



Council of the European Union  
General Secretariat

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**Interinstitutional files:**  
**2025/0543 (COD)**  
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WK 13407/2025 INIT

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## CONTRIBUTION

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From: General Secretariat of the Council  
To: Working Party on Research

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N° prev. doc.: 12007/25; 12005/25  
N° Cion doc.: ST 11765 2025 REV 1; ST 11749 2025 INIT

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Subject: Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing Horizon Europe, the Framework Programme for Research and Innovation, for the period 2028-2034 laying down its rules for participation and dissemination, and repealing Regulation (EU) 2021/695

Proposal for a COUNCIL DECISION on establishing the Specific Programme implementing Horizon Europe - the Framework Programme for Research and Innovation for the period 2028-2034, laying down the rules for participation and dissemination under that Programme, and repealing Decision (EU) 2021/764

- Member States comments on the Competitiveness and Society Pillar including European Partnerships (block 3)

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

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WK 13407/2025 INIT

**LIMITE**

**EN**

**Horizon Europe Framework Programme and Specific Programme bracketed proposals Block III Pilar II + Partnerships**

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

**Updated: 09/10/2025 11:28**

**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
<b>General Comments</b>	EE <b>(Comments):</b> Disclaimer: Estonian national position is still on the process. This means that the comments and drafting suggestions are preliminary and may be refined or changed after the formal positions is adopted. IE <b>(Comments):</b> Given the tight timelines and the fact that many of the substantive questions raised by MS on the Commission proposals to date remain unanswered, we will not be suggesting specific text amendments at this point. More detailed information is required from the Commission on a wide range of issues across the framework programme proposals in order to have informed and efficient negotiations in the RWP over the coming weeks and months.

**Horizon Europe Framework Programme and Specific Programme bracketed proposals Block III Pilar II + Partnerships**

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

**Updated: 09/10/2025 11:28**

Commission proposal	Drafting Suggestions and Comments
	<p>Ireland recognises the need to simplify and streamline the next programme and provide the flexibility to respond to any significant developments over a seven-year period. However, flexibility and simplification cannot mean diluting the Member States’ influence on the substance of the framework programme.</p> <p>It is essential that Member States have a central role in the design and implementation of the next programme. Ensuring the priorities of both the Member States and the Commission are reflected in the work programmes is key to enhancing greater alignment at EU and national levels – one of our core objectives.</p> <p>We need to ensure that we do not undermine the factors that have made the framework programmes a success – particularly excellence and transnational collaboration.</p> <p>We need greater clarity on how the interplay between the ECF and the framework programme will be managed in practice – at both the design and implementation stages. Excellence must be prioritised and protected in collaborative calls to maximise the impact of R&amp;I investment.</p> <p>NL <b>(Comments):</b></p> <p>This is a first effort to streamline and adjust the text. NL keeps a scrutiny reservation to further shape these texts in the right direction to ensure a well functioning Framework Programme and thus properly develop R&amp;I as a base to find solutions and knowledge to tackle societal and technological challenges and strengthen European Competitiveness.</p> <p>PT <b>(Comments):</b></p>

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**Updated: 09/10/2025 11:28**

Commission proposal	Drafting Suggestions and Comments
	<p>The comments provided aim at contributing to the initial discussion process of the regulation proposal of Horizon Europe, without pre-empting or compromising Portugal's position during upcoming negotiations.</p> <p>SK  <b>(Comments):</b></p> <p>Are all the European Partnerships going to be thematically tied to the four European Competitiveness Fund policy windows? How will it be decided which of the current Partnerships are going to continue their operations beyond 2028?</p>
<p>Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing Horizon Europe, the Framework Programme for Research and Innovation, for the period 2028-2034 laying down its rules for participation and dissemination, and repealing Regulation (EU) 2021/695</p>	<p>NL  <b>(Comments):</b></p> <p>NL is confused about the Commission’s confirmation in the RWP that co-funded partnerships will remain possible. Co-funded partnerships are essential for R&amp;I alignment between national and EU level and achieving the ERA, an important goal of Horizon Europe. However, the legal text does not seem to accommodate this.</p>

Commission proposal	Drafting Suggestions and Comments
<p style="text-align: center;"><i>Article 11</i> <i>European Partnerships</i></p>	<p>SK <b>(Comments):</b></p> <p>It is important to strengthen synergies, linkages and teaming up of European partnerships with other MFF programmes, national, and regional programmes to deliver on the ambitious twin transitions and contribute to the EU priorities while avoiding any duplication. EU partnerships must bring together a broad range of interested actors to work towards a common goal, and turn research results into tangible socio-economic impact. Therefore, we call for more openness and transparency in terms of new participants, activities and results. It is crucial to avoid any so-called “Closed Club” within any type of partnership. To improve performance, simplifying implementation and minimizing the administrative burden of the European partnerships is necessary.</p> <p>MT <b>(Comments):</b></p> <p>Malta would like to reiterate its stance that well-functioning European Partnerships under HE 2021-2027 like PRIMA, not directly tied to the ECF policy windows, should receive support to continue operating beyond 2027. In this regard, we are seeking the answer to the question on what mechanism to decide which of the current Partnerships are going to continue their operations under the next Framework Programme will be used and who is going to take these decisions.</p>
<p>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.</p>	<p>BE <b>(Comments):</b></p> <p>What is the main focus or vision of COM regarding the future of partnerships? - Regarding the current three types of partnerships, the only type of partnership mentioned is the Joint Undertaking (JU) while COM clarified</p>

Commission proposal	Drafting Suggestions and Comments
	<p>work programme based partnerships would replace the other two types. How will the transition of e.g. co-funded partnerships to work programme based partnerships happen, as they should then be based on MoUs?</p> <p>- Can the cap of 49.9% of funding of Pillar II (both ‘society’ as well as ‘competitiveness’) that can go to partnerships be reintroduced? This would leave sufficient room for the regular collaborative work regarding the global challenges. (e.g. FP9 art 10.2a: ‘the majority of the budget in Pillar II shall be allocated to actions outside European Partnerships’. Half of the total budget should leave enough flexibility.</p> <p>The relation with the ECF still needs to be further clarified. If partnerships are set up in the ‘competitiveness’ part of Pillar II, how will the governance be done, priorities set, work programmes written, ... Art 12.11 of the ECF states that to attain objectives of the ECF it may implement activities in public-public or public private partnerships established in the FP. Does this mean that also partnerships could fall under the total remit of the ECF (see also art 12.3)?</p> <p>ES  <b>(Drafting Suggestions):</b></p> <p>Where necessary to achieve the objectives set out in Article 3, activities under this Regulation may be implemented through European Partnerships, by default through <b>the work programmes of Pilar Competitiveness and Society</b></p> <p>ES  <b>(Comments):</b></p> <p>Several important points are not in the text and should be clarified and added where appropriate.</p>

Commission proposal	Drafting Suggestions and Comments
	<p>Considering that the objectives set up in Article 3 are generic, in which areas are the partnerships going to be implemented? Who is going to make the decision of the partnership to be established and how (selection criteria)? How will Member States participate in the decisions? Will a specific governance body be established for partnerships in general or it will be for each partnership? Is it possible to have partnerships in any part of the Programme? In which part?</p> <p>If partnerships will be implemented through work programmes (WPs) by default, will partnerships similar to the current co-programmed ones be prioritised? Will partnerships be part of the WPs for their creation (as is currently the case with co-financed ones) or will there be specific calls for proposals associated with the partnerships (similar to the current co-programmed ones)? It is not clear from which part of HE, or within Pilar II the partnerships will come. Will they be implemented through the wp under the policy windows?</p> <p>FR  <b>(Drafting Suggestions):</b></p> <ol style="list-style-type: none"> <li>Where necessary to achieve the objectives set out in Article 3, activities under this Regulation may be implemented through European Partnerships, <del>by default</del> <u>in particular</u> through the work programmes. <u>To foster synergies and overall coherence of the Partnership landscape, it is necessary to ensure harmonised rules and to establish a strategic and coherent portfolio of a limited number of European Partnerships.</u></li> </ol> <p>FR  <b>(Comments):</b></p>

Commission proposal	Drafting Suggestions and Comments
	<p><u>The implementation modalities of the Partnerships should not be pre-defined and should remain flexible, according to the principle ‘the form follows the function’.</u></p> <p><u>The last sentence is moved from recital 9, since those objectives should be part of the regulation.</u></p> <p>PT  <b>(Comments):</b></p> <p>1. The idea of using work programmes makes the legal setup easier but it is also necessary consider that different partnerships have different levels of development and ambition. A one-size-fits-all approach could make it harder to align EP with national strategies and respond to specific needs in each country.</p> <p><b>Side Note:</b> European Partnerships shall be implemented through work programmes, with flexibility to adapt to the varying levels of maturity, ambition and national relevance of each partnership. Where appropriate, differentiated modalities may be adopted to ensure alignment with national strategies and responsiveness to country-specific needs.</p> <p>Can you confirm if you’re planning <b>two forms</b> of partnerships (work programme based and Treaty-based). If so, what is the relation with the current HE partnerships?</p>
<p>2. European Partnerships shall be based on a Memorandum of Understanding, agreed and signed between the partners, stipulating:</p>	<p>DE  <b>(Comments):</b></p> <p>DE: Will this memorandum of understanding replace the grant agreement signed between the Commission and the consortium that submitted the proposal to implement the partnership? Or does the MoU apply to some earlier stage in partnership preparation?</p>

Commission proposal	Drafting Suggestions and Comments
	<p>Since MoUs are not legally binding, the points described therein cannot ultimately be referred to; ultimately, they are only intentions that are presented.</p> <p>ES (Comments):</p> <p>How will partnerships in which the consortium consists of national funding agencies be managed? One size does not fit all.</p> <p>NL (Drafting Suggestions):</p> <p>European Partnerships shall be based on a Memorandum of Understanding, <b>or a grant agreement</b>, agreed and signed between the partners, stipulating:</p> <p>NL (Comments):</p> <p>For co-funded partnerships not an MoU but a multannual Grant Agreement forms the basis. Or does the CION wish to change this? If so, please explain.</p> <p>SI (Drafting Suggestions):</p> <p>European Partnerships shall be based on a Memorandum of Understanding, agreed and signed between the partners <b>or Grant agreement, agreed and signed between the partners and European Commisison</b>, stipulating:</p> <p>SI (Comments):</p> <p>incorporation of co-funded partnerships in regulation</p>
(a) the results to be delivered, which shall be clear, measurable, time-bound;	

