverage through scientific excellence, brain circulation, and new collaborations, supported by complimentary efforts by Member States.** **3. integrate SSH disciplines across all policy windows, with specific calls for SSH topics where appropriate.** 4. **streamline administrative procedures and use a two-stage submission and evaluation procedure to reduce the burden for applicants and beneficiaries.**
Article 8	

PUBLIC

Competitiveness Seal	IT (Comments): The introduction of the provisions on the competitiveness seal are positive but should be consistent with the investment journey principle. HR (Comments): Horizon Europe regulation states that « in addition to the conditions set out in Article 8(1) and (2) of Regulation (EU) XXX [European Competitiveness Fund], a Competitiveness Seal shall be awarded only to high-quality actions that have not been financed under the Programme due to budgetary constraints. » This would then exclude any other parts of Horizon Europe programme that have not been assessed in an award procedure under the ECF : from Excellent Science to Innovation. This sets a precedent compared to the practice of Seal of Excellence awarding in previous and current FP FI (Comments): Scrutiny reservation. DE (Comments): The Competitiveness Seal has the potential to become a recognized sign that a project is worthy of funcing since certain minimum requirements have been met. Where and how will the specific decision be taken on the award of the seal? It is also unclear under which conditions (e.g. as concerns state aid regulations) Member States could support projects with a Competitiveness Seal. How will the quality of such projects be evaluated, especially of strategic projects under NZIA or CMA? CZ (Comments): CZ - *General comment:*

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	The Competitiveness Seal must include state aid exemptions similar to the Horizon Europe Seal of Excellence, in line with Article 25a to 25d of the GBER, and with stable and predictable rules. SE (Comments): Further clarifications are needed on how the competitiveness seal would work in practice and its implications. FR (Comments): The objective of the Competitiveness Seal should be clearly mentioned before setting the criteria according to which it could be granted. Does this Seal applies to collaborative research?
1. A Competitiveness Seal may be awarded to high-quality actions which shall comply at least with the following conditions:	IE (Comments): IE is supportive of Competitiveness Seal quality label. Will any issues of duplication arise between Competitiveness Seals and existing Horizon Europe Seals of excellence? This could be perceived to devalue H.E. seals. BE (Drafting Suggestions): 1. A Competitiveness Seal ~~may~~ **shall** be awarded to high-quality actions which shall comply at least with the following **cumulative** conditions: BE (Comments): - Every project that complies should receive a Competitiveness Seal.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	- Explicitly state that both conditions need to be fulfilled. How does this Competitiveness Seal relate to the STEP Seal (and the NZIA/CRMA strategic projects that have received a STEP Seal)? AT (Comments): As already asked inn writing: Can the COM explain the procedure for awarding the seal in more detail? Maybe it would be good to have a diagram illustrating the process and involving the stakeholders to improve comprehensibility. It is unclear whether it will also be extended to cooperative projects, for example? SE (Comments): Why has the term "high-quality" been chosen instead of "excellence"? PL (Drafting Suggestions): Additional point: **"Member States shall establish national registries of sealed projects to facilitate visibility, matchmaking, and funding opportunities."** PL (Comments): No mechanism to track or promote sealed projects at national level to help Poland identify and support high-potential projects that meet EU standards but lack funding as well as improve transparency and coordination RO (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	The advisory services and the use of a "Competitiveness Seal" should be developped in a mandatory collaborative system involving partners from less competitive countries in certain areas, in order to develop capacity along the value chain in those countries as well. SI (Drafting Suggestions): A Competitiveness Seal may be awarded to high-quality ~~actions~~ **projects** which shall comply at least with the following conditions:
	PL (Drafting Suggestions): Additional point: **"Projects awarded the Seal shall be eligible for simplified access to state aid schemes, including under IPCEI and national innovation programmes."** PL (Comments): No mechanism linking the Seal to state aid eligibility. Proposal addresses Poland's limited use of IPCEI and state aid flexibility; helps unlock funding for strategic innovation projects
(a) they have been assessed in an award procedure under the ECF;	AT (Drafting Suggestions): they have been assessed in an award procedure under the ECF **including collaborative research and innovation projects evaluated under Horizon Europe rules**
(b) they comply with the minimum quality requirements of that award procedure;	LV (Drafting Suggestions): (b) they comply with the minimum quality requirements of that award procedure **within the framework of programs**;

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	LV (Comments): Proposal to add clarification that minimum requirements will be included in specific programs. If it is planned that minimum requirements will be stipulated in the general regulation, please name them.
	SE (Drafting Suggestions): (c) they comply with state aid regulations SE (Comments): It is important that state aid rules remain applicable within the seal. SI (Drafting Suggestions): **c) they achieve at least 80% of the maximum score across the evaluation criteria of the award procedure** SI (Comments): A clear and uniform threshold should be agreed and defined in advance
2. The work programme or the documents related to the award procedure may set out additional conditions.	BE (Drafting Suggestions): 2. The work programme or the documents related to the award procedure may set out additional conditions **in order to award a Competitiveness Seal.** BE (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	Textual clarification PL (Drafting Suggestions): Aditional point: *"**Additional conditions may include alignment with regional smart specialization strategies and macroregional cooperation platforms. Additional conditions may include compliance with enhanced aid intensity thresholds for innovation and strategic technologies".*** PL (Comments): No reference to regional innovation priorities or smart specialization which ensures that sealed projects reflect Poland's RIS3 priorities and Baltic Sea Region innovation goals (e.g. green tech, maritime innovation). No reference to aid intensity or compatibility with EU state aid rules. Drafting proposal allows Member States to offer higher aid intensity for sealed projects, reducing barriers to implementation.
3. Member States may support projects which have been awarded a seal, or may provide support through the ECF by making additional resources available to the ECF in accordance with Article 5(1) or (2).	HR (Drafting Suggestions): Member States may support projects which have been awarded a seal, or may provide support through the ECF by making additional resources available to the ECF in accordance with Article 5(1) or (2). **Particular attention should be given to SMEs and projects in less advanced regions.** HR (Comments): HR proposes this addition to ensure that SMEs and regions with weaker innovation ecosystems can benefit. PL

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Drafting Suggestions): Additional point: "**Member States may rec*eive preferential co-financing rates or technical assistance when supporting sealed projects. Member States may prioritize sealed projects in national aid programmes and benefit from streamlined notification procedures*"** PL (Comments): No incentive mechanism for Member States to co-finance sealed projects to encourage also Poland to invest in high-quality projects and overcome budgetary constraints, especially in less-developed regions. No incentive for Member States to prioritize sealed projects in national aid schemes. Proposal encourages Poland to align national funding with EU-recognized quality, reducing administrative burden and delays NL (Drafting Suggestions): **Without prejudice to the State aid rules**, Member States may support projects which have been awarded a seal, or may provide support through the ECF by making additional resources available to the ECF in accordance with Article 5(1) or (2). NL (Comments): Important to clarify the State aid rules still apply for MS support to projects with a seal. Can the Commission confirm that if a MS supports a specific project with a Seal through a contribution to the ECF in line with Article 5, and in combination with Article 20(2)(a)(2), it still needs to comply with the State aid rules? ES (Drafting Suggestions):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	Member States may support projects which have been awarded a seal, or may provide support through the ECF by making additional resources available to the ECF in accordance with Article 5(1) or (2). **The seal shall not create any automatic entitlement to Union funding but shall facilitate complementary support by Member States, while preserving a balanced distribution of projects.** ES (Comments): Clarifies that the seal is not an automatic right and prevents concentration among a few beneficiaries. SI (Drafting Suggestions): 3. Member States may support projects which have been awarded a seal, or may provide support through the ECF by making additional resources available to the ECF in accordance with Article 5(1) or (2**), including resources of European Fund for Economic, Territorial, Social Cohesion, Agriculture and Rural, Fisheries and Maritime Prosperity and Security allocated to them under shared management.**
4. Strategic projects under CRMA, NZIA, CMA and other strategic projects identified in Union legislation that fulfil the conditions in paragraph 1, will be directly granted the Competitiveness Seal.	SE (Comments): This cannot automatically imply support from the ECF without an open call. This will distort distrubution of funds within the ECF. Se article 20. 2.a.2. PL (Drafting Suggestions): Additional point:

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	"Strategic projects shall be listed in a publicly accessible EU registry and monitored for impact, with regular updates shared and approved by the Member States." PL (Comments): No clarity on how strategic projects are identified or monitored. Need to improve accountability and allow Poland to align national funding with EU strategic priorities. No link to aid exemptions or fast-track procedures. Proposal improves Poland's access to strategic EU instruments and reduces regulatory uncertainty for high-impact projects. NL (Comments): Can the Commission clarify the "*other strategic projects identified in Union legislation that fulfil the conditions in paragraph 1*" part? Which Union legislation does the Commission have in mind? And will these projects *not* directly be granted a Seal, given they have to have been assessed in an ECF award procedure, unlinke CRMA/NZIA/CMA projects? RO (Drafting Suggestions): Strategic projects under CRMA, NZIA, CMA and other strategic projects identified in Union legislation that fulfil the conditions in paragraph 1, will be directly granted the Competitiveness Seal **and should be considered as priorities to be supported by other financial instruments.** EL (Drafting Suggestions): 4. Strategic projects under CRMA **Critical Raw Materials Act Regulation (EU) 2024/1252**, NZIA **Net-Zero Industry Act Regulation (EU) 2024/1735**, CMA, **projects of digital technologies and data storage, as well as** other strategic projects identified in Union legislation**, including Integrated production facilities and Open EU foundries regulated in**

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	the Chips Act Regulation (EU) 2023/1781 that fulfil the conditions in paragraph 1, will be directly granted the Competitiveness Seal. EL (Comments): Specific reference needs to be made to Chips Act. Also, the Competitiveness Seal is considered a main tool for the promotion of the referenced strategic projects. Thus, it would be essential to include the sector of digital technologies and data storage considering its significance in the current economic framework FR (Comments): If sustainable aviation fuels (SAF) are well identified in the NZIA, their qualification as strategic projects does not seem automatic. The French authorities would like clarification on this point. Will SAF projects automatically benefit from the competitiveness seal ?
	PL (Drafting Suggestions): Art. 8.5 (new) – Macroregional/Regional innovation seal (**optional addition**): Add: "A Macroregional/Regional Competitiveness Seal may be awarded to projects demonstrating excellence in regional innovation or macroregional cooperation. A Regional Competitiveness Seal may be linked to regional aid maps and smart specialization strategies to ensure compatibility with state aid rules" PL (Comments): No recognition mechanism for regional excellence or cross-border innovation, which would strengthen visibility of Baltic Sea Macroregion innovation projects and supports Poland's leadership in transnational initiatives. No mechanism to coordinate regional aid with Seal recognition. Proposal supports Poland's regional innovation ecosystems and ensures legal certainty in aid allocation under EU rules.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
Article 9	
	MT (Comments): Malta stresses the need for proportionality and avoidance of excessive administrative burdens, given limited administrative capacity. Important to ensure grants remain available alongside financial instruments, as Malta's market size and underdeveloped capital markets limit access to equity/venture funding.
Eligibility	FI (Comments): Finland has a scrutiny to this article that is also deeply linked to the article 10 on EU preference. DE (Comments): We believe that there is merit in combining eligibility criteria with the possibility of association of third countries in order to ensure a balance between EU industrial policy interests and cooperation with partners. This creates planning security. However, we need to examine this in more detail, also with regard to potential exceptions and the specifics of the defense sector. At least the criteria and parameters should be laid down at the level of the Regulation and not in the work programs. FR (Comments): Concerning the EU Space Programme, this article needs to be analyzed in light of article 69. Indeed and at first sight, these eligibility criteria do not seem sufficiently constraining regarding the sensibility of the Space Programme. France may thus ask that the elibility criteria applied by default to the Space Programme be those of article 69 (or similar to those of article 69).
	FR

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Drafting Suggestions): Only actions which contribute to the achievement of the objectives referred to in Article 3 shall be eligible for funding. Such actions include studies, works and other accompanying measures necessary for the management and implementation of the Fund. Studies shall be eligible only if they relate to projects eligible under the Fund. FR (Comments): The French authorities believe that a better framework is needed for the actions eligible for this fund.
1. Eligibility criteria shall be set to support achievement of the general and specific objectives referred to in Article 3 of this Regulation, in accordance with Regulation (EU, Euratom) 2024/2509 and apply to all award procedures under the ECF.	SE (Drafting Suggestions): Eligibility criteria shall be set ~~to support achievement of~~ **in line with** the general and specific objectives referred to in Article 3 of this Regulation, in accordance with Regulation (EU, Euratom) 2024/2509 and apply to all award procedures under the ECF. **The eligibility criteria should include excellence criteria, ensuring non-distortiton on the single market and addressing market failures in all award procedures.** PL (Drafting Suggestions): Additional point: "**Eligibility criteria shall reflect national and regional smart specialization strategies and support place-based innovation.**" PL (Comments): No link to smart specialization or regional innovation strategies – drafting proposal aligns ECF with Poland's RIS3 priorities and addresses regional disparities in innovation capacity CY

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Drafting Suggestions): **Taking into account the protection of strategic, security, defence and public order interests of the Union and its Member States and** provided that any specific condition …. CY (Comments): **Important to include here similar text as in A 11.2.e. Safegaurding the interests of the EU and its MSs must be the baseline in relation to the inclusion of any third country/external actor** SI (Drafting Suggestions): 1. Eligibility criteria shall be set to support achievement of the general and specific objectives referred to in Article 3 of this Regulation, in accordance with Regulation (EU, Euratom) 2024/2509 and apply to all award procedures under the ECF**, except for the rules for collaborative research and innovation activities, which are set out in the regulation establishing Horizon Europe.** FR (Drafting Suggestions): 1. Eligibility criteria shall be set **with early involvement of Member States** to support achievement of the general and specific objectives referred to in Article 3 of this Regulation, in accordance with Regulation (EU, Euratom) 2024/2509 and apply to all award procedures under the ECF. **Regarding Defence (chapter 7 section 2), eligibility criterias for the definition of associated countries are set in article 50.** FR (Comments): Reinforcing the position of Member States in the definition of eligibility criteria is necessary in line with the ambition of article 10 on EU preference.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	Do these criteria apply to collaborative research? France would like to clarify the eligibility criteria relating to defense (if possible by grouping them together in one article, which could be Article 50).
2. Provided any specific condition laid down within each policy window or component are met, one or more of the following categories of legal entities may be eligible to receive Union support in award procedures under direct and indirect management:	PL (Drafting Suggestions): Additional point: "***Entities may include regional innovation agencies, technology parks, technology clusters, technology transfer centers as well as cross-border innovation networks and platforms"*** PL (Comments): No mention of regional innovation agencies or clusters. Proposal supports participation of local actors in Poland and Baltic Sea Region, improving territorial relevance and inclusiveness. ES (Drafting Suggestions): Provided any specific condition laid down within each policy window or component are met, one or more of the following categories of legal entities may be eligible to receive Union support in award procedures under direct and indirect management, **provided that such participation does not undermine the Union's economic security or technological sovereignty**:
(a) entities established in a Member State or in Overseas Countries and Territories;	LV (Drafting Suggestions):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	entities established in a Member State or in Overseas Countries and Territories, including state-owned companies, state-owned enterprises, and the non-governmental sector; LV (Comments): Please add the proposed explanation so that there are no possibilities of interpretation that "entities" also include state-owned companies, state-owned enterprises, and NGOs.
(b) entities established in an associated third country;	SI (Drafting Suggestions): (b) entities established in an associated ~~third~~ country; SI (Comments): It should apply to all associated countries.
(c) international organisations;	
(d) other entities established in non-associated third countries where the funding of such entities is essential for implementing the action and contributes to the objectives set out in Article 3.	FR (Drafting Suggestions): (d) ~~other entities established in non-associated third countries where the funding of such entities is essential for implementing the action and contributes to the objectives set out in Article 3~~**~~(1)(b).~~** FR (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	Can examples be provided of cases in which such funding would be necessary?
	NL (Drafting Suggestions): (e) the European Investment Bank
3. In addition to Article 168(2) and (3) of Regulation (EU, Euratom) 2024/2509, associated third countries referred to in Article 11(1) of this Regulation and international organisations may, where relevant, participate in and benefit from any procurement mechanisms set Article 168(2) and (3) of Regulation (EU, Euratom) 2024/2509. Rules applicable to Member States pursuant to Article 168 of Regulation (EU, Euratom) 2024/2509 shall be applied, mutatis mutandis, to participating associated third countries and international organisations.	IT (Drafting Suggestions): In addition to Article 168(2) and (3) of Regulation (EU, Euratom) 2024/2509, associated third countries referred to in Article 11(1) of this Regulation and international organisations may, where relevant, participate in and benefit from any procurement mechanisms set **out in** Article 168(2) and (3) of Regulation (EU, Euratom) 2024/2509. Rules applicable to Member States pursuant to Article 168 of Regulation (EU, Euratom) 2024/2509 shall be applied, mutatis mutandis, to participating associated third countries and international organisations IT (Comments): It clarifies the reference to the procurement mechanisms, ensuring grammatical precision and readability.
4. In award procedures, the following activities shall not be eligible for support:	PL (Drafting Suggestions): Additional point: **"Participation shall be subject to compatibility with EU state aid rules and may benefit from simplified co-financing procedures for sealed or strategic projects."** PL (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	No reference to state aid compatibility or co-financing rules . Proposal facilitates access to funding for Polish entities and reduces administrative barriers in state aid clearance
(a) activities that are prohibited by Union law, applicable international law, or by national law in all Member States;	SI (Comments): Does it mean that an activity, that is not eligible for support, has to be prohibited in all Member States at the same time?
(b) activities that are already fully financed from other public or private sources,	AT (Drafting Suggestions): (b) activities that are already ~~fully~~ **or could be** financed from other public or private sources, AT (Comments): This paragraph tackles a common criticism of many Union programmes, i.e. that the use of Union resources lacks additionality in many cases. How will ex ante be assessed that activities meet this eligibility criterion? Will there also be ex post evaluations to assess additionality? PL (Drafting Suggestions): Additional point: "**Activities may be eligible if they are not fully financed and demonstrate added value through co-investment or blended finance.**" PL (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	No guidance on partial financing or co-investment models. Proposal encourages public-private partnerships and enables Polish entities to leverage multiple funding sources. HU (Drafting Suggestions): activities that are already fully financed from other public or private sources, ***unless these sources are considered to be pre-financing,***
(c) in accordance with Article 136 of the Financial Regulation, eligibility restrictions shall apply to high-risk suppliers in line with EU law, for security reasons.	IT (Drafting Suggestions): ~~in accordance with Article 136 of the Financial Regulation,~~ ~~e~~Eligibility restrictions shall apply to high-risk suppliers ~~in line with EU law,~~ for security reasons, **in accordance with Article 136 of the Financial Regulation and in line with EU law**. IT (Comments): Improves readability by placing the objective (security restrictions) first, while keeping the legal reference secondary. SE (Comments): How is high-risk defined in this context?
	NL (Drafting Suggestions): **(d) activities that raise discriminatory, unjustified or disproportionate obstacles and undermine the implementation and enforcement of Union law in the areas of the internal market for goods and services.** NL

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Comments): Activities supported from the European Competitiveness Fund should effectively strengthen competitiveness and not undermine competitiveness by raising new barriers in the Single Market (because of for example inadequate implementation and enforcement).
5. The work programme or the documents related to the award procedure may further specify the eligibility criteria set out in this Regulation or set out additional eligibility criteria for specific actions.	LT (Comments): Under this point it is ensured that the eligibility criteria set out in this Regulation can be specified in the work programme or the documents related to award procedure. We would like to point out that it is of utmost importance to ensure the participation of the member states while deciding upon the eligibility criteria. FR (Drafting Suggestions): 5. **Where appropriate and duly justified**, the work programme or the documents related to the award procedure may further specify the eligibility criteria set out in this Regulation or set out additional eligibility criteria for specific actions. FR (Comments): The integration of additional eligibility criteria should be exceptional since project applicants need a stability of rules of participation.
6. Representatives of third countries or international organisations shall not be present in deliberations on eligibility/award criteria.	LT (Comments): We would like to clarify what is meant by “third countries”? All third countries or non-associated third countries? HU

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Comments): This might need some further clarifications taking into account all the the entities listed in Art. 5 and Art. 9.2.
Article 11	

PUBLIC

Association of third countries to activities under the ECF	HR (Comments): A clearer text on how this association would be at play having in mind the regulation of the same association in Horizon Europe would be very much welcomed (does one exlude or include the other and/or the inlusion of third countries in the commitology will defer depending on the programme). Additionally, are additional conditions will be set for third country participation in defence related policy window. FI (Comments): Scrutiny reservation. DE (Comments): We welcome that EFC is open to the participation of third countries. This can be crucial for technological and economic impact of certain programmes / projects. Given the wide scope of the ECF, how will the association agreements be negotiated and how will Member States be involved? Would it be possible to concluse multiple agreemens with one third country? Besides, the Horizon Europe Regulation contains similar rules on the association of third countries. Will it continue to be possible to associate only to Horizon Europe under the conditions set out in Horizon Europe? Will it continue to be possible to associate only to pillar II of Horizon Europe under the conditions of the Horizon Europe regulation (as currently the case for i.e. New Zealand, Canada)? AT (Drafting Suggestions): ~~Association~~ **Participation** of third countries **and international organisations** to activities under the ECF

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	AT (Comments): To be as clear as Article 7 of the current Space Programme Regulation (2021/696). FR (Comments): Do these criteria apply to collaborative research, or is it the rules set out in the Framework Programme for Research and Innovation regulation? Regarding Defence, France would like to ensure that particular conditions set at article 50 apply.
1. The ECF may be opened to the participation of the following third countries through full or partial association, in accordance with the objectives laid down in Article 3 and in accordance with the relevant international agreements or any decisions adopted under the framework of those agreements and applicable to:	CZ (Comments): CZ - *General comment:* When promoting the EU's technological sovereignty, it is necessary to take into account the EU's technological dependence on three countries and not to adopt too restrictive measures for participation in the ECF where this would harm the research and innovation development of the technology concerned and stakeholders in the EU. NL (Comments): This article should be aligned with other Funds of the MFF and in particular Horizon Europe to ensure a similar approach to engagement with third countries and create efficient procedure to assess partherships for more than one fund at a time. ES (Drafting Suggestions): The ECF may be opened to the participation of the following third countries, through full or partial association, **subject to reciprocity and excluding sensitive sectors where the Union's**

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	economic security or technological sovereignty could be undermined and in accordance with the objectives laid down in Article 3 and in accordance with the relevant international agreements or any decisions adopted under the framework of those agreements and applicable to: ES (Comments): The Commission should clarify what "full or partial association" means, if third countries need to conclude specific bilateral or multilateral agreements specifying the terms of participation (inclufing elegibility conditions) in the ECF, and what procedure will be followed to adopt such agreements. How would a third country associated to Pillar II of HE participate in the comitology of the windows under the ECF (category d in particular, since it is often associated only with pillar 2 - although the United Kingdom is associated with everything). The proposal establishes the windows and their governance under the ECF, including as regards R&I, through the dedicated committees of the ECG WP. Will it require association with the ECF? Will the current associated countries have to modify the cooperation agreement (umbrella)? Will they maintain the current HE protocol and/or will they require a new one for the ECF? CY (Drafting Suggestions): **Taking into account the protection of strategic, security, defence and public order interests of the Union and its Member States** the ECF may be opened to the participation of the following third countries, **in full respect of the respective framework of relations between the EU and each of these countries,** through full or partial association…, CY (Comments): In A. 11.2, safeguarding the inetretss of the EU and ts MSs its being taken into consideration in the Association Agreements for programme participation. It is required to include a similar

Public

Commission proposal	Drafting Suggestions and Comments
	safeguard in the previous stage, i.e. when deciding which thrird countries are eligible for participation At the same time, any such decisions must be in full respect of the respective framework of relations between the EU and each of these countries, so as to enhsure policy coherence across the board. FR (Drafting Suggestions): 1. The ECF may be opened to the participation of the following third countries through full or partial association, in accordance with the objectives laid down in Article 3 and in accordance with the relevant international agreements or any decisions adopted under the framework of those agreements ~~and applicable to:~~ FR (Comments): France is stille examining this article and reserves the right to suggest additional modifications to this article.
(a) members of the European Free Trade Association which are members of the European Economic Area, as well as Andorra, Monaco and San Marino;	FR (Drafting Suggestions): a) members of the European Free Trade Association which are members of the European Economic Area, as well as Andorra, Monaco and San Marino;
(b) acceding countries, candidate countries and potential candidates;	FR (Drafting Suggestions): b) acceding countries, candidate countries and potential candidates;
(c) European Neighbourhood Policy countries;	FR

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Drafting Suggestions): (c) European Neighbourhood Policy countries;
(d) other third countries.	AT (Drafting Suggestions): (d) other third countries **or international organisations in accordance with the conditions laid down in a specific agreement concluded in accordance with Article 218 TFEU**. AT (Comments): To be as clear as Article 7 of the current Space Programme Regulation (2021/696). PL (Drafting Suggestions): It may be opened to other third countries **on a full or partial association basis, subject to specific security, strategic and financial conditions.** PL (Comments): Ensures flexibility to onboard global partners while safeguarding the EU's strategic interests. LT (Comments): We would like to draw your attention, that it is important to consider the mechanism that for instance China, russia, belarus, Kazakhstan and others wouldn't be among those „third countries". FR

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Drafting Suggestions): ~~(d) other third countries.~~ OU other third countries, **as provided by an Association Agreement, in line with the specific conditions laid down in each policy window provision** FR (Comments): Could this criteria be more precise?
2. Provided any possible specific conditions laid down within each policy window or component are met by the interested third country, the Association Agreements for programme participation in the ECF shall:	FR (Comments): Could the Commission specify how it intends to report on monitoring and compliance with the conditions set out in paragraph 2?
(a) ensure a fair balance as regards the contributions and benefits of the third country participating in the ECF;	IT (Drafting Suggestions): ensure a fair balance ~~as regards~~ **between** the contributions and benefits of the third country participating in the ECF; IT (Comments): The revision ensures stylistic consistency, improves readability, and clarifies the balance of contributions and benefits for third countries. FI

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Comments): What is the mechanism that would be used for monitoring this? AT (Drafting Suggestions): (a) ensure a fair balance as regards the contributions and benefits of the third country **or international organisation** participating in the ECF; AT (Comments): To be as clear as Article 7 of the current Space Programme Regulation (2021/696).
(b) lay down the conditions of participation in the programmes, including the calculation of financial contributions, consisting of an operational contribution and a participation fee, to the ECF and its general administrative costs;	PL (Drafting Suggestions): …., **scaled transparently to GDP per capita and R&I effort.** PL (Comments): Provides predictability and transparency for third-country financing.
(c) not confer on the third country any decision-making power in the programme;	AT (Drafting Suggestions): (c) not confer on the third country **or international organisation** any decision-making power in the programme; AT (Comments): To be as clear as Article 7 of the current Space Programme Regulation (2021/696).

PUBLIC

Commission proposal	Drafting Suggestions and Comments
(d) guarantee the rights of the Union to ensure sound financial management and to protect its financial interests;	PL (Drafting Suggestions): They shall guarantee the Union's rights to sound financial management and protection of its financial interests, **including OLAF audit access and recovery of funds in case of irregularities.** PL (Comments): Safeguards EU funds against misuse and ensures robust financial control.
(e) ensure the protection of strategic, security, defence and public order interests of the Union and its Member States.	AT (Drafting Suggestions): **(e)** ensure the protection of strategic, security, defence and public order interests of the Union and its Member States~~.~~ **, including as regards the protection of classified information under Article 13.** AT (Comments): To ensure the protection of classified information. PL (Drafting Suggestions): They shall ensure protection of strategic, security, defence and public order interests of the Union and its Member States, **requiring adherence to EU export control and sensitive technology protection rules.** PL

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Comments): Minimises risks of unauthorized transfer of critical technologies and protects key EU assets. ES (Drafting Suggestions): ensure the protection of strategic, security, defence and public order interests of the Union and its Member States**, including suspension or termination clauses in case of systemic risks**. ES (Comments): What are the criteria to ensure this? SI (Drafting Suggestions): (e) ensure the protection of strategic, security, defence and ~~public order interests~~ of the Union and its Member States. SI (Comments): How and who defines public order interests?
	SI (Drafting Suggestions): f**) respect of human rights and international law**
3. For the purposes of point (d), the third country shall grant the necessary rights and access required under Regulations (EU, Euratom) 2024/2509 and (EU, Euratom) No 883/2013, and guarantee that enforcement decisions imposing a pecuniary obligation on the basis of Article 299 TFEU, as well as judgements and orders of the Court of Justice of the European Union, are enforceable. and	SE (Drafting Suggestions): Add the following: **Association or partial association with other third countries shall only be possible if they fulfil all the following criteria: (a) commitment to a rules-based open market economy, including fair and equitable dealing with intellectual property rights,**

PUBLIC

Commission proposal	Drafting Suggestions and Comments
ensure that its competent authorities cooperate with the European Public Prosecutor's Office (EPPO) in the investigations and prosecutions of criminal offences affecting the Union's financial interests in accordance with applicable international agreements or other applicable rules.	**respect of human rights, backed by democratic institutions; (b) active promotion of policies to improve the economic and social well-being of citizens** SE (Comments): Rules similar to the ones proposed for the Horizon regulation are also needed here, for the sake of protecting IPR rights and European values of involved European actors. PL (Drafting Suggestions): **Third countries shall grant the necessary rights and access under Regulations (EU, Euratom) 2024/2509 and 883/2013, guarantee enforceability of Court of Justice judgments, and cooperate with OLAF and the EPPO in investigations and prosecutions affecting the Union's financial interests**. PL (Comments): Ensures effective enforcement of EU law and joint action against financial fraud.
4. Separate specific agreements may be concluded in accordance with Article 218 TFEU for activities under the ECF related to security, the provision of secured services and critical assets to the EU.	IT (Drafting Suggestions): Separate specific agreements may be concluded in accordance with Article 218 TFEU for activities under the ECF related to security, the provision of secure~~d~~ services and critical assets to the EU. IT (Comments): Term *secure services* is the more accurate in legal English.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	ES (Drafting Suggestions): Separate specific agreements may be concluded in accordance with Article 218 TFEU for activities under the ECF related to security, the provision of secured services and critical assets to the EU. **Such specific agreements shall be subject to periodic review.**
	AT (Drafting Suggestions): **5. For the sub-component Space Surveillance and Tracking of the Space Systems component Space Situational Awareness Article 62 paragraph 11 applies.** AT (Comments): For the sake of completeness and clarity.
Article 12	
	CZ (Comments): CZ -The Czech Republic also proposes that the ECF includes measures to facilitate the participation of first-time applicants. Specifically, it calls for the introduction of more favorable and simpler conditions for entities participating in the program for the first time, for example through simplified administrative requirements, appropriate financial guarantees, and targeted support tools, including training and a clear definition of the minimum scope of consulting services for first-time applicants. Such an adjustment would reduce barriers to entry, increase the diversity of participants, and contribute to expanding the fund's impact across the EU.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
Implementation and forms of Union support	IT (Comments): With regard to the implementation, the principle of technological neutrality should be duly emphasized. HR (Comments): ECF has to ensure geographically balanced participation and fostering integration of stakeholders from all Member States. We strongly advocated introducton of predefined national allocations within the ECF, especially for less developed Member States. FI (Comments): Scrutiny reservation. BG (Comments): With a view to ensuring balanced development across the Union, an appropriate share of the resources under the ECF shall be alocated for entities established in Member State or region where GDP per capita is below the EU average. HU (Comments): The **issue of geographical balance** should also be given more consideration in the proposal to support level playing field among Member States.
1. The ECF is to be implemented through work programmes in accordance with Article 110 of Regulation (EU, Euratom) 2024/2509.	IT (Drafting Suggestions):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	/ The ECF ~~is to~~ **shall** be implemented through work programmes in accordance with Article 110 of Regulation (EU, Euratom) 2024/2509. IT (Comments): Align with the following paragraphs In order to ensure equal access for all Member States to the Fund, it seems appropriate to establish aspects to be considered in the work programme, including differences in the background situation, for example in terms of skills. DE (Comments): See also Article 15: In principle, we support greater flexibility in terms of the distribution of funding over individual activities and over the years of the MFF period. However, the transfer of key distribution criteria and award criteria into the work programs goes too far. Key policy elements of the Fund, such as the selection/award criteria cannot be determined in the comitology and/or annual budget procedures. They must be fundamentally and consistently regulated in the Regulation itself, not only in some of its areas (such as Art. 53). In addition, MS must play a sufficient role in the strategic management of activities. Among other things, the examination procedure should be used throughout the adoption of the work programs, not only in the Security/Defence window. This follows from Art. 2 in combination with recital 12 of the Comitology Regulation. RO (Drafting Suggestions):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	The ECF is to be implemented through **multianual** work programmes in accordance with Article 110 of Regulation (EU, Euratom) 2024/2509. RO (Comments): In order to ensurse predictibility, it is preferable to havd a multiannaul programming. ES (Drafting Suggestions): The ECF is to be implemented through work programmes in accordance with Article 110 of Regulation (EU, Euratom) 2024/2509**, and shall include where applicable outcome-based milestones linking support to industrial deployment in the Union**. SI (Comments): It is important to define at which level the WPs will be prepared – at the level of each window or at the level of each current programme (InvestEU, LIFE, EDF….) or on more detailed level.
2. The ECF shall be implemented in accordance with Regulation (EU, Euratom) 2024/2509, under direct management or under indirect management with entities referred to in Article 62(1), point (c) of that Regulation.	LV (Comments): The inclusion of a wide toolbox (budgetary guarantees, financial instruments, equity, loans, etc.) goes beyond LIFE's current grant-based model. Smaller actors such as NGOs and municipalities may find it difficult to access these more complex instruments. Will traditional grant schemes for small-scale demonstration and governance projects remain accessible under the Fund, or will priority shift to financial instruments more suited to large-scale industrial projects?
	CZ (Drafting Suggestions):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	3. In order to ensure a balanced development across the Union, at least 35 % of the resources under the ECF shall be directed to entities from Members States whose GNI per capita remains below the EU average. CZ (Comments): CZ recognizes the importance of supporting excellence within the European Competitiveness Fund (ECF), we believe that no Member State can be left behind. Moreover, further widening of disparities between Member States must be avoided. Ensuring geographically balanced participation and fostering integration of stakeholders from all Member States into wider European industrial and innovation value chains, whilst ensuring fair and effective access to support mechanisms within the ECF is therefore a fundamental prerequisite for strengthening the overall competitiveness and resilience of the EU. To make European projects truly European there is a need for more balanced distribution of funding across the Member States. Otherwise, we risk that many entities from certain Member States – especially those with relatively limited experience with Union-level instruments - will not be able to participate in collaborative efforts. We therefore advocate for the introduction of measures that would better safeguard such balance within ECF, in particular through adding the new provisions. RO (Drafting Suggestions): **Adding a new paragraph to Art. 12 (possible new para 3), as follows:** **In order to ensure a balanced development across the Union, at least 35 % of the resources under the ECF shall be directed to entities from Members States whose GNI per capita remains below the EU average.**

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	Adding a new paragraph 4 to Art. 12: **In order to promote a balanced distribution of resources within the ECF, the Commission shall implement it on basis of a regular analysis of participation trends and access barriers. To that effect, the Commission shall take specific measures, in particular:** **(a) establishing minimum indicative thresholds for the allocation of funding to Member States referred to in paragraph 3 of Article 12 under certain calls or instruments of the ECF, on the basis of objective and transparent criteria;** **(b) supporting the integration of entities from different Member States into Single Market value chains as referred in Article 16, notably through ensuring geographic balance in the composition of consortia or in the value chain, by establishing a minimum number of MS taking part in the projects.** **The Commission shall regularly involve Member States in the design and monitoring of such measures.**
3. Award procedures implemented under the ECF, shall comply with the general provisions of the ECF as set out in Chapters I and II of this Regulation, which, in case of conflict, shall prevail over any other rules pertaining to the activities or subsequent implementing acts.	DE (Comments): The award criteria appear way too vague to us. Overarching criteria should be defined for all areas of the Regulation directly in the text of the Regulation. Those criteria must ensure that excellence and competitiveness are promoted effectively – for instance, as hitherto R&I activities must be based on excellence. See comments on Art. 3. Question: What is the meaning of the last part of the sentence, what conflicts of law are anticipated here? PL (Drafting Suggestions): adding a new paragraph 3b with a wording: b) In order to ensure a geographically balanced distribution of funds across MS and thus equal opportunities in building the EU's competitiveness and benefiting from it, separate countries' envelopes should be awarded under the specific programmes and the additional points shall be

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	awarded to entities from Members States which GNI per capita indicator remains below the EU average SI (Drafting Suggestions): 3. Award procedures implemented under the ECF, **shall be primarily based on open, competitive calls for proposals** and shall comply with the general provisions of the ECF as set out in Chapters I and II of this Regulation, which, in case of conflict, shall prevail over any other rules pertaining to the activities or subsequent implementing acts. **For research and innovation actions the rules of the Horizon Europe regulation apply.** SI (Comments): In line with paragraph 5.
	SI (Drafting Suggestions): **3a) In order to ensure a balanced development across the Union, at least 35 % of the resources under the ECF shall be directed to entities from Members States whose GNI per capita remains below the EU average.** SI (Comments): To make European projects truly European there is a need for more balanced distribution of funding across the Member States. Otherwise, we risk that many entities from certain Member States – especially those with relatively limited experience with Union-level instruments - will not be able to participate in collaborative efforts. We therefore advocate for the introduction of measures that would better safeguard such balance within ECF.
4. Where award procedures concern more than one specific objective laid down in Article 3(2), the work programme may specify that the award procedure is	IT (Drafting Suggestions):

Commission proposal	Drafting Suggestions and Comments
implemented under a single set of rules by applying directly Regulation (EU, Euratom) 2024/2509, complemented by the general rules set out in Chapter I and II, or by applying the rules of one of the concerned specific objectives.	Where award procedures concern more than one specific objective laid down in Article 3(2), the work programme may specify that the award procedure is implemented under a single set of rules **through, alternatively: a)** ~~by applying~~ direct~~ly~~ **application of the** Regulation (EU, Euratom) 2024/2509, complemented by the general rules set out in Chapter I and II~~,~~**; b)** ~~or by applying~~ **application of** the rules of one of the concerned specific objectives IT (Comments): make the alternative choice clearer PL (Drafting Suggestions): Adding a new paragraph 4b "4b The Commission shall implement a regular analysis of participation trends and access barriers. To that effect, the Commission shall take additional specific measures, in particular: supporting the integration of entities from different Member States into Single Market value chains as referred in Article 16, notably through ensuring geographic balance in the composition of consortia or in the value chain. The Commission shall regularly involve Member States in the design and monitoring of such measures. FR (Comments): Can the Commission clarify what is intended by "rules of one of the concerned specific objectives" ? Does it mean that each window may develop its own procedures for selecting projetcs ? Would this paragraph apply to pilar 2, collaborative research of the FPRI ?
	CZ (Drafting Suggestions):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	4. In order to promote a geographically balanced distribution of resources within the ECF, the Commission shall implement it on basis of a regular analysis of participation trends and access barriers. To that effect, the Commission shall take specific measures, in particular: **(a) establishing minimum indicative thresholds for the allocation of funding to Member States referred to in paragraph 3 of Article 12 under certain calls or instruments of the ECF, on the basis of objective and transparent criteria;** **(b) supporting the integration of entities from different Member States into Single Market value chains as referred in Article 16, notably through ensuring geographic balance in the composition of consortia or in the value chain.** **The Commission shall regularly involve Member States in the design and monitoring of such measures** CZ (Comments): CZ recognizes the importance of supporting excellence within the European Competitiveness Fund (ECF), we believe that no Member State can be left behind. Moreover, further widening of disparities between Member States must be avoided. Ensuring geographically balanced participation and fostering integration of stakeholders from all Member States into wider European industrial and innovation value chains, whilst ensuring fair and effective access to support mechanisms within the ECF is therefore a fundamental prerequisite for strengthening the overall competitiveness and resilience of the EU. To make European projects truly European there is a need for more balanced distribution of funding across the Member States. Otherwise, we risk that many entities from certain Member States – especially those with relatively limited experience with Union-level instruments - will not be able to participate in collaborative efforts. We therefore advocate for the introduction of

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	measures that would better safeguard such balance within ECF, in particular through adding the new provisions. SI (Drafting Suggestions): **4.a) In order to promote a balanced distribution of resources within the ECF, the Commission shall implement it on basis of a regular analysis of participation trends and access barriers. To that effect, the Commission shall take specific measures, in particular:** **(a) establishing minimum indicative thresholds for the allocation of funding to Member States referred to in paragraph 3 of Article 12 under certain calls or instruments of the ECF, on the basis of objective and transparent criteria;** **(b) supporting the integration of entities from different Member States into Single Market value chains as referred in Article 16, notably through ensuring geographic balance in the composition of consortia or in the value chain.** **c) he Commission shall regularly involve Member States in the design and monitoring of such measures.** SI (Comments): To make European projects truly European there is a need for more balanced distribution of funding across the Member States. Otherwise, we risk that many entities from certain Member States – especially those with relatively limited experience with Union-level instruments - will not be able to participate in collaborative efforts. We therefore advocate for the introduction of measures that would better safeguard such balance within ECF.
5. In certain duly substantiated circumstances, Union funding may be granted without a call for proposals in accordance with Article 198 of Regulation (EU, Euratom) 2024/2509, including with point (e).	IT (Drafting Suggestions):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	In certain duly substantiated circumstances, Union funding may be granted without a call for proposals in accordance with Article 198 of Regulation (EU, Euratom) 2024/2509~~, including with point (e).~~ IT (Comments): unnecessary specification FI (Drafting Suggestions): 5. In certain duly substantiated **and exceptional** circumstances, Union funding may be granted without a call for proposals in accordance with Article 198 of Regulation (EU, Euratom) 2024/2509, including with point (e). CZ (Drafting Suggestions): 5. In certain duly substantiated circumstances, **in particular with regard to strategic projects pursuant to the NZIA and the CRMA, after consulation with Member States,** Union funding may be granted without a call for proposals in accordance with Article 198 of Regulation (EU, Euratom) 2024/2509, including with point (e). BE (Comments): What does 'substantiated circumstances' mean? How will this be defined and who will decided that circumstances are duly substantiated? AT (Comments): Please further substantiate such "circumstances", here or in a recital. SE

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Drafting Suggestions): In certain duly substantiated **exceptional** circumstances, Union funding may be granted without a call for proposals in accordance with Article 198 of Regulation (EU, Euratom) 2024/2509, including with point (e). NL (Drafting Suggestions): 5. In certain duly substantiated **exceptional** circumstances, Union funding may be granted without a call for proposals in accordance with Article 198 of Regulation (EU, Euratom) 2024/2509, including with point (e). ES (Drafting Suggestions): In certain duly substantiated circumstances **and cases of urgency, market failure or security need**, Union funding may be granted without a call for proposals in accordance with Article 198 of Regulation (EU, Euratom) 2024/2509, including with point (e). ES (Comments): Exceptions should be as ringfenced and specific as possible. SI (Comments): In Article 198 of Regulation (EU, Euratom) 2024/2509 no certain duly substantiated circumstances are specificated or demand. What kind of duly substantiated circumstances are foreseen? FR (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	Which sectors would be affected? Based on what criteria?
6. Union support may be provided in any form in accordance with Regulation (EU, Euratom) 2024/2509, in particular grants, prizes, procurement, non-financial donations, budgetary guarantees, and financial instruments.	FI (Comments): It is particularly important that financial instruments (loans, guarantees, equity) carry the greatest weight in the ECF, as their multiplier effect is significantly higher than that of grants—making them a more efficient use of taxpayers' money. Moreover, the nature of repayable financing is in itself the most reliable way to enable economically competitive investments, as financiers always assess the cash flow generated by projects and their economic viability. SE (Drafting Suggestions): Union support may be provided in any form in accordance with Regulation (EU, Euratom) 2024/2509, in particular grants, prizes, procurement, non-financial donations, budgetary guarantees, and financial instruments. **Priority should be given to budgetary guarantees and financial instruments.** SI (Drafting Suggestions): 6. Union support may be provided in any form in accordance with Regulation (EU, Euratom) 2024/2509, in particular grants, prizes, procurement, non-financial donations, budgetary guarantees, and financial instruments **in the form of loans, guarantees, equity and blending instruments with non-repayable support .** SI (Comments): We ask the Commission to clarify the definition of financial instruments. FR (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	Which article of the Regulation (EU, Euratom) 2024/2509 this article refers to?
7. Where Union support is provided in the form of a budgetary guarantee and financial instruments, including when combined with other forms of non-repayable support in blending operations, it shall be implemented in accordance with Title X of Regulation (EU, Euratom) 2024/2509 .	
8. Where Union funding is provided in the form of a grant, including when combined in blending operations with other forms of repayable support not supported by the Union budget, funding shall be provided in accordance with Title VIII of Regulation (EU, Euratom) 2024/2509 and in the form of financing not linked to costs in accordance with Article 125(1), point (a), of that Regulation (EU, Euratom) 2024/2509, or, where necessary, simplified cost options. Funding may be also provided in the form of actual eligible cost reimbursement where the objectives of an action cannot be achieved otherwise or where this form is necessary to enable other sources of funding, including financing from Member States.	IT (Drafting Suggestions): Where Union funding is provided in the form of a grant, including when combined in blending operations with other forms of repayable support not supported by the Union budget, funding shall be provided in accordance with Title VIII of Regulation (EU, Euratom) 2024/2509 and in the form of financing not linked to costs in accordance with Article 125(1), point (a), of that Regulation (EU, Euratom) 2024/2509, or, where necessary, **and in accordance with the same regulation,** simplified cost options **(lump sums, unit costs or flat-rate financing)**. Funding may be also provided in the form of actual eligible cost reimbursement where the objectives of an action cannot be achieved otherwise or where this form is necessary to enable other sources of funding, including financing from Member States. IT (Comments): bring the simplified procedures back to the regulatory framework RO (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	The ECF regulation explicitly foresees the extensive use of simplified cost mechanisms to reduce administrative burden, but there is no indication if there will be used standard methodologies for calculating unit/lump-sum costs, or will this be left to the discretion of each window.
9. In accordance with Article 153(3) of Regulation (EU, Euratom) 2024/2509, for actions implementing research and innovation activities, the evaluation committee may be composed partially or fully of independent external experts.	BE (Drafting Suggestions): In accordance with Article 153(3) of Regulation (EU, Euratom) 2024/2509, for actions implementing research and innovation activities, the evaluation committee ~~may~~ **must** be composed partially or fully of independent external experts **of different disciplines where relevant** BE (Comments): Especially for R&I activities, evaluation should rely on scientific excellence and take an interdisciplinary perspective. PL (Drafting Suggestions): 9. *In accordance with Article 153(3) of Regulation (EU, Euratom) 2024/2509, for actions implementing research and innovation activities, the evaluation committee may be composed partially or fully of independent external experts* ***and should be geographically balanced.*** PL (Comments): Ensuring the geographical balance of the evaluation committess is key in ensuring fair and transparent decisions on funding. NL

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Drafting Suggestions): 9. In accordance with Article 153(3) of Regulation (EU, Euratom) 2024/2509, for actions implementing research and innovation activities, the evaluation committee may be composed ~~partially or fully~~ of independent external experts. MT (Drafting Suggestions): In accordance with Article 153(3) of Regulation (EU, Euratom) 2024/2509, for actions implementing research and innovation activities, the evaluation committee ~~may~~ **shall** be composed ~~partially or fully~~ of independent external experts. MT (Comments): This is in line with current practice under Horizon Europe. Malta sees no need to change this practice. It is important to stress that experts should be "independent" and "external". LT (Drafting Suggestions): **In accordance with Article 153(3) of Regulation (EU, Euratom) 2024/2509, for actions implementing research and innovation activities, the evaluation committee ~~may~~ shall be composed ~~partially or~~ fully of independent external experts. In duly justified cases set out in the work programme, the evaluation committee may be composed partially of independent external experts.** LT (Comments): **We consider that for actions implementing research and innovation activities the evaluation committee composed of independent experts should remain a default option.**

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	SI (Drafting Suggestions): 9. In accordance with Article 153(3) of Regulation (EU, Euratom) 2024/2509, for actions implementing research and innovation activities, the evaluation committee ~~may~~ **shall** be composed ~~partially or fully~~ of independent external experts. **Except in duly justified cases as set out in the work programme, when the evaluation committee may be composed partially or fully of representatives of Union institutions or bodies as referred to in Article 153 of the Financial Regulation.** SI (Comments): The article is not clear - the new provision is not in accordance with the article (but in regardless of the provisions of the Article 153(3) the third paragraf of Regulation (EU, Euratom) 2024/2509, the provision provides "Members of the evaluation committee may be external experts where that possibility is provided for in the basic act"). Are the other parts (provisions) of the Article 153(3) of Regulation (EU, Euratom) 2024/2509 not taken into consideration? RIA activities must be evaluated by external experts. FR (Comments): Further clarification is needed on the different bodies of the ECF, in this case the evaluation committee, on the way member states are involved in or associated to these instances, and on their articulation with the FPRI
	CZ (Drafting Suggestions): **9a. National experts will be included in the evaluation committee with regard to their expertise in a given topic of Union competitiveness.**

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	CZ (Comments): CZ - The Czech Republic considers it important that national experts are nominated to the evaluation committee with regard to their expertise.
10. Contributions to a mutual insurance mechanism set out in Article 30 of the Framework Programme for Research and Innovation may cover the risk associated with the recovery of sums due by recipients and shall be considered as a sufficient guarantee under Article 155 of Regulation (EU, Euratom) 2024/2509. No additional guarantee or security shall be accepted from beneficiaries or imposed upon them.	
11. Where necessary to achieve the objectives set out in Article 3, parts of the ECF may be implemented through Public-Private or Public-public Partnerships established under the Framework Programme for Research and Innovation, in particular by entrusting budget implementation tasks, in accordance with Article 62(1), point (c) of Regulation (EU, Euratom) 2024/2509, to joint undertakings established pursuant to 187 TFEU. Support from the ECF shall be conditional upon efficient use of Union financing, a proportionate financial contribution from other partners at least matching the Union contribution and voting rights for the Union in the governing bodies ensuring protection of the interests of the Union in the partnership. For that purpose, joint undertakings shall be established through a single	CZ (Drafting Suggestions): Where necessary to achieve the objectives set out in Article 3, parts of the ECF may be implemented through Public-Private or Public-public Partnerships established under the Framework Programme for Research and Innovation, in particular by entrusting budget implementation tasks, in accordance with Article 62(1), point (c) of Regulation (EU, Euratom) 2024/2509, to joint undertakings established pursuant to 187 TFEU. Support from the ECF shall be conditional upon efficient use of Union financing, a proportionate financial contribution from other partners ~~at least matching the Union contribution~~ and ~~voting rights for the Union in the governing bodies~~ ensuring protection of the interests of the Union in the partnership. For that purpose, joint undertakings shall be established through a single establishing act ensuring centralised administrative functions. CZ (Comments):

Commission proposal	Drafting Suggestions and Comments
establishing act ensuring centralised administrative functions.	CZ is strongly in favour of making the implementation of European partnerships, with regards to the contributions of other partners than the EU, more flexible and suggests to keep only "proportionate funding" in the text, which is sufficient. The previous wording would cause serious issues for financing excellent projects in tripartite partnerships such as the Chips JU, where achieving a same or higher contribution to a project by Participating States that by the Commission is, in some cases, difficult to achieve (from practical reasons, such as many partners from many Participating States with a limited budget, different eligibility rules in each country, different funding rates, etc.). This point is fundamental for CZ. Furthermore, CZ suggests to discuss and set the rules for voting rights in the legislative act establishing the joint undertakings and not here, which would enable better to reflect specificities of each partnership. BE (Comments): It is important that Member States are sufficiently involved and duly consulted in the design and implementation of the partnerships. AT (Comments): Could the Commission give more detail on how overlaps between ECF and HE activities can be avoided and the goals of simplification be achieved if partnerships can be established under both ECF and HE? Could the COM pls provide examples for such PPP including information on the voting rights for the Union in the governing bodies? PL (Drafting Suggestions): Where necessary to achieve Article 3 objectives, parts of the ECF may be implemented through public-private or public-public partnerships under the Framework Programme, entrusting tasks to joint undertakings in accordance with Article 62(1)(c). **Participation shall require efficient**

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	use of Union funds, matching contributions from national/regional partners and Union voting rights in governance. PL (Comments): Promotes PPP and PPPub structures with Polish and macroregional partners while safeguarding Union interests through governance and matching finance. MT (Drafting Suggestions): Where necessary to achieve the objectives set out in Article 3, parts of the ECF may be implemented through Public-Private or Public-public Partnerships established under the Framework Programme for Research and Innovation, in particular by entrusting budget implementation tasks, in accordance with Article 62(1), point (c) of Regulation (EU, Euratom) 2024/2509, to joint undertakings established pursuant to 187 TFEU. **The establishment of such Partnerships should be limited to cases of strict necessity where collaborative calls could not be sufficient to achieve the objectives.** Support from the ECF shall be conditional upon efficient use of Union financing, a proportionate financial contribution from other partners at least matching the Union contribution and voting rights for the Union in the governing bodies ensuring protection of the interests of the Union in the partnership. For that purpose, joint undertakings shall be established through a single establishing act ensuring centralised administrative functions. MT (Comments): Due to the additional admnistrative burden as well as the financial contribution needed from other partners, it is important to avoid having too many of these partnerships unless proven necessary. ES (Drafting Suggestions):

Commission proposal	Drafting Suggestions and Comments
	11. Where necessary to achieve the objectives set out in Article 3, parts of the ECF may be implemented through Public-Private or Public-public Partnerships established under the Framework Programme for Research and Innovation, in particular by entrusting budget implementation tasks, in accordance with Article 62(1), point (c) of Regulation (EU, Euratom) 2024/2509, to joint undertakings established pursuant to **Article 185 or Article** 187 TFEU. Support from the ECF shall be conditional upon efficient use of Union financing, a proportionate financial contribution from other partners at least matching the Union contribution and voting rights for the Union in the governing bodies ensuring protection of the interests of the Union in the partnership. For that purpose, joint undertakings shall be established through a single establishing act ensuring centralised administrative functions. ES (Comments): Article 185 TFEU has not been included in the means of implementation. Currently Metrology and PRIMA follow this institutional partnership model and contribute to the ECF objectives. SI (Drafting Suggestions): 11. Where ~~necessary to achieve~~ the objectives set out in Article 3 **cannot be achieved by other means,** parts of the ECF may be implemented through Public-Private or ~~Public-public~~ Partnerships established ~~under the Framework Programme for Research and Innovation~~, in particular by entrusting budget implementation tasks, in accordance with Article 62(1), point (c) of Regulation (EU, Euratom) 2024/2509, to joint undertakings established pursuant to 187 TFEU. Support from the ECF shall be conditional upon efficient use of Union financing, a proportionate financial contribution from other partners at least matching the Union contribution and voting rights for the Union in the governing bodies ensuring protection of the interests of the Union in the partnership. For that purpose, joint undertakings shall be established through a single establishing act ensuring centralised administrative functions. SI (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	A more strict wording needs to be put in place. This text also needs to be consolidated with the proposal for the Horizon Europe Regulation, where public-public partnerships are not mentioned. Which Framework is that? Is establishment meant from curent HEU and partnerships that are continuing into new Horizon Europe? Or this refers to newly established P2Ps & PPPs? FR (Drafting Suggestions): 11. Where necessary to achieve the objectives set out in Article 3, parts of the ECF may be implemented through ~~Public-Private or Public-public Partnerships~~ **Joint Undertakings** established under the Framework Programme for Research and Innovation **pursuant to article 187 TFEU**, in particular by entrusting budget implementation tasks, in accordance with Article 62(1), point (c) of Regulation (EU, Euratom) 2024/2509~~, to joint undertakings established pursuant to 187 TFEU~~. Support from the ECF shall be conditional upon efficient use of Union financing, a proportionate ~~financial~~ contribution from other partners at least matching the Union contribution and voting rights for the Union in the governing bodies ensuring protection of the interests of the Union in the partnership. For that purpose, joint undertakings shall be established through a single establishing act ensuring centralised administrative functions. FR (Comments): Can the Commission explain how it intends to implement the following condition: " support from the ECF shall be conditional upon efficient use of EU financing"? To what extent does this article, including the "proportionate financial contribution from other partners" apply to private participation in partnership and research activities under the FPRI ? Joint Undertakings established pursuant to art 187 are public-private by definition.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	The contribution from other partners should not only be financial, to take into account in-kind contribution (e.g. EuroHPC).
12. In addition to the grounds set out in Article 132 of Regulation (EU, Euratom) 2024/2509, award procedures and resulting legal commitments shall allow for termination where the objectives of the action are unlikely to be achieved at all or within the set timelines, or the action has lost its policy relevance	IT (Comments): Suggestion: provide a mechanism to protect the economic operator, otherwise it will discourage participation or risk legal actions. Before termination, we recommend attempting to renegotiate the terms of the contract, based on emerging needs CZ (Comments): CZ - If an action loses its policy relevance, is it necessary to reimburse the entirety of the funds, or only a part thereof? BE (Comments): MT (Drafting Suggestions): In addition to the grounds set out in Article 132 of Regulation (EU, Euratom) 2024/2509, award procedures and resulting legal commitments shall allow for ~~termination~~ **proportional reduction of contributions** where the objectives of the action are unlikely to be achieved at all or within the set timelines, or the action has lost its policy relevance MT (Comments): This is more in line with Article 132 of regulation 2024/2509. SI

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Drafting Suggestions): 12. In addition to the grounds set out in Article 132 of Regulation (EU, Euratom) 2024/2509, award procedures and resulting legal commitments shall allow for **a duly justified** termination where the objectives of the action **as established in the supporting agreement** are unlikely to be achieved at all or within the set timelines, or the action has lost its policy relevance SI (Comments): It is unclear in which cases exactly the provision will apply. This should be further clarified. Will the specific cases be further clarified (for unlikely to be achived / lost policy relevance)?
	LV (Drafting Suggestions): *13. In order to ensure a balanced development across the Union, at least 35 % of the resources under the ECF shall be directed to entities from Members States whose GNI per capita remains below the EU average.* *14. In order to promote a balanced distribution of resources within the ECF, the Commission shall implement it on basis of a analysis of participation trends and access barriers. To that effect, the Commission shall take specific measures, in particular:* *(a) establishing minimum indicative thresholds for the allocation of funding to Member States referred to in paragraph 3 of Article 12 under certain calls or instruments of the ECF, on the basis of objective and transparent criteria;* *(b) supporting the integration of entities into Single Market value chains as referred in Article 16, notably through ensuring geographic balance in the composition of consortia or in the value chain.* LV (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	Although we recognize the importance of supporting excellence within the European Competitiveness Fund (ECF), we believe that no Member State can be left behind. Moreover, further widening of disparities between Member States must be avoided. Ensuring geographically balanced participation and fostering integration of stakeholders from all Member States into wider European industrial and innovation value chains, whilst ensuring fair and effective access to support mechanisms within the ECF is therefore a fundamental prerequisite for strengthening the overall competitiveness and resilience of the EU. To make European projects truly European there is a need for more balanced distribution of funding across the Member States. Otherwise, we risk that many entities from certain Member States – especially those with relatively limited experience with Union-level instruments - will not be able to participate in collaborative efforts. **Therefore advocate for the introduction of measures that would better safeguard such balance within ECF, in particular through adding the new provisions underneath we offer to add a new paragrph.**
Article 14	FR (Comments): France would like to clarify the specific structures in charge of defining priorities and actions for Defence (chapter 7, section 2)