Commission proposal	Drafting Suggestions and Comments
<p>(b) reporting requirements;</p>	<p>ES  <b>(Comments):</b>                      Monitoring and reporting requirements should be the same as for direct management calls for proposals</p> <p>FI  <b>(Drafting Suggestions):</b>  <u>single set of</u> reporting requirements;</p> <p>FI  <b>(Comments):</b>                      Reporting is currently challenging and single set of reporting requirements would bring clarity.</p> <p>SI  <b>(Drafting Suggestions):</b>                      reporting requirements <b>and key performance and impact indicators</b></p>
<p>(c) the related commitments from all partners;</p>	<p>DE  <b>(Comments):</b>                      DE: What kind of commitments are meant here? All kind of commitments or just financial ones?                      Since MoUs are not legally binding, the commitments therein cannot ultimately be referred to; ultimately, they are only intentions that are presented.</p> <p>FI  <b>(Drafting Suggestions):</b>                      the related <b>cash and/or in-kind</b> commitments from all partners;</p> <p>FI</p>

Commission proposal	Drafting Suggestions and Comments
	<p>(Comments):</p> <p>We would welcome that the possibility of in-kind contribution by partners is maintained. This can be decisive for many partners who might not be able to contribute in cash but would be interested in partnering and would bring added-value to the partnership.</p> <p>FR</p> <p>(Drafting Suggestions):</p> <p>(c) the related commitments from all partners <u>regarding their financial and/or in-kind contributions</u>;</p> <p>PT</p> <p>(Comments):</p> <p>Can you elaborate if this commitments from all partners should include their financial and /or in-kind contributions, key performance and impact indicators and the results to be delivered and reporting arrangements</p> <p>SI</p> <p>(Drafting Suggestions):</p> <p>the related commitments from all partners, <b><u>particularly their financial and/or in-kind contributions</u></b></p>
<p>(d) governance arrangements with a mechanism for partners to discuss and agree on the partnerships’ programming and activities.</p>	<p>DE</p> <p>(Drafting Suggestions):</p> <p>governance arrangements with a mechanism for <b><u>all</u></b> partners <b><u>involved in the partnership</u></b> to discuss and agree on the partnerships’ programming and activities.</p> <p>FR</p> <p>(Drafting Suggestions):</p>

Commission proposal	Drafting Suggestions and Comments
	<p>(d) governance arrangements with a mechanism for <u>all partners involved in the partnership</u> to discuss and agree on the partnerships’ programming and activities. <u>Such governance arrangements shall be based on common governance-related guidelines for all partnerships.</u> -</p> <p>FR (Comments): <u>To avoid having 50 different governance arrangements, there is a need to streamline the governance model. We call therefore for common guidelines – discussed between Member States and the Commission.</u></p> <p>SI (Drafting Suggestions): governance arrangements <b>shall include</b> <del>with</del> a mechanism for partners to discuss and agree on the partnerships’ programming and activities, <b>with Strategic Research and Innovation Agendas (SRIAs) being one of the key elements of programming activities.</b></p>
	<p>AT (Drafting Suggestions): <b><u>(e) a clear strategy for gradually or fully phasing out from Union funding</u></b></p> <p>AT (Comments): This is necessary for evaluating the sustainability and longer-term impact of partnerships and may thus be an important criterion for short-listing partnership proposals and their later implementation.</p> <p>BE (Drafting Suggestions):</p>

Commission proposal	Drafting Suggestions and Comments
	<p><b><u>(e) The Commission will ensure that reporting requirements for partnerships will be streamlined under the various EU programmes financing those partnerships.</u></b></p>
<p>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.</p>	<p>DE  <b>(Comments):</b>                      DE: What does the Commission mean by 'duly justified cases'?</p> <p>ES  <b>(Drafting Suggestions):</b>                      In duly justified cases European Partnerships will be implemented by entrusting budget implementation tasks from <b>one or</b> 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</p> <p>ES  <b>(Comments):</b>                      In which cases will the implementation of part of the budget be entrusted to entities established on the basis of Articles 185 and 187 of the TFEU? What criteria will be used? In which areas? Who decides?                      The financing of several EU programmes for partnerships is established by default; this should be left open. Does this mean that all partnerships will go beyond R&amp;I? How will it be ensured that HE funds will be used solely for the financing of R&amp;I?</p> <p>FR  <b>(Comments):</b>  <u>What is called 'duly justified cases'? Who will decide whether it is justified or not?</u></p> <p>MT  <b>(Comments):</b></p>

Commission proposal	Drafting Suggestions and Comments
	<p>Malta would like to inquire on how the overlaps between the Competitiveness Fund and Horizon Europe, particularly regarding partnerships, JUs, and strategic technologies will be avoided.</p>
<p>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.</p>	<p>AT  <b>(Drafting Suggestions):</b>  <i>a proportionate financial contribution from other partners at least matching the Union contribution</i></p> <p>AT  <b>(Comments):</b>                      This wording does not reflect the actual process:                       So far, the Union asks Member States and/or private partners for their commitments as a first step. The total outcome should then be matched with Union funding.   <u><b>Please clarify either the wording or any proposed changes to the process.</b></u></p> <p>BE  <b>(Drafting Suggestions):</b>                      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<del>te</del> 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.</p> <p>BE  <b>(Comments):</b></p>

Commission proposal	Drafting Suggestions and Comments
	<p>Current article is unclear on financing and raises the following questions: does this mean 50-50% financing or other % depending on number of participating consortium partners (other than Union)? How is this seen from the lifecycle perspective? Does harmonised rules mean also similar structure for their financing? Does the term financial contribution entail also in-kind contributions or is it limited? Clarifications would be appreciated.</p> <p>CZ (Drafting Suggestions):</p> <p>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 <del>at least matching the Union contribution and voting rights for the Union in the governing bodies</del> 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.</p> <p>CZ (Comments):</p> <p><u>CZ sees as more practical to leave a certain flexibility when it comes to the contributions between partners in the European partnerships. CZ sees the “proportionate financial contribution” as more adequate and as giving more leeway in practical implementation. “At least matching” contribution, i.e. same or higher, would threaten funding of projects in partnerships like Chips JU, where, due to several complexities (high number of partners from many MS with different funding allocation, different national funding rates, different eligibility criteria) the same or higher national funding is extremely difficult to achieve.</u></p>

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	<p><u>Furthermore, CZ suggests to decide on voting rights in the legislative act establishing the partnerships and their rules, as there the specificities of each partnership could be reflected better.</u></p> <p>DE (Drafting Suggestions):</p> <p>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 <b>and/or in-kind</b> contribution from other partners at least matching the Union contribution and voting rights for the Union <b>and EU member states</b> in the governing bodies ensuring protection of the interests of the Union and <b>EU member states</b> in the partnership. For that purpose, Joint Undertakings shall be established through a single establishing act ensuring harmonised rules.</p> <p>DE (Comments):</p> <p>DE The participation of Member States and associated countries in the Strategic Coordinating Process for European Partnerships is essential to achieve true co-ownership of the partnerships. To this end, Member States and associated countries must jointly lead the processes of identifying, and selecting and implementing partnerships with the Commission.</p> <p>ES (Comments):</p> <p>It is necessary to clarify how voting rights will be defined for Partnerships established pursuant to paragraph 2. It is established that the: support from the Programme shall be conditional upon efficient use of Union financing,</p> <p>There is uncertainty on the extent of EC funding that partnerships will be able to receive and if some of the European Partnership will be forced to</p>

Commission proposal	Drafting Suggestions and Comments
	<p>continue without EC funding (phasing-out strategies requested to the current European Partnerships).</p> <p>FR  <u>(Drafting Suggestions):</u></p> <p>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 <u>and/or in-kind</u> contribution from other partners at least matching the Union contribution and voting rights for the 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.</p> <p>FR  <u>(Comments):</u></p> <p><u>We also suggest reintroducing the possibility to participate via in-kind contribution, which is particularly important for international partnerships.</u></p> <p>NL  <u>(Drafting Suggestions):</u></p> <p>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 <u>and/or in-kind</u> 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.</p> <p>PT  <u>(Comments):</u></p>

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	<p>Does this mean that all European partnerships will be Joint Undertakings? This information may be conflicting with previous reference to public-public and public-private partnerships.</p> <p>To be clarified if this provision applies to existing European Partnerships as well.</p>
<p>5. European Partnerships shall:</p>	<p>DE <b>(Drafting Suggestions):</b></p> <p><u>5aa) be identified in a co-creation process together with EU member states before being implemented in work programmes ,</u></p> <p><u>5ab) contain a preparatory phase</u></p> <p><u>5ac) safeguard capacities and funding for steering and coordination at all steering and coordination levels</u></p> <p>DE <b>(Comments):</b></p> <p>DE suggests to add new para under 5aa.</p> <p>DE: Suggestion to add new para</p>
	<p>ES <b>(Drafting Suggestions):</b></p> <p><u>be identified in a co-creation process together with EU member states before being implemented in work programmes ,</u></p> <p>FR</p>

Commission proposal	Drafting Suggestions and Comments
	<p>(Drafting Suggestions):</p> <p><u>(aa) be identified in a co-creation process together with EU Member States before being implemented in work programmes, after a preparatory stage:</u></p> <p>FR</p> <p>(Comments):</p> <p><u>Support to DE proposal: since most Partnerships should be established at the level of work programmes, Member States must jointly lead the process of identifying, selecting and implementing partnerships with the Commission.</u></p>
<p>(a) be established only in cases where Union action alone or other forms of support under the Programme cannot achieve the desired objectives.</p>	<p>BE</p> <p>(Drafting Suggestions):</p> <p>(a) be established only in cases where <b><u>the involvement of associate partners with the Union brings added value to</u></b> <del>Union action alone or other forms of support under the Programme cannot achieve the desired objectives.</del></p> <p>BE</p> <p>(Comments):</p> <p>Since it is difficult to precisely define when Union action alone is not sufficient, partnerships should be considered where their format clearly enhance outcomes while maintaining a coherent and limited portfolio.</p> <p>ES</p> <p>(Comments):</p> <p>In Which part of the Programme?</p> <p>HR</p> <p>(Drafting Suggestions):</p> <p>(a) be established only in cases where Union action alone or other forms of support under the Programme cannot achieve the <del>desired</del> objectives <b><u>set out in Article 3 of the Programme.</u></b></p> <p>HR</p>

Commission proposal	Drafting Suggestions and Comments
	<p>(Comments): Desired is vague and non definitive, it must be clear in which cases EP as an instrument can be used.</p>
<p>(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.</p>	<p>AT (Drafting Suggestions): 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 <b><u>and governance levels.</u></b></p> <p>AT (Comments): Partnerships not only support coordination across actors in terms of R&amp;I actors but also in terms of governance actors. EC-MS cooperation in PS allow different ways to mobilise and involve local/regional/national level.</p> <p>HR (Drafting Suggestions): (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, <b><u>where Union action alone or other forms of support under the Programme cannot address those challenges as set out in Article 3 of the Programme.</u></b></p>
<p>(c) align with and assist in the implementation of major Union policies and policy initiatives.</p>	<p>AT (Comments): The proposed legal basis for the future Horizon Europe programme <b>lacks strategic orientations</b>, which could set the priorities for the development of the work programmes and the future EU partnerships.</p>

Commission proposal	Drafting Suggestions and Comments
	<p>Furthermore, there is no strategic exchange foreseen, which would involve the Member States <i>before</i> the Commission tables the work programmes. The role and functioning of the future Competitiveness Coordination Tool remains unclear.</p> <p>At the same time, one of the specific objectives of the programme is the <b>alignment</b> of EU, national and regional priorities.</p> <p><b>For AT it is essential to agree on the constructive involvement of Member States by anchoring the necessary provisions in the legal texts for the future Horizon Europe. AT is considering different options to propose.</b></p> <p>BE  <b>(Drafting Suggestions):</b></p> <p>(c) align with and assist in the implementation of major Union policies and policy initiatives, <b><u>while remaining consistent with relevant national and regional strategies (in order to foster complementarity an enhance impact).</u></b></p> <p>BE  <b>(Comments):</b></p> <p>To ensure coherence and foster implementation, alignment with EU policies must be paired with alignment with national and regional initiatives (in the same domain.)</p> <p>FI  <b>(Drafting Suggestions):</b></p> <p>align with <b><u>strategic priorities</u></b> and assist in the implementation of major Union policies and policy initiatives.</p> <p>FR  <b>(Drafting Suggestions):</b></p>

Commission proposal	Drafting Suggestions and Comments
	<p>(c) align with and assist in the implementation of major Union <u>and Member States'</u> policies and policy initiatives.</p> <p>SI (Drafting Suggestions):</p> <p>align with and assist in the implementation of <del>major</del> Union policies and policy initiatives, <b><u>that are complementary to those of the Member States..</u></b></p>
	<p>FR (Drafting Suggestions):</p> <p><u>(ca) ensure coherence and consistency across the pillar II and with the European Competitiveness Fund.</u></p>
<p>(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.</p>	<p>BE (Comments):</p> <p>under study</p> <p>DE (Drafting Suggestions):</p> <p>d) be selected <b><u>by the Commission services including decision-making by member states</u></b> in a competitive manner based on a set of quantifiable lifecycle criteria and a strong portfolio approach, resulting in a coherent set of initiatives.</p> <p>DE (Comments):</p> <p>DE: See comment above</p> <p>ES (Comments):</p> <p>The process and criteria should be defined here.</p>

Commission proposal	Drafting Suggestions and Comments
	<p>FI  <b>(Drafting Suggestions):</b>                      be selected <b><u>in a transparent and clear procedure and in a</u></b> competitive manner based on a set of quantifiable lifecycle criteria and a strong portfolio approach, resulting in a coherent set of initiatives <b><u>with balanced thematic distribution matching the strategic objectives of the European Union.</u></b></p> <p>FI  <b>(Comments):</b>                      FI welcomes the lifecycle approach. It is important that procedure for selection of partnership portfolio is transparent and clear. It is important that the partnership portfolio is discussed and monitored regularly together (what partnerships are needed, what is the best type of partnership etc.). In addition it is important that the procedure is thought-through and discussed together in a forum that has the responsibility also for the strategic steering of the partnership portfolio.</p> <p>FR  <b>(Drafting Suggestions):</b>                      (d) be selected in a competitive manner <u>after a joint identification process with Member States,</u> based on a set of quantifiable lifecycle criteria and a strong portfolio approach, resulting in a coherent set of initiatives.</p> <p>FR  <b>(Comments):</b>  <u>See comment above.</u></p> <p>IT  <b>(Drafting Suggestions):</b>                      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</p>

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	<p>initiatives, <b>including mechanisms to ensure the involvement of SMEs, regional actors and civil society organisations.</b></p> <p>NL  <b>(Drafting Suggestions):</b></p> <p>be selected in a competitive manner <b><u>in close consultation with Member States</u></b>, based on a set of quantifiable lifecycle criteria and a strong portfolio approach, resulting in a coherent set of initiatives.</p> <p>NL  <b>(Comments):</b></p> <p>Questions still stand on by whom and how the portfolio will be decided. What is meant with ‘competitive manner’, does this mean multiple partnerships need to compete for support?</p> <p>PT  <b>(Comments):</b></p> <p>Who will select the European Partnerships? What are the set of quantifiable lifecycle criteria?</p> <p>SI  <b>(Drafting Suggestions):</b></p> <p>be selected <del>in a competitive manner</del> <b><u>through competitive process, using</u></b> <del>based on a set of</del> quantifiable lifecycle criteria and a strong portfolio approach, resulting in a coherent set of initiatives.</p>
<p>(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.</p>	<p>AT  <b>(Drafting Suggestions):</b></p> <p>be based on ex ante, long-term and formal commitments from all partners to contribute financially to the resources of the European Partnership, <del>which shall be centrally managed, except in duly justified cases.</del></p>

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	<p>AT  <b>(Comments):</b>                      Central management of financial contributions could be interpreted as transfer of financial contributions to the partnerships. Such an approach is incompatible with multiple national funding schemes. Non-central financial management should unconditionally remain as an option in addition to central financial management.</p> <p>BE  <b>(Drafting Suggestions):</b>                      (e) be based on ex ante, long-term and formal commitments from all partners to contribute financially <b>or via in-kind contributions</b> to the resources of the European Partnership, which shall be centrally managed, except in duly justified cases.</p> <p>BE  <b>(Comments):</b>                      Central management should include open, proportionate accession for small public actors; administrative burden must be minimised.</p> <p>The request for an upfront plan for gradual or full phasing out of EU funding is not appropriate.                      EU Partnerships require long-term RDI investments and adaptation according to developments over years. So while understanding that each new FP requires a new decision on partnership creation, continuation or termination, the termination should not be the end goal.</p> <p>DE  <b>(Drafting Suggestions):</b>                      be based on ex ante, long-term and formal commitments from all partners <b>in accordance with national provisions</b> to contribute financially to the</p>

Commission proposal	Drafting Suggestions and Comments
	<p>resources of the European Partnership, which shall be centrally managed, except in duly justified cases.</p> <p>DE  <b>(Comments):</b>                      DE: National provisions need to be respected</p> <p>ES  <b>(Comments):</b>                      Should the contribution of the Union (and the other partners) be decided before the selection of the partnership is launched?                      How will centralised management be carried out? Does centralised management mean a ‘common pot’ in partnerships co-financed by Member States and/or Associated States? In the current co-financed JUs, Member States manage their own contributions. Centralised management was attempted at the beginning of the current HE but has not been achieved. Will it be a mandatory condition? Will the necessary resources be made available to carry out this centralisation?</p> <p>FI  <b>(Drafting Suggestions):</b>                      be based on ex ante, long-term and formal commitments from all partners to contribute financially <b>and/or via in-kind contributions</b> to the resources of the European Partnership, which shall be centrally managed, except in duly justified cases.</p> <p>FI  <b>(Comments):</b>                      We would welcome that the possibility of in-kind contribution by partners is maintained. This can be decisive for many partners who might not be able to contribute in cash but would be interested in partnering and would bring added-value to the partnership.</p>

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	<p>FR (Drafting Suggestions):</p> <p>(e) be based on ex ante, long-term and formal commitments from all partners <u>in accordance with national provisions</u> to contribute financially to the resources of the European Partnership, which shall be centrally managed, except in duly justified cases.</p> <p>FR (Comments):</p> <p><u>Support to DE proposal.</u></p> <p>NL (Drafting Suggestions):</p> <p>be based on ex ante, long-term and formal commitments from all partners to contribute financially to the resources of the European Partnership, <b><u>Partnerships established pursuant paragraph 3</u></b>, which shall be centrally managed, except in duly justified cases.</p> <p>NL (Comments):</p> <p>Central financial management complicates the in essence ‘light regime’ of co-programmed partnerships and should not be made compulsory.</p> <p>SI (Drafting Suggestions):</p> <p>be based on ex ante, long-term and formal <b><u>implementation and resource</u></b> commitments from all partners to contribute financially to the resources of the European Partnership, which shall be centrally managed, except in duly justified cases.</p>
	<p>SI (Drafting Suggestions):</p>