PUBLIC

Governance and Advisory Boards	IT (Comments): Provide a link with the Competitiveness Coordination Tool (from Competitiveness Compass, COM(2025) 30 final) HR (Comments): It is of utmost importance to properly include the MS in both of this boards, be that as their members or oversight bodies, esp. in relation to the commitology procedures.This is also much relevant when it comes to ensuring inclusiveness and realization of potential across the Union. Additionally, any duplication and further fragmentation of coordination of interlinked programmes such as ECF and Horizon Europe would not be appreciated and could, in case of HorizonEurope, endanger the basic principles of its implementation, global attractivness and recognition that FP is. FI (Comments): Scrutiny reservation. DE (Comments): How does the Commission envisage the composition of the Strategic Stakeholders Board? How is it ensured that R&I needs are taken into account in expert committees, advisory boards and comitology committees? BE (Comments): The ECF governance should be closely linked to NZIA/CRMA governance, also in order to avoid duplication of efforts. To this end, please include in recital 35: 'Even if the Critical Raw Materials Board has no formal role in the establishment of the work prgrammes, their views on addressing challenges related to the supply and sustainability of critical raw materials should be taken into account.' and in recital 10: 'Furthermore, the opinion of the advisory boards of

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	representatives of all Member States, such as the Critical Raw Material Board or the European Semiconductor Board shall be taken into account when drafting the work programmes.' AT (Comments): **Rules of Procedure: All 3 governing bodies (Stakeholder Board, Investment Committee and Advisory Board) should approve their Rules of Procedure when constituting.** RO (Comments): Member States should play a formal role within the Advisory Boards, together with the representatives of the private sectors.
	AT (Comments): How does the established governance correspond to the planned Competitiveness Coordination Tool? FR (Drafting Suggestions): 1.**The Commission act in accordance with strategic guidance given by Member States. The Commission will allow for extensive exchanges with the European Parliament, to be complemented by consultations with stakeholders and the general public.** FR (Comments): The current proposal does not establish a role for Member States in the governance of the ECF. Strategic decisions need to be made by Member States. Proposed wording is inspired by article 6 of the Horizon Europe regulation.
1. A Strategic Stakeholders Board is established.	IT

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Comments): It would be useful to have more information on the role, powers and common participation rules of the Strategic Stakeholders Board (especially for the collaborative research component). FI (Comments): We support the idea of discussing with stakeholders in an organised and transparent manner. The Strategic Stakeholder Board must provide its advice and inputs at an early strategic phase and should under no circumstances introduce an additional layer of decision-making or bureaucracy. The role of the Strategic Stakeholders Board needs to be designed so that its input is proportional to the actual shareholders of the programme and that it cannot manipulate the award criteria in case of open calls. SI (Drafting Suggestions): ~~1. A Strategic Stakeholders Board is established.~~ SI (Comments): **Scrutiny reservation on entire Article.** FR (Comments): In order to give a proper opinion on this article, it would be useful that the European Commission provides further details on the coordination between this committee and those existing under other programmes (Horizon Europe programme committees), and the European Defence Agency.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
2. The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, following an open call for nominations or for expressions of interest, or both, whichever the Commission finds more appropriate, and taking into account the need for balance in sector, organisation type, including private investors, and size, expertise, gender, age and geographical distribution. The term of members the Board shall be limited to four years, renewable once. Members of the Board should act with integrity and probity.	IT (Drafting Suggestions): The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, following an open call for nominations **and** ~~**or for**~~ expressions of interest~~**, or both, whichever the Commission finds more appropriate,**~~ and taking into account the need for balance in sector, organisation type, including private investors, and size, expertise, gender, age and geographical distribution. The term of members the Board shall be limited to four years, renewable once. Members of the Board should act with integrity and probity. DE (Comments): Should the term of the mandate not be linked to the MFF term? As concerns different organisation types, will R&I experts / academia as well as civil society be included? CZ (Drafting Suggestions): 2. The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, following an open call for nominations or for expressions of interest, or both, whichever the Commission finds more appropriate, and taking into account the need for balance in sector, organisation type, including private investors, and size, expertise, gender, age and geographical distribution**, <u>including the nominee designated by each Member State</u>.** The term of members the Board shall be limited to four years, renewable once. Members of the Board should act with integrity and probity. SE

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Drafting Suggestions): The ECF Strategic Stakeholder Board, informed by an observatory on emerging technologies, shall advise on the overall direction for the ECF, advise on long-term competitiveness trends, advise on areas of market failures ~~and suboptimal investment situations~~ that could be addressed in the implementation of the ECF, and advise on the identification of ~~strategic~~ portfolios of projects within and across activities of the ECF, for which it may be composed in different policy-oriented configurations. SE (Comments): Need clarification on what balance in "size" refers to. SE would like to ask what the meaning of *geographical distribution* is in regard to this article? NL (Drafting Suggestions): 2. The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, **after consultation of the Council**, following ~~a~~**n transparant process and** open call for nominations or for expressions of interest, or both, whichever the Commission finds more appropriate, and taking into account the need for balance in sector **with particular attention to strategic sectors,** organisation type, including private investors **and academia**, and size, expertise, gender, age and geographical distribution. The term of members **of** the Board shall be limited to four years~~, renewable once~~. **Terms shall be non-renewable**. Members of the Board should act with integrity and probity. CY (Drafting Suggestions): The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, following an open call for nominations or for expressions of interest, or both, whichever the Commission finds more appropriate, and taking into account the need for balance in sector,

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	organisation type, including private investors, and size, expertise, gender, age and geographical distribution, ensuring that all Member States are represented in the Board. The term of members the Board shall be limited to four years, renewable once. Members of the Board should act with integrity and probity. EL (Drafting Suggestions): The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, following an open call for nominations or for expressions of interest, or both, whichever the Commission finds more appropriate, and taking into account the need for balance in sector, organisation type, including private investors, and size, expertise, gender, age and geographical distribution **including the less developed regions and the Union outermost regions.** EL (Comments): We advocate for the official representation of Member States on the **Strategic Stakeholders Board of the ECF**. Although not currently foreseen, it remains essential for the inclusive governance.] Also, the sustainable development within the regions, especially the developing ones, of member states needs to be secured. FR (Drafting Suggestions): The members of the ECF Strategic Stakeholders Board shall be appointed by the ~~Commission~~ **Council based on a recommendation from the Commission** following an open call for nominations or for expressions of interest, or both, whichever the Commission, **jointly with the Council**, finds more appropriate, and taking into account the need for balance in sector, organisation type, including private investors, and size, expertise, gender, age and geographical distribution **and with due balance between the specific objectives listed in article 3.2**. The term of members the Board shall be limited to four years, renewable once. Members of the Board may act with integrity and probity.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	FR (Comments): The Commission should involve the Council in defining the composition of the Strategic Stakeholder Board, so as to guarantee the participation of Member States in the fund's governance bodies. It is essential that the strategic steering structures of the defense components of the ECF take account of existing structures and representation of EU Member States. How will the balance between sectors be ensured so that all strategic stakeholders from the domains covered by the ECF are properly represented?
	AT (Comments): 1. **Decision-Making and Structure**: Key questions revolve around who prioritizes research topics, the development of Integrated Work Programs, decision-making structures, budget allocation, and the involvement of member states. This requires a clear understanding of the roles and composition of the Strategic Stakeholder Board and the Observatory of Emerging Technologies and how National Contact Points (NCPs) are integrated within the ECF. 2. **Coordination and Support**: There is a need for a well-coordinated support structure at both national and European levels to facilitate research and innovation, involving investment support, business services, and networks. Ensuring effective synergies between various funding programs and the ECF through tools like the Competitiveness Coordination Tool is crucial for optimizing these processes.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	3. **Partnerships and Contributions**: A strategic portfolio of European partnerships is essential, with the ECF playing a supportive role. Decisions are needed on the continuation of partnership types and joint undertakings into FP10, while national interests such as budget sovereignty and SME proximity need to be preserved to maintain a favorable legal and operational environment. 4. National autonomy: maintaining national participation and ensuring that partnerships align with national interests and funding flexibility is vital. 5. **Financial Commitments and Locations**: Clarification is needed on the financial commitments required from countries and the consequences of non-compliance. Additionally, the structural location of partnerships and their interface with the ECF, as well as the contribution to policy windows, require greater clarity to ensure coherence and functionality within the funding framework. 6.
3. The Commission shall establish the detailed rules on selection and composition, remuneration, rules of procedure, conflicts of interest and confidentiality for the ECF Stakeholder Board. Members of the Board shall be bound by these terms.	AT (Drafting Suggestions): 3. The Commission shall establish the detailed rules on selection and composition, remuneration, ~~rules of procedure,~~ conflicts of interest and confidentiality for the ECF Stakeholder Board. Members of the Board shall be bound by these terms. **3 (bis) On proposal by the Commission, the ECF Stakeholder Board shall adopt its rules of procedure upon consitution** AT (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	Rules of Procedure should be approved by the Stakeholder Board. NL (Drafting Suggestions): 3. The Commission shall establish the detailed rules on selection and composition, remuneration, ~~rules of procedure,~~ conflicts of interest and confidentiality for the ECF Stakeholder Board. Members of the Board shall be bound by these terms. RO (Comments): It should be clarified how the procedures for identifying, preventing, and managing conflicts of interest—both with external stakeholders and among members of the Strategic Advisory Board—will be implemented and monitored to ensure full transparency and impartiality. Furthermore, with regard to the same article, we would like to ensure that the geographical criterion adequately guarantees representation of entities and individuals from all Member States. Maybe these elements should also apply to the independent Investment Committee under the ECF InvestEU Instrument. FR (Drafting Suggestions): The Commission shall establish the detailed rules on selection and composition, remuneration, rules of procedure, conflicts of interest and confidentiality for the ECF Stakeholder Board **that will be approved by the Council.** Members of the Board shall be bound by these terms.
	FR (Drafting Suggestions): The ECF Strategic Stakeholder Board, informed by an observatory on emerging technologies, shall advise on the overall direction for the ECF, advise on long-term competitiveness trends, advise on areas of market failures and suboptimal investment situations that could be addressed in the implementation of the ECF, and advise on the identification of strategic portfolios of

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	projects within and across activities of the ECF, for which it may be composed in different policy-oriented configurations. FR (Comments): Does this observatory on emerging technologies already exist? Will it be created for this specific purpose? What form will it take? What added-value will this observatory have compared to already existing structures? Specificities of the defence industry domain should be taken into account (e.g. the economic dynamics are not always similar to other domains).
4. The ECF Strategic Stakeholder Board, informed by an observatory on emerging technologies, shall advise on the overall direction for the ECF, advise on long-term competitiveness trends, advise on areas of market failures and suboptimal investment situations that could be addressed in the implementation of the ECF, and advise on the identification of strategic portfolios of projects within and across activities of the ECF, for which it may be composed in different policy-oriented configurations.	IT (Drafting Suggestions): The ECF Strategic Stakeholder Board, informed by an observatory on emerging technologies, shall advise on the overall direction for the ECF, advise on long-term competitiveness trends, advise on areas of market failures and suboptimal investment situations that could be addressed in the implementation of the ECF, **advise on shortages of skills contributing to the availability of skills in investment in strategic sectors for EU competitiveness**, and advise on the identification of strategic portfolios of projects within and across activities of the ECF, for which it may be composed in different policy-oriented configurations. FI (Comments): Is this the same Observatory of Critical Technologies, (OTC) mentioned in article 67 or something else? Will it be funded by ECF? Why it would serve in priority the ECF SSB and not the MS? AT (Comments): How will the Board cooperate with the Competitiveness Coordination Tool?

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	SE (Drafting Suggestions): The ECF Strategic Stakeholder Board, informed by an observatory on emerging technologies, shall advise on the overall direction for the ECF, advise on long-term competitiveness trends, advise on areas of market failures ~~and suboptimal investment situations~~ that could be addressed in the implementation of the ECF, and advise on the identification of strategic portfolios of projects within and across activities of the ECF, for which it may be composed in different policy-oriented configurations. PL (Drafting Suggestions): Informed by an emerging-technologies observatory, the Board shall advise the Commission on ECF strategic direction, long-term competitiveness trends, market failures and suboptimal investment gaps, and on strategic project portfolios, **meeting in policy-oriented configurations as needed.** PL (Comments): Enhances evidence-based, flexible strategic guidance tailored to identified market and technology needs NL (Drafting Suggestions): 4. The ECF Strategic Stakeholder Board, informed by an observatory on emerging technologies, shall advise **the Commission and Council** on the overall direction for the ECF, advise on long-term competitiveness trends, advise on areas of market failures and suboptimal investment situations that could be addressed in the implementation of the ECF, and advise on the identification of strategic portfolios of projects within and across activities of the ECF, for which it may be composed in different policy-oriented configurations. **It shall explicity take**

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	the perspective of SME's, start-ups and scaleups into account, given their importance in EU value chains and building the economy of tomorrow. NL (Comments): Can the Commission give further clarification on the observatory on emerging technologies? SI (Drafting Suggestions): 4. The ECF Strategic Stakeholder Board, informed by an observatory on emerging technologies, shall advise on the overall direction for the ECF, advise on long-term **research and** competitiveness trends, advise on areas of market failures and suboptimal investment situations that could be addressed in the implementation of the ECF, and advise on the identification of strategic portfolios of projects within and across activities of the ECF, for which it may be composed in different policy-oriented configurations. SI (Comments): If these are technologies not yet developed, research trends should also be monitored and advised on.
	NL (Drafting Suggestions): **x. In the performance of its tasks, the Strategic Stakeholder Board shall enjoy full independence in the discharge of its functions, performing its duties impartially and solely in the interest of the Union as a whole. It shall not seek nor take instructions from any government of a Member State, Union institutions or bodies or from any other public or private body.** **y. The Strategic Stakeholder Board shall establish its own Rules of Procedure**

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	z. Where possible and with regard to the (economic) security interests of the Union and its Member States, the advise and reports of the Board shall be made public as much as possible. ES (Drafting Suggestions): **4bis. The President of the ECF Strategic Stakeholder Board will inform the Council regularly about the activities of the Board and the conclusions taken therein.** ES (Comments): The Regulation should foresee a reporting procedure so the Council is duly informed about the discussions of the ECF Strategic Stakeholder Board.
5. An independent Investment Committee shall be established under the ECF InvestEU Instrument (the 'Investment Committee').	BE (Drafting Suggestions): 5. An independent Investment Committee shall be established under the ECF InvestEU Instrument (the 'Investment Committee'). **It shall be composed of independent experts.** BE (Comments): Inspired by article 24 of the InvestEU Regulation AT (Comments): How will the Committee correspond to and cooperate with the Competitiveness Coordination Tool? PL (Drafting Suggestions):

Public

Commission proposal	Drafting Suggestions and Comments
	An independent Investment Committee shall be established under the ECF InvestEU instrument **to examine financing and investment operations proposed by implementing partners for coverage under the Union guarantee.** PL (Comments): Clarifies the Committee's role in screening and endorsing guarantee-backed operations.
6. The composition of the Investment Committee shall ensure that it has a wide knowledge of the sectors covered by the ECF and a wide knowledge of the geographic markets in the Union, and shall ensure that the Investment Committee as a whole is gender-balanced.	IT (Drafting Suggestions): The composition of the Investment Committee shall ensure that it has a wide knowledge of the sectors covered by the ECF and a wide knowledge of the geographic markets in the Union, **skills gap** and shall ensure that the Investment Committee as a whole is gender-balanced AT (Drafting Suggestions): 6. The composition of the Investment Committee shall ensure that it has a wide knowledge of the sectors covered by the ECF and a wide knowledge of the geographic markets in the Union, and shall ensure that the Investment Committee **is acting independently and** as a whole is gender-balanced. AT (Comments): To underline the importance of avoiding conflict of interest situations from the outset. PL (Drafting Suggestions): *The composition of the Investment Committee shall ensure that it has a wide knowledge of the sectors covered by the ECF and a wide knowledge of the geographic markets in the Union, and*

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	*shall ensure that the Investment Committee as a **whole is geographically**- and gender-balanced.* PL (Comments): Ensuring the geographic balance of the Investment Committee is in line with the rules on the EFC Strategic Stakeholder Board and is a prerequisite to have "a wide knowledge of the geographic markets in the Union". NL (Drafting Suggestions): 6. The composition of the Investment Committee shall ensure that it has a wide knowledge of the sectors covered by the ECF and a wide knowledge of the geographic markets in the Union **and the global value chains**, and shall ensure that the Investment Committee as a whole is gender-balanced. CY (Drafting Suggestions): The composition of the Investment Committee shall ensure that it has a wide knowledge of the sectors covered by the ECF and a wide knowledge of the geographic markets in the Union, and shall ensure that the Investment Committee as a whole is gender-balanced, and geographically balanced. EL (Drafting Suggestions): The composition of the Investment Committee shall ensure that it has a wide knowledge of the sectors covered by the ECF and a wide knowledge of the geographic markets in the Union, **especially as it concerns the less developed regions and the Union outermost regions**, and shall ensure that the Investment Committee as a whole is gender-balanced. EL

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Comments): **The sustainable development within the regions, especially the developing ones, of member states needs to be secured**
	FR (Drafting Suggestions): The Investment Committee shall (a) examine the proposals for financing and investment operations submitted by implementing partners for coverage under the Union guarantee and verify the compliance with the applicable rules of the proposals for financing under the ECF InvestEU Instrument. **(b) verify the compliance of the proposals with this Regulation and the relevant investment guidelines; (c) control any potential overlapping with the EC accelerator or any other funds implemented and (d) check whether the financing and investment operations that would benefit from the support under the EU guarantee comply with all relevant requirements**. FR (Comments): Could the Commission specify, in a dedicated paragraph, the Investment Committee's prerogatives in terms of monitoring and reporting, as well as the specific resources and tools made available to it to accomplish these tasks?
7. The Investment Committee shall examine the proposals for financing and investment operations submitted by implementing partners for coverage under the Union guarantee and verify the compliance with the applicable rules of the proposals for financing under the ECF InvestEU Instrument.	AT (Drafting Suggestions): 7. The Investment Committee shall examine the proposals for financing and investment operations submitted by implementing partners for coverage under the Union guarantee and verify the compliance with the applicable rules of the proposals for financing under the ECF InvestEU Instrument, **with a special focus on additionality and mobilisation of private resources.** AT

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Comments): A special focus should be put on verifying the additionality of Union support and the mobilisation of private capital. SE (Drafting Suggestions): The Investment Committee shall examine the proposals for financing and investment operations submitted by implementing partners for coverage under the Union guarantee and verify the compliance with the applicable rules of the proposals for financing under the ECF InvestEU Instrument. **The Investment Committee should inform the Advisory Board on ECF InvestEU on its decisions and main deliberations.** FR (Drafting Suggestions): A **scoreboard of indicators** (the 'Scoreboard') shall be established to ensure that the Investment Committee is able to carry out an independent, transparent and harmonised assessment of requests for the use of the EU guarantee for financing and investment operations proposed by implementing partners Implementing partners shall fill out the Scoreboard for their proposals for financing and investment operations The Scoreboard shall cover the following elements: (a) a description of the proposed financing or investment operation; (b) how the proposed financing or investment operation contributes to EU policy objectives; (c) a description of additionality; (d) a description of the market failure or suboptimal investment situation; e) the financial and technical contribution by the implementing partner; (f) the impact of the investment; (g) the financial profile of the financing or investment operation; (h) complementary indicators. The Investment Committee shall use the Scoreboard in its assessment and verification of the proposed financial and investment operations.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	Conclusions of the Investment Committee shall be adopted by simple majority of all members, Conclusions of the Investment Committee approving the coverage of the EU guarantee for a financing or investment operation shall be publicly accessible and shall include the rationale for the approval and information on the operation, in particular its description, the identity of the promoters or financial intermediaries, and the objectives of the operation. The conclusions shall also refer to the global assessment stemming from the Scoreboard FR (Comments): Outil de monitoring présent dans le règlement InvestEU qui serait important de reprendre.
	FR (Drafting Suggestions): The Advisory Board on ECF InvestEU Instrument shall be composed of one representative of each implementing partner and one representative of each Member State. the Advisory Board on ECF InvestEU Instrument shall, (a) provide advice on the design of financial products and on the strategic and operational direction in its area of competence **to the strategic steering board (b) provide advice to the Commission and the Steering Board about market developments, market conditions, market failures and suboptimal investment situations; (c) exchange views on market developments and share best practices**. It shall also provide advice on the coordination with the EIC to ensure complementarity with other Union funding or private investments. The Advisory Board shall be chaired by a representative of the Commission. The Commission shall establish the operating rules and procedures for the Advisory Board and shall manage the secretariat of the Advisory Board. All relevant documentation and information shall be made available to the Advisory Board to enable it to exercise its tasks. FR (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	Reprise de dispositions relatives à l'Advisory Board dans InvestEU.
8. The Advisory Board on ECF InvestEU Instrument shall be composed of one representative of each implementing partner and one representative of each Member State. the Advisory Board on ECF InvestEU Instrument shall, provide advice on the design of financial products and on the strategic and operational direction in its area of competence. It shall also provide advice on the coordination with the EIC to ensure complementarity with other Union funding or private investments. The Advisory Board shall be chaired by a representative of the Commission.	CZ (Drafting Suggestions): 8. The Advisory Board on ECF InvestEU Instrument shall be composed of one representative of each implementing partner and one representative **nominated by** each Member State. the Advisory Board on ECF InvestEU Instrument shall, provide advice on the design of financial products and on the strategic and operational direction in its area of competence. It shall also provide advice on the coordination with the EIC to ensure complementarity with other Union funding or private investments. The Advisory Board shall be chaired by a representative of the Commission. AT (Comments): How will the Advisory Board correspond to the Competitiveness Coordination Tool? NL (Drafting Suggestions): The Advisory Board on ECF InvestEU Instrument shall be composed of one representative of each implementing partner and one representative of each Member State. the Advisory Board on ECF InvestEU Instrument shall, provide advice on the design of financial products and on the strategic and operational direction in its area of competence. It shall also provide advice on the coordination with the EIC to ensure complementarity with other Union funding or private investments. The Advisory Board shall be chaired by a representative of the Commission. **The representative of the EIB Group shall be the vice-chair.** NL (Comments): Add role of EIB as is standing practise now ES

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Drafting Suggestions): 8. The Advisory Board on ECF InvestEU Instrument shall be composed of one representative of each implementing partner and one representative of each Member State. the Advisory Board on ECF InvestEU Instrument shall, provide advice on the design of financial products and on the strategic and operational direction in its area of competence. It shall also provide advice on the coordination with the EIC to ensure complementarity with other Union funding or private investments. The Advisory Board shall be chaired by a representative of the Commission. **Meetings of representatives of the Member States in a separate format shall also be organised at least twice a year**. ES (Comments): The Regulation should establish a minimum number of annual meetings to be held. Currently, the InvestEU Advisory Board meets twice per year.
	FR (Drafting Suggestions): The Commission shall, **by means of implementing acts,** establish the detailed rules on selection and composition and remuneration for the Investment Committee and the Advisory Board on ECF InvestEU Instrument. The Commission shall jointly establish the detailed rules of procedure, conflicts of interest and confidentiality for the Investment Committee and the Advisory Board on ECF InvestEU Instrument. **Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 83(3).** FR (Comments): The Council should be involved in defining the composition of the Committee and the Board and the related provisions, in particular by guaranteeing a review procedure for the adoption of all these provisions.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
9. The Commission shall establish the detailed rules on selection and composition, remuneration, rules of procedure, conflicts of interest and confidentiality for the Investment Committee and the Advisory Board on ECF InvestEU Instrument.	AT (Drafting Suggestions): 9. The Commission shall establish the detailed rules on selection and composition, remuneration, ~~rules of procedure,~~ conflicts of interest and confidentiality for the Investment Committee and the Advisory Board on ECF InvestEU Instrument. **9 (bis). On proposal by the Commission, the Investment Committee and the Advisory Board shall adopt their respective rules of procedure upon consitution.** AT (Comments): Rules of Procedure should be approved by the Advisory Board and the Investment Committee, respectively. SE (Drafting Suggestions): The Commission shall, **after consulting the Member States,** establish the detailed rules on selection and composition, remuneration, rules of procedure, conflicts of interest and confidentiality for the Investment Committee and the Advisory Board on ECF InvestEU Instrument. NL (Drafting Suggestions): 9. The Commission, **in cooperation EIB Group**, shall establish the detailed rules on selection and composition, remuneration, rules of procedure, conflicts of interest and confidentiality for the Investment Committee and the Advisory Board on ECF InvestEU Instrument. ES (Drafting Suggestions):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	9.1 The Commission shall establish the detailed rules on selection and composition, remuneration, rules of procedure, conflicts of interest and confidentiality for the Investment Committee ~~and the Advisory Board on ECF InvestEU Instrument~~. ES (Comments): The Member States and the implementing partners should be able to chose their representatives in the Advisory Board independently.
	ES (Drafting Suggestions): **9.2 . The Commission shall suggest the operating rules and procedures for the Advisory Board, that should be adopted in the first meeting and shall manage the secretariat of the Advisory Board. All relevant documentation and information shall be made available to the Advisory Board to enable it to exercise its tasks.** ES (Comments): This is based on the current InvestEU Regulation, except that the operating rules are proposed by the Commission and adopted by the Advisory Board.
10. The Commission and Implementing partners shall establish regular Policy Review Dialogues to discuss progress with the implementation of the financial products and engage on relevant policy developments.	CZ (Drafting Suggestions): 10. The Commission, **Member States** and Implementing partners shall establish regular Policy Review Dialogues to discuss progress with the implementation of the financial products and engage on relevant policy developments.
	FR (Drafting Suggestions): 11. The Commission shall ensure that stakeholders **and Member States** are **associated to** ~~consulted in~~ the development of the work programmes, with the creation of one or several

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	thematic platforms per window **and per specific objectives as listed in article 3.2. Regarding collaborative research, the R&I community should be associated to the elaboration of work programmes.** FR (Comments): It is important that Member States are associated to the development of the work programmes, and that such committees are set up and consulted for each sector and not just by thematic windows. For example, in the 'Health, bio-technologies, bio-economy and agriculture' window, considering in particular the important specificities of the health and agricultural sectors, a balanced representation or sub-committees should be considered. It is important not only to associate industrial stakeholders but also scientific experts to take into account R&I specificities, and to cover the whole innovation value chain. Should thematic platforms be cross-sectional (covering several windows) or would they belong to a specific window ?
11. The Commission shall ensure that stakeholders are consulted in the development of the work programmes, with the creation of one or several thematic platforms per window.	FI (Drafting Suggestions): 11. The Commission shall ensure that stakeholders are consulted in **the course of** the development of the work programmes, with the creation of one or several thematic platforms per window. FI (Comments): The stakeholders are potential beneficiaries of the programme and cannot be directly involved in designing the final work programme and the award criteria. CZ (Drafting Suggestions):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	11. The Commission shall ensure that stakeholders, **including academic sector, and Member States** are consulted in the development of the work programmes, with the creation of one or several thematic platforms per window. PL (Drafting Suggestions): The Commission shall consult stakeholders in developing each work programme through one or more thematic platforms per policy window, **ensuring input from national, regional and macro-regional experts.** PL (Comments): Enhances stakeholder-driven programme design and integrates macro-regional expertise. LT (Comments): **Could you please elaborate on the thematic platforms? Will they be** based **on MS representation?**
	SE (Drafting Suggestions): 12. **The Commission shall establish one or several Evaluation Committees to decide on the award of grant funding. The Evaluation Committee shall assess the proposals compliance with the regulation. The Evaluation Committee should consist of both Commission staff and independent experts. The Evaluation Committees should inform Member States about its decisions and delibarations.**
Chapter II	

PUBLIC

Commission proposal	Drafting Suggestions and Comments
ECF TOOLBOX	
SECTION 1	
GRANTS, PROCUREMENT AND INDUSTRIAL POLICY COORDINATION TOOLS	IT (Comments): The nature and functioning of the coordination tools must be better laid out. We ask the Commission to further explain the relationship between the governance of the ECF, as governed by the ECF Regulation [COM(2025) 555 final] (Stategic Stakeholders Board, Advisory Board on ECF InvestEU Instrument and Investment Committee) and the Competitiveness Coordination Tool envisaged by the Competitiveness Compass [COM(2025) 30 final], but not yet defined in its functioning (Coordination procedure? Representative body? Which council branches will be involved?) FI (Comments): Scrutiny reservation.
	FI (Drafting Suggestions): **Award criteria and selection** 1. A proposal shall be evaluated on the basis of the following award criteria: (a) excellence; (b) impact; (c) quality and efficiency of the implementation.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	The work programme shall specify details on how these award criteria are to be applied. FI (Comments): There needs to be a separate article on the award criteria and selection.
Article 15	
	ES (Comments): In general, a political level is missing in the governance of the ECF. In the current proposal, every aspect (both political and technical) in the implementation of the ECF is left to the Work Programmes. However, political key decisions (on sectoral priorities, types of actions, eligibility criteria, etc.) should be differentiated from purely technical details. If Work Programmes retain both type of elements, the role of the MS and the Council should be strengthened in their adoption.