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	<p><b><u>(e' ) ensure their continuous openness for partners of all sizes across the entire value chain and disciplines, including for participation in calls for proposals, and transparency in priority setting and governance.</u></b></p>
<p>(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.</p>	<p>BE  <b>(Drafting Suggestions):</b></p> <p>(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, <b><u>by leveraging further impact and scale-up development through private capital, to enhance financial sustainability. Any envisaged phasing out from Union funding shall be subject to an ex-ante impact assessment and appropriate transitional support measures.</u></b></p> <p>BE  <b>(Comments):</b></p> <p>More clarity on life cycle approach and meaning of ‘phasing out from Union funding’ is needed.  Does this mean ending the partnership, or a (financial) sustainability requirement? For those partnerships focusing on lower to medium TRL levels, this would be difficult.</p> <p>To avoid cliff effects on regional and national research ecosystems, any phasing-out strategy should be based on an ex-ante impact assessment, and should include transitional support measures.</p> <p>DE  <b>(Drafting Suggestions):</b></p> <p><b><u>fa) A phasing out strategy shall include stipulations to the use of data created during the project and ensure availability of data at least 10 years after the end of the partnership, including e.g. websites.</u></b></p> <p>FI</p>

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	<p><b>(Comments):</b></p> <p>EU Partnerships supporting key strategic technology areas like for e.g. hydrogen, semi-conductors, etc. require long-term RDI investments: the strategic planning and EU coordination of those investments require adaptation according to the developments over years, this does not necessarily require having an end date on the EU <i>coordination</i> effort.</p> <p>FR</p> <p><b>(Drafting Suggestions):</b></p> <p>(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. <u>The phasing out strategy shall include provisions regarding the use of data created during the project, and shall ensure availability of this data at least 10 years after the end of the Partnership.</u></p> <p>PL</p> <p><b>(Drafting Suggestions):</b></p> <p>require a clear lifecycle approach, including an upfront plan for the implementation of the initiative, and – <b>when possible</b> - with a strategy for gradually or fully phasing out from Union funding.</p> <p>PL</p> <p><b>(Comments):</b></p> <p>For some partnerships, the goals are beyond a seven-year period of the MFF (eg. in health, digital, climate), therefore the partnership can include achieving significant milestones to the strategy, but including phasing out from the EU finding might be impossible to schedule</p> <p>PT</p> <p><b>(Comments):</b></p> <p>Is this phasing-out strategy a required obligation for European Partnerships under the future portfolio? In any case, criteria for phasing out EU funding or</p>

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	<p>transitioning partnerships is needed. Without these, the lifecycle model risks becoming a procedural formality rather than a strategic tool for managing relevance and impact.</p> <p>SI  <b>(Drafting Suggestions):</b>                      require a clear lifecycle approach, including an upfront plan for the implementation of the initiative with an <b>initial</b> strategy for gradually or fully phasing out from Union funding. <b><u>Non-compliance with this requirement may result in the reduction, suspension, or recovery of Union funding, or other appropriate measures.</u></b></p>
	<p>AT  <b>(Drafting Suggestions):</b>  <b><u>g) should be aligned with other Union funding instruments, in order to avoid overlaps and duplications and instead ensure added value and maximise impact.</u></b></p> <p>AT  <b>(Comments):</b>                      It is important to provide coherence with other instruments within Horizon Europe, e.g. the EU missions and the proposed “Moonshots”.</p> <p>Furthermore, since EU partnerships might also be supported with funding from the European Competitiveness Fund, thematic bridges need to be established in a coordinated way.</p> <p>ES  <b>(Drafting Suggestions):</b>                      (g) be implemented under a systematic approach, including active and early involvement and engagement of private or public bodies, continuous</p>

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	<p>openness and transparency, coordination of procedures and joint activities, looking always for the final beneficiary</p> <p>ES (Comments):</p> <p>Include also requirements for their implementation in terms of harmonization</p>
<p>6. Contributions from Partners other than the Union shall take the following forms:</p>	<p>BE (Comments):</p> <p>Where is the simplification for beneficiaries in this article? Not only does the individual financial calculation of funding rates and co-financing represent a considerable additional burden for all participants, but so does the contractual aspect.</p> <ol style="list-style-type: none"> <li>1. EU: Processing from proposal to GA Declaration, Grant Agreement, Consortium Agreement, accounting</li> <li>2. National: separate national applications, processing, grant notifications, accounting</li> <li>3. Industry: additional co-financing agreements, accounting</li> <li>4. Compliance with non-profit rules</li> </ol> <p>How the co-financing will be organised (from a clean table or not) would require precision.</p> <p>In section 6 with a) and b) together allows the continuation of collecting membership fees as well as provisions to take part in granted actions. JUs have today different models to calculate these. Consequently, beneficiaries must adapt to the multiple models of JU membership fees. These different mechanisms should be streamlined and harmonised for sake of transparency, openness and programming.</p> <p>CZ (Drafting Suggestions):</p> <p>Contributions from Partners other than the Union <del>shall</del><u>may</u> take the following forms:</p>

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	<p>CZ (Comments): <u>Wording “may” is more appropriate and flexible. CZ believes that we shall differentiate among Partners other than the Union – these can be Member States, industry associations, etc. For different type of partner and a different type of partnership, a different type of contribution shall be envisaged.</u></p> <p>ES (Drafting Suggestions): Contributions from Partners other than the Union shall may take <b>at least, one of</b> the following forms:</p> <p>ES (Comments): A clarification of the contribution, financing and participation of other Partners is needed. Both types of contribution may not happen at the same time.</p> <p>SK (Comments): We would like to point out that European partnerships have already undergone reform during the transition from Horizon 2020 to Horizon Europe, which appeared sufficient and sustainable for the future at the time. If further reform of co-financed partnerships is necessary, it should not be at the expense of partnerships that are important for the public sector.</p>
(a) financial contributions to the operational budget of the initiative;	<p>BE (Drafting Suggestions): (a) financial contributions, <b><u>in cash or in kind,</u></b> to the operational budget of the initiative;</p>

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	<p>DE  <b>(Drafting Suggestions):</b>  <del>financial contributions to the operational budget of the initiative;</del>  <u>commitments for financial and/ or in-kind contributions, from each partner in accordance with national provisions throughout the duration of the initiative</u></p> <p>DE  <b>(Comments):</b>                      DE: The value added by the partnerships (including their Additional Activities) must be maintained in FP10 and thus be reflected in the co-financing model</p> <p>ES  <b>(Drafting Suggestions):</b>                      (a) <del>financial contributions to the operational budget of the initiative;</del>  <b>commitments for financial and/ or in-kind contributions, from each partner in accordance with national provisions throughout the duration of the initiative</b></p> <p>FR  <b>(Drafting Suggestions):</b>                      (a) <del>financial contributions to the operational budget of the initiative</del>  <del>commitments for financial and/or in-kind contributions, from each partner in accordance with national provisions throughout the duration of the initiative;</del></p> <p>FR  <b>(Comments):</b>  <u>We suggest coming back to the provisions under the current FP to reflect the added-value of Partnerships (e.g. Additional activities) in their business model.</u></p>

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	<p>PT  <b>(Comments):</b>                      How will these contributions be monitored or evaluated and how will disparities in national capacities be accounted for, given the potential budgetary asymmetries between Member States?</p>
<p>(b) co-financing by the Partners of their own participation, or that of their members, in projects funded through the initiative.</p>	<p>BE  <b>(Drafting Suggestions):</b>                      (b) co-financing, <b>in cash or in kind</b>, by the Partners of their own participation, or that of their members, in projects funded through the initiative.</p> <p>DE  <b>(Drafting Suggestions):</b>  <del>co-financing by the Partners of their own participation, or that of their members, in projects funded through the initiative.</del></p> <p>DE  <b>(Comments):</b>                      DE:Art. 11, para. 4, Art. 11, para. 5(e) and Art. 11, para. 9 already ensure that the partners provide funding to the individual partnerships. The manner in which the funding is distributed within each partnership is a matter to be set out in the corresponding MoU (Art. 11, para. 2) and is not to be predetermined here.</p> <p>FI  <b>(Drafting Suggestions):</b>                      co-financing, <b>in cash and/or in-kind</b>, by the Partners of their own participation, or that of their members, in projects funded through the initiative.</p>

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	<p>FI  <b>(Comments):</b>                      We would welcome that the possibility of in-kind contribution by partners is maintained. This can be decisive for many partners who might not be able to contribute in cash but would be interested in partnering and would bring added-value to the partnership.</p> <p>FR  <b>(Drafting Suggestions):</b>  <del>(b) — co-financing by the Partners of their own participation, or that of their members, in projects funded through the initiative.</del></p> <p>FR  <b>(Comments):</b>  <u>Art. 11, para. 4, Art. 11, para. 5(e) and Art. 11, para. 9 already ensure that the partners provide funding to the individual partnerships. The manner in which the funding is distributed within each partnership is a matter to be set out in the corresponding MoU (Art. 11, para. 2) and is not to be predetermined here.</u></p> <p>PT  <b>(Comments):</b>                      Can this co-finance take the form of in-kind contributions or cash only contributions?</p>
	<p>SI  <b>(Drafting Suggestions):</b>  <u><b>(c) In-kind contribution</b></u>   <u><b>(d) an appropriate share of the budget of the Programme shall be allocated to those actions of the Programme that are implemented through European Partnerships; the majority of the budget of each</b></u></p>

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	<p><b><u>component under Article 4(1)(b) shall be allocated to actions outside European Partnerships.</u></b></p> <p>SI (Comments): See recital 27</p>
<p>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.</p>	<p>BE (Comments): under study</p> <p>DE (Comments): DE: Is this information in addition to the regular reporting?</p> <p>FR (Comments): <u>This does not seem like a simplification measure, since it would add new tasks to the regular reporting process.</u></p> <p>PT (Comments): This paragraph lacks clarity regarding its purpose and expected use. Without specifying the objectives or the scope of this information collection, it risks adding unnecessary administrative burden. Based on experience from HE 2021-27, generic reporting obligations often led to disproportionate effort with unclear added value. To ensure efficiency and proportionality, the regulation should define the rationale, frequency, and expected outcomes of this reporting, and align it with existing monitoring frameworks to avoid duplication. <b>Side Note:</b> Partners shall provide structured and periodic information on membership and activities, aligned with existing monitoring frameworks. The scope, frequency and format of reporting shall be proportionate and</p>

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	<p>clearly defined in the work programme, avoiding duplication and unnecessary administrative burden.</p> <p>SI (Drafting Suggestions):</p> <p>All Partners other than the Union shall provide <b>transparent and publicly available</b> 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.</p>
	<p>ES (Drafting Suggestions):</p> <p><b><u>Detailed information on the evaluation process and results from all calls for proposals within European Partnerships, to be made available timely and accessible and in the same way as in general calls for proposals.</u></b></p> <p>ES (Comments):</p> <p>In order to monitor and manage the programme, it is necessary to have the details of each call for proposals, including European Partnerships <a href="https://eur-lex.europa.eu/eli/dec/2021/764/oj/eng#anx_III">https://eur-lex.europa.eu/eli/dec/2021/764/oj/eng#anx_III</a></p>
<p>(9) It should be possible to implement parts of the budget through European Partnerships together with other public and private entities, where this is the most effective implementation form to achieve the policy objectives. European Partnerships should be established where a close involvement of the Union is required and should ensure appropriate voting rights for the Union as well as sufficient co-investment by other partners to leverage Union funding. In view of fostering synergies and efficiencies, it is necessary to ensure harmonised rules. Therefore, a strategic and coherent portfolio of a limited number of European Partnerships should be established.</p>	<p>AT (Drafting Suggestions):</p> <p>... Therefore, a strategic and coherent portfolio of a limited number of European Partnerships should be established, <b><u>while ensuring that individual initiatives are not overstretched by an excessively broad thematic scope.</u></b></p> <p>AT (Comments):</p>

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	<p>he goal to reduce the number of Partnerships should not lead to merging of several thematic topics, historically addressed by separate large initiatives, into a single overly broad partnership.</p> <p>BE (Drafting Suggestions):</p> <p>(9) It should be possible to implement parts of the budget through European Partnerships together with other public and private entities, where this is the most effective implementation form to achieve the policy objectives. European Partnerships should be established where a close involvement of the Union is required and should ensure appropriate voting rights for the Union <b>and partners</b> as well as sufficient co-investment by other partners to leverage Union funding. In view of fostering synergies and efficiencies, it is necessary to ensure harmonised rules. Therefore, a strategic and coherent portfolio of a limited number of European Partnerships should be established.</p> <p><b><u>European Partnerships are key in developing research and industrial ecosystems and in broadening participation in EU R&amp;I. Their implementation should reflect this inclusive ambition.</u></b></p> <p>BE (Comments):</p> <p>Partnerships are also essential for developing research and industrial ecosystems, and for fostering collaborative research and integrating smaller and new entrants into EU R&amp;I efforts.</p> <p>DE (Drafting Suggestions):</p> <p>(9) <del>It should be possible to implement parts of the budget through</del> <b>The European Partnerships shall be implemented</b> together with <del>other</del> public and/or private entities, <del>where this is the most effective implementation form to</del></p>

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	<p>achieve the policy objectives. <del>European Partnerships should be established where a close involvement of the Union is required and should ensure appropriate voting rights for the Union and member states as well as sufficient co-investment by the Union and other partners to leverage Union funding. In view of</del> To fostering synergies and efficiencies, it is necessary to ensure harmonised rules. <del>Therefore</del> <b>For the same reason</b>, a strategic and coherent portfolio of a limited number of European Partnerships should be established.</p> <p>DE  <b>(Comments):</b></p> <p>DE: Large parts of this paragraph are redundant. The conditions for when and how partnerships should be considered are covered in previous parts of this article. Voting rights are also addressed in a previous paragraph. The only new points here are the reference to the partnerships being in collaboration with public/private entities  the need for harmonised rules  the limited portfolio of partnerships  Given the nature of each of these points, perhaps they should be addressed individually and not merely in continuous text (e.g., as 9(a), 9(b) and 9(c)).</p> <p>ES  <b>(Drafting Suggestions):</b></p> <p>(9) It should be possible to implement parts of the budget through European Partnerships together with other public and private entities, <b>based on a co-creation exercise between the EU and the MS</b>, where this is the most effective implementation form to achieve the policy objectives. European Partnerships should be established where a close involvement of the Union is required and should ensure appropriate voting rights for the Union as well as sufficient co-investment by other partners to leverage Union funding. In view of fostering synergies and efficiencies, it is necessary to ensure harmonised rules. Therefore, a strategic and coherent portfolio of a</p>

Commission proposal	Drafting Suggestions and Comments
	<p><b>limited number of European Partnerships should be established. <u>The majority of the budget shall be allocated to actions not directed to European Partnerships;</u></b></p> <p>ES (Comments): A maximum amount of budget dedicated to European Partnerships is needed. The majority of the budget shall be allocated to actions outside European Partnerships. Specifically, no solutions fits all, the inclusion of private for-profit entities in European Partnership in Health can be controversial due the public health goals pursued by them, in which normally commercial interest are excluded.</p> <p>FR (Drafting Suggestions): <del>(9) — It should be possible to implement parts of the budget through European Partnerships together with other public and private entities, where this is the most effective implementation form to achieve the policy objectives. European Partnerships should be established where a close involvement of the Union is required and should ensure appropriate voting rights for the Union as well as sufficient co-investment by other partners to leverage Union funding. In view of fostering synergies and efficiencies, it is necessary to ensure harmonised rules. Therefore, a strategic and coherent portfolio of a limited number of European Partnerships should be established.</del></p> <p>FR (Comments): <u>Already covered by many para of art 9. The last part has been moved to art 9 para 1.</u></p> <p>NL (Drafting Suggestions):</p>

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	<p>(9) It should be possible to implement parts of the budget through European Partnerships together with other public and/or private entities, where this is the most effective implementation form to achieve the policy objectives. European Partnerships should be established where a close involvement of the Union is required and should ensure appropriate voting rights for the Union as well as sufficient co-investment by other partners to leverage Union funding. In view of fostering synergies and efficiencies, it is necessary to ensure harmonised rules. Therefore, a strategic and coherent portfolio of a limited number of European Partnerships should be established.</p>
<p>(10) [The European Partnerships, including in the form of Joint Undertakings, as an essential tool to deliver on industrial involvement and investment in collaborative research and innovation, should contribute to the specific policy objectives of the policy windows of the European Competitiveness Fund, and be supported through it, where necessary, to complete these objectives.]</p>	<p>DE (Comments): DE: Will the ECF, in turn, contribute additional financial resources to the partnerships where these conditions apply?</p> <p>FR (Comments): <u>Even though this recital is in brackets, it is essential to ensure a financial contribution of the ECF for Partnerships which contribute to ECF objectives.</u></p> <p>HU (Drafting Suggestions): The European Partnerships, including in the form of Joint Undertakings, as an essential tool to deliver on industrial involvement and investment in collaborative research and innovation, <b>capacity building and technology transfer, multiplication, adaptation and development</b>, should contribute to the specific policy objectives of the policy windows of the European Competitiveness Fund, and be supported through it, where necessary, to complete these objectives.</p> <p>HU</p>

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	<p>(Comments):</p> <p>Market access for new technologies should be supported. The newly developed European technologies should have EU wide accessibility; however, their deployment will require research and innovation to be able to adapt to the local conditions.</p>
<p>(34) [Where Union support under the Programme is to be provided in the form of a budgetary guarantee or a financial instrument, including where combined with non-repayable support in a blending operation, with the exception of financial instruments under the EIC, such support should be provided exclusively through the ECF InvestEU Instrument in accordance with the applicable rules of the ECF InvestEU Instrument.]</p>	
<p><b>Chapter III</b></p>	
<p><b>Competitiveness and Society</b></p>	
<p><i>Article 15</i> <b>Collaborative research</b></p>	<p>MT</p> <p>(Comments):</p> <p>Malta calls for all collaborative research work programmes to be adopted in the examination procedure with a greater role of the Member States.</p>
<p>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</p>	<p>AT</p> <p>(Drafting Suggestions):</p> <p>Collaborative research shall support the creation of transnational research and innovation cooperation networks, bringing together entities of different disciplines <b>and sectors</b>, to support the development and swift diffusion of high-quality results <b>on topics of European added value such as</b> the Union’s</p>

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<p>creativity, and to strengthen the impact of research in developing and supporting Union policies.</p>	<p>industrial competitiveness, space, <b><u>peace and</u></b> security, <b><u>green and</u></b> clean transition, <b><u>sustainable use of natural resources</u></b>, preparedness and resilience, <b><u>health and life sciences</u></b> and addressing societal challenges, including culture and creativity, and to strengthen the impact and <b><u>socio-economic benefits of research</u></b> in developing and supporting Union policies.</p> <p>AT  <b>(Comments):</b></p> <p>Industrial competitiveness and the clean transition rely on natural resources. In this context, enhanced research in ecology, biodiversity and ecosystem services is crucial for sustaining economic prosperity, human well-being, and resilience to environmental challenges.</p> <p>BE  <b>(Drafting Suggestions):</b></p> <p>Collaborative research shall support the creation of transnational research and innovation cooperation networks, bringing together entities of <b><u>across</u></b> different disciplines, to support <b><u>the creation of excellent knowledge, technologies and sustainable solutions, reinforce</u></b> 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 <b><u>global and</u></b> societal challenges, including culture and creativity, and to strengthen the impact of research in developing and supporting Union policies. <b><u>SSAH shall be integrated across all components, including within the ‘Competitiveness’ research and innovation activities outlined in chapters IV to VII of the ECF, when relevant. This integration can also encompass targeted and dedicated activities.</u></b></p> <p>DE  <b>(Drafting Suggestions):</b></p>