PUBLIC

Work Programmes	DE (Comments): In principle, we support greater flexibility in terms of the distribution of funding over individual activities and over the years of the MFF period. However, the transfer of key distribution criteria and award criteria into the work programs goes too far. Key policy elements of the Fund, such as the selection/award criteria cannot be determined in the comitology and/or annual budget procedures. They must be fundamentally and consistently regulated in the Regulation itself, not only in some of its areas (such as Art. 53). In addition, MS must play a sufficient role in the strategic management of activities. Among other things, the examination procedure should be used throughout the adoption of the work programs, not only in the Security/Defence window. This follows from Art. 2 in combination with recital 12 of the Comitology Regulation. What will the link between the work programs and the Competitiveness Coordination Tool as well as the MFF's Steering Mechanism look like in practice? What is MS role in the Competitiveness Coordination Tool? How does the COM envision the process for drafting the work progammes in practice? What is the internal governance of the COM for the purpose of adopting work programs? It is good that there shall be a close link with Horizon Europe. It is important that the link between Horizon Europe (including the European Innovation Council) and the ECF is defined clearly. For the design of the R&I parts that are implemented via Horizon Europe it is crucial that R&I experts are involved – those experts can assess the state of research. This is the only way to ensure synergies between national and European R&I policy and to avoid duplications. The link with the European Innovation Council is also important – it is therefore not sufficient that this link only appears in recital 53. PL (Drafting Suggestions):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	When adopting work programmes, the Commission shall ensure the effective participation of Member States in the decision-making process. Project evaluation criteria shall include territorial impact and employment effects to guarantee that the Fund contributes to balanced and inclusive growth." PL (Comments): Ensuring a stronger role for Member States in shaping work programmes and evaluation criteria increases transparency and aligns the Fund with the Union's cohesion and employment objectives HU (Comments): General comment: The envisioned governance structure is worrying. The role of the Council shall be strengthened, sidelining Member States for the decision-making processes is not the right way forward. National ownership must be ensured during the whole process of the ECF. To preserve institutional balance, designating the Council as the entity adopting the implementing acts should be taken into consideration.
	FR (Drafting Suggestions): The work programmes may set out **for the entire budget period with a year breakdown:** FR (Comments): Can the Commission specify the budget nomenclature associated with the Competitiveness Fund and the financial programming envisaged?
1. The work programmes may set out:	MT (Drafting Suggestions): The work programmes ~~may~~ **shall** set out:

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	MT (Comments): Provides greater certainty on what to expect in a Work Programme. RO (Comments): If the work programmes for ECF InvestEU Instruments are set yearly, it might be difficult to avoid overlaps and confusions in the market SI (Drafting Suggestions): 1. The work programmes shall ~~may~~ set out: SI (Comments): We suggest to clarify at what level WPs will be prepared (individual fund, window or lower level).
(a) actions and associated budget from ECF as well as actions set out in the specific dedicated part of the work programmes indicated in paragraph 2;	HR (Drafting Suggestions): actions and associated budget from ECF as well as actions set out in the specific dedicated part of the work programmes indicated in paragraph 2, **taking into account the need for balanced participation of SMEs across all Member States**. HR (Comments): HR proposes adding a reference to SMEs' balanced participation to avoid concentration of resources in more advanced regions.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	SE (Comments): If these acitivities are stipulated by Article 34.4, i.e. Competitiveness and Society activities supported under the Horizon Regulation, SE maintains a scrutiny reservation on this paragraph and seeks clarification regarding how these activities will be developed, and how MS and stakeholders will be involved.
	FR (Comments): The coordination between different ways of funding (INVEST EU / grants related to the specific objectives) should be more developed in the Regulation text – not only in the work programmes. This includes adding precisions for INVEST EU, specifically the introduction of similar eligibility criteria as the ones related to each specific objective (e.g. defence industry).
(b) instruments and form of funding;	
	FR (Drafting Suggestions): (c) ~~eligibility and award criteria;~~ FR (Comments): Eligibility criteria should be defined in the sole regulation. and award criteria should be defined in the regulation text rather than in the work programme. Regarding award criteria, the work programme shall lay down further details concerning the application of those laid down in the regulation, including any weighting to be applied. The work programme shall not set individual thresholds
(c) eligibility and award criteria;	IT

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Comments): Carefully evaluate this flexibility given to the Commission. It is necessary to ensure that Member States are involved. IE (Comments): IE would like a clearer articulation of horizontal award criteria in the text. FI (Drafting Suggestions): (c) eligibility ~~and award~~ criteria; FI (Comments): Award criteria cannot be left at WP level. There needs to be a separate article (see above) on the award criteria referring to the WP as follows: **Award criteria and selection** 1. A proposal shall be evaluated on the basis of the following award criteria: (a) excellence; (b) impact; (c) quality and efficiency of the implementation. The work programme shall specify details on how these award criteria are to be applied. SE (Drafting Suggestions):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	eligibility and award criteria **to foster excellence** **in line with this regulation** SE (Comments): The criteria for support should be set out in the regulation rather than be left to the work programme. NL (Drafting Suggestions): **Additional** eligibility and award criteria; NL (Comments): It should be clear that this article is read in combination with the main articles on eligibility and award criteria. It will be hard in the excecution of the programme when every work programme sets its own criteria. RO (Comments): Do the award criteria refer to implementing partners? We see necessary to foresee criteria that incentivize the participation from all MS, in a suitable manner to the market development phase and innovation cycle. These criteria could return higher EU competitiveness if set in a cooperative logic, not a competitive one among MS across EU. Gepgraphical balance shall be ensured.
(d) a single co-financing rate per action for actual cost grants;	SE (Drafting Suggestions): ~~a single co-financing rate per action for actual cost grants;~~

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	SE (Comments): The key criteria for support should be set out in the regulation rather than left to the work programme. NL (Comments): How does the Commission foresee to execute these rates in a consistent manner when this is dicided on the level of a workprogramme. Shouldn't there be some general guidance in the legal text? Which could be choosen from in a workprogramme? SI (Drafting Suggestions): (d) a single co-financing rate per action ~~for actual cost grants~~; SI (Comments): A single co-financing rate should be the norm.
	CZ (Comments): Without offering specific text proposals, we offer the following idea for further consideration. The implementation of the EDF, for example, has shown that securing co-financing is often a lengthy and demanding process. The situation can be further complicated by national legislation, and it could take years to provide the finances to consortia. Therefore, CZ proposes to add an article, which would allow the provision of finances directly to the European Commission, which would then distribute it to the respective consortia, according to the work packages and provisions, as defined in the grant agreement. The process would be as follows:

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	• 1. Before the project proposal is submitted, the EU MS usually know the amount of co-financing from their entities and sometimes provide the so-called *Co-financing declaration.* • 2. After the project is evaluated and awarded, the EU MS usually receive, by the European Commission, information containing total eligible cost of participant, requested EU contribution for participant, and need for co-financing for entities established in the respective EU MS. • 3. The EU MS could provide the co-funding directly to the European Commission, which would further distribute it to consortia, together with a contribution from the EU. The main added value of this proposal is that it would further streamline the process and reduce the bureaucratic burden. Moreover, the finances would not be connected with the MoU preparation and its signature and could be, theoretically, provided faster. FR (Comments): The coordination between Horizon Europe and the ECF (incl. possibilites of common funding, cumulated rates, eligibility rules…) should also be defined in the Regulation text – not only in the work programme.
(e) actions to which the Mutual Insurance Mechanism under Regulation (EU) [XXX] [Horizon Europe] applies;	
(f) rules applicable to actions concerning more than one specific objective;	
(g) actions to which specific rules apply, in particular on ownership, exploitation and dissemination, transfer and licensing as well as access rights to results;	

PUBLIC

Commission proposal	Drafting Suggestions and Comments
(h) actions which benefit from the mechanisms set out in Article 20;	
	IT (Drafting Suggestions): **i) <u>Skills gap analyses</u>** FR (Drafting Suggestions): z FR (Comments): What will be the interaction between the ECF and Horizon Europe comitologies? Can the Commission confirm that this paragraph covers both parts of the FPRI's Pillar II (competitiveness and society) ? What is the process of drafting and adopting work programmes for collaborative research? How R&I specificities will be taken into account? What will be the articulation between ECF and Horizon Europe comitologies?
2. The work programmes under this Regulation shall integrate in a specific dedicated part collaborative research and innovation activities and their dedicated budget.	BE (Drafting Suggestions): 2. The work programmes under this Regulation shall integrate in a specific dedicated part collaborative research and innovation activities and their dedicated budget. **<u>These work programmes will be consistent with principles and objectives established under the Framework Programme for Research and Innovation.</u>** BE

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Comments): It will be important that work programmes for collaborative research and innovation activities are in line with principles and general/specific objectives of the Framework Programme for R&I, including ethics and integrity, freedom of scientific research, open science, integration of social sciences and humanities, etc. AT (Drafting Suggestions): The work programmes under this Regulation shall integrate in a specific dedicated part collaborative research and innovation activities and their dedicated budget**, in line with the Horizon Europe Regulation**. ES (Drafting Suggestions): 2. The work programmes under this Regulation shall integrate in a specific dedicated part collaborative research and innovation activities and their dedicated budget. **The Specific Programme that will implement Horizon Europe shall establish the specific objectives for research and innovation activities, while ensuring compliance with the ECF's general objective to increase European competitiveness along the investment journey.** SI (Drafting Suggestions): 2. The work programmes under this Regulation shall **include** ~~integrate~~ in a specific dedicated **section for** ~~part~~ collaborative research and innovation activities**, along with an earmarked** ~~and their dedicated~~ budget.
	FR (Drafting Suggestions): The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2), points (a), (b), (c) and (d) and

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	for the horizontal activities in Chapter III. Those implementing acts shall be adopted in accordance with the **examination** procedure referred to in Article 83(**3**). FR (Comments): Council should be involved into the governance of the work programs, in particular by guaranteeing a review procedure for the adoption of these programs.
3. The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2), points (a), (b), (c) and (d) and for the horizontal activities in Chapter III. Those implementing acts shall be adopted in accordance with the advisory procedure referred to in Article 83(2).	IT (Comments): This formulation is not acceptable for Italy. It is imperative to involve the Council, and the decision-making process within the ECF should therefore be rethought. HR (Drafting Suggestions): 3. The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2), points (a), (b), (c) and (d) and for the horizontal activities in Chapter III. Those implementing acts shall be adopted in accordance with the ~~advisory~~ **examination** procedure referred to in Article 83(2). HR (Comments): Ensure a stronger role of the MS in the management of the ECF through greater use of the examination procedure. FI (Comments): Finland has a scrutiny reservation to the selection of the committee procedure. DE (Comments):

Commission proposal	Drafting Suggestions and Comments
	See above: MS must play a sufficient role in the strategic management of activities. Among other things, the examination procedure should be used throughout the adoption of the work programs, not only in the Security/Defence window. This follows from Art. 2 in combination with recital 12 of the Comitology Regulation. CZ (Drafting Suggestions): 3. The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2), points (a), (b), (c) and (d) and for the horizontal activities in Chapter III. Those implementing acts shall be adopted in accordance with the ~~advisory~~ **examination** procedure referred to in Article 83(2). BE (Drafting Suggestions): 3. The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2), points (a), (b), (c) and, (d) and for the horizontal activities in Chapter III. Those implementing acts shall be adopted in accordance with the ~~advisory~~ **examination** procedure referred to in Article 83(~~2~~**3**). BE (Comments): This should also be the examination procedure. Member State should be actively involved in the drafting of the work programmes. In areas where national co-financing will be significant and which require full support from and synergies with regional and national programmes, Member States must be actively involved. AT (Drafting Suggestions):

Commission proposal	Drafting Suggestions and Comments
	The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2), points (a), (b), (c) and (d) and for the horizontal activities in Chapter III. Those implementing acts shall be adopted in accordance with the ~~advisory~~ **examination** procedure referred to in Article 83(2), 83(**3**). AT (Comments): Since the ECF aims to align EU with national and regional priorities, the role of Member States should not be reduced to the advisory procedure. SE (Drafting Suggestions): The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2), points (a), (b), (c) and (d) and for the horizontal activities in Chapter III. Those implementing acts shall be adopted in accordance with the **examination**~~advisory~~ procedure referred to in Article 83(**3**~~2~~). SE (Comments): A stronger involvement of MS is required, i.a. in order to support good linking of priorities on EU, national and regional level (which is a stated objective under the current Horizon Europe proposal). PL (Drafting Suggestions): *The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2), points (a), (b), (c) and (d) and for the horizontal activities in Chapter III* ***at least for the period of two years.*** *Those implementing acts shall be adopted in accordance with* ~~*the advisory procedure referred to in Article 83(2)*~~ ***examination procedure referred to in Article 83(3).*** PL

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Comments): The work programmes are to define many importants issues concerning the EFC implementation and management at the level of the work programmes instead at the level of the regulation. That is the main reason to sustain the current rules in terms of stating their multiannual perpsective. Annual WP hamper the efforts of the Member States and applicants to prepare for participation in the programmes and to undertake related planning activities. Moreover, leaving many decisions to be taken at the stage of the work programmes, we do not see the reason for limiting the role of the MS in their elaboration and we do not agree with the proposed change from the present examination procedure to advisory procedure. NL (Drafting Suggestions): The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2), points (a), (b), (c) and (d) **(1)** and for the horizontal activities in Chapter III. Those implementing acts shall be adopted in accordance with the ~~advisory~~ **examination** procedure referred to in Article 83(~~2~~**3**). NL (Comments): Specifify d (1), otherwise (d) (2) (3) and (4) are covered by both Art 15(3) and 15(4) We are of the opinion it is more appropriate to apply the examination procedure. In aprticual because of the many open options not further specified in this article and left open to the workprogramme without legal certainty in the rest of this text. MT (Drafting Suggestions): Those implementing acts shall be adopted in accordance with the ~~advisory~~ examination **procedure** referred to in Article 83(~~2~~ **3**). MT

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Comments): There is no objective reason to diminish Member States' input in adopting the work programmes for these objectives. LT (Drafting Suggestions): **The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2), points (a), (b), (c) and (d) and for the horizontal activities in Chapter III. Those implementing acts shall be adopted in accordance with the ~~advisory~~examination procedure referred to in Article 83(~~2~~3).** LT (Comments): **Lithuania considers that examination procedure should be followed as it provides for higher ~~considertaion~~engagement of MSs ~~interests.is~~ Furthermore, it would allow to continue usual practice in ~~the~~ case of specific dedicated part of the work programme, describing the collaborative research and ~~i~~inovation acti~~on~~vities.** ES (Drafting Suggestions): The Commission shall **propose, and the Council** ~~Commission~~, by means of **an** implementing **decision** ~~acts~~, adopt the work programmes implementing the specific objectives referred to in Article 3(2), points (a), (b), (c) and (d) ~~and for the horizontal activities in Chapter III. Those implementing acts shall be adopted in accordance with the advisory procedure referred to in Article 83(2)~~. ES (Comments): Strategic decisions within the Work Programmes should be taken by the Council. Only technical issues should be adopted by means of implementing acts.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	HU (Comments): We urge the adoption of decisions in accordance with the examination procedure referred to in Article 83(3) in as many policy windows as possible (not only defence-related ones) to reinforce Member States' decision-making role and to prevent the further expansion of the Commission's powers. SI (Drafting Suggestions): ~~3. The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2), points (a), (b), (c) and (d) and for the horizontal activities in Chapter III. Those implementing acts shall be adopted in accordance with the advisory procedure referred to in Article 83(2).~~ SI (Comments): **Scrutiny reservation** We advocate for all work programmes to be adopted in examination comitology procedure. We trust that the partnership between the EC and MSs and the early co-design of priorities through the Steering Mechanism and Competitiveness Coordination Tool will ensure a swift and smooth examination and adoption of the Work programme.
	FR (Drafting Suggestions): The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2), point (d) **(1)** (2), (3) and (4). Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 83(3).

PUBLIC

Commission proposal	Drafting Suggestions and Comments
4. The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2), point (d) (2), (3) and (4). Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 83(3).	IT (Comments): This formulation is not acceptable for Italy. It is imperative to involve the Council, and the decision-making process within the ECF should therefore be rethought. SE (Drafting Suggestions): The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2), point (d) (2), (3) and (4). Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 83(3). **Where the committee delivers no opinion, the Commission shall not adopt the draft implementing act and Article 5(4), third subparagraph, of Regulation (EU) No 182/2011 shall apply.** LT (Comments): **Provided that our comment above is accepted, this para could be deleted.** ES (Drafting Suggestions): ~~4. The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2), point (d) (2), (3) and (4). Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 83(3).~~ ES (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	Strategic decisions within the Work Programmes should be taken by the Council. Only technical issues should be adopted by means of implementing acts. CY (Comments): We remain cautious on whether the comitology examination procedure should be reserved only for defense industry and space, or whether it should be extended also to the other policy windows (currently under advisory procedure). HU (Comments): Strongly agree, defence related decisions shall only be adopted in accordance with the examination procedure referred to in Article 83(3). SI (Drafting Suggestions): ~~4. The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2), point (d) (2), (3) and (4). Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 83(3).~~ SI (Comments): **Scrutiny reservation** We advocate for all work programmes to be adopted in examination comitology procedure. We trust that the partnership between the EC and MSs and the early co-design of priorities through the Steering Mechanism and Competitiveness Coordination Tool will ensure a swift and smooth examination and adoption of the Work programme.
	FR (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	Can the Commission explain the reasons for such an exception from the procedure for adopting work programs?
5. On duly justified imperative grounds of urgency relating to the fact that a work programme has not been adopted by October 1 of the year preceding the year of budget implementation, the Commission shall adopt the work programme by means of immediately applicable implementing acts in accordance with the procedure referred to in Article 83(4) and not later than October 15 of the year preceding the year of budget implementation. Those implementing acts shall remain in force for the period of budget implementation.	IT (Comments): As a minimum, the Commission should describe the reasons for urgency in order to justify its action, providing elements of transparency to the Member States. This seems to entail that a Work Plan must be adopted by **October 2027**. Consequently, the Advisory Board must already be established and operational, and the ECF regulations must be adopted even earlier. What happens if the Regulation is not adopted within this timeframe? Moreover, we would appreciate clarification on how this provision can be reconciled with the timeline of the annual EU budgetary procedure, which is normally concluded in November. Allowing the Commission to adopt work programmes by 15 October — before the budget for the following year is formally adopted — raises questions about the legal and budgetary consistency of programming decisions taken prior to the finalisation of the budget. DE (Comments): Why is there a deviation from the regular procedure under the Budget Regulation (adoption by March of the following year)? What is the political objective of setting the adoption of the work programs before the adoption of the annual budget? Should the work programmes be adopted with a budgetary reservation? How will the (draft) work programmes be reflected in the publication of the detailed multiannual financial planning alongside the draft budget? How does the COM justify the use of immediately applicable implementing acts in paragraph 5 and thus outside the crisis and emergency situations referred to in paragraph 6? What would constitute “justified imperative grounds”? What would be limitations of the grounds and therefore on the scope of a work programme adopted under this clause? We take critical view in principle as concerns the use of such immediately applicable legal instruments outside such

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	crisis and emergeny situations, especially since they are supposed to apply for the entire duration of the budget period (possibly also multiannual?). BE (Comments): Why this provision? Is this also applicable in other legislations of the MFF such as FP10? PL (Drafting Suggestions): On duly justified imperative grounds of ~~urgency relating to the fact that a work programme has not been adopted by October 1 of the year preceding the year of budget implementation, the Commission shall adopt the work programme by means of immediately applicable implementing acts in accordance with the procedure referred to in Article 83(4) and not later than October 15 of the year preceding the year of budget implementation. Those implementing acts shall remain in force for the period of budget implementation.~~ PL (Comments): When leaving many significant decisions to be taken at the stage of the work programmes, we do not see the reason for limiting the role of the MS in their elaboration. The provision is too general in defining why there is need of such action. The EC is responsible for proper planning and managing the programme. Urgent situation (crisis) is mentioned in the next point. NL (Comments): NL is not yet convinced of the need for this procedure and this implementing act. We do not consider this enough justification as for an imperative grounds of urgency. Can the Commission further substantiate this article? MT (Drafting Suggestions):

Commission proposal	Drafting Suggestions and Comments
	On duly justified imperative grounds of urgency ~~relating to the fact that a work programme has not been adopted by October 1 of the year preceding the year of budget implementation,~~ the Commission shall adopt the work programme by means of immediately applicable implementing acts in accordance with the procedure referred to in Article 83(4) ~~and not later than October 15 of the year preceding the year of budget implementation~~. Those implementing acts shall remain in force for the period of budget implementation. MT (Comments): Malta does not feel that not meeting an arbitrary deadline is grounds for invoking this 'urgency' clause. ES (Drafting Suggestions): ~~5. On duly justified imperative grounds of urgency relating to the fact that a work programme has not been adopted by October 1 of the year preceding the year of budget implementation, the Commission shall adopt the work programme by means of immediately applicable implementing acts in accordance with the procedure referred to in Article 83(4) and not later than October 15 of the year preceding the year of budget implementation. Those implementing acts shall remain in force for the period of budget implementation.~~ ES (Comments): Strategic decisions within the Work Programmes should be taken by the Council. Only technical issues should be adopted by means of implementing acts. HU (Drafting Suggestions): ***With the exemption of work programmes referred to in Article 15(4), on*** duly justified imperative grounds of urgency relating to the fact that a work programme has not been adopted by October 1 of the year preceding the year of budget implementation, the Commission shall

Commission proposal	Drafting Suggestions and Comments
	adopt the work programme by means of immediately applicable implementing acts in accordance with the procedure referred to in Article 83(4) and not later than October 15 of the year preceding the year of budget implementation. Those implementing acts shall remain in force for the period of budget implementation. HU (Comments): Defence related decisions shall only be adopted in accordance with the examination procedure referred to in Article 83(3). SI (Drafting Suggestions): ~~5. On duly justified imperative grounds of urgency relating to the fact that a work programme has not been adopted by October 1 of the year preceding the year of budget implementation, the Commission shall adopt the work programme by means of immediately applicable implementing acts in accordance with the procedure referred to in Article 83(4) and not later than October 15 of the year preceding the year of budget implementation. Those implementing acts shall remain in force for the period of budget implementation.~~ SI (Comments): How was this cut-off date defined? In Horizon Europe it is rare to have a work programme adopted ahead of October 1 of a given year. Need to improve transparency - *why* this exception exists or *what justification is acceptable* **Scrutiny reservation.** This would enable the Commission to adopt the work programme in absence of the opinion (or consensus) of the Member States, which would significanlty errode the role of Member States in programming and governance of ECF.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	FR (Comments): Can the Commission explain the reasons for such an exception from the procedure for adopting work programs?
6. On duly justified imperative grounds of urgency relating to the need for an immediate reaction to a crisis or other similar exceptional and duly substantiated emergencies, the Commission may adopt a work programme by means of immediately applicable implementing acts in accordance with the procedure referred to in Article 83(4).	IT (Comments): As a minimum, the Commission should describe the reasons for urgency in order to justify its action, providing elements of transparency to the Member States AT (Comments): Could you please elaborate whether you foresee a budgetary cap for such action? NL (Drafting Suggestions): ~~6. On duly justified imperative grounds of urgency relating to the need for an immediate reaction to a crisis or other similar exceptional and duly substantiated emergencies, the Commission may adopt a work programme by means of immediately applicable implementing acts in accordance with the procedure referred to in Article 83(4).~~ NL (Comments): NL is not convinced of the neccesity for this possibility under the ECF, given it is a long term investment fund and not a crisis instrument. In addition, the definition of crisis or other similar exceptional and duly substantiated emergencies is not sufficiently delineated RO (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	If clear and transparent criteria are not established for what constitutes an 'imperative ground of interest,' there is a risk that some Member States could be disadvantaged. Divergent interpretations may create legal uncertainty and result in projects with European-level potential being excluded or unable to benefit from exemptions. A harmonized approach across all Member States is therefore essential to ensure fairness, consistency, and full exploitation of EU-level opportunities. ES (Drafting Suggestions): 6. On duly justified imperative grounds of urgency relating to the need for an immediate reaction to a crisis or other similar exceptional and duly substantiated emergencies, the Commission may adopt a work programme by means of immediately applicable implementing acts in accordance with the procedure referred to in Article 83(4). **Budgetary commitments made on this basis should not exeed the [X] % of the amount referred to in Article 4(1).** ES (Comments): The Regulation should give a more detailed indication of what a crisis may mean (e.g. linking these situations to the crisis that warrant the activation of the new crisis mechanism in the recitals). The amount of resources that could be mobilized under this paragraph should be capped. HU (Drafting Suggestions): ***With the exemption of work programmes referred to in Article 15(4), on*** duly justified imperative grounds of urgency relating to the need for an immediate reaction to a crisis or other similar exceptional and duly substantiated emergencies, the Commission may adopt a work programme by means of immediately applicable implementing acts in accordance with the procedure referred to in Article 83(4). HU

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Comments): Defence related decisions shall only be adopted in accordance with the examination procedure referred to in Article 83(3). SI (Drafting Suggestions): ~~6. On duly justified imperative grounds of urgency relating to the need for an immediate reaction to a crisis or other similar exceptional and duly substantiated emergencies, the Commission may adopt a work programme by means of immediately applicable implementing acts in accordance with the procedure referred to in Article 83(4).~~ SI (Comments): Not sure if the crisis and other emegencies are duly defined and justifed. **Scrutiny reservation.** This would enable the Commission to adopt the work programme in absence of the opinion (or consensus) of the Member States, which would significanlty errode the role of Member States in programming and governance of ECF. FR (Drafting Suggestions): **Article 15 – Collaborative research** **1. Collaborative research shall support the creation of transnational research and innovation cooperation networks, bringing together entities of different disciplines, to support the development and swift diffusion of high-quality results in favour of the Union's industrial competitiveness, space, security, clean transition, preparedness and resilience, and addressing societal challenges, including culture and creativity, and to strengthen the impact of research in developing and supporting Union policies.**

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	2. Activities shall be carried out in a balanced manner between lower and higher Technology Readiness Levels, thereby covering the whole value chain. **3. The Programme should contribute to the funding of Excellence Initiatives, which are exploratory research projects based solely on the criterion of excellence among several European laboratories. They must trigger breakthrough discoveries in each policy window of the ECF and fuel the innovation chain. They focus on governance – managerial innovations, strategic planning, benchmarking – and on mainstreaming a culture of excellence.** **4. Calls for collaborative research projects should take into account R&I specificities. The selection criteria established by the Framework Programme for Research and Innovation shall apply to these calls.** **6. Member States should be actively and early on involved in the elaboration and adoption of work programmes for collaborative research. Dedicated governance committees should be set up for each policy window.** FR (Comments): To ensure consistency with the implementation of the Framework Programme for Research and Innovation, there is a need to define the concept of collaborative research and the rules applying to these calls. Fundamental bottom-up research should also be funded by ECF calls on collaborative research to ensure the emergence of breakthrough technologies from very early stages.
	EE (Drafting Suggestions): For the the work programmes covering the collaborative research and innovation activities under the policy windows corresponding to Pillar II of the Framework Programme as provided in Article 15(3) of the Horizon Europe Regulation, the comitology procedures set out in Article 18(1) of the Specific Programme implementing Horizon Europe and Regulation (EU) No 182/2011 shall apply.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	EE (Comments): Article 15 lets the Commission adopt most ECF work programmes under the *advisory* procedure, with *examination* used only for a narrow subset. That would allow the "dedicated part" that hosts HE Pillar II collaborative R&I (and its budget) to be set without full Member State decision control. Given HE Article 15(3) places Pillar II collaborative R&I in a dedicated part of ECF work programmes adopted under ECF Article 15, and given the HE Specific Programme requires work programmes to follow Reg. 182/2011 due to their financial implications, ECF Article 15 must use the examination procedure for adopting and amending the dedicated Pillar II part and its budget envelopes, ensuring Member State decision-making. PL (Drafting Suggestions): ***When adopting the work programmes referred to in paragraphs 3 to 6, the Commission shall ensure the effective participation of the Member States in the decision-making process. The Commission shall conduct prior consultations with the Member States and take due account of their positions so as to guarantee that the Fund's actions reflect the diverse needs and potential of the Union's national economies".*** **"*The ECF shall maintain sufficient flexibility to support projects and work programmes based on smart specialisations relevant to all countries and regions. Specific mechanisms, including thematic reserves, simplified procedures, application support, and widening measures, shall be established to enable participation of entities from less developed countries and regions"*** ***"The Commission shall ensure that Member States have the possibility to monitor and influence the content of work programmes through an appropriate procedure, providing them with effective oversight rather than a merely advisory role"*** PL (Comments):

Commission proposal	Drafting Suggestions and Comments
	Many key issues to be decided by the European Commission within the programmes should be addressed with the involvement of the Member States. Ensuring a greater influence of the Member States in the decision-making process is essential both for the sake of transparency and to guarantee that the actions of the Fund reflect the diverse needs and potential of individual national economies. It is therefore essential to maintain the appropriate flexibility of the ECF, so as to enable the implementation of projects and work programmes based on smart specialisations relevant to all countries and regions, with particular attention to building capacity in sectors with high, long-term growth potential, while fully utilizing local resources and absorption capacities. Similarly to Horizon Europe, the ECF should also include, among its objectives and mechanisms, a 'widening' approach enabling entities from countries with a low success rate to participate in projects and enhance their capacities. In this context, consideration should be given to introducing corrective mechanisms or thematic reserves targeting less developed countries, procedural simplifications, application support, and monitoring of territorial and sectoral balance in the implementation of the Fund. For Poland, it is very important to ensure that Member States have the possibility to oversee work programmes through an appropriate procedure, allowing them to effectively monitor and influence their content, rather than having merely an advisory role NL (Drafting Suggestions): ***Article XX*** **Award criteria** **1. To ensure projects with the most EU value added are supported, the work programmes and award procedures set out in Article 15 shall at least include the following horizontal award criteria:**

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(a) excellence of the proposed action; **(b) impact of the proposed action, in particular on European competitiveness, especially focusing on strategic sectors and technologies along the investment journey;** **(c) the quality and efficiency of the implementation of the proposed action;** **(d) stimulating effect of Union support on private investment as much as possible;** **(e) the need to overcome a market failure, including transition failure, such as a lack of market finance, insufficient commercial viability, high upfront costs, expected economies of scale or cross-border spillover effects;** **(f) Where relevant, synergies with other Union programmes, in line with Article 7.** **2. Where applicable, the work programme and award procedure may set out further award criteria specific to the policy area concerned.** **3. Concerning research and innovation activities, only the following award criteria shall apply:** **(a) excellence;** **(b) impact;** **(c) quality and efficiency of implementation.**
Article 16	

PUBLIC

Commission proposal	Drafting Suggestions and Comments
Single Market value chains builder	DE (Comments): What is the funding approach behind "value chain builders"? Where is this term defined legally? Who should be supported for which projects and when? The funding purpose and award criteria must be regulated in sufficient detail in the Regulation (see comments on Art. 15). EL (Comments): Need for specification of the provisions.
	FR (Drafting Suggestions): In order to foster resilient Union value chains, the work programmes may include dedicated value-chains scale up calls which shall support both project preparation and crowding in of additional public and private capital to integrate suppliers, manufacturers, and innovators from different Member States and diversify sources of supply.
1. In order to foster resilient Union value chains, the work programmes may include dedicated value-chains scale up calls which shall support both project preparation and crowding in of additional public and private capital to integrate suppliers, manufacturers, and innovators from different Member States and diversify sources of supply.	FI (Drafting Suggestions): 1. In order to foster resilient Union value chains, the work programmes may include dedicated value-chains scale up calls which shall support both project preparation and crowding in of additional public and private capital to integrate suppliers, manufacturers, and innovators from different Member States and diversify sources of supply **while not distorting the single market**. FI (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	This is absolutely fundamental. The single market is the guarantee and guardian of level-playing field, fair competition, true EU added value, global competitiveness and resilience in all value chains. SE (Drafting Suggestions): In order to foster resilient Union value chains, the work programmes may include dedicated value-chains scale up calls which shall support both project preparation and crowding in of additional public and private capital to integrate suppliers, manufacturers, and innovators from different Member States and diversify sources of supply **while not distorting the Single market and safeguarding openness through rules based trade.** SE (Comments): Measures should be taken to avoid market distortion. It is important that the ECF safeguards openness towards the rest of the world, and a well functioning Single Market, and does not foster inhouse production where open, rules-based trade is more efficient. NL (Drafting Suggestions): 1. In order to foster resilient Union value chains, the work programmes may include dedicated value-chains scale up calls which shall support both project preparation and crowding in of additional public and private capital to integrate suppliers, manufacturers, and innovators from different Member States and diversify sources of supply. **The Single Market value chains builder may not lead to distortions on the Single Market.** RO (Drafting Suggestions):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	In order to foster resilient Union value chains, the work programmes **shall** ~~may~~ include dedicated value-chains scale up calls which shall support both project preparation and crowding in of additional public and private capital to integrate suppliers, manufacturers, and innovators from different Member States and diversify sources of supply. ES (Drafting Suggestions): In order to foster resilient Union value chains, the work programmes may include dedicated value-chains scale up calls which shall support both project preparation and crowding in of additional public and private capital to integrate suppliers, manufacturers, and innovators**, including SMEs,** from different Member States and diversify sources of supply.
Article 17	
	FR (Comments): Can the Commission specify the planned budget for this article? Can it specify the budget nomenclature associated with the Competitiveness Fund and the financial programming envisaged?