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	<p>Collaborative research shall support the creation of transnational research and innovation cooperation networks, bringing together entities of different disciplines <b>and countries including social sciences and humanities</b>, to support the <b>discovery</b>, 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 <b>while adopting a human-centered approach and taking into account societal aspects</b>, including culture and creativity, <b>climate change and sustainable use of resources taking into account the One and Planetary Health approach</b> and to strengthen the impact of research in developing and supporting <b>the Union’s and member states’</b> policies.</p> <p>DE (Comments):</p> <p>DE: Social challenges also exist in dealing with climate change and the limits of available resources.</p> <p>DE: Integration of perspectives from social sciences and humanities not only under “societies” but also under “competitiveness” is essential to ensure that societal needs and aspects are taken into account and results in the area of industrial competitiveness, space, security, clean transition, preparedness and resilience are accepted and taken up in society. Likewise, the results should also support societal challenges within the policy windows.</p> <p>Art. 5a. of the proposal for the Horizon Europe regulation states that SSH shall be integrated in all programme parts. However, in the proposal for the ECF the policy windows do not reflect this yet.</p> <p>ES</p>

Commission proposal	Drafting Suggestions and Comments
	<p><b>(Drafting Suggestions):</b></p> <p>Collaborative research shall support the creation of transnational research and innovation cooperation networks, bringing together entities of different disciplines, to support the <b>discovery</b>, development and swift diffusion of high-quality <del>outputs</del> <b>results</b> in favour of the Union’s industrial competitiveness, <del>space, security, clean transition, preparedness and resilience, and addressing societal challenges, including culture and creativity</del>, and to strengthen the impact of research in developing and supporting the Union’s and Member States policies.</p> <p>ES</p> <p><b>(Comments):</b></p> <p>Many priorities are missing. If all the priorities are not included it is better to have a more general wording.          “Union’s industrial competitiveness, space, security, clean transition, <b>Health</b>, preparedness and resilience, and addressing societal challenges and <b>transformations</b>, including culture, <b>cultural heritage</b> and creativity <b>among others</b>, and to strengthen the impact of research in developing and supporting Union policies.”</p> <p>If transnational research and innovation cooperation networks, are a new instrument, consider to add its definition</p> <p>FI</p> <p><b>(Drafting Suggestions):</b></p> <p>Collaborative research shall support the creation of transnational research and innovation cooperation networks, bringing together entities of different disciplines <b>and sectors and cross-borders</b>, to support the development and swift diffusion of high-quality results in favour of the Union’s industrial competitiveness, space, security, <b>digital and</b> 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.</p>

Commission proposal	Drafting Suggestions and Comments
	<p>FR (Drafting Suggestions):</p> <p>1. Collaborative research shall support the creation of <u>the most excellent</u> transnational research and innovation cooperation networks, bringing together entities of different disciplines, to support the <u>discovery</u>, development and swift diffusion of high-quality results in favour of the Union’s <del>industrial</del> competitiveness, <u>sovereignty</u>, space, security, clean transition, preparedness and resilience, and addressing societal challenges, including culture and creativity, <u>climate change and biodiversity</u>, and to strengthen the impact of research in developing and supporting Union <u>and Member States</u> policies.</p> <p>FR (Comments):</p> <p><u>Need to recall the excellence principle.</u></p> <p><u>Not clear why it only refers to some of the objectives of the ECF but not all.</u></p> <p>HR (Drafting Suggestions):</p> <p>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 <b><u>open strategic autonomy, technological sovereignty, industrial transformation and high technological</u></b> competitiveness, space, security, clean transition, preparedness and resilience, and addressing societal challenges, including <b><u>health and wellbeing</u></b>, culture and creativity, and to strengthen the impact of research in developing and supporting Union policies <b><u>ensuring balanced geographic participation</u></b>.</p>

Commission proposal	Drafting Suggestions and Comments
	<p>HR  <b>(Comments):</b>  <b>HR:</b> The additions stresses the importance of fair opportunities for all Member States, enabling smaller R&amp;I systems to contribute more effectively.</p> <p>They also highlight the contribution of R&amp;I activities in industry not only to its global competitiveness, but also to the European Union’s strategic autonomy, particularly with regard to critical raw materials, advanced materials and chemicals. It further underlines the importance of technological sovereignty and transformation of industries through the development of advanced industrial and digital technologies, supporting the EU’s capacity to lead in key strategic areas and to reduce dependencies in essential value chains.</p> <p>The addition of health and wellbeing challenges emphasizes the relevance of public health, mental wellbeing, and quality of life as key societal issues that collaborative research should also address.</p> <p>PT  <b>(Comments):</b>                      high quality" vs “excellence”. This drafting of the text is somewhat not coherent with the clarifications provided in the SP in section b).</p> <p>Suggestion to include wellbeing and health as a societal challenges.</p> <p>SI  <b>(Drafting Suggestions):</b></p>

Commission proposal	Drafting Suggestions and Comments
	<p>Collaborative research shall support the creation of transnational research and innovation <b>activities and</b> cooperation networks, bringing together entities of different disciplines <b>and sectors</b>, to support the development and swift diffusion of <b>results of excellence (new knowledge, technologies and sustainable solutions)</b> high-quality results in favour of the <b>prosperity of its citizens</b>. Union's industrial competitiveness, space, <b>peace and</b> security, <b>green</b>, clean <b>and digital</b> transition, <b>sustainable use of natural resources</b>, preparedness and resilience, <b>health and life sciences</b> and addressing societal challenges, including culture and creativity, and to strengthen the <b>economic and non-economic</b> impact of <b>socio-economic benefits of research</b> in developing and supporting Union policies.</p> <p>SK  <b>(Drafting Suggestions):</b></p> <p>1. Collaborative research shall support the creation of transnational research and innovation cooperation networks, bringing together entities of different disciplines <b>and sectors</b>, to support the development and swift diffusion of high-quality results <b>on topics of European added value such as</b> the Union's industrial competitiveness, space, <b>peace and</b> security, <b>green and</b> clean transition, <b>sustainable use of natural resources</b>, preparedness and resilience, <b>health and life sciences</b> and addressing societal challenges, including culture and creativity, and to strengthen the impact and <b>socio-economic benefits of research</b> in developing and supporting Union policies, <b>include participatory approaches and stakeholder engagement</b>.</p> <p>SK  <b>(Comments):</b></p> <p>We suggest explicit inclusion of participatory approaches, stakeholder engagement, co-creation and open science, in line with Article 11 TEU and ERA Policy Agenda 2022-2024.</p>

Commission proposal	Drafting Suggestions and Comments
	<p>Moreover, we highlight the importance of cultural and creative sectors (Article 167 TFEU) as drivers of innovation and cohesion.</p> <p>AT (Drafting Suggestions): <b><u>Collaborative research activities shall also foster the demand-driven cooperation between research actors and industry, providing support for bottom-up initiatives in open calls with a view to establishing strategic cooperation on a the respective research topic.</u></b></p> <p>AT (Comments): A new bottom-up mechanism – on the one hand for smaller consortia, and on the other hand with the aim of mid- to long-term strategic cooperation between research actors and industry – should be established to strengthen demand-driven cooperation.</p>
<p>2. Activities shall be carried out in a balanced manner between lower and higher Technology Readiness Levels, thereby covering the whole value chain.</p>	<p>AT (Drafting Suggestions): Activities shall be carried out in a balanced manner between lower and higher Technology Readiness Levels, thereby covering the whole value chain. <b><u>Social, system and technological innovation, as well as societal relevant research shall contribute to finding the best solutions.</u></b></p> <p>AT (Comments): European competitiveness cannot be strengthened by technological innovation alone. EU-funded research has shown that social and systemic innovations, combined with ensuring the societal relevance of research and innovation from the outset, are equally essential.</p> <p>BE (Drafting Suggestions):</p>

Commission proposal	Drafting Suggestions and Comments
	<p>2. Activities shall be carried out in a balanced manner between lower and higher Technology Readiness Levels, <b><u>including within the competitiveness component linked to the ECF</u></b>, thereby covering the whole value chain.</p> <p>BE (Comments): Considering the tight connection with ECF , it is important to ensure the balance of TRL in all components of pillar II.</p> <p>DE (Drafting Suggestions): <b><u>The collaborative research and innovation</u></b> Activities shall be carried out in a balanced manner between lower and higher Technology Readiness Levels <b><u>up to TRL 8</u></b>, thereby covering the whole value chain.</p> <p>ES (Drafting Suggestions):</p> <p>2. <b>The collaborative research and innovation</b> Activities shall be carried out in a balanced manner between lower and higher Technology Readiness Levels, thereby covering the whole value chain.</p> <p>ES (Comments): Balanced is vague and open to interpretation. It, should be clarified to avoid misunderstandings. How (and who) will ensure that there is a balance between high and low levels of technological maturity? Considering that collaborative R&amp;I activities are embedded in the Competitiveness Fund, balance is complicated and may be conditioned by EU sectoral policies. The entire value chain must be covered and have dedicated budget.</p>

Commission proposal	Drafting Suggestions and Comments
	<p>HR (Comments): HR: Strong support, particularly with regard to key enabling technologies.</p> <p>PT (Comments): What concrete operational and governance modes are we going to apply to ensure a sufficient focus also on low-TRL collaborative R&amp;I on topics important for European competitiveness?</p> <p>SI (Drafting Suggestions): Activities shall be carried out in a balanced manner between lower and higher Technology Readiness Levels, <b>ensuring equal focus on both ends of the</b> <del>thereby covering the whole</del> value chain.</p> <p>SK (Drafting Suggestions): 2. Activities shall be carried out in a balanced manner between lower and higher Technology Readiness Levels, <b>maintaining the prominent place of basic research</b> thereby covering the whole value chain.</p>
<p>3. This Programme shall include the collaborative research and innovation activities in a specific dedicated part of the work programmes adopted under Chapters IV to VII of the Regulation (EU) XXX European Competitiveness Fund. Those work programmes shall be adopted in accordance with Article 15 of the Regulation (EU) XXX [European Competitiveness Fund Regulation].</p>	<p>AT (Comments): Vice versa, the work programmes adopted in accordance with Article 15 of the Regulation (EU) XXX [European Competitiveness Fund Regulation] must be in line with the Horizon Europe Regulation.</p> <p><b>NB:</b> In the context of the negotiations about the ECF (AHWP ECF subgroup), AT advocates for the introduction of the <b>examination procedure</b> for all committee configurations.</p>

Commission proposal	Drafting Suggestions and Comments
	<p>BE (Comments): <b>STUDY RESERVATION</b></p> <p>ES (Comments): Detailed information of the R&amp;I activities to be funded under the Programme should be included here and coordinated with ECF. Work programmes for R&amp;I activities should be independent and have a dedicated budget. The work programmes should be approved by a specific configuration of the Programme Committee in accordance with the examination procedure. Given the multiplicity of areas included in each “policy window”, different sub configurations of the Programme Committee should be arranged.</p> <p>FR (Comments): <u>Scrutiny reservation. FR is still discussing internally on the articulation between the two programmes and on the governance model.</u>  <u>Clear information on the ECF governance and its scientific programming methods are still missing while those are required in order to ensure that collaborative R&amp;I activities could be undertaken by ECF work programmes.</u></p> <p>NL (Comments): Vice versa, the work programmes adopted in accordance with Article 15 of the Regulation (EU) XXX [European Competitiveness Fund Regulation] must be in line with the Horizon Europe Regulation.</p> <p>PT</p>

Commission proposal	Drafting Suggestions and Comments
	<p><b>(Comments):</b></p> <p>How will the Horizon Europe collaborative research topics be agreed and coordinated with the policy windows under the European Competitiveness Fund (ECF)? What will the role of the Programme Committees be in this process?</p> <p>MT</p> <p><b>(Drafting Suggestions):</b></p> <p>3. This Programme shall include the collaborative research and innovation activities in <b><u>the following areas: Clean Transition and Industrial Decarbonisation; Health, Biotech, Agriculture and Bioeconomy; Digital Leadership; Resilience and Security, Defence Industry and Space; synergistic to the policy windows described in Chapters IV to VII of the European Competitiveness Fund, but with independent work programmes.</u></b> <del>a specific dedicated part of the work programmes adopted under Chapters IV to VII of the Regulation (EU) XXX European Competitiveness Fund. Those work programmes shall be adopted in accordance with Article 15 of the Regulation (EU) XXX [European Competitiveness Fund Regulation].</del></p> <p>MT</p> <p><b>(Comments):</b></p> <p>Malta asserts that collaborative research under Horizon Europe regulation should not be subordinate to the European Competitiveness Fund work programmes. We are calling for a greater independence of the European Framework Programme for Research and Innovation.</p>
<p>4. The Programme shall support activities to tackle global societal challenges in the areas of strengthening democratic values and tackling disinformation, including rule of law and fundamental rights; promoting socio-economic transformations that contribute to inclusion and growth, addressing demographic and intergenerational</p>	<p>AT</p> <p><b>(Drafting Suggestions):</b></p> <p>The Programme shall support activities to tackle global societal challenges in the areas of strengthening democratic values and tackling disinformation,</p>

Commission proposal	Drafting Suggestions and Comments
<p>challenges, including from a youth perspective and including migration management and integration of migrants.</p>	<p>including rule of law and fundamental rights <b><u>and security</u></b>; promoting socio-economic transformations (<b>incl. the triple transition</b>) that contribute to inclusion and growth, addressing <b><u>the climate crisis, health</u></b>, demographic and intergenerational challenges, including from a youth perspective and including migration management and integration of migrants; <b><u>fostering research on peace and security, such as conflict prevention, peacebuilding and peacekeeping; supporting research on the role of culture and creativity in strengthening our societies.</u></b></p> <p>AT  <b>(Comments):</b>                      This paragraph should be aligned with <b>Article 11(i):</b>                      strengthening democratic values and foundations, civic engagement, the rule of law, fundamental rights <b><u>and security</u></b>, by fostering resilient, pluralistic <b><u>and peaceful</u></b> societies, <b><u>the role of culture and creativity in strengthening such societies,</u></b> and the integrity of the information and media space and countering <b><u>foreign interference</u></b>, polarisation, disinformation, hate speech, discrimination, and xenophobia, in a rapidly evolving world of geopolitical shifts; <b><u>fostering research on peace and security, such as conflict prevention, peacebuilding and peacekeeping.</u></b></p> <p><b>General comment: AT considers this as a very important part of the programme, which should receive adequate attention and resources.</b></p> <p>BE  <b>(Drafting Suggestions):</b>                      The Programme shall support activities to tackle global societal challenges, <b><u>including, among others,</u></b> the areas of strengthening democratic values and tackling disinformation, including rule of law and fundamental rights; promoting socio-economic transformations that contribute to inclusion and</p>

Commission proposal	Drafting Suggestions and Comments
	<p>growth, addressing demographic and intergenerational <b><u>and climate-related</u></b> challenges, including from a youth perspective and including migration management and integration of migrants; <b><u>safeguarding our cultural heritage and exploring the potential of cultural and creative sectors.</u></b></p> <p>DE (Drafting Suggestions):</p> <p>The Programme shall support activities to <b><u>promote democratic, inclusive, value-based and competitive European societies and</u></b> tackle global societal challenges in the areas of strengthening democratic values and tackling disinformation, including rule of law and fundamental rights; <b><u>taking into consideration cultural heritage and cultural identity,</u></b> promoting socio-economic transformations that contribute to inclusion and growth, addressing demographic and intergenerational challenges, including from a youth perspective and including migration management and integration of migrants.</p> <p>DE (Comments):</p> <p>DE: The “global societal challenges” part of “societies” focuses on issues such as strengthening democracies and promoting inclusive socio-economic transformations. The current title “global societal challenges” however is very broad and therefore can be misleading.</p> <p>DE: Article 15 (1) lists “culture and creativity” as one area that should be taken up here. Research on cultural contexts, cultural identity, and cultural heritage is essential for addressing societal challenges and developing solutions.</p> <p>ES (Drafting Suggestions):</p>

Commission proposal	Drafting Suggestions and Comments
	<p>The Programme shall support activities to <b>promote democratic, inclusive, value-based and competitive European societies and</b> tackle global societal challenges in the areas of strengthening democratic values and tackling disinformation, including rule of law and fundamental rights; <b>taking into consideration cultural heritage and cultural identity</b>, promoting <b>social innovation</b> and socio-economic transformations that contribute to inclusion and growth, addressing demographic and intergenerational challenges, including from a youth perspective and including migration management and integration of migrants. <b>It will also tackle cultural transformation, Cultural and Creative Industries innovation and the cultural heritage challenge.</b></p> <p>FR  <b>(Comments):</b>  <u>Scrutiny reservation.</u></p> <p><u>We are in the process of identifying societal challenges to be included here.</u></p> <p>HR  <b>(Drafting Suggestions):</b></p> <p>The Programme shall support activities <del>to tackle</del> <b>addressing</b> global societal challenges in the areas of strengthening democratic values, <b><u>institutions and rule of law, including</u></b> tackling disinformation, <del>including rule of law and;</del> <b><u>protecting and promoting</u></b> fundamental rights, <b><u>social inclusion and citizen’s participation;</u></b> promoting socio-economic transformations that contribute to inclusion and growth, <b><u>while</u></b> addressing demographic and intergenerational challenges, including from a youth perspective and including migration management and integration of migrants <b><u>into European societies</u></b></p> <p>HR  <b>(Comments):</b></p>

Commission proposal	Drafting Suggestions and Comments
	<p><b>HR proposes</b> a more precise definition of activities related to addressing global societal challenges. The proposed activities fall within the main goals of Destinations 1 and 3 in Cluster 2 of the current FP. HR proposes several changes to the existing definition, aiming to align it more precisely with the general objectives of this cluster and the global societal challenges it seeks to address.</p> <p>NL  <b>(Drafting Suggestions):</b></p> <p>The Programme shall support activities to tackle global societal challenges <b>for instance</b> in the areas of strengthening democratic values and tackling disinformation, including rule of law and fundamental rights; promoting socio-economic transformations that contribute to inclusion and growth, addressing demographic and intergenerational challenges, including from a youth perspective and including migration management and integration of migrants.</p> <p>NL  <b>(Comments):</b></p> <p>The suggested scope of the society part seem quite limiting, therefore it does not do full justice to the goal to ‘tackle global societal challenges’.</p> <p>PT  <b>(Comments):</b></p> <p>Collaborative Research in Societal Challenges which should also encompass topics in all scientific domains is reduced to Social Sciences, apparently. MS have voiced the need for Research Actions of lower TRLs in all scientific domains under the principles of Pillar II.</p> <p>SI  <b>(Drafting Suggestions):</b></p> <p>The Programme shall support <b>research and innovation</b> activities to tackle global societal challenges in the areas <b>such as</b> <del>of</del> strengthening democratic</p>

Commission proposal	Drafting Suggestions and Comments
	<p>values and tackling disinformation, including rule of law and fundamental rights; promoting <b>research of</b> socio-economic transformations (<i>incl. the triple transition</i>) that contribute to inclusion and growth, <b>research</b> addressing <i>the climate crisis, health</i>, demographic and intergenerational challenges, <i>fostering research on peace and security, such as conflict prevention, peacebuilding and peacekeeping</i> including from a youth perspective and including migration management and integration of migrants.</p> <p>SK  <b>(Drafting Suggestions):</b></p> <p>The Programme shall support activities to tackle global societal challenges in the areas of strengthening democratic values and tackling disinformation, including rule of law and fundamental rights <b>and security</b>; promoting socio-economic transformations (<i>incl. the triple transition</i>) that contribute to inclusion and growth, addressing <b>the climate crisis, health</b>, demographic and intergenerational challenges, including from a youth perspective and including migration management and integration of migrants; <b>fostering research on peace and security, such as conflict prevention, peacebuilding and peacekeeping; supporting research on the role of culture and creativity in strengthening our societies.</b></p>
<p>5. The Programme shall contribute to EU Missions notably through the identification of priority actions for R&amp;I funding for the development of new knowledge, technologies, services, and products in view of their goals. Funding for the EU Missions established under Article 8 of the Regulation (EU) 2021/695 shall be awarded on the basis of work programmes covering up to the budgetary year 2030.</p>	<p>BE  <b>(Comments):</b></p> <p>Integrating the Missions into Pillar II ‘society’ is questionable.</p> <p>Clarity on the future of the missions after 2030 would be welcome.</p> <p>‘Moonshots’ is missing in the regulation. Are we correct in understanding that ‘moonshots’ are essentially a semantic term to cover coordinated planning in and beyond the FP, but these have no operational or technical meaning?</p>