PUBLIC

Commission proposal	Drafting Suggestions and Comments
EU Tech frontrunners	IT (Comments): In general terms, the provisions on EU Tech frontrunners is positive, but further clarification on the procedures would be helpful. DE (Comments): What is the funding approach behind "EU Tech Frontrunner"? Where is this term defined legally? Who should be supported for which projects and when? The funding purpose and award criteria must be regulated in sufficient detail in the Regulation (see comments on Art. 15). CZ (Comments): CZ - Czechia understands the need to ensure maximum flexibility of the Fund, particularly in view of the specific purposes and features of the actions under Article 17. Nevertheless, we consider that overarching rules should be defined. We thus kindly request clarification in written response on comments below. AT (Comments): Please kindly explain how the EU Tech Forerunners shall interact with partnerships in Horizon Europe.
1. The work programmes may include dedicated two-stage bottom-up award procedures to identify and support EU Tech frontrunners through industry-driven consortia leveraging on their role as innovation and export drivers to strengthen their global competitive position along with	IE (Comments): Given this proposal is trageting high TRLs, this article needs to address market failures. FI

PUBLIC

Commission proposal	Drafting Suggestions and Comments
their European SME suppliers through investments in new solutions and identification of relevant partners. Project preparation as well as crowding in of additional public and private capital may be supported.	(Comments): In our view this is a very important instrument and as a prerequisite it needs to be implemented with open calls and through transparent and excellence-driven award criteria (see above in the comments). This instrument would continue the legacy of Horizon Europe second pillar higher TRL and industry-driven projects including the once in PPPs or JUs, being at the same time more bottom-up, openly designed, smaller, more agile and extending towards commercialisation through crowding in private capital. This instrument also needs to be implemented seamlessly with Horizon Europe as the instrument operates at the interface and the project could include also research and innovation activities. CZ (Comments): CZ - Clarification is needed on the overarching principles or rules that would apply with regard to project size and expected impact, as well as on the role foreseen for different types of enterprises. In this context, we would also appreciate explanation on what the criteria that will define a “Tech frontrunner” and determine the eligibility of projects for support would be. Further details are needed on the organisation of the two-stage process. In particular, it should be specified whether the provision that “project preparation may be supported” implies that applicants would be eligible for financial support already during the first stage. SE (Comments): There is a risk that a this supports established companies in favour of upcoming competitors. How do we ensure promotion of effective competition with this set up? ES (Drafting Suggestions): The work programmes may include dedicated two-stage bottom-up award procedures to identify and support EU Tech frontrunners through industry-driven consortia leveraging on their role as innovation and export drivers to strengthen their global competitive position along

Commission proposal	Drafting Suggestions and Comments
	with their ~~European~~ SME suppliers **established in the Union** through investments in new solutions and identification of relevant partners, **conditional where applicable on commitments to scale-up manufacturing and reinforce the Union's value chains**. Project preparation as well as crowding in of additional public and private capital may be supported. ES (Comments): Ensures that tech hubs are focused on manufacturing and value chains. SI (Drafting Suggestions): 1. The work programmes may include dedicated two-stage bottom-up award procedures to identify and support EU Tech frontrunners through industry-driven consortia leveraging on their role as innovation and export drivers to strengthen their global competitive position along with their European SME suppliers **and academic R&I partners** through investments in new solutions and identification of relevant partners. Project preparation as well as crowding in of additional public and private capital may be supported.
	FR (Comments): How would this new mechanism be structured?
2. At the first stage, an open call for expression of interest for goods, works or services that might contribute to Union competitiveness in general, or in a specified sector, may be published without specification of the kind of activities or the instrument of budget implementation to be used.	

PUBLIC

Commission proposal	Drafting Suggestions and Comments
3. At the second stage, analysis and crowding in of additional public and private capital shall be supported.	FI (Drafting Suggestions): 3. At the second stage, **Horizon Europe funding can be used for further research and innovation activities** and analysis and crowding in of additional public and private capital shall be supported. FI (Comments): look above
4. Proposals and offers shall be evaluated and ranked based on common award criteria such as their comparative contribution to Union competitiveness.	FI (Drafting Suggestions): 4. Proposals and offers shall be evaluated and ranked based on ~~common~~ **the award criteria referred to in the Article xx.** FI (Comments): Therefore this should refer to a separate new article on general award criteria (look above). DE (Comments): Excellence and competition need to be the sole criteria. AT (Comments): How, where and by whom is “comparative contribution to European competitiveness” defined and evaluated? SE

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Drafting Suggestions): Proposals and offers shall be evaluated and ranked based on common award criteria such as **excellence, innovation, addressing a market failure and** their comparative contribution to Union **long-term** competitiveness. SE (Comments): Long term competitiveness and innovation should be prioritized over short term industry support. PL (Drafting Suggestions): Proposals and offers shall be evaluated and ranked based on common award criteria, including their comparative contribution to Union competitiveness. "***A mandatory geographic balance criterion shall be applied to ensure the identification of technological frontrunners across all EU Member States, including Central and Eastern European countries. Projects with leaders or key partners from regions with lower innovation performance may be awarded additional points"*** PL (Comments): Establishes transparent, strategic criteria aligned with EU competitiveness goals; drives consortia to deliver scalable, high-impact solutions and strong partnership structures.
5. The evaluation committee shall determine the most appropriate instrument of budget implementation, as well as propose the maximum amount and form of the Union contribution.	FI (Drafting Suggestions): 5. The evaluation committee **referred to in the Article xxx** shall determine the most appropriate instrument of budget implementation, as well as propose the maximum amount and form of the Union contribution.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	FI (Comments): There needs to be more details regulated on the evaluation committee. CZ (Comments): CZ - Clarification is also required regarding the composition of the evaluation committees. AT (Comments): How is the evaluation committee composed? Is there a specific budget for the frontrunners or will the budget come from the corresponding policy windows? PL (Drafting Suggestions): The evaluation committee shall recommend the most appropriate financing instrument under Regulation (EU, Euratom) 2024/2509 and propose the maximum Union contribution **and its form—such as grants, equity-like instruments or budgetary guarantees—tailored to each project's risk profile and scale-up needs.** PL (Comments): Ensures each frontrunner project receives a bespoke financing mix that matches its development stage and risk, optimizes leverage of EU budget, and aligns with the legal framework for financial instruments. EL (Comments): We need to clarify the authority and procedures of the evaluation committee.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	SI (Drafting Suggestions): 5. The evaluation committee**, composed partially or fully of independent external experts with in-depth knowledge of EU technology landscape,** shall determine the most appropriate instrument of budget implementation, as well as propose the maximum amount and form of the Union contribution.
Article 18	

PUBLIC

Commission proposal	Drafting Suggestions and Comments
Production Ramp up actions	FI (Comments): Finland has a scrutiny reservation to the entire article. DE (Comments): In principle, we are critical of the possibility of opening up the ECF to retroactive financing of projects. The Regulation must comprehensively prevent windfall effects and ensure additionality financing effects. In any case, the justification of the deviation from the Budget Regulation in case of urgency should be legally certain, unambiguous and appropriate. The reference to general resilience objectives is not sufficient. SE (Drafting Suggestions): **<u>Actions to ramp up innovative production</u>** SE (Comments): Production and manufacturing seems to be used interchangebly. Is there a distinction? If not production is preferred as this includes intangeble products such as software.
	CZ (Comments): CZ - Czechia considers it important that the relevant work programme duly defines the conditions under which such support may be granted. We therefore kindly request clarification in written on the following points.
1. By way of derogation from Article 196(2) of the Financial Regulation, financial contributions may, where	IE

PUBLIC

Commission proposal	Drafting Suggestions and Comments
necessary for the implementation of manufacturing projects essential to support the general resilience objective as indicated on Article 3(1), or activities required to ensure the security, resilience or service continuity to support the objective referred to in Article 3(2), point (d), cover actions that started prior to the date of the submission of the proposal for those actions .	(Comments): IE notes that this is a very late stage of investment and there is a need to ensure that we are targeting market failure and not hampering innovation. FI (Drafting Suggestions): 1. By way of derogation from Article 196(2) of the Financial Regulation, financial contributions may, **in exceptional and duly justified cases addressing market failures,** where necessary for the implementation of manufacturing projects essential to support the general resilience objective as indicated on Article 3(1), or activities required to ensure the security, resilience or service continuity to support the objective referred to in Article 3(2), point (d), cover actions that started prior to the date of the submission of the proposal for those actions, **when there is duly justified value-added to do that.** FI (Comments): preliminary proposals, still under scrutiny EE (Comments): Accessibility must be proportionate and manageable both for smaller NPIs/NPBs and for large international banks. The role of advisory services is increasing, yet the conditions remain unclear as to when undergoing such an advisory service will be required. CZ (Comments): Clarification is needed on how the need to launch Production Ramp-up actions will be determined, and who will be responsible for deciding and approving their urgency. It should also be specified whether and how all Member States will be involved in such decisions, and whether a comitology procedure is envisaged.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	Further clarification is required on the general principles to be applied when determining the eligible period and level of support for costs incurred prior to the submission of the project proposal. AT (Drafting Suggestions): 1. By way of derogation from Article 196(2) of the Financial Regulation, financial contributions may, where necessary for the implementation of manufacturing projects essential to support the general resilience objective as indicated on Article 3(1), or activities required to ensure the security, resilience or service continuity to support the objective referred to in Article 3(2), point (d), cover actions that started **up to x months** prior to the date of the submission of the proposal for those actions. AT (Comments): What should be the maximum timespan allowed? SE (Drafting Suggestions): By way of derogation from Article 196(2) of the Financial Regulation, financial contributions may, **in exceptional cases** where necessary for the implementation of **innovative** manufacturing projects essential to support the general resilience objective as indicated on Article 3(1), or activities required to ensure the security, resilience or service continuity to support the objective referred to in Article 3(2), point (d) **and that address market failures**, cover actions that started **up to six months** prior to the date of the submission of the proposal for those actions. SE (Comments): In the WP on 11 Sep, Cion referred to “special cases” here. Need clarification on that.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	We question the need to connect ramp-up actions with retroactive support. How will support for actions previously started before submission ramp up production? PL (Comments): How should the "general resilience objective" be interpreted? How will it be assessed whether a given project is significant enough to support the achievement of the overarching resilience goal? It is reasonable that the interpretation should be as broad as possible and should take into account not only defence, but also health, food, and energy security. In this context, it would be important to consider the possibility of supporting projects increasing the availability of modern health technologies, infrastructure and innovative therapies in key areas for public health in the EU. The inclusion of this element in the ECF's actions will contribute to building the Union's health resilience and is in line with the Union's long-term strategic objectives. Insufficient funding/lack of dedicated instrument to finance the ambitious objectives of the draft Critical Medicines Act (CMA) should also be mentioned. During the meeting of the Working Group on Pharmaceuticals and Medical Devices, Mr. The EU stressed that funding should also be ensured under the future financial framework. NL (Drafting Suggestions): ~~1. By way of derogation from Article 196(2) of the Financial Regulation, financial contributions may, where necessary for the implementation of manufacturing projects essential to support the general resilience objective as indicated on Article 3(1), or activities required to ensure the security, resilience or service continuity to support the objective referred to in Article 3(2), point (d), cover actions that started prior to the date of the submission of the proposal for those actions .~~

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	NL (Comments): We see no need for such broad possibility to support prior started actions. It undermines selecting the best project based on competitive procedures and thus does not effectively contribute to EU competitiveness. It coud be considered to applying it only to defence, article 3(2), point d (2) and limiting it in time (e.g. only x months after the action has started).
	FR (Comments): Can the Commission clarify the "additional conditions" mentioned?
2. The work programme or the documents related to the award procedure shall set out additional conditions to ensure that the support is necessary and proportionate, excluding overcompensation and double funding, is temporary and decreases over time.	NL (Drafting Suggestions): ~~2. The work programme or the documents related to the award procedure shall set out additional conditions to ensure that the support is necessary and proportionate, excluding overcompensation and double funding, is temporary and decreases over time.~~ ES (Drafting Suggestions): The work programme or the documents related to the award procedure shall set out additional conditions to ensure that the support is necessary and proportionate, excluding overcompensation and double funding, is temporary and decreases over time**, and ensuring supported facilities contribute to the Union's value chains.** ES (Comments): To ensure that support translates into value chain resilience. SI

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Drafting Suggestions): 2. The work programme or the documents related to the award procedure shall set out additional conditions to ensure that the support ***ensures European added value,*** is necessary and proportionate, excluding overcompensation and double funding, is temporary and decreases over time.
Article 20	

PUBLIC

Commission proposal	Drafting Suggestions and Comments
Accelerated and Targeted Actions for Competitiveness	IT (Comments): It would be helpful to understand how it would function in practice, in order to enhance both the flexibility and speed of funding delivery. FI (Comments): Finland has a scrutiny reservation on this entire article. DE (Comments): We have many questions on this article. COM is granted a very far-reaching deviation from ordinary procurement procedures, the justification for which is usually very broadly interpretable. We are extremely critical of awards without award procedure (paragraph 2a), awards based on the applicants' self-evaluation (paragraph 2b) or awards without a specific funding reason (paragraph 2d). We ask the COM for further information on this article. EL (Comments): We need to add safeguards in order to ensure fair competition. SI (Drafting Suggestions): ~~Accelerated and Targeted Actions for Competitiveness~~ SI (Comments): **Scrutiny reservation on entire Article.**
	SI

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Comments): Point 1. of this Article is missing in the table.
2. In accordance with paragraph 1, one or more of the following measures may be applied to an award procedure:	AT (Comments): Can the COM explain the "special" award procedure in more detail, with a focus on the proposed derogations? Maybe it would be good to have a diagram illustrating the process and involving the stakeholders to improve comprehensibility. Will there be a budgetary cap for "accelerated and targeted actions"? NL (Comments): We have concerns to which extent such interventions undermine competitive selection of the best projects to achieve the goal of EU competitiveness. Can the Commission further substantiate the need for these possibilities?
(a) For grants, without prejudice to the use of competitive procedures wherever appropriate in line with Article 192(1) and in addition to Article 198 of Regulation (EU, Euratom) 2024/2509, the work programme may specify that an award procedure takes the form of a targeted intervention to:	FI (Drafting Suggestions): (a) For grants, without prejudice to the use of competitive procedures wherever appropriate in line with Article 192(1) and in addition to Article 198 of Regulation (EU, Euratom) 2024/2509, the work programme may **in duly justified and exceptional cases** specify that an award procedure takes the form of a targeted intervention to: SE (Drafting Suggestions): For grants, without prejudice to the use of competitive procedures wherever appropriate in line with Article 192(1) and in addition to Article 198 of Regulation (EU, Euratom) 2024/2509, the

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	work programme may **in exceptional cases** specify that an award procedure takes the form of a targeted intervention to: NL (Drafting Suggestions): (a) For grants, without prejudice to the use of competitive procedures wherever appropriate in line with Article 192(1) and in addition to Article 198 of Regulation (EU, Euratom) 2024/2509, the work programme may **in exceptional cases** specify that an award procedure takes the form of a targeted intervention to: SI (Comments): It is unclear in which cases exactly the provision will apply. This should be further clarified.
	FR (Comments): Can the Commission clarify what is meant by the "imperative public interests of the Union" referred to in Article 2?
(1) identify an action of imperative public interests of the Union and the beneficiaries or categories of beneficiaries which may be invited to submit a proposal without a call; or,	BE (Comments): - How will be decided which (group of) beneficiaries are invited to submit a proposal? - Will this be linked to the Competitiveness Seal? Will the Commission check whether there are any projects with a Competitiveness Seal that are relevant to the targeted intervention? AT (Comments): How and by whom will "imperative public interest" be defined/ decided upon ? RO (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	'Imperative public interest' means, for the purpose of Article 20, an overriding reason for providing Union support for a certain action, or set of actions, due to a clear and significant contribution to the achievement of policy objectives under the ECF, which justifies the application of accelerated and simplified rules to the award. It is necessay to better circumstantiate / clarify on the basis of which criteria the 'imperative public interest of the Union' referred to in Article 20(2) will be defined.
(2) set out an amount up to which proposals may be identified and invited that have been awarded a seal referred to in Article 8 of this Regulation but have not received Union funding due to lack of budget. The applicants may be invited to resubmit their proposal without a call; where the proposal is resubmitted without substantial change, the granting authority may decide to fully rely on the prior positive evaluation and any previously conducted controls and submitted supporting documents; the reasons for the award of the individual action shall be duly substantiated in the award decision and the list of actions shall be published in the Annual Activity Report referred to in Article 74(9) of Regulation (EU, Euratom) 2024/2509; or,	SE (Drafting Suggestions): (2) set out an amount up to which proposals may be identified and invited that have been awarded a seal referred to in Article 8 of this Regulation but have not received Union funding due to lack of budget. The applicants may be invited to resubmit their proposal ~~without a call~~; where the proposal is resubmitted without substantial change, the granting authority may **consider** ~~decide to fully rely on~~ the prior positive evaluation and any previously conducted controls and submitted supporting documents, **when considering granting Union funding**; the reasons for the award of the individual action shall be duly substantiated in the award decision and the list of actions shall be published in the Annual Activity Report referred to in Article 74(9) of Regulation (EU, Euratom) 2024/2509; or, SE (Comments): Well-functioning markets with effective competition are what make companies competitive; it is important that support or support criteria does not distort the market and competition between sectors or companies. To have effecitve competition to support the most productive actions the calls needs to be transparent. MT (Drafting Suggestions):

Commission proposal	Drafting Suggestions and Comments
	(2) set out an amount up to which proposals may be identified and invited that have been awarded a seal referred to in Article 8 of this Regulation but have not received Union funding due to lack of budget. The applicants may be invited to resubmit their proposal without a call; where the proposal is resubmitted without substantial change, the granting authority may decide to fully rely on the prior positive evaluation and any previously conducted controls and submitted supporting documents; **the criteria for the award shall be made known beforehand**, and the reasons for the award of the individual action shall be duly substantiated in the award decision and the list of actions shall be published in the Annual Activity Report referred to in Article 74(9) of Regulation (EU, Euratom) 2024/2509; or, MT (Comments): The criteria on which the awards will be decided need to be made clear beforehand for the sake of transparency. Perhaps a more streamlined approach would be to open the call for other submissions in the following work programmes, rather than creating a separate mechanism. LT (Comments): **Could the European Commission explain the rationale of this para? It is not clear why ~~projecta~~ proposal that has not been selected for funding due to ~~t~~lack of budget, later is funded no~~rt~~ by selecting project fo~~r~~rom the reserve list but by inviting to resubmit proposal awarded a seal.** ES (Drafting Suggestions): set out an amount up to which proposals may be identified and invited that have been awarded a seal referred to in Article 8 of this Regulation but have not received Union funding due to lack of budget**, taking into account criteria of geographical balance and SME access**. The applicants may be invited to resubmit their proposal without a call; where the proposal is

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	resubmitted without substantial change, the granting authority may decide to fully rely on the prior positive evaluation and any previously conducted controls and submitted supporting documents; the reasons for the award of the individual action shall be duly substantiated in the award decision and the list of actions shall be published in the Annual Activity Report referred to in Article 74(9) of Regulation (EU, Euratom) 2024/2509; or
	FR (Comments): Could the Commission specify – including by giving an example – of 'categories of beneficiaries'?
(3) specify an action and beneficiaries, or a policy area and categories of beneficiaries, and set out an amount up to which proposals may be invited for extension of actions under the ECF or other Union programmes, in order to continue or add additional activities or entities, and/or to further develop results; where actions and beneficiaries are not individually identified in the work programme, the reasons for the award of the individual action shall be duly substantiated in the award decision and the list of actions shall be published in the Annual Activity Report referred to in Article 74(9) of Regulation (EU, Euratom) 2024/2509. The award may take the form of an amendment to the original action by adding new activities and increasing the maximum Union contribution.	BE (Comments): Would this not favour the organisations that have been involved from the outset of a project and thus make it even more difficult for other – maybe smaller entities – to have access to this funding? PL (Comments): This derogations from open call procedures is very general and not justified enough. It decreases the transparceny of EC decisions on spending the EU budget, poses risk of decisions being made under the influence of lobbying, and of projects and beneficiaries treated under different rules. LT (Comments): **We advocate for MSs' representatives involvement in this process.** SI (Drafting Suggestions):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(3) specify an action and beneficiaries, or a policy area and categories of beneficiaries, and set out an amount up to which proposals may be invited for extension of actions under the ECF or other Union programmes, in order to continue or add additional activities or entities, and/or to further develop results; where actions and beneficiaries are not individually identified in the work programme, the reasons for the award of the individual action shall be duly substantiated in the award decision and the list of actions shall be published in the Annual Activity Report referred to in Article 74(9) of Regulation (EU, Euratom) 2024/2509. The award may take the form of an amendment to the original action by adding new activities **and/or partners, or both,** and increasing the maximum Union contribution.
(b) By way of derogation from Articles 199, 201, 203 regarding grants or from Article 170(1), points (b) and (c), and (2) regarding procurement, of Regulation (EU, Euratom) 2024/2509, the work programme may specify that an award procedure takes the form of an accelerated intervention to:	FI (Drafting Suggestions): By way of derogation from Articles 199, 201, 203 regarding grants or from Article 170(1), points (b) and (c), and (2) regarding procurement, of Regulation (EU, Euratom) 2024/2509, the work programme may **in duly justified and exceptional cases** specify that an award procedure takes the form of an accelerated intervention to: SE (Drafting Suggestions): By way of derogation from Articles 199, 201, 203 regarding grants or from Article 170(1), points (b) and (c), and (2) regarding procurement, of Regulation (EU, Euratom) 2024/2509, the work programme may **in exceptional cases** specify that an award procedure takes the form of an accelerated intervention to: NL (Drafting Suggestions): (b) By way of derogation from Articles 199, 201, 203 regarding grants or from Article 170(1), points (b) and (c), and (2) regarding procurement, of Regulation (EU, Euratom)

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	2024/2509, the work programme may **in exceptional cases** specify that an award procedure takes the form of an accelerated intervention to:
(1) limit the requirements for the award decision and signature of legal commitments to a preliminary evaluation of award and exclusion criteria; the award decision shall be taken based solely on a self-declaration of applicants and tenderers on selection and eligibility criteria without request for corresponding supporting documents during pre-evaluation; the final evaluation, including for selection and eligibility criteria, and the requests for any relevant supporting documents shall be conducted within three months of the signature of the legal commitment; and,	MT (Comments): This text seems to imply that projects will be allowed to start without a GA in place. If this is the case, what happens in case of non-compliance? SI (Comments): This
(2) require the notification of the results of the preliminary evaluation to the applicants or tenderers within 30 calendar days of the deadline for submission of proposals or tenders; the award decision shall be taken within 60 calendar days of the deadline for submission of proposals or tenders and shall be exempted, where applicable, from the procedures set out in Article 83; until the completion of the final evaluation no pre-financing shall be paid.	MT (Comments): Does this mean that time to grant is of 3 months? Will projects be able to start without the pre-financing?
(c) By way of derogation from Article 9 of this Regulation, the work programme may specify that an award procedure takes the form of an inducement intervention to allow for a temporary and conditional	LT (Comments): **Could the European Commition explain the rationale of this para?**

PUBLIC

Commission proposal	Drafting Suggestions and Comments
waiver of compliance with a specified part of the eligibility criteria during the award procedure and parts of the implementation of the action, in particular regarding the place of establishment; compliance with the temporarily waived eligibility criteria shall instead be achieved and evaluated during the implementation of the action within a timeframe specified in the legal commitment. If the temporarily waived eligibility criteria are not complied with at the specified date, the action shall be considered ineligible in its entirety and any Union funding shall be fully recovered; for inducement interventions no pre-financing shall be paid.	
(d) The work programme may set up special two-stage bottom-up award procedures in accordance with the following rules:.	NL (Comments): How does this possibility relate to the 2-stage procedure in article 17?
(1) during the first stage, a call for expression of interest may be launched without specification of the kind of activities or the instrument of budget implementation to be used, to enable applicants, tenderers and pillar-assessed entities to submit project proposals or offers for goods, works or services that might contribute to Union competitiveness in general or in a specified sector.	ES (Drafting Suggestions): during the first stage, a call for expression of interest may be launched without specification of the kind of activities or the instrument of budget implementation to be used, to enable applicants, tenderers and pillar-assessed entities to submit project proposals or offers for goods, works or services that might contribute to Union competitiveness in general or in a specified sector. **The expression of interest stage may be fed by Union-funded capacity and bottleneck mappings to prioritise time-critical supply-chain issues without additional procedural layers.** ES

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Comments): Using existing evidence from capability/bottleneck mapping will enable accelerated actions to be prioritised without additional paperwork. SI (Comments): It is unclear in which cases exactly the provision will apply. This should be further clarified
	FR (Comments): What is meant by 'non-financial donations'? In-kind contributions? This is not the agreed wording in previous regulations.
(2) proposals and offers shall be evaluated and ranked based on common award criteria such as their comparative contribution to Union competitiveness. The evaluation committee shall determine the most appropriate instrument of budget implementation under direct or indirect management, in particular grant, procurement, non-financial donations, contribution agreements or other support, as well as propose the maximum amount and form of the Union contribution.	FI (Drafting Suggestions): (2) proposals and offers shall be evaluated and ranked based on common award criteria **based on Article xx and** their comparative contribution to Union competitiveness. The evaluation committee **referred to in Article xxx** shall determine the most appropriate instrument of budget implementation under direct or indirect management, in particular grant, procurement, non-financial donations, contribution agreements or other support, as well as propose the maximum amount and form of the Union contribution. FI (Comments): preliminary proposal SE (Drafting Suggestions):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	proposals and offers shall be evaluated and ranked based on common award criteria such as **excellence, innovation, addressing a market failure and** their comparative contribution to Union **long-term** competitiveness. CY (Drafting Suggestions): (2) proposals and offers shall be evaluated and ranked based on common award criteria such as their comparative contribution to Union competitiveness. The evaluation committee shall determine the most appropriate instrument of budget implementation under direct or indirect management, in particular grant, procurement, non-financial donations, contribution agreements or other support, as well as propose the maximum amount and form of the Union contribution. In this context, association with third countries shall respect the provisions in Article 11 of this Regulation. SI (Comments): It is unclear in which cases exactly the provision will apply. This should be further clarified.
(3) during the second stage, within the available budget, successfully evaluated projects or offers shall be invited to adjust and complete their proposal or offer in accordance with the conclusions of the evaluation committee. The award procedure shall otherwise proceed in accordance with the rules set out in Article 12, as applicable to the respective instrument of budget implementation.	
	AT (Drafting Suggestions): **New Art 16 Collaborative research and innonvation activities**

Commission proposal	Drafting Suggestions and Comments
	Collaborative research shall support the creation of transnational research and innovation cooperation networks in areas of high societal impact, bringing together entities of different disciplines, to support the development and swift diffusion of high-quality results in favour of the Union's industrial competitiveness, space, ecurity, clean transition, preparedness and resilience, and considering societal challenges, including culture and reativity, and to strengthen the impact of research in developing and supporting Union policies. Activities shall be carried out in a balanced manner between lower and higher Technology Readiness Levels, thereby covering the whole value chain. Collaborative research and innovation will be supported in the form of a grant as financing not linked to cost, or as simplified cost options in particular through lump sums as well as unit costs for personnel, in accordance with Regulation (EU, Euratom) 2024/2509 To be eligible for participation in grant actions legal entities shall form a consortium that includes as beneficiaries three legal entities independent of each other and each established in different countries as follows: (a) at least two legal entities established in different Member States; and (b) at least one other legal entity established in another Member State or an associated country. AT (Comments): A dedicated instrument for collaborative R&I entiled "Collaborative research and innovation activites" needs to be added to the ECF Toolbox in an additional and dedicated Article. Please also add a reference to the respective Articles of the proposal for the regulation establishing Horizon Europe. Support provided for the activities referred to in the four policy windows include and explicitly refer to collaborative research and innovation activities set out in Regulation (EU) [XXX] [Framework Programme for Research and Innovation] and identified in a specific dedicated part of the Work Programme.]

PUBLIC

Commission proposal	Drafting Suggestions and Comments
SECTION 2	

PUBLIC

Commission proposal	Drafting Suggestions and Comments
ECF INVESTEU INSTRUMENT	IT (Comments): In general, the common objective of support provided through financial instruments is to mitigate the consequences of market failures, which typically take the form of credit rationing, by facilitating access to credit for deserving enterprises that private financiers would not otherwise be willing to support. In order to ensure the effectiveness of financial instruments, however, it is essential to adopt appropriate criteria for designing and implementing measures that are consistent with the characteristics of the entrepreneurial system concerned. Therefore, it is necessary to avoid an exclusive or excessive centralisation at EU level in the management of financial instruments for SMEs, so as to allow, at national level, the definition of instruments with the required flexibility to take into account the entrepreneurial fabric of the relevant territories/regions. More specifically, with regard to access to credit, it should be noted that the use of European instruments and platforms, while offering limited advantages in terms of leverage effect and ability to address the actual financial needs of enterprises, involves the adoption of "rigid" intervention models, which are administratively burdensome and, unless laboriously adjusted through corrective measures, cannot be operationally implemented in a flexible manner that meets the consolidation and/or development needs of territorially rooted enterprises. This is particularly relevant, in the case of Italy, for enterprises located in less developed areas, or characterised by sectoral or dimensional diversity. DE (Comments): Aiming for continuity in the InvestEU instrument is generally welcome. InvestEU has proven its worth in the past. However, many provisions seem to have been waived (Are there regulations on guarantee contracts? Will there be a legal basis for the investment guidelines?), so many aspects are still unclear and need to be examined in detail. The COM's responses to the member states' written questions is essential.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
Article 21	
General Framework	
	NL (Comments): legal elements from the current INEU legislation shoud be added: - division of budget between the EIB and other implementing partners, which is currently 75 – 25%.. [future division for negotiation] -Partnership with the EIB, current chapter 3 - Requirements of the guarantee (now art 13 of INEU regulation) ES (Comments): The section on the InvestEU Instrument is much less detailed than the InvestEU Regulation (Regulation (EU) 2021/523), which includes many more technical aspects. Will the InvestEU Regulation continue to apply? If not, where are those technical details going to be defined?
1. As a horizontal delivery tool for Union internal policies, the ECF InvestEU Instrument shall contain the budgetary guarantee and financial instruments, including when combined with non-repayable support in a blending operation, for the purpose of contributing to the general and specific objectives set out in Article 3, and may be implemented in synergy with other Union or national activities, including through compartments for Member States.	IT (Comments): The Commission should clarify whether and how continuity is ensured with regard to the possibilities, currently provided for in the InvestEU Regulation (Articles 9(2) and 10(3) of Regulation (EU) 2021/523), to combine the two compartments in a single operation with selective risk allocation between different levels (tranches). EE (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	It is essential to ensure fair participation and access to the schemes for smaller Member States, taking into account their more limited fiscal capacity. How will mandates be allocated to smaller Member States in comparison with large international financial institutions or bigger Member States? DE (Comments): The term "financial instrument" is somewhat unclear and circular. Financial instruments within the meaning of Art. 2 (30) of the Financial Regulation are "equity or equity based instruments, loans or guarantees, or other risk-sharing arrangments […]" PL (Drafting Suggestions): The ECF InvestEU Instrument shall serve as a horizontal delivery tool for Union internal policies, providing a budgetary guarantee and financial instruments—including when blended with non-repayable support—to contribute to the general and specific objectives of Article 3. It may be deployed in synergy with other Union or national initiatives, including through dedicated compartments for Member States. PL (Comments): We would like the EC to give more details on this possibilities and to explain how such actions will stimulate the equal participation of MS in the calls. In our opinion this, together with the other provision on the need to supply additional resources for project realisation, could only increase the inequality of MS particpation in the programme, where the award winners would be these entities and those countries that could secure the missing financing. The European Investment Bank Group (EIBG) is currently considered one of many implementing partners under the InvestEU guarantee instrument (ECF). This status does not reflect the EIBG's key role and crucial experience. Until now, the EIB's partnership with the

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	European Commission under InvestEU has been strategic and collaborative, particularly with regard to risk assessment and the design of financial instruments. Reducing this role would undermine the effectiveness of implementation and could hinder the instrument's swift launch on the market. The rationale behind the Commission's approach is unclear, especially since it has previously evaluated the EIB/EIF's implementation of InvestEU — and the EFSI before that — positively. In the context of specific questions: 1. Why is there no dedicated envelope for the EIBG? This could pose a serious problem for the bank's participation in the instrument, particularly with regard to building a pipeline of projects, which requires long-term capital planning, and maintaining relationships with financial institutions and clients. What would the role of other EU national promotional banks be? 2. Risk assessment: under InvestEU so far, the EIB has played a key role in risk assessment and co-designing instruments with the Commission, based on its long-standing experience of and capacity for risk management in investment projects. However, it is unclear who will be responsible for risk assessment in the new system, and on what basis, especially given the planned 'open architecture' and the resulting increased number of implementing partners. 3. In light of the above, the issue of governance and the EIB's role in managing the instrument is also important. While the document vaguely refers to the roles of different partners, it does not clearly define the EIB's role in fund management. This includes participation in investment committees, consultations on investment guidelines and monitoring activities RO (Comments): It should better delignated/clarified: a) to what extent the management of ECF guarantees will ensure transparency for Member State; b) how will the contingent liabilities associated with the unified budget guarantee be managed

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	ES (Drafting Suggestions): As a horizontal delivery tool for Union internal policies, the ECF InvestEU Instrument shall contain the budgetary guarantee and financial instruments, including when combined with non-repayable support in a blending operation, for the purpose of contributing to the general and specific objectives set out in Article 3, and may be implemented in synergy with other Union or national activities, including through compartments for Member States. **Where projects require public capital expenditure not suitable for financial instruments, grants or procurement shall be used as the primary form of Union support.** ES (Comments): Avoids bias towards financial instruments when public CAPEX is required. SI (Drafting Suggestions): As a horizontal delivery tool for Union internal policies, the ECF InvestEU Instrument shall contain the budgetary guarantee and financial instruments, **as stated in the point 2 of this article** including when combined with non-repayable support in a blending operation, for the purpose of contributing to the general and specific objectives set out in Article 3, and may be implemented in synergy with other Union or national activities, including through compartments for Member States. SI (Comments): We believe that it should be added which are financial instrumenta under this Regulation: loans, guarantees, counter-guarantees, capital market instruments, any other form of funding or credit enhancement, including subordinated debt, or equity or quasi-equity investments. Blending instruments are already stated in the following text.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
2. The ECF InvestEU Instrument shall address market failures or suboptimal investment situations. The ECF InvestEU Instrument may in particular provide loans, guarantees, counter-guarantees, capital market instruments, any other form of funding or credit enhancement, including subordinated debt, or equity or quasi-equity investments, provided directly or indirectly through financial intermediaries, funds, investment platforms or other vehicles to be channelled to final recipients.	IT (Comments): Not clear what kind of instrument the ECF InvestEU Instrument may provide: if all those listed "loans, guarantees, counter-guarantees, capital market instruments, any other form of funding or credit enhancement, including subordinated debt, or equity or quasi-equity investments, funds, investment platforms or other vehicles to be channelled to final recipients", is there a share for each instrument OR How will the (3). Budgetary guarantee of EUR 70b be used toward such instrument? A guarantee to finance a loan? EE (Comments): • What are the exact conditions for access — specifically, how and under which circumstances will access be ensured under the 'indirect' and 'direct management' arrangements? • Is the pillar assessment a mandatory requirement for access? AT (Drafting Suggestions): 2. The ECF InvestEU Instrument shall address market failures or suboptimal investment situations**, including by crowding in private capital and institutional investors, ensuring additionality, while avoiding duplication and crowding out private or other public investors.** The ECF InvestEU Instrument may in particular provide loans, guarantees, counter-guarantees, capital market instruments, any other form of funding or credit enhancement, including subordinated debt, or equity or quasi-equity investments, provided directly or indirectly through financial intermediaries, funds, investment platforms or other vehicles to be channelled to final recipients. AT

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Comments): AT refers to the last part of a written question submitted before the summer break: [How will absorption capacity and additionality be achieved?] It is important to avoid crowding out existing private or national support. SE (Drafting Suggestions): The ECF InvestEU Instrument shall address market failures **that cannot be mitigated in a more efficient manner.**~~or suboptimal investment situations~~. The ECF InvestEU Instrument may in particular provide loans, guarantees, counter-guarantees, capital market instruments, any other form of funding or credit enhancement, including subordinated debt, or equity or quasi-equity investments, provided directly or indirectly through financial intermediaries, funds, investment platforms or other vehicles to be channelled to final recipients. SE (Comments): Support can be justified if it deals with a clear market failure that cannot be adressed in a more efficient manner. PL (Drafting Suggestions): **The Commission shall in particular develop a Scale-up facility in cooperation with the EIB Group, other international financial institutions and National Promotional Banks. The facility shall provide in a coordinated and consistent manner, a comprehensive set of financing tools tailored to the unique needs of scale-ups, including indirect and direct equity and quasi-equity, venture debt, loans, guarantees and blended finance, with a view to attract private investors in supporting scale up financing and facilitate exit options. The facility shall target SMEs as a priority and also including small mid-cap companies and Mid-cap companies.**

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	PL (Comments): Specifies the full range of financial tools available to tackle gaps in financing and mobilize private investment along EU value chains. NL (Drafting Suggestions): The ECF InvestEU Instrument shall address market failures, **including transition failures,** or suboptimal investment situations. The ECF InvestEU Instrument may in particular provide loans, guarantees, counter-guarantees, capital market instruments, any other form of funding or credit enhancement, including subordinated debt, or equity or quasi-equity investments, provided directly or indirectly through financial intermediaries, funds, investment platforms or other vehicles to be channelled to final recipients.
	FR (Drafting Suggestions): The maximum amount of the budgetary guarantee under the EU Compartment of the ECF InvestEU Instrument shall be EUR 70 000 000 000 in current prices.[ ] It shall be provisioned at the rate of 50 %. **An additional amount of the EU guarantee may be provided for the purposes of the Member State compartment referred to in Article 24 of this Regulation, subject to the allocation by Member States and in accordance with the contribution agreement signed with the Commission detailling obligations and reporting.** FR (Comments): Can the Commission clarify the underlying factors behind the change in the provisioning rate, which previously was set at 40%?
3. [The maximum amount of the budgetary guarantee under the EU Compartment of the ECF InvestEU	CZ (Drafting Suggestions):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
Instrument shall be EUR 70 000 000 000 in current prices.**]** It shall be provisioned at the rate of 50 %.	The maximum amount of the budgetary guarantee under the EU Compartment of the ECF InvestEU Instrument shall be EUR 70 000 000 000 in current prices.**]** It shall be provisioned at the rate of ~~50~~**40** % CZ (Comments): CZ - The InvestEU programme in 2021-2027 has a 40 % provisioning rate. Higher provisioning rate means utilisation of more resources from the EU budget and it should be somehow substantiated. We would like to ask for reasoned written explanation of this change. RO (Comments): The Fund provides a budget guarantee to leverage private investments, but it does not specify if each sector (renewable energy, digital tech) has a separate maximum exposure or if a single overall ceiling applies. Could the Commission indicate any market assessments in respect of the financing/funding instruments to be used per each policy window, or some indicative volumes to be awarded as grants, guarantees or financial instruments ES (Drafting Suggestions): 3. The maximum amount of the budgetary guarantee under the EU Compartment of the ECF InvestEU Instrument shall be EUR 70 000 000 000 in current prices. It shall be provisioned at the rate of ~~50~~ **[40]** **%.** ES (Comments): We support the use of the guarantees for higher risk projects, but in the current programme, the provisioning rate is set so it covers the VaR with a 95% confidence interval, ad we believe this

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	confidence interval can be reduced (and thus the provisioning rate also be reduced), given the track record with previous programmes.
	ES (Drafting Suggestions): **3bis. [X] % of the EU guarantee under the EU compartment, amounting to EUR [X], shall be granted to the EIB Group. The EIB Group shall provide an aggregate financial contribution amounting to EUR [X]. That contribution shall be provided in a manner and form that facilitates the implementation of the InvestEU Fund.** ES (Comments): The EFC Regulation should establish the minimum participation of the EIB Group, as the current InvestEU Regulation does.
4. [The minimum amount of the Union support from ECF delivered through ECF InvestEU Instrument shall be EUR 17 000 000 000, to be used in support of the general and specific objectives set out in Article 3.] This minimum amount shall be increased by the contributions from the work programmes set out in Article 15. The contributions shall be a favoured means of implementation under the ECF and used for provisioning of the budgetary guarantee or financing of the financial instruments.	IT (Drafting Suggestions): 4. The minimum amount of the Union support from ECF delivered through ECF InvestEU Instrument shall be EUR 17 000 000 000 bn, to be used in support of the general and specific objectives set out in Article 3. This minimum amount shall be increased by the contributions from the work programmes, set out in Article 15. **The work programmes shall be multi-annual, and [t]**he contributions shall be a favoured means of implementation under the ECF and used for provisioning of the budgetary guarantee or financing of the financial instruments. IT (Comments): As also provided for in Recital 50 of the Proposal, work programmes in the multi-annual format would provide greater predictability for implementing partners in relation to budgetary guarantees and financial instruments. Accordingly we propose the following drafting:

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(50) The ECF should be implemented through work programmes as set out in this Regulation. Work programmes could be adopted under an annual or multi-annual format. The latter could in particular be considered for the purposes of Union support provided for budgetary guarantees and financial instruments, with a view to provide predictability to implementing partners**, as is the case of the ECF InvestEU Instrument**. The designated mode of implementation reflects the identified needs for directionality, flexibility, predictability and efficiency, required to meet the objectives of the Regulation. In accordance with Regulation (EU Euratom) 2024/2059, the work programmes and the call documents will set out more technical implementation details for the budget across the set of policies supported by the ECF, including specific eligibility and award criteria depending on the instrument of budget implementation, be it grant, or procurement, and the specific policy objectives pursued. Work programmes are also the appropriate place to allocate budget in accordance with evolving policy priorities, and they should set out contributions, specific conditions and expected results. DE (Comments): Taking into account first presentations by the COM, the proposal still seems unclear with regards to the minimum amount of EUR 17 billion. Is our understanding correct that: - Of the EUR 17 bn, EUR 14 bn are meant as a budgetary guarantee (with a provisioning rate of 50 %, EUR 7 bn will be provisioned). - Of the EUR 17 bn, EUR 3 bn are foreseen for financial instruments. Do we understand correctly that the provisioning rate of these financial instruments would amount to 100 %? Do we also understand correctly that for financial instruments, the limit of EUR 70 bn does not apply?
	FI (Drafting Suggestions): **4a. At the minimum 75 % of the EU guarantee under the EU Compartment of the ECF InvestEU Instrument shall be granted to the EIB Group.** FI

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Comments): Given the leading role of the EIB Group as an implementing partner of the InvestEU, it is appropriate to set a minimum level for its share of the EU guarantee. – Alternatively, this provision could be added in Article 25 Community of implementing partners. FR (Drafting Suggestions): The investment guidelines set out by the Commission shall define in more detail the scope of intervention in support of the general and specific objectives set out in Article 3. **The investment guidelines shall also set out the arrangements for the implementation and the monitoring of the ECF InvestEU, the reporting obligations of any entity granted by ECF InvestEU products (EIB group, Implementing partners, financial intermediaires, Member states) and any necessary requirements relating to the control and executive management of final recipients for other areas, and to the control of intermediaries such as guarantee agreements, in the light of any applicable public order or security considerations. Taking account of those requirements, the Steering Board shall set out any necessary additional requirements.** The investment guidelines shall be prepared in close dialogue with **the EIB Group** and the potential implementing partners.
5. The investment guidelines set out by the Commission shall define in more detail the scope of intervention in support of the general and specific objectives set out in Article 3. The investment guidelines shall be prepared in close dialogue with the potential implementing partners.	SE (Drafting Suggestions): The investment guidelines set out by the Commission **after consultation with the Member States** shall define in more detail the scope of intervention in support of the general and specific objectives set out in Article 3. The investment guidelines shall be prepared in close dialogue with the potential implementing partners.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
6. The following rules shall apply to the provisioning referred to in paragraph 3:	
	FR (Drafting Suggestions): the provisioning rate shall be assessed every year in accordance with the assessment referred to in Article 41(5) of Regulation (EU, Euratom) 2024/2509 **with a specific review of the adequacy of the provisioning rate laid down in Article 21(3) of this Regulation with respect to the actual risk profile of the financing and investment operations covered by the ECF InvestEU**
(a) the provisioning rate shall be assessed every year in accordance with the assessment referred to in Article 41(5) of Regulation (EU, Euratom) 2024/2509;	SE (Drafting Suggestions): the provisioning rate shall be assessed every year, **to reflect the portfolio risk, and** in accordance with the assessment referred to in Article 41(5) of Regulation (EU, Euratom) 2024/2509; SE (Comments): In order to maintain sound budgeting principles, the provisioning rate needs to reflect the portfolio risk.
(b) for the purpose of support under other Union programmes referred to in Article 23(2) the provisioning shall be made from that other Union programme;	
(c) the provisioning shall be committed until 31 December 2034 and shall take into account the progress in granting the budgetary guarantee under the ECF InvestEU Instrument.	

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	FR (Comments): Can the Commission justify the need to set this deadline and specify the criteria used to determine it?
(d) in accordance with Article 214(2) of Regulation (EU, Euratom) 2024/2509, the provisioning shall be constituted until 31 December 2037 and shall take into account the progress in the approval and signature of the financing and investment operations.	
	FR (Comments): Can the Commission explain the increase in the adjustment threshold from 15% to 20%?
7. The Commission is empowered to adopt delegated acts in accordance with Article 84 to amend paragraph 3 to adjust the provisioning rate and to adjust the maximum amount of the budgetary guarantee with up to 20% of that amount.	DE (Comments): Where will the funds for the provisioning rate for such a guarantee increase of 20 % come from? AT (Drafting Suggestions): 7. The Commission is empowered to adopt delegated acts in accordance with Article 84 to amend paragraph 3 to adjust the provisioning rate and to adjust the maximum amount of the budgetary guarantee with up to ~~20~~**15**% of that amount AT (Comments): Without further substantiation, we prefer to stick with the 15% flexibility for the adjustment of the the provisioning rate - as foreseen in the current InvestEU regulation. SE

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Drafting Suggestions): The Commission is empowered to adopt ~~delegated~~ **implementing** acts in accordance with Article 84 to amend paragraph 3 to adjust the provisioning rate and to adjust the maximum amount of the budgetary guarantee with up to 20% of that amount. SE (Comments): Important with appropriate influence for MS. ES (Comments): This provision is confusing. Does this mean that the Commission can only increase the maximum amount of the budgetary guarantee if it reduces the provisioning rate? If the decisions to adjust the provisioning rate anf the maximum amount of the budgetary guarantee are independent of each other, the wording should be more clear. FR (Drafting Suggestions): **Article 8: monitoring and reporting** 1. Indicators to report on the progress of the ECF InvestEU instruments and the ECF funds towards the achievement of the general and specific objectives laid down in Article 3 shall be set out in Annex XXX 2. The Commission shall provide anual financial and operational reporting of the ECF fund and reporting of the financing and investment operations under the ECF investment instrument to the Strategiic steering board including reporting on the relevant indicators related to the policy objectives covered. 3. Every six months, the Commission shall provide to the Startegic steering board a uptodate reporting on the management and proposed reallocation of all revenues,

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	repayments, released guarantees, recoveries or surplus provisions generated under this Regulation, its predecessors Regulations (EU) 2015/1017 and (EU) 2021/523, as well as those referred to in Annex IV of Regulation (EU) 2021/523. FR (Comments): Provisions relating to monitoring, reporting and evaluation are present in the Invest EU regulation but absent from the ECF.
	FR (Drafting Suggestions): **Article 9: Evaluation.** 1. Evaluations of the ECF program including specifically the ECF InvestEU instrument shall be carried out so that they feed into the decision-making process in a timely manner. 2. By 30 September 2031, the Commission shall submit to the European Parliament and to the Council an independent interim evaluation report on the ECF program assessing its effectiveness, efficiency, impact, relevance, and results in relation to the general and specific objectives of each policy window as well as its coordination with Horizon Europe. 3.By 30 September 2031, the Commission shall submit to the European Parliament and to the Council an independent interim evaluation report of the ECF InvestEU instrument, in particular on the use of the EU guarantee, on the fulfilment of the implementing partners' obligations, on the allocation of the EU guarantee, on the implementation MS compartiments as well as the Project advisory activities, and on the The evaluation shall in particular demonstrate how the ECF InvestEU instrument has contributed to the reaching of ECF Programme targets as well as EU policy goals, especially with regard to added value and the geographical and sectoral balance of the supported financing

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	and investment operations. The evaluation shall also assess the application of the focus on SMEs, as well as the developement of skills nd the support to scaleups and starups.
Article 22	

PUBLIC

Support to scaleups and startups	IT (Comments): More information would be useful to understand how it will be implemented in practice. The inclusion of scale-ups in the ECF is seen as a positive element. However, in this context, it is also important to ensure that the majority of funds are not absorbed by start-ups, scale-ups, and mid-cap companies to the detriment of SMEs. Moreover, the relationship between these provisions and support to scale up under Horizon Europe is unclear. FI (Comments): Scrutiny reservation, to be also looked together with HE EIC proposal and the upcoming Scaleup Europe fund. Will there be different approaches to deep tech vs. other scaleup companies? DE (Comments): In principle, we welcome measures to strengthen the financing of start-ups and scaleups in the EU. It is important that existing structures at MS level are not replaced by EU instruments and that there is no competition with private funding. The classification under state aid rules is also important in this regard. The Regulation should include a reference to the need for coherence with national instruments. Furthermore, many questions remain unanswered: How and where will the financing of scale-up be carried out and structured? (Background to the question: recital 52 of the ECF states that all scale-up funding from 2028 onward is to be provided by the ECF, but at the same time Horizon Europe stipulates in Article 16 that scale-up is one of the objectives of the European Innovation Council.) We should avoid duplications. We have questions on: Relationship to the Scaleup Europe Fund, planned new instruments, industry openness of the Scaleup Facility, level of involvement of private funds, etc.? How should the expertise and competence of the EIF be preserved in the context of growth financing? BG

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Drafting Suggestions): Support to start-ups and scale-ups
1. The ECF InvestEU Instrument shall serve as the Union's integrated platform for delivering targeted financial support to companies across all development phases start-ups, scale-ups, including those actively pursuing manufacturing, industrial and market deployment. It shall ensure that high-potential European companies developing or deploying innovative solutions can access the capital and resources to grow in the Union, thus strengthening the integration of the Single market and the Savings and Investment Union.	IT (Comments): Could the Commission clarify the process through which these instruments are proposed, evaluated and approved? In particular, the following should be better defined: the criteria by which the Commission approves new instruments proposed by the EIB, which has operational autonomy with regard to its own resources; the degree of autonomy of the EIB in the technical design of the instruments; the way in which other financial partners are involved; and the mechanisms for transparency and accountability in the selection and implementation. Furthermore, it is not specified whether there are quantitative or qualitative limits to the facility's intervention, nor whether evaluation tools are envisaged. IE (Comments): Need to see continued complementarity between InvestEU instrument and the European Innovation Council funding instruments. AT (Drafting Suggestions): The ECF InvestEU Instrument shall serve as the Union's integrated platform for delivering targeted financial support to companies across all development phases start-ups, scale-ups, including those actively pursuing manufacturing, industrial and market deployment. It shall ensure that high-potential European companies developing or deploying innovative solutions can access the capital and resources to grow in the Union, **bridging the gap between research and market deployment**, thus strengthening the integration of the Single market and the Savings and Investment Union

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	SE (Drafting Suggestions): The ECF InvestEU Instrument shall serve as the Union's integrated platform for delivering targeted financial support to companies across all development phases-start-ups, scale-ups~~,~~ ~~including those~~ actively pursuing **innovative** manufacturing, industrial and market deployment. It shall **promote** ~~ensure that~~, [high-potential] European companies **with potential to be productive,** developing or deploying innovative solutions can access the capital and resources to grow in the Union, thus strengthening the integration of the Single market and the Savings and Investment Union. SE (Comments): Financial support should not be given to established manufacturing processes, as it risks counteracting the necessary structural adjustment of the economy. Need further discussions on what "high potential" means. See brackets. NL (Comments): No concrete drafting suggestions as of yet, We welcome possibilities for scaling up, but do we have questions about how this relates to rest of ECF/INEU and existing initiatives like ETCI and Scaleup Europe Fund. Also the link to the EIC Accerator is not clear. How do we avoid duplication? FR (Comments): What is the difference with the EIC Fund?