Commission proposal	Drafting Suggestions and Comments
	<p>EE  <b>(Drafting Suggestions):</b>  <del>5. The Programme shall contribute to EU Missions notably through the identification of priority actions for R&amp;I funding for the development of new knowledge, technologies, services, and products in view of their goals. Funding for the EU Missions established under Article 8 of the Regulation (EU) 2021/695 shall be awarded on the basis of work programmes covering up to the budgetary year 2030.</del></p> <p>EE  <b>(Comments):</b>                      The missions have reached the dissemination and outreach stage in their implementation, making them more suitable for the ECF. Therefore we do not see what kind of added value the missions would have for the framework programme.</p> <p>ES  <b>(Drafting Suggestions):</b>  <del>The Programme shall contribute to EU Missions notably through the identification of priority actions for R&amp;I funding for the development of new knowledge, technologies, services, and products in view of their goals. Funding for the EU Missions established under Article 8 of the Regulation (EU) 2021/695 shall be awarded on the basis of work programmes covering up to the budgetary year 2030.</del></p> <p>ES  <b>(Comments):</b>                      HE should only fund R&amp;I activities. From 2028 onwards EU Mission activities will be deployment and uptake activities, therefore should be part of the ECF policy windows.                      R&amp;I activities related to EU Mission (if needed) should be included in other parts of the Programme for the sake of simplification</p>

Commission proposal	Drafting Suggestions and Comments
	<p>FI  <b>(Drafting Suggestions):</b>                      The Programme shall contribute to EU Missions <b><u>established under Article 8 of the Regulation (EU) 2021/695</u></b> notably through the identification of priority actions for R&amp;I funding for the development of new knowledge, technologies, services, and products in view of their goals. Funding for the <b><u>established</u></b> EU Missions <del>established under Article 8 of the Regulation (EU) 2021/695</del> shall be awarded on the basis of work programmes covering up to the budgetary year 2030.</p> <p>FI  <b>(Comments):</b>  <u>In the first sentence already clarifying that the programme contributes to the current missions</u></p> <p>FR  <b>(Comments):</b>  <u>Scrutiny reservation.</u></p> <p>HR  <b>(Drafting Suggestions):</b>                      The Programme shall contribute to EU Missions, <b><u>as established under Article 8 of the Regulation (EU) 2021/695</u></b>, notably through the identification of priority actions for R&amp;I funding for the development of new knowledge, <b><u>breakthrough</u></b> technologies, services, <del>and products</del> <b><u>and social innovations in view of their goals essential for achieving the ambitious objectives of EU Missions defined in their implementation plans. The Framework Programme shall finance, the research and innovation activities of the EU Missions, while their coordination, deployment and scaling up should be delivered through other EU programmes and national and private funding.</u></b> <del>Funding for the EU Missions established under Article 8 of the</del></p>

Commission proposal	Drafting Suggestions and Comments
	<p>Regulation (EU) 2021/695 shall be awarded on the basis of work programmes covering up to the budgetary year 2030.</p> <p>HR  <b>(Comments):</b></p> <p><b>HR</b> proposes one unified point for EU Missions, aligning with the simplification objective and eliminating redundant text.</p> <p>The proposed wording of this integrated point clearly states that FP10 contributes to R&amp;I actions of the EU Missions already established under the Regulation (EU) 2021/695. Non-R&amp;I mission activities are funded through other sources.</p> <p>By explicitly mentioning Mission implementation plans, this point ensures the focus and directionality of R&amp;I activities.</p> <p>PL  <b>(Drafting Suggestions):</b></p> <p>We suggest adding the following: <b>The continuation of EU Missions shall be subject to a critical assessment of their outcomes and added value.</b></p> <p>PL  <b>(Comments):</b></p> <p>This suggestion emphasizes the lack of clear distinction between mission projects and (current) Pillar II projects. Effectiveness evaluation is required to check if missions serve their purposes.</p> <p>PT  <b>(Comments):</b></p> <p>One of the aspects that has hindered full implementation of the EU Missions is its framework within Horizon Europe only. The support to EU Missions should go beyond R&amp;I, and should include deployment of solutions.</p>

Commission proposal	Drafting Suggestions and Comments
	<p>Therefore, an approach covering the whole value chain should be pursued in FP10.</p> <p>Are Missions the mechanism to introduce a workaround for the issue raised under (4), as they create a space where the other scientific domains are included and both Societal Challenges and Missions would correspond to the Collaborative R&amp;I Calls and the Competitiveness Part would correspond to higher TRLs (mostly)?</p> <p>SI  <b>(Drafting Suggestions):</b>                      The Programme shall contribute to EU Missions notably through the identification of priority actions for R&amp;I funding for the development of new knowledge, technologies, services, and products in view of their goals. Funding for the EU Missions established under Article 8 of the Regulation (EU) 2021/695 shall be awarded on the basis of work programmes covering up to the budgetary year 2030.</p> <p>SI  <b>(Comments):</b>                      In terms of their content and form, the Missions should no longer belongs to FP. Mission have achieved their research phase and it is time for implementation, that should not be funded from R&amp;I programme and therefore should be included in the ECF.</p> <p>MT  <b>(Comments):</b>                      MT would like to know what is going to happen to the EU Missions and their goals beyond 2030 and whether the Moonshots will continue the Missions' objectives.</p>

Commission proposal	Drafting Suggestions and Comments
<p>6. The Programme shall support the R&amp;I component of the New European Bauhaus Facility.</p>	<p>BE  <b>(Comments):</b>                      Integrating the NEB into pillar II ‘society’ is questionable.                       The focus on the R&amp;I aspects is stated, but not in line with what is described in the specific plan, namely art. 11 (b) (iii) NEB will support activities to foster development and scaling up of innovative research solution. These aspects should be covered under the ECF.</p> <p>EE  <b>(Drafting Suggestions):</b>                      6. The Programme shall support <u>to the R&amp;I component</u> of the New European Bauhaus Facility <b><u>shall be limited to the R&amp;I component.</u></b></p> <p>EE  <b>(Comments):</b>                      We want to be sure that the only support to the NEB will be on it’s R&amp;I component.</p> <p>ES  <b>(Drafting Suggestions):</b>  <del>The Programme shall support the R&amp;I component of the New European Bauhaus Facility.</del></p> <p>ES  <b>(Comments):</b>                      R&amp;I activities related to the NEB Facility (if needed) should be included in other parts of the Programme for the sake of simplification.</p> <p>FR  <b>(Comments):</b></p>

Commission proposal	Drafting Suggestions and Comments
	<p><u>Scrutiny reservation.</u></p>
<p>(11) EU Missions as set up in the Regulation 2021/695 should enable a transformative and systemic impact for society, by fostering cross-disciplinary, cross-sectoral, cross-policy and cross-border collaboration. They should rely on research and innovation to develop the breakthrough technologies, services, products, and social innovations needed to achieve their ambitious objectives. In turn, EU Missions should accelerate the development, scaling, and deployment of innovative solutions and help create lead markets for new products and services. The Framework Programme should finance the research and innovation activities of the Missions, while the deployment and scaling up should be delivered through other EU programmes and national funding.</p>	<p>AT  <b>(Drafting Suggestions):</b>                  ...should be delivered through other EU programmes, <b>including the ECF, National and Regional Partnership Plans, Connecting Europe Facility and national funding.</b></p> <p>AT  <b>(Comments):</b>                  The “other” EU programmes supposed to deliver deployment and scaling should be specified, e.g. ECF, structural and cohesion funds, CEF, etc. The deployment and scaling component of the missions should also be embedded in the legal bases of those other EU programmes.</p> <p>BE  <b>(Drafting Suggestions):</b>                  (11) EU Missions as set up in the Regulation 2021/695 should enable a transformative and systemic impact for society, by fostering cross-disciplinary, cross-sectoral, cross-policy and cross-border collaboration. They should rely on research and innovation to develop the breakthrough technologies, services, products, <del>and</del> social <b>and cultural</b> innovations needed to achieve their ambitious objectives. In turn, EU Missions should accelerate the development, scaling, and deployment of innovative solutions and help create lead markets for new products and services. The Framework Programme should finance the research and innovation activities of the Missions, <b>which may be partially done through European partnerships</b>, while the deployment and scaling up should be delivered through other EU programmes and national funding.</p> <p>EE</p>

Commission proposal	Drafting Suggestions and Comments
	<p>(Drafting Suggestions):</p> <p>(11) — EU Missions as set up in the Regulation 2021/695 should enable a transformative and systemic impact for society, by fostering cross-disciplinary, cross-sectoral, cross-policy and cross-border collaboration. They should rely on research and innovation to develop the breakthrough technologies, services, products, and social innovations needed to achieve their ambitious objectives. In turn, EU Missions should accelerate the development, scaling, and deployment of innovative solutions and help create lead markets for new products and services. The Framework Programme should finance the research and innovation activities of the Missions, while the deployment and scaling up should be delivered through other EU programmes and national funding.</p> <p>ES</p> <p>(Comments):</p> <p>R&amp;I activities related to EU Mission (if needed) should be included in other parts of the Programme for the sake of simplification. So far there is no positive evaluation on the continuation of the Missions. Missions currently complicate the Fp program and clearly overlap. Beyond we have not seen any reference to Missions in the rest of the MFF 2028-2034 package.</p> <p>FR</p> <p>(Comments):</p> <p><u>Scrutiny reservation