PUBLIC

Commission proposal	Drafting Suggestions and Comments
2. The Commission shall in particular develop a Scale-up facility in cooperation with the EIB Group, other international financial institutions and National Promotional Banks. The facility shall provide in a coordinated and consistent manner, a comprehensive set of financing tools tailored to the unique needs of scale-ups, including indirect and direct equity and quasi-equity, venture debt, loans, guarantees and blended finance, with a view to attract private investors in supporting scale up financing and facilitate exit options. The facility shall target SMEs and small mid-cap companies and Mid-cap companies.	FI (Comments): The variety of financial instruments is large. How would for example blended finance work in this facility? Would the current definition used in EIC Accelerator on non-bankability be in use? DE (Comments): With regard to direct equity, we see a need for discussion. BG (Drafting Suggestions): The facility shall target SMEs and small mid-cap companies. ~~and Mid-cap companies~~ BG (Comments): Mid-cap companies are large enterprises by definition and do not need financial support or state aid for their growth. BE (Drafting Suggestions): 2. The Commission shall in particular develop a Scale-up facility in cooperation with the EIB Group, other international financial institutions and National Promotional Banks. The facility shall provide in a coordinated and consistent manner, a comprehensive set of financing tools tailored to the unique needs of scale-ups, including indirect and direct equity and quasi-equity, venture debt, loans, guarantees and blended finance, with a view to attract private investors in supporting scale up financing and facilitate exit options. The facility shall target SMEs and small mid-cap companies. ~~and Mid-cap companies~~. BE

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Comments): Efforts and funding must not be scattered. They should be focus on SMEs and SMCs. MID caps have easier access to the financial instruments. AT (Drafting Suggestions): 2. The Commission shall in particular develop a Scale-up facility in cooperation with the EIB Group, other international financial institutions and National Promotional Banks. The facility shall provide in a coordinated and consistent manner, a comprehensive set of financing tools tailored to the unique needs of scale-ups, including **indirect** ~~and direct~~ **equity** and quasi-equity, venture debt, loans, guarantees and blended finance, with a view to attract private investors in supporting scale up financing and facilitate exit options. The facility shall target SMEs and small mid-cap companies and Mid-cap companies. AT (Comments): We do not see neither the COM nor the EIB exercising ownership rights and hence welcome the COM's statement in the AHWP sub group on 11 September that the ECF InvestEU is referring to indirect equity. RO (Comments): Consideration should be given to be more specific and to indicate to what extent will the facility be implemented in cooperation with National Promotional Banks, and what specific criteria will these banks need to meet for certain types of products or their involvement in the facility. ES (Drafting Suggestions): 2. The Commission shall in particular develop a Scale-up facility in cooperation with the EIB Group, other international financial institutions and National Promotional Banks. The facility shall provide in a coordinated and consistent manner, a comprehensive set of financing tools

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	tailored to the unique needs of scale-ups, including indirect and direct equity and quasi-equity, venture debt, loans, guarantees and blended finance, with a view to attract private investors in supporting scale up financing and facilitate exit options. The facility shall target SMEs and small mid-cap companies and Mid-cap companies**, and shall ensure specific support for widening regions**. **Deep tech and disruptive innovation from research to scale-up will be funded the European Innovation Council (EIC) under Regulation (EU) [XXX] [Horizon Europe.** ES (Comments): There should be reference to the EIC and HE to ensure the coverage of all types of start ups, as well as specific guaranteed support for widening regions (i.e. regions associated to lower R&I performance). SI (Drafting Suggestions): 2. The Commission shall in particular develop a Scale-up facility in cooperation with the EIB Group, other international financial institutions and National Promotional Banks. The facility shall provide in a coordinated and consistent manner, a comprehensive set of financing tools tailored to the unique needs of scale-ups, including indirect and direct equity and quasi-equity, venture debt, loans, guarantees and blended finance, with a view to attract private investors in supporting scale up financing and facilitate exit options. The facility shall target SMEs and small mid-cap companies ~~and Mid-cap companies~~. SI (Comments): In our view Mid-cap companies should be able to mobilize the necessaray funding and capital for growth. FR (Drafting Suggestions):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	The Commission shall in particular develop a Scale-up facility in cooperation with the EIB Group, other international financial institutions and National Promotional Banks **and EIC Board.** The facility shall provide in a coordinated and consistent manner, a comprehensive set of financing tools tailored to the unique needs of scale-ups **detailled in the investment guidelines**, including indirect and direct equity and quasi-equity, venture debt, loans, guarantees and blended finance, with a view to attract private investors in supporting scale up financing and facilitate exit options. The facility shall target SMEs and small mid-cap companies and Mid-cap companies.
3. The facility shall intervene where market investors cannot provide sufficient financing for European high-growth, innovative and strategic companies, including if needed to protect the Union's strategic assets, interests, autonomy or economic security.	IE (Drafting Suggestions): 3. The facility shall intervene where market investors cannot provide sufficient financing for European high-growth, **high-risk, high impact** innovative and strategic companies, **that have the potential to create new markets or disrupt existing ones,** including if needed to protect the Union's strategic assets, interests, autonomy or economic security. IE (Comments): Need to see continued complementarity between InvestEU instrument and the European Innovation Council funding instruments Scope here for a reference to high-risk, high-impact innovations that have the potential to create new markets or disrupt existing ones – similar to the EIC. DE (Comments): It is also clear that funds under Art. 22 shall benefit only start-ups and scale-ups; paragraph 3 must be specified accordingly.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	AT (Comments): What are the criteria for deciding on a "financing gap"? Who is deciding on the existance of such a gap? Again, the definition of additionality is key. SE (Drafting Suggestions): The facility shall intervene where market investors cannot provide ~~sufficient~~ financing for European high-growth, innovative ~~and strategic~~ companies, ~~including if needed to protect the Union's strategic assets, interests, autonomy or economic security~~ **due to a clear market failure that cannot be addressed in a more efficient manner and intervening not risk crowding out private investments.** SE (Comments): Well-functioning markets with effective competition are what make companies competitive; it is important that support does not distort the market and competition between sectors or companies. Support can be justified if it deals with a clear market failure that cannot be adressed in a more efficient manner. It is important that the ECF safeguards openness towards the rest of the world and does not foster inhouse production where open, rules-based trade is more efficient. RO (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	Consideration should be given so that to be more specific and to clarify the criteria that will be used to define European high-growth, innovative, and strategic companies, and how these criteria will ensure fair access for companies from all Member States. ES (Drafting Suggestions): 3. The facility shall intervene where market investors cannot provide sufficient financing for European high-growth, innovative and strategic companies, ~~including if needed~~ **and** to protect the Union's strategic assets, interests, autonomy or economic security. SI (Drafting Suggestions): 3. The facility shall intervene where market investors cannot provide sufficient financing for European high-growth, innovative ~~and strategic~~ companies, including if needed to protect the Union's strategic assets, interests, autonomy or economic security. SI (Comments): It is not clear where strategic companies are defined and who defines them. FR (Drafting Suggestions): The facility shall intervene where market investors cannot provide sufficient financing for European high-growth, innovative, strategic companies, including if needed to protect the Union's strategic assets, interests, autonomy or economic security.
4. It will leverage public investment to catalyse substantial private and institutional capital flows, such as from private equity funds, corporates, pension funds, insurance companies, and other long-term investors, thus	

PUBLIC

Commission proposal	Drafting Suggestions and Comments
deepening Europe's capital markets and fostering sustainable growth of scale-up companies.	
Article 23	
Exclusivity clause	
1. During the period of the MFF 2028-2034, budgetary guarantees, financial instruments, or financial instruments directly implemented by the Commission in accordance with Article 219 of Regulation (EU, Euratom) 2024/2509 to support policy objectives on the territory of the Union shall solely be established under this Section.	IT (Comments): Will it be possible for the Member State to implement financial instruments under the NRPP? NL (Comments): We have doubts about these blending posibilities, could the Commission provide more clarification?
Article 24	

PUBLIC

Commission proposal	Drafting Suggestions and Comments
EU Compartment and Member States Compartment	DE (Comments): Where will the governance of the compartments be regulated? Should the provisions of the previous InvestEU Regulation continue to apply for this purpose? It is key for us that the ECF InvestEU instrument will continue to pursue European objectives which are defined at European level. ES (Comments): The Regulation should include an article on the MS compartment. The provisions in art. 10 of the current InvestEU Regulation should be discussed.
	NL (Comments): Legal elements from the current INEU legislation should be added, like the new financial instrument and details of contribution agreements
1. The ECF InvestEU Instrument shall consist of an EU Compartment and a Member State Compartment.	EE (Comments): A Member State must have a clear right to design solutions to address market failures specific to its national context. We also consider it essential that Member States are able to contribute to product development, in order to ensure their alignment with local needs. The procedure and the mandate fitness check should be reviewed, as the existing access to the EU Compartment has not proven to be a workable solution. It is overly complex and has generated limited interest, although it could become an effective instrument if the rules on direct mandate accessibility were reconsidered. The volume of required documentation and the reporting burden must be reasonable, and the procedure accelerated, as the current system is overly complicated for both Member States and applicants.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	RO (Drafting Suggestions): The ECF InvestEU Instrument shall consist of an EU Compartment and a Member States **Compartment through which it will deliver Union support** RO (Comments): It would be clearer and avoiding confusions in stating that both EU and MS compartments deploy Union support SI (Comments): Can the Commission clafiry the procedure in relation to this paragraph.
	FR (Drafting Suggestions): **The Member State compartment shall address specific market failures or suboptimal investment situations in one or several regions or Member States to deliver the policy objectives of the contributing funds**
2. Specific contributions to the ECF InvestEU Instrument under Article 5(1) may be made in accordance with Articles 211(2) and 221(2) of Regulation (EU, Euratom) 2024/2509. Specific contributions to the budgetary guarantee under the ECF InvestEU Instrument shall result in an additional amount of the budgetary guarantee referred to in Article 21(3).	RO (Comments): Art 221(2) of Regulation (EU, Euratom) 2024/2509 foresees an agreement between the Commission and contributors that shall contain, in particular, provisions concerning the payment conditions. Could the Commission kindly provide details on the scope of specific contributions? Will they be also subject to the work programmes and constitute top-ups to off-the-shelf instruments or are there also possible contributions to tailored instruments? In case of the former, could the Commission confirm that state-aid compliance is ensured irrespective of the implementing partner, EIB, other IFI or a national promotional institution?

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	ES (Drafting Suggestions): **Article 24.2 ter. Member State Compartments** **1. The establishment of the part of the EU guarantee under the Member State compartment according to Article 5 shall be subject to the conclusion of a contribution agreement between a Member State and the Commission.** **Two or more Member States may conclude a joint contribution agreement with the Commission.** **By way of derogation from Article 211(1) of the Financial Regulation, the provisioning rate of the EU guarantee under the Member State compartment shall be set in each contribution agreement to take account of the risks attached to the financial products intended to be used.** **2.The contribution agreement shall at least contain the following elements:** **(a) the overall amount of the part of the EU guarantee under the Member State compartment pertaining to the Member State concerned, its provisioning rate, the amount of the contribution from funds under shared management;** **(b) the Member State strategy, consisting of the financial products and their minimum leverage, the geographical coverage, including regional coverage if necessary, types of projects, the investment period and, where applicable, the categories of final recipients and of eligible intermediaries;** **(c) the selected implementing partner or partners; (d) any contribution from funds under shared management;** **(e) the obligations to provide annual reports to the Member State, including reporting on the relevant indicators;** **(f) provisions on the remuneration for the part of the EU guarantee under the Member State compartment;**

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(g) any combination with resources under the EU compartment, including in a layered structure to achieve better risk coverage. **The contribution agreements shall be implemented by the Commission through guarantee agreements concluded with the implementing partners selected by the Member State. Where no guarantee agreement has been concluded within nine months from the conclusion of the contribution agreement, the contribution agreement shall be terminated or prolonged by mutual agreement. Where the amount of a contribution agreement has not been fully committed under one or more guarantee agreements within nine months from the conclusion of the contribution agreement, that amount shall be amended accordingly. The unused amount of provisioning attributable to amounts allocated by a Member State shall be paid back to the Member State.** ES (Comments): We suggest to take the main elements of art. 10 of Regulation (EU) 2021/523, with the following adjustments: • The provisioning rate should be agreed between the Commission and the Member State • The guarantee agreement should be signed by the Commission and the Implementing Partner/Implementing Partners selected by the contributing MS. The Commission shall not be allowed to implement the MS Compartment through an IP different from the one/the ones selected by the contributing Member States. FR (Drafting Suggestions): **The establishment of the part of the EU guarantee under the Member State compartment shall be subject to the conclusion of a contribution agreement between a Member State and the Commission.**

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	By way of derogation from Article 211(1) of the Financial Regulation, the provisioning rate of the EU guarantee under the Member State compartment shall be set at 40 % and may be adjusted downwards or upwards in each contribution agreement to take account of the risks attached to the financial products intended to be used. **The contribution agreement shall at least contain the following elements: (a) the overall amount of the part of the EU guarantee under the Member State compartment pertaining to the Member State concerned, its provisioning rate, the amount of the contribution from other funds, the constitution phase of the provisioning and the amount of the resulting contingent liability to be covered by a back-to-back guarantee provided by the Member State concerned;** **(b) the Member State strategy, consisting of the financial products and their minimum leverage, the geographical coverage, including regional coverage if necessary, types of projects, the investment period and, where applicable, the categories of final recipients and of eligible intermediaries;** **(c) the potential implementing partner or partners proposed and the obligation of the Commission to inform the Member State concerned of the implementing partner or partners selected;** **(d) any contribution from funds to the ECF InvestEU Advisory activities; (e) the obligations to provide annual reports to the Commission, including reporting on the relevant indicators related to the policy objectives covered in the funds programmes (f) provisions on the remuneration for the part of the EU guarantee under the Member State compartment;**
Article 25	

PUBLIC

Commission proposal	Drafting Suggestions and Comments
Community of implementing partners	DE (Comments): Under the current InvestEU Regulation, the European Investment Bank is the central implementation partner of the EU guarantee. In our view, this is understandable given that the EIB it the bank of the EU and its Member States. We also see the EIB's need for planning security. RO (Comments): Is the selection process to be foreseen in the work programmes? Is there any minimum financial contribution that these implementing partners should expect to provide? EL (Comments): Taking into account recitals 69 and 70, we consider that the community of implementing partners should remain open to new partners, and not relying only to existing implementing partners. FR (Comments): This article should mention the challenges of consolidating the reporting of the various partners to ensure efficient management of this instrument.
1. The ECF InvestEU Instrument will be implemented by partners in an open architecture model, including the European Investment Bank (EIB) Group, international financial institutions, the national promotional banks and institutions.	IT (Drafting Suggestions): The ECF InvestEU Instrument will be implemented by partners in an open architecture model, ~~including~~ **with 75% of the EU guarantee granted to** the European Investment Bank (EIB) Group, **while the remaining 25% is granted to other implementing partners** ~~international financial institutions, the national promotional banks and institutions~~**.**

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	IT (Comments): A direct allocation of a share of InvestEU to EIB Group, as in the past (currently at least 75%) will pursue EU objectives, as the EIB Group applies and delivers EU policies. In addition, a stable and predictable allocation, ensures efficient programming foresight. In the past 10 years, including with EFSI, it boosted investment not otherwise financed in the market. The EIB Group finances large and transnational infrastructures, multicountry projects, not otherwise financed. Keeping the current access ensures operational continuity, efficiency in implementation and a stable institutional oversight for the achievement of the Union's objectives of competitiveness and strategic autonomy. Ex-ante known allocation allows the EU Bank to finance riskier operations, addressing market failure and suboptimal investment, in the whole EU membership. HR (Drafting Suggestions): 1. The ECF InvestEU Instrument will be implemented by partners in an open architecture model, including the European Investment Bank (EIB) Group, international financial institutions, the national promotional banks and institutions **where XX% of funds will be earmarked for the European Investment Bank (EIB) Group.** HR (Comments): We propose to include earmarking of funds for the EIB group to avoid the risk of overdominance and the potential marginalisation of other implementing partners, in particular smaller institutions. FI (Comments): It appears that a pillar-assessed private bank could also act as a direct implementing partner. If large European banks act as implementing partners, they may end up managing significant

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	portfolios. Has the Commission considered any measures to mitigate such risks? How could it ensure that the investment themes are so clearly defined for commercial actors that there is no risk of guaranteeing banks' regular loan portfolios with taxpayers' money? AT (Comments): AT is supportive of an open architecture for ECF InvestEU. RO (Comments): It could be clarified how much of the share for other implementing partners it is estimated that would go to national promotional banks. It could be noted as an intention for future negotiations, ideally with an indicative maximum share in the regulation. HU (Drafting Suggestions): 1. The ECF InvestEU Instrument will be implemented by partners in an open architecture model, including the European Investment Bank (EIB) Group, international financial institutions, the national promotional banks and institutions **with accepting the validity of the pillar assessments carried out under REGULATION (EU) 2021/523 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 March 2021 establishing the InvestEU Programme and amending Regulation (EU) 2015/1017.** HU (Comments): Point 69 of the preamble to the draft regulation refers to the fact that guarantee agreements and pillar-based assessments concluded under the current InvestEU Regulation will also apply to the implementation of the ECF InvestEU. For the sake of clarity, it is proposed that this - in particular the continuation of the pillar-based evaluation - should also be reflected here, in the text of the regulation. SI

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Drafting Suggestions): The ECF InvestEU Instrument will be implemented by partners in an open architecture model, including the European Investment Bank (EIB) Group, international financial institutions, the national promotional banks and **other national financial** institutions SI (Comments): We suggtest to add reference to other nacional financial institution since the financial instruments are implemented also through other financial institutions such as public funds.
	FR (Drafting Suggestions): **National promotional banks and institutions that have successfully undergone a pillar assessment under the predecessor Regulations (EU) 2015/1017 and (EU) 2021/523, and that comply with all requirements and obligations stemming from previous agreements, shall be considered eligible for the ECF investment instrument** FR (Comments): Provisions that InvestEU implementing partners can submit new guarantee agreements without having to undergo a new pillar assessment.
2. By way of derogation from Article 211(5) of Regulation (EU, Euratom) 2024/2509, and subject to Article 12 of this Regulation, the implementation of a budgetary guarantee or financial instrument, including when combined with non-repayable support in a blending operation, may be entrusted to any entity referred to in Article 62(1), first subparagraph, point (c), of Regulation (EU, Euratom) 2024/2509.	AT (Comments): Could the COM provide more information on the planned expansion of eligible entities? Would it be possible to provide examples for each of the types of entity to be added compared to the current InvestEU regulation? Does this cover ECAs? If yes, why are they not mentioned explicitly?

PUBLIC

Commission proposal	Drafting Suggestions and Comments
3. In addition to entities referred to in Article 62(1), first subparagraph, point (c), and Article 211(5) of Regulation (EU Euratom) 2024/2029, bodies established in a Member State, governed by the private law of a Member State or Union law may also be exceptionally entrusted, following a positive pillar assessment, with the implementation of a budgetary guarantee or financial instrument, including when combined with non-repayable support in a blending operation, to the extent that such bodies are provided with adequate financial guarantees which may be, for each action, limited to the maximum amount of the Union support. Those bodies governed by private law shall be selected with due account to the nature of the financial instrument or budgetary guarantee to be implemented, the experience and the financial and operational capacity, and their rules and procedures for verifying the economic viability of projects of final recipients. The selection shall be transparent, justified on objective grounds and shall not give rise to a conflict of interests.	DE (Comments): With regards to bodies governed by private law as implementing partners: What is the reason for the addition, and does the Commission already have specific companies in mind? Please provide a concrete example. Could SEAPs qualify as possible implementing partners under Article 25(3)? AT (Comments): The question on Art. 25) 2 also applies here NL (Drafting Suggestions): In addition to entities referred to in Article 62(1), first subparagraph, point (c), and Article 211(5) of Regulation (EU Euratom) 2024/2029, bodies established in a Member State, **[governed by the *private law* of a Member State or Union law may also be exceptionally entrusted, following a positive pillar assessment],** with the implementation of a budgetary guarantee or financial instrument, including when combined with non-repayable support in a blending operation, to the extent that such bodies are provided with adequate financial guarantees which may be, for each action, limited to the maximum amount of the Union support. **[Those bodies governed by private law shall be selected with due account to the nature of the financial instrument or budgetary guarantee to be implemented, the experience and the financial and operational capacity, and their rules and procedures for verifying the economic viability of projects of final recipients. The selection shall be transparent, justified on objective grounds and..]** NL (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	Serious doubt to make it possible for bodies under private law to become IP, need more justification RO (Drafting Suggestions): In addition to entities referred to in Article 62(1), first subparagraph, point (c), and Article 211(5) of Regulation (EU Euratom) 2024/2029, bodies established in a Member State, governed by the private law of a Member State or Union law may also be exceptionally entrusted, following a positive pillar assessment, with the implementation of a budgetary guarantee or financial instrument, including when combined with non-repayable support in a blending operation, to the extent that such bodies are provided with adequate financial guarantees which may be, for each action, limited to the maximum amount of the Union **support to be entrusted with.** RO (Comments): It should contain at least some key objective criteria for the selection of the entities so that to guarantee an equitable geographical distribution across Member States, especially if we are talking about entities mentioned in article 62(1), first subparagraph, point. (c), elements (v)-(ix)?
	ES (Drafting Suggestions): **4. Implementing partners under EU Regulation2021/423 shall not be subject to a new process of pillar assessment.Guarantee agreements under regulation 2021/523 could serve as a basis for new guarantee agreements under EFC InvestEU.** ES (Comments): The idea of Recital 68 should be made more explicit in this article. FR

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Drafting Suggestions): **4. 75% of the EU guarantee under the EU compartment), amounting to EUR XXX, shall be granted to the EIB Group. The EIB Group shall provide an aggregate financial contribution amounting to EUR XXX. That contribution shall be provided in a manner and form that facilitates the implementation of the European Competitivess Fund and the achievement of the objectives set out in Article 3.** **5. The remaining 25% of the EU guarantee under the EU compartment shall be granted to other implementing partners, which shall also provide a financial contribution to be determined in the guarantee agreements.**
Chapter III	
Project Advisory, SME Collaboration, skills development and Access to Funding	
SECTION 1	FI (Comments): Scrutiny reservation to this section.
PROJECT ADVISORY	
Article 26	

PUBLIC

Commission proposal	Drafting Suggestions and Comments
Project Advisory	DE (Comments): In principle, we welcome the fact that companies and institutions have a central point of contact where they receive advice. Important for simplifying funding. The rationale and criteria for making public funds available to private applicants for business or investment advice (paragraphs 2a and 2b) must be significantly tightened, otherwise significant windfall effects could be expected. Shall the advice servives also be valid for FP10 including the research part of the policy windows? FR (Comments): Can the Commission specify the budget nomenclature associated with the Competitiveness Fund and the financial programming envisaged?
1. The Project Advisory shall be made available for repayable and non-repayable instruments. Actions and activities supported under this chapter shall contribute to the general objectives set out in Article 3(1) and shall support and complement, where relevant, activities under the other chapters.	IT (Drafting Suggestions): The Project Advisory shall be made available for repayable and non-repayable instruments. Actions and activities supported under this chapter shall contribute to the general objectives set out in Article 3(1) and shall ~~support and~~ **strategically** complement **and leverage**, where relevant, activities under the other chapters. IT (Comments): Emphasises added value and alignment with other chapters. NL (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	Could the Commission clarify the relationship between this advisory body and the advisory bodies established under Article 14? RO (Comments): The advisory services and the use of a "Competitiveness Seal" should be developped in a mandatory collaborative system involving partners from less competitive countries in certain areas, in order to develop capacity along the value chain in those countries as well. EL (Drafting Suggestions): The Project Advisory shall be made available for repayable and non-repayable instruments. Actions and activities supported under this chapter shall contribute to the general objectives set out in Article 3(1) and shall support and complement, where relevant, activities under the other chapters. **Every Member State should have at least a national contact point for advisory services to businesses.** EL (Comments): **It is important to secure a direct link for every member state in order to facilitate the interested actors overcoming potetntial challenges that they may face as well as keep them updated with current legal framework**.
2. A centralised access to advisory and business acceleration services shall be provided, which may include:	SE (Drafting Suggestions): A centralised access to advisory and business acceleration services shall be provided **and shall be part financed by the recipients,** which may include: PL (Drafting Suggestions):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	2. *A centralised access to advisory and business acceleration services shall be provided,* ***ensuring accessibility and fair opportunities for companies and project promoters across all Member States, including those with less developed innovation ecosystems or limited advisory capacity****, which may include:* 2. A centralised access to advisory and business acceleration services shall be provided, ensuring accessibility and fair opportunities for companies and project promoters across all Member States, including those with less developed innovation ecosystems or limited advisory capacity, which may include: PL (Comments): Ensuring accessibility and fairness across all Member States in the provision of Project Advisory services is essential to prevent geographic imbalances and to guarantee that companies in less developed innovation ecosystems are not disadvantaged. While efficiency and synergies are crucial, without explicit safeguards there is a risk that advisory support and business acceleration services concentrate in Member States and regions with already mature innovation and financing environments. By explicitly embedding accessibility and fairness in the Project Advisory provisions, the Fund strengthens inclusiveness, supports the integrity of the Single Market, and maximises its impact by unlocking untapped potential across all Member States, especially in regions at risk of brain drain or structural disadvantage. ES (Drafting Suggestions): 2. A centralised access to advisory and business acceleration services**, with a particular emphasis on SMEs and widening regions,** shall be provided, which may include: EL (Drafting Suggestions):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	A centralised access to advisory and business acceleration services shall be provided**, securing that proposals that receive advisory support will not be favored (in terms of scoring). Proposals should be approved through evaluation procedures. This cetralised access may include:** EL (Comments): **It is essential to secure equal treatment among inteersted actors. Therefore, it needs to be clear that no advisory will affect the evaluation process**. FR (Comments): Articulation and synergies should be planned with the actions of the EIC.
(a) investment advisory services, including market development activities and advisory support for the identification, preparation, development, structuring, procuring and implementation of investment projects, and for enhancing the capacity of project promoters and financial intermediaries to implement financing and investment operations and improve the understanding and use of financial instruments to exploit their full potential. Such support may cover any stage of the life cycle of a project or financing of a supported entity;	IT (Drafting Suggestions): investment advisory services, including market development activities and advisory support for the **full life-cycle of investment projects, from** identification, preparation, development, structuring, procuring and implementation ~~of investment projects~~, and for enhancing the capacity of project promoters and financial intermediaries to implement financing and investment operations and improve the understanding and use of financial instruments to exploit their full potential. Such support may cover any stage of the life cycle of a project or financing of a supported entity; IT (Comments): The addition clarifies that advisory support covers the entire project life-cycle and strengthens the capacity of promoters and intermediaries to fully utilise financial instruments. Maintains consistency with previous proposals emphasizing clarity and alignment with EU terminology.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
(b) business coaching and acceleration services targeting potential ECF beneficiaries and other project promoters, including SMEs and mid-cap companies, start-ups and scale-ups, supporting and facilitating their access to ECF funding and financing, and facilitating matchmaking with private investors and promoting financial literacy of entrepreneurs, including understanding of the opportunities offered by capital market based financing;	IT (Drafting Suggestions): business coaching and acceleration services targeting potential ECF beneficiaries and other project promoters, including SMEs and mid-cap companies, start-ups and scale-ups, **aimed at supporting** ~~and facilitating their~~ access to ECF funding and financing, ~~and~~ facilitating matchmaking with private investors, and promoting financial literacy of entrepreneurs, including understanding of the opportunities offered by capital market based financing; IT (Comments): Condenses repetitive phrasing HR (Drafting Suggestions): business coaching and acceleration services targeting potential ECF beneficiaries and other project promoters, including SMEs and mid-cap companies, start-ups and scale-ups, supporting and facilitating their access to ECF funding and financing, and facilitating matchmaking with private investors and promoting financial literacy of entrepreneurs, including understanding of the opportunities offered by capital market based financing; **as well as support for improving managerial and governance capacities of SMEs**. HR (Comments): HR suggests including a reference to strengthening managerial and governance capacities to reflect the needs of smaller companies BE (Drafting Suggestions):

Commission proposal	Drafting Suggestions and Comments
	(b) business coaching and acceleration services targeting potential ECF beneficiaries and other project promoters, including SMEs, ~~and~~ mid-cap companies, start-ups and scale-ups, supporting and facilitating their access to ECF funding and financing, and facilitating matchmaking with private investors and promoting financial literacy of entrepreneurs, including understanding of the opportunities offered by capital market based financing; BE (Comments): SMEs must be differentiated from mid caps. PL (Drafting Suggestions): (b) *business coaching and acceleration services targeting potential ECF beneficiaries and other project promoters, ~~including~~* ***especially*** *SMEs and mid-cap companies, start-ups and scale-ups, supporting and facilitating their access to ECF funding and financing, and facilitating matchmaking with private investors and promoting financial literacy of entrepreneurs, ~~including~~* ***especially*** *understanding of the opportunities offered by capital market based financing;* PL (Comments): The strengthening of SMEs, mid-caps, start-ups and scale-ups is of particular significane to the EU's strategic objectives, as well as those of the ECF, therefore more emphasis of the project advisory towards these entites will help achieve these goals in a more efficient way.
	CZ (Drafting Suggestions): **<u>(d) specific advisory services for first-time applicants and Member States referred to in paragraph 3 of Article 12;</u>** CZ (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	CZ - Although CZ recognize the importance of supporting excellence within the ECF, we believe that no Member State can be left behind. Moreover, further widening of disparities between Member States must be avoided. Ensuring geographically balanced participation and fostering integration of stakeholders from all Member States into wider European industrial and innovation value chains, whilst ensuring fair and effective access to support mechanisms within the ECF is therefore a fundamental prerequisite for strengthening the overall competitiveness and resilience of the EU. Thus, we propose to add new par. (d). PL (Drafting Suggestions): (d) specific advisory services for first-time applicants and Member States referred to in paragraph 3 of Article 12; PL (Comments): As above SI (Drafting Suggestions): **(c) specific advisory services for first-time applicants and Member States referred to in paragraph 3 of Article 12;** SI (Comments): To make European projects truly European there is a need for more balanced distribution of funding across the Member States. Otherwise, we risk that many entities from certain Member States – especially those with relatively limited experience with Union-level instruments - will

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	not be able to participate in collaborative efforts. We therefore advocate for the introduction of measures that would better safeguard such balance within ECF. LV (Drafting Suggestions): c) *specific advisory services for first-time applicants and Member States referred to in paragraph 3 of Article 12;* LV (Comments): Although we recognize the importance of supporting excellence within the European Competitiveness Fund (ECF), we believe that no Member State can be left behind. Moreover, further widening of disparities between Member States must be avoided. Ensuring geographically balanced participation and fostering integration of stakeholders from all Member States into wider European industrial and innovation value chains, whilst ensuring fair and effective access to support mechanisms within the ECF is therefore a fundamental prerequisite for strengthening the overall competitiveness and resilience of the EU. To make European projects truly European there is a need for more balanced distribution of funding across the Member States. Otherwise, we risk that many entities from certain Member States – especially those with relatively limited experience with Union-level instruments - will not be able to participate in collaborative efforts. **Therefore advocate for the introduction of measures that would better safeguard such balance within ECF, in particular through adding the new provisions underneath we offer to add a new letter c) to Art. 26 paragraph 2.**
3. Project advisory shall, among others, support the generation of project pipelines and the development of potential investment projects under the ECF InvestEU Instrument and contribute to their further development.	IT (Drafting Suggestions):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
Project advisory shall also cooperate with industrial alliances and European clusters. Project advisory shall be available under each policy window referred, covering sectors under that window. In addition, advisory support may cover general objectives and cross-cutting actions.	Project advisory shall, among others, support the generation of project pipelines and the development of potential investment projects under the ECF InvestEU Instrument and contribute to their further development. Project advisory shall also cooperate with industrial alliances and European clusters. ~~Project advisory~~ **It** shall be available under each policy window ~~referred~~, covering **all relevant** sectors ~~under that window.~~ , **and may also** ~~In addition, advisory~~ **provide** support ~~may cover general objectives and~~ **for** cross-cutting actions **and general objectives**. IT (Comments): This revision consolidates and streamlines the text for better readability, removes redundancy, and clarifies that project advisory covers all sectors and cross-cutting actions under each policy window. CZ (Drafting Suggestions): Project advisory shall, among others, support the generation of project pipelines and the development of potential investment projects under the ECF InvestEU Instrument and contribute to their further development. Project advisory shall also cooperate with industrial alliances and European clusters. Project advisory shall be available **in each Member State** under each policy window referred, covering sectors under that window. In addition, advisory support may cover general objectives and cross-cutting actions. SE (Drafting Suggestions): Project advisory shall, among others, support the generation of project pipelines and the development of potential investment projects under the ECF InvestEU Instrument and contribute to their further development. Project advisory shall also cooperate with industrial

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	alliances and European clusters **or other relevant European ecosystems or partnerships of relevance**. Project advisory shall be available under each policy window referred, covering sectors under that window. In addition, advisory support may cover general objectives and cross-cutting actions. SE (Comments): Only listing the clusters and the alliances could be too narrow.
4. The Commission may conclude advisory agreements with advisory partners and service providers in line with the needs of each policy windows. The Commission and the advisory partners, including the EIB Group, shall cooperate closely with a view to ensuring efficiency, synergies and effective geographic coverage across the Union, while taking account of existing structures and work.	IT (Drafting Suggestions): The Commission may conclude advisory agreements with advisory partners and service providers in line with the needs of each policy windows. The Commission and the advisory partners, including the EIB Group, shall cooperate closely with a view to ensuring efficiency, synergies and effective geographic coverage across the Union, while taking **into** account of existing structures and work. IT (Comments): This revision corrects minor wording issues EE (Drafting Suggestions): The Commission **shall** conclude advisory agreements with advisory partners and service providers in line with the needs of each policy windows. EE (Comments): It needs to be clear that policy advisory will be available for all policy windows.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	Also it should be clear if project advisory will be available in every MS and will be offered also in a local language. This would ensure fair access to the instruments and facilitate project preparation. CZ (Drafting Suggestions): 4. The Commission may conclude advisory agreements with advisory partners and service providers in line with the needs of each policy windows. The Commission and the advisory partners, including the EIB Group, shall cooperate closely with a view to ensuring efficiency, synergies and effective geographic coverage across the Union, while taking account of existing structures and work. CZ (Comments): CZ - We consider it necessary to include National Contact Points of previous programmes as Member States can built on their knowledge and linkages as well as advisory services. PL (Drafting Suggestions): *The Commission may conclude advisory agreements with advisory partners and service providers in line with the needs of each policy windows. The Commission and the advisory partners, including the EIB Group, shall cooperate closely with a view to ensuring efficiency, synergies and effective geographic coverage across the Union,* ***as well as the cohesion of the Single Market****, while taking account of existing structures and work* ***and guaranteeing fair and non-discriminatory access for companies and project promoters in all Member States, with particular attention to regions with lower innovation and advisory capacity.*** PL (Comments): The explicit reference to “the cohesion of the Single Market” ensures that advisory activities under the Fund do not only pursue efficiency and synergies but also actively contribute to

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	balanced development across the Union. The Single Market is the EU's cornerstone, but disparities between Member States and regions in their ability to access advisory services, financial instruments, and innovation ecosystems risk creating fragmentation. This addition ensures that the advisory dimension of the Fund supports inclusiveness and accessibility across all Member States, including those with less developed advisory ecosystems. It also guarantees that the Fund's support contributes to strengthening the integrity and unity of the Single Market, avoiding the risk of uneven take-up or reinforcing existing imbalances. In this way, the reference to cohesion secures both fairness and effectiveness in the delivery of advisory support. Enables tailored partnerships that maximise reach, avoid duplication and harness the expertise of established advisory networks, delivering cost-effective and well-coordinated services. RO (Comments): Please provide a definition (in Art 2) of 'service provider' SI (Comments): We understand from recital (77) that the EFC may rely on the existing community of the InvestEU Programme pillar assessed advisory partners. However, what are the criteria for the selection of additional advisory partners? FR (Drafting Suggestions): The Commission may conclude advisory agreements with advisory partners and service providers in line with the needs of each policy windows. The Commission and the advisory partners, including the EIB Group, shall cooperate closely with a view to ensuring efficiency, synergies ~~and effective geographic coverage across the Union,~~ while taking account of existing structures and work.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	The Commission may conclude advisory agreements with advisory partners and service providers in line with the needs of each policy windows. **Advisory partners that have successfully undergone a pillar assessment under the predecessor Regulations (EU) 2015/1017 and (EU) 2021/523, and that comply with all requirements and obligations stemming from previous agreements shall be considered eligible to conclude advisory agreements under this regulation.** The Commission and the advisory partners, including the EIB Group, shall cooperate closely with a view to ensuring efficiency, synergies and effective geographic coverage across the Union, while taking account of existing structures and work. FR (Comments): Can the Commission guarantee that the principles of excellence, European preference and the strengthening of our strategic autonomy will remain the only guiding principles for the actions of this fund? Provisions that InvestEU implementing partners can submit new guarantee agreements without having to undergo a new pillar assessment
	CZ (Drafting Suggestions): **4a The Commission shall support the establishment of an advisory structure at national level, to be managed by the Member States, which may, at their discretion, further extend such advisory services to the regional level.** CZ (Comments): CZ - We consider it necessary to ensure the provision of advisory services at the level of the Member State. In order to incentivise applicants to submit projects, they need a reliable point of support. Member States already have established structures which may serve as a basis for this purpose. Moreover, these actors are familiar with the environment in which the project will be

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	implemented. For these reasons, it is essential to involve the Member States directly in the advisory process.
5. Irrespective of the instrument of budget implementation for the acquisition or provision of advisory services, providers and recipients of the services shall be selected in accordance with the principles of transparency and equal treatment, avoidance of conflict of interest, including conflicting professional interests.	RO (Comments): It would be recommended either to define the term 'conflicting professional interests' be formally defined, or reference should be made to its meaning in another existing legal or regulatory act
6. When implementing the Project Advisory, the Commission, its advisory partners and other service providers shall, when appropriate, collaborate with other Union or national public or private advisory and support service providers, including the EU for Business Network.	SE (Drafting Suggestions): When implementing the Project Advisory, the Commission, its advisory partners and other service providers shall, when appropriate, collaborate with other Union or national public or private advisory and support service providers, including the EU for Business Network. **National advisory and support service providers can be sub-contracted as advisory partners for the ECF, in order not to duplicate national structures on EU level.**
SECTION 2	RO (Drafting Suggestions): SECTION 2 RO (Comments): SECTION 2

PUBLIC

Commission proposal	Drafting Suggestions and Comments
SME COLLABORATION	DE (Comments): We renew our call for visible EU SME funding and strong supporting system for SMEs in the ECF as this will replace the SME pillar of the existing Single Market Programme beyond 2027. We recall the consistent application of the COM's "SME first" principle. Which parts of the SME pillar of the Single Market Programme will be included in the ECF? Which will go beyond that?
Article 27	
EU for Business Network	DE (Comments): We highly welcome the fact that the demonstrably successful Enterprise Europe Network (EEN) is to be continued with an extended mandate within the framework of the EU for Business Network. However, this mandate can only be successful if the network is relieved of internal network bureaucracy. EL (Comments): We need more clarification regarding the added value of the new EU for Business Network envisaged by the Commission, in relation to the existing Enterprise Europe Network.
	SI (Comments): What will be the difference between this tool and the project advisory activities?
1. "EU for Business" Network shall be established to help Union businesses become more competitive and	IE

PUBLIC

Commission proposal	Drafting Suggestions and Comments
innovate, grow and scale in the Single Market and beyond, with a particular emphasis on SMEs, startups, scaleups and small mid-cap companies. The network shall have a Union-wide and geographically balanced coverage, taking into account the specificities of all types of regions in the Union, including the less developed regions and the Union outermost regions.	(Drafting Suggestions): "…taking into account the specificities of all types of regions in the Union, including the less developed regions, **transition regions,** and the Union outermost regions. IE (Comments): IE note that this is potentially complementary to the Regional Innovation Valleys initiative. HR (Comments): It is necessary to further clarify whether the new network will fully replace the existing initiatives in the long term (for example, the Enterprise Europe Network (EEN)) or whether it will act as an overarching framework that brings them together and coordinates them AT (Comments): As already stated in writing, could you please provide more details on the specific role of the "EU Business Network" within the project's advisory architecture? SE (Comments): Which actors (intermediaries etc.) are intented to conduct the measures of business support listed (a-h)? How does the EU for Business Network relate to the current SME Envoy Network and the European Enterprise Network? NL (Comments): Could the Commission clarify the specific objectives of the 'EU for Business' Network, and how it intends to achieve them with this network? And how it will ensure alignment with

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	existing national or EU initiatives while avoiding duplication? NL also appreciates further clarification whether this network wil leverage best practices by existing national contact points that are in place for existing funds such as Digital Europe. NL underlines the importance of publicly available project support in the member states. ES (Drafting Suggestions): 1. **An** "EU for Business" Network shall be established to help Union businesses become more competitive and innovate, grow and scale in the Single Market and beyond, with a particular emphasis on SMEs, startups, scaleups and small mid-cap companies. The network shall have a Union-wide and geographically balanced coverage, taking into account the specificities of all types of regions in the Union, including the less developed regions and the Union outermost regions. **The network shall also facilitate referrals to ECF instruments.** EL (Drafting Suggestions): 1. "EU for Business" Network shall be established to help Union businesses become more competitive and innovate, grow and scale in the Single Market and beyond, with a particular emphasis on SMEs, startups, scaleups and small mid-cap companies. The network shall have a Union-wide and geographically balanced coverage, taking into account the specificities of all types of regions in the Union, including the less developed regions**, insular areas, regions in transition,** and the Union outermost regions. EL (Comments): Businesses in insular areas and regions in transition face greater challenges and deserve specific attention. FR (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	What does "balanced coverage" mean in practice? Will it imply a preferential approach favoring less represented countries, or one aligned with the level of financial contributions from each country?
Article 28	
Business support	FI (Comments): Scrutiny reservation. How the support described here would be implemented through and with help of the ECF toolbox described earlier?
1. The ECF shall conduct cross-cutting activities focused on strengthening the competitiveness of the SMEs and achieve additionality at Union level, including through the following measures:	IE (Comments): IE would like to see clarity in the text on the use of all public monies, to include safegaurds to avoid deadweight. BG (Comments): It is important to ensure that the ECF complements the Horizon Europe programme without unnecessary overlaps, while providing equal access and broad availability for small and medium-sized enterprises (SMEs) and supporting economic convergence between Member States. Advisory support should be directed towards business associations, specialised associations and organisations, as well as the authorities of the Member States. SE (Drafting Suggestions):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	The ECF shall, **<u>including by using national advisory and support service providers</u>**, conduct cross-cutting activities focused on strengthening the competitiveness of the SMEs and achieve additionality at Union level, including through the following measures: SE (Comments): There should be opportunity for sub-contracting national business advice services, to avoid market distortion and overlapping structures. PL (Drafting Suggestions): The ECF shall conduct *cross-cutting activities focused on strengthening the competitiveness of the SMEs,* ***while ensuring accessibility and fair opportunities for these entities across all Member States,*** *including through the following measures:* PL (Comments): Ensuring accessibility and fairness in ECF cross-cutting SME activities is essential to prevent concentration of support in regions with already strong innovation ecosystems. Without explicit attention to inclusion, SMEs and small mid-cap companies in less developed Member States or peripheral regions may lack the resources, networks, or knowledge to benefit fully from EU-level support. NL (Comments): Could the Commission clarify who will conduct these activities and how this is related to the EU for Business Network and current National Contact Points for existing funds? RO (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	"In the context of the regulation, reference to official acts should be made for definitions of start-ups, SMEs, and small mid-cap companies, scale-ups (references to the legal acts where they are defined) or specific definitios could be includded, so that to avoid different interepretations
(a) provision of integrated business advice and support to companies, including through financial support to third parties;	PL (Drafting Suggestions): a) *provision of integrated business advice and support to companies,* ***with particular attention to companies in regions with lower innovation and advisory capacity****, including through financial support to third parties*
(b) provision of partnering opportunities and capacity building;	
(c) support and assistance for access to technologies, technology infrastructure and facilities, support market uptake of innovation and support business organisations, SMEs and small mid-cap companies, including startups and scaleups, to participate in collaborative platforms and sectors;	IE (Comments): IE welcome this provision. FI (Comments): This seems very wide. More details needed. EL (Drafting Suggestions): (c) support and assistance for **ensuring equal** access to technologies, technology infrastructure and facilities, support market uptake of innovation and support business

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	organisations, SMEs and small mid-cap companies, including startups and scaleups, to participate in collaborative platforms and sectors; EL (Comments): We should ensure equal access to technologies, infrastructures, digital services for all businesses, especially SMEs, across all regions of EU. FR (Drafting Suggestions): support and assistance for access to **research and innovation activities, as well as** to technologies, technology infrastructure and facilities, support market uptake of innovation and support business organisations, SMEs and small mid-cap companies, including startups and scaleups, to participate in collaborative platforms and sectors; FR (Comments): It is important to flag here the role of SMEs in some economic sectors (such as the agri-food sector) to generate knowledge and innovations, that are not only of a technological nature (food products and processes for example)and that can gain important market shares in Europe and abroad.
(d) promoting business understanding of Union policies, obtaining feedback on their effectiveness;	PL (Drafting Suggestions): DIP II The ECF shall engage businesses to enhance understanding of Union policies, collect feedback on their effectiveness, and inform policy refinement. PL

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Comments): Creates a continuous feedback loop between SMEs and policymakers, improving policy relevance and increasing business buy-in. ES (Drafting Suggestions): (d) promoting business understanding of Union policies, obtaining feedback on their effectiveness**, including on the need for further simplifying procedures and reducing reporting burdens**;
(e) increasing the access and the availability of finance for SMEs including micro-finance and support to social enterprises, and for small mid-cap companies;	PL (Drafting Suggestions): increasing the access and the availability of finance for SMEs **as a priority,** including micro-finance and support to social enterprises, and for small mid-cap companies; PL (Comments): It is worth highlighting that, in accordance with the "Think Small First" principle set out in the SBA, the specific needs of SMEs should be duly taken into account. Given the specific characteristics of SMEs, in particular the structural limitations in terms of human and financial resources, which may impede their access to funds from the ECF, it is proposed that the relevant provisions be amended so as to expressly reflect the necessity of granting SMEs preferential treatment in comparison to other categories of enterprises, such as SMCs.
(f) facilitation access to markets including through support to the internationalisation of SMEs and provision of market intelligence, including in less developed regions and outermost regions;	RO (Comments):

Commission proposal	Drafting Suggestions and Comments
	In the context of the regulation, reference to official acts should be made for definitions of "internationalisation of SMEs" or specific definition including the scope ot the concept (e.g. activities covered for the purpose of Regulation, such as exporting goods or services abroad, establishing subsidiaries or partnerships in other countries, participating in international research or innovation networks, or accessing foreign investment and global value chains). EL (Drafting Suggestions): (f) facilitation access to markets including through support to the internationalisation of SMEs and provision of market intelligence, including in less developed regions**, insular areas, regions in transition,** and outermost regions; EL (Comments): SMEs in insular areas and regions in transition face even greater challenges and deserve specific attention.
(g) improving the business environment for SMEs and promote new business opportunities for SMEs by supporting among others intellectual property valorisation, standard setting and public procurement;	IE (Drafting Suggestions): (g) improving the business environment for SMEs and promote new business opportunities for SMEs by supporting among others intellectual property valorisation, standard setting and public procurement **of innovation.**" BE (Drafting Suggestions): (g) improving the business environment for SMEs and promote new business opportunities for SMEs by supporting among others **their transition to more sustainable business models,** intellectual property valorisation, standard setting and public procurement; BE

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	(Comments): The Sustainability advisory services already developed by the Enterprise Europe Network since 2021 should be anchored in this regulation to ensure their perenity as the green transition of SMEs will be crucial for the green transition of our economy.
(h) promoting entrepreneurship, including women and youth entrepreneurship and the acquisition of entrepreneurial and business skills.	HR (Drafting Suggestions): promoting entrepreneurship, including women and youth entrepreneurship and the acquisition of entrepreneurial and business skills**, particularly towards fostering entrepreneurship in less developed regions.** HR (Comments): HR proposes reinforcing the reference to regional balance by highlighting the importance of entrepreneurship support in less developed areas. BG (Comments): Support for women and youth entrepreneurship should include support for small family businesses, creative industries and crafts, which should be considered as a key factor for sustainable growth. PL (Drafting Suggestions): The ECF shall promote entrepreneurship—with particular emphasis on women and youth—**through dedicated training, mentoring and skills-development programmes.** PL (Comments):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	Boosts diversity and regeneration in the entrepreneurial ecosystem by targeting under-represented groups and equipping them with critical business and innovation skills. SI (Drafting Suggestions): (h) promoting entrepreneurship, including women and youth entrepreneurship and the acquisition of **design thinking, design management,** entrepreneurial and business skills. SI (Comments): Promoting design thinking and design management skills in SMEs is of utmost importance, since these skills and knowledge strongly contribute to innovation performance of SMEs.
	CZ (Drafting Suggestions): **2. The Actions within the ECF should allow SMEs participation and be designed accordingly.** CZ (Comments): CZ welcomes dedicated SME actions. However, this should not limit the participation of SMEs in non-dedicated actions. It is imperative that all actions allow SMEs to participate.
Article 29	

PUBLIC

Commission proposal	Drafting Suggestions and Comments
Dedicated SME Actions to increase SME participation	FI (Comments): Scrutiny reservation. BG (Comments): It is necessary to provide a more detailed specification of the resources allocated for SMEs ES (Comments): The Regulation should be more clear and specific on the support granted to SMEs, including by ringfencing a specific amount for this purpose, in each window. FR (Comments): Can the Commission specify the planned budget for this article? Can it specify the budget nomenclature associated with the Competitiveness Fund and the financial programming envisaged?
1. Each window shall support dedicated, sector-specific actions targeting start-ups, SMEs and small mid-cap companies or calls for SMEs in strategic sectors with a view to fostering innovation, business acceleration, commercialisation and scaling-up.	FI (Comments): We think start-ups, SMEs and small mid-caps should be in special focus horizontally in the ECF regulation. Having this article should not in any manner dilute their role in other parts. BG (Comments): The draft regulation must include a separate programme with a separate budget to promote the development of European small and medium-sized enterprises. The lack of such Programme puts at risk the main objective of the European Competitiveness Fund. The inclusion of large

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	enterprises under the cover of mid-cap enterprises means less funding, opportunities, participation in value chains and innovations for SMEs. BE (Drafting Suggestions): 1. Each window shall support dedicated, sector-specific actions targeting start-ups, SMEs ~~and small mid-cap companies~~ or calls for SMEs in strategic sectors with a view to fostering innovation, business acceleration, commercialisation and scaling-up. BE (Comments): This article is specifically dedicated to SMEs. It is important not to confuse SMEs and Small Mid Caps. SE (Drafting Suggestions): Each window shall support dedicated, sector-specific actions targeting **innovative** start-ups, SMEs and small mid-cap companies or calls for SMEs ~~in strategic sectors~~ with a view to fostering innovation, business acceleration, commercialisation and scaling-up **and without crowding out private investments.** RO (Comments): It should be clear which is the exact share within each window dedicated to SMEs. ES (Drafting Suggestions): 1. Each window shall support dedicated, sector-specific actions targeting start-ups, SMEs and small mid-cap companies ~~or calls for SMEs in strategic sectors with a view to fostering innovation, business acceleration, commercialisation and scaling-up~~**, including with simplified calls and fast-track evaluation for SMEs in strategic sectors**.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	FR (Drafting Suggestions): Each window shall support dedicated, sector specific actions targeting start-ups, SMEs and small mid-cap companies, **groupings of such actors**, or calls for SMEs in strategic sectors with a view to fostering innovation, **participation in research and knowledge generation activities**, business acceleration, commercialisation and scaling-up. **Notably, dedicate specific actions to accelerate use of digital and AI by SMEs, so as to foster their growth and competitiveness, shall be supported**.
	CZ (Drafting Suggestions): **2. At least 30 % of the financial envelope for each window shall be allocated to sector-specific actions or calls for start-ups, SMEs, and small mid-caps companies.** CZ (Comments): CZ - EU documents have stated that SMEs play an ever more improtant role as agile providers of disruptive technologies and innovation. However, access to finance remains a major concern for more than 40 % of SMEs. They also have fewer opportunitities than in the US or in the UK. It is, for example, estimated that the SMEs received only approx. 16 % allocated budget of the EDF. There also remain a significant grant request oversubscription for various SMEs calls, which prevents us from financing high-quality projects. The EU should provide SMEs with futher opportunities to contribute to various ECF targets / objectives. Unlike European “primes” that can raise fiancnes from other sources, the SMEs need out dedicated support, which will not only lead to new innovative products, but also to a more competitive EDTIB. ES (Drafting Suggestions):

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	1bis. A specific work progamme dedicated to SMEs should be adopted for each window. An amount of EUR [X] shall be allocated for SMEs.
Article 30	
Support for skills development	DE (Comments): It is important that national competences on education laid down in Article 165 and 166 TFEU are not touched upon by the activities forseen in this article. In principle, supporting skills development strengthens competitiveness and competences and supports the creation of high-quality jobs. In this context, it is unclear why Art. 30 and the accompanying recital 21 does not touch upon complementarity and synergies with the Union of Skills as well as the ESF and its existing structures (especially with regard to life-long learning as well as up- and reskilling of employees). FR (Comments): Can the Commission specify the planned budget for this article? Can it specify the budget nomenclature associated with the Competitiveness Fund and the financial programming envisaged?
1. The ECF shall finance activities in support of skills development, in particular in the strategic sectors, building strong links between higher education, vocational education and training providers, applied research and businesses for an agile, innovative and competitive economy. This shall include support for a European Skills Guarantee to support value chain transitions in favour of	IT (Comments): Define more clearly the complementarity between ECF financial support for skills in strategic sectors (*clean transition and industrial decarbonisation; digital leadership; health, biotechnology and bioeconomy; resilience, defence and space*) and the Erasmus+ programme in the field of lifelong learning, skills and talent development, and attracting human capital in

PUBLIC

Commission proposal	Drafting Suggestions and Comments
strategic growth sectors or occupations across the labour market through upskilling and reskilling of the workforce and Vocational Education and Training (VET) partnerships to strengthen cooperation between VET providers and businesses, especially SMEs and connecting them with regional industrial ecosystems.	terms of mobility (consider, for example, the opportunity for scholarships in strategic sectors such as green tech, AI, cyber, etc. under the *first strategic axis "learning opportunities for all"*). Further elements of synergy/complementarity can be seen between the Erasmus+ *strategic axis 2 "capacity building"* and Articles 27-30 of the proposed ECF Regulation with regard to "*support for skills development*" and the establishment of "*strong links between higher education, VET providers and businesses*". IE (Drafting Suggestions): The ECF shall finance activities in support of skills development, in particular in the strategic sectors **including tourism**….. and connecting them with regional **tourism** and industrial ecosystems **across the Member States**. IE (Comments): IE would like to include tourism here as it is a very significant economic sector, with common upskilling and education requirements across the different MS. SE (Comments): Need clarification on the cooperation between education institutions. The cooperation needs to be volontary as higher education institutions are autonomous. It needs to be clarified which organisation or institution that is responsible for providing this guarantee. PL (Drafting Suggestions): *The ECF shall finance activities in support of skills development, ~~in particular~~ in the strategic sectors, building strong links* between *higher education, vocational education and training*

Commission proposal	Drafting Suggestions and Comments
	providers, applied research and businesses for an agile, innovative and competitive economy. This shall only include support for a European Skills Guarantee to support value chain transitions in favour of strategic growth sectors or occupations across the labour market through upskilling and reskilling of the workforce and Vocational Education and Training (VET) partnerships to strengthen cooperation between VET providers and businesses, especially SMEs and connecting them with regional industrial ecosystems. PL (Comments): It is essential to establish a clear demarcation line between the ECF and actions supported by Erasmus+, the ESF, and other EU programmes/funds. The ECF, particularly in the area of skills development, should concentrate on strategic sectors through the implementation of targeted initiatives i.e. the European Skills Guarantee and Vocational Education and Training partnerships. Without a clearly defined scope at the level of overarching regulations, there is a significant risk of duplication—where similar activities are funded by multiple instruments—leading to inefficiencies and fragmented efforts. A well-articulated division of responsibilities ensures rational allocation of resources, avoids overlaps, and enhances the transparency of planning and implementation processes. Moreover, such clarity supports coherent policy-making and facilitates monitoring and evaluation, allowing stakeholders to better assess the impact of each programme. It also strengthens strategic coordination across EU funding instruments, ensuring that each contributes effectively to the Union's broader skills agenda. LT (Drafting Suggestions): The ECF shall finance activities in support of skills development, in particular in the strategic sectors, building strong links between higher education, vocational education and training

Commission proposal	Drafting Suggestions and Comments
	providers, applied research and businesses for an agile, innovative and competitive economy. This shall include support for a European Skills Guarantee to support value chain transitions in favour of strategic growth sectors or occupations across the labour market through skills intelligence, upskilling and reskilling of the workforce and Vocational Education and Training (VET) partnerships to strengthen cooperation between VET providers and businesses, especially SMEs and connecting them with regional industrial ecosystems~~.~~; furthermore, this should include the support of innovative mechanisms and pilot measures designed to foster upskilling and reskilling, facilitation of talent attraction to alleviate skills shortages, the development of curricula as well as the adjustment of skills to the evolving requirements of the labour market. LT (Comments): Taking into account Article 21 of the Preamble, we propose to add that the ECF should also include support for innovative mechanisms and pilot measures for upskilling and reskilling, development of curricula, attraction of foreign talent and matching of skills with the labour market. To add, this recital foresees that, in complementing the actions of the Union of Skills, the proposed measures could include not only reskilling and upskilling, but also skills intelligence, mobility and exchanges, as well as technical assistance to Member States. RO (Drafting Suggestions): The ECF shall finance activities in support of skills development, in particular in the strategic sectors, building strong links between higher education, vocational education and training providers, applied research and businesses **including through dual education programmes** for an agile, innovative and competitive economy. This shall include support for a European Skills Guarantee to support value chain transitions in favour of strategic growth sectors or occupations across the labour market through upskilling and reskilling of the workforce and Vocational Education and Training (VET) partnerships to strengthen cooperation between VET providers and businesses, especially SMEs and connecting them with regional industrial ecosystems. **The**

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	potential of higher education to contribute to regional industrial ecosystems is also an important aspect RO (Comments): Please clarify which instrument will finance a European Skills Guarantee, also addressed by the ESF. Dual education programmes both at level 3-4 EQF and advance dual education programmes – level 5, 6 and 7 have a big potential to address skill shortages while having a partnership approach. Therefore, we suggest including a reference in the text of art. 30 to dual education programmes and the potential of higher education to contribute to regional industrial ecosystems is also an important aspect SI (Drafting Suggestions): 1. The ECF shall finance activities in support of skills development, in particular in the strategic sectors **as well as in areas of future technologies**, building strong links between higher education, vocational education and training providers, applied research and businesses for an agile, innovative and competitive economy. This shall include support for a ~~European Skills Guarantee to support~~ value chain transitions in favour of strategic growth sectors or occupations across the labour market through upskilling and reskilling of the workforce and Vocational Education and Training (VET) partnerships to strengthen cooperation between VET providers and businesses, especially SMEs and connecting them with regional industrial ecosystems. SI (Comments): EU needs to be future-oriented also when supporting skills development. We suggest deleting the reference of the European Skills Guarantee since it does not yet exist, or rather, it is only being prepared by the European Commission. Until it is not properly established, we cannot give it a legal force within another legal act.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	Furthermore, given that the proposed EU programmes increasingly address and mention skills, it would be appropriate to include a definition of "skills". Please find our proposal based on Council Recommendation on key competences for lifelong learning: "**skills are defined as the ability and capacity to carry out processes and use the existing knowledge to achieve results" and, therefore, form one of the integral parts of key competences alongside knowledge and attitudes, based on the Council Recommendation on key competences for lifelong learning,''** FR (Drafting Suggestions): The ECF shall finance activities in support of skills development, in particular in the strategic sectors **for EU competitiveness and sovereignty**, building strong links between higher education, vocational education and training providers, applied research and businesses for an agile, innovative, **sustainable, resilient** and competitive economy. This shall include support for a European Skills Guarantee to support value chain transitions in favour of strategic growth sectors or occupations across the labour market through upskilling and reskilling of the workforce and Vocational Education and Training (VET) partnerships to strengthen cooperation between VET providers and businesses, especially SMEs and connecting them with regional industrial and **agricultural** ecosystems. **Where relevant and appropriate, the ECF should also finance activities of the European Universities Alliances, as they constitute a lever for intergated European ecosystems across Europe.** FR (Comments): Skills development should also involve promoting closer ties between academia and business. European Universities alliances – funded by Erasmus+ - are key actors for global competitiveness and active contributors to their innovation ecosystems. The ECF shall also

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	contribute to their financing, as they are a lever for integrated European innovation ecosystems across Europe**.**
SECTION 3	
BENEFICIARY SERVICE DESK	
Article 31	
	PL (Drafting Suggestions): In accordance with Article 150 of Regulation (EU, Euratom) 2024/2509, the ECF shall finance and support the maintenance, extension and user-centric designed enhancement of the single electronic data interchange area and related digital grant management infrastructure. This shall apply irrespective of the mode or instrument of budget implementation and shall integrate advisory and business-acceleration services as well as the single gateway for access to Union support under the Performance Regulation PL (Comments): Ensures a streamlined, consistent digital entry point for all ECF participants, reduces administrative burden across funding instruments, and embeds advisory and acceleration support directly into the online access platform.

PUBLIC

Commission proposal	Drafting Suggestions and Comments
Access to Union funding	DE (Comments): What is the difference to the Project Advisory in Article 26? EL (Comments): Need to specify the provisions. FR (Comments): Can the Commission specify the planned budget for this article? Can it specify the budget nomenclature associated with the Competitiveness Fund and the financial programming envisaged? *
	SI (Comments): Point 1. of this article is missing.
2. The ECF may support any additional activities to facilitate and accelerate access to Union funding, and other funding, financing and investments, as well as to ensure valorisation and uptake of results through tools and instruments such as proof of concept, deployment grants, advisory and business support services, and any dedicated platform.	IE (Drafting Suggestions): Add "**public procurement of innovation**" IE (Comments): IE welcomes this objective but would like more detailed information on the proposals. IE would like to stress that the activities supported by European Competitiveness Fund (Article 33) should be aligned with the aims of proposed Industrial Decarbonisation Act and that all proposed measures are included in ECF. We are also supportive of Article 35.1 regarding Competitive bidding mechanisms

PUBLIC

Commission proposal	Drafting Suggestions and Comments
	CZ (Comments): It should be clarified how this portal will be linked to the *Single Gateway* referred to in Art. 12 of the draft ‚Regulation establishing the framework for monitoring budgetary expenditure, performance and other horizontal rules for Union programmes and activities' (COM(2025) 545 final), as well as to other Commission web portals for applicants and the public. Could it be confirmed/explained whether an online tool enabling the identification of consortia seeking new partners will continue to be available (may facilitate access to funding for entities of different sizes and levels of experience in ECF-like programmes). We kindly request the issue being clarified in written response. PL (Comments): The regulation does not mention the existing structures of National Contact Points networks that have invested in the previous years in increasing competence, professional advisory services and network building. We consider that the experience and the value of these structures need to be acknowledged and biult in the regulation. Broadens the ECF's remit to address remaining access barriers, promotes rapid proof-of-concept and deployment, and leverages both digital and in-person tools to maximise the uptake and impact of funded results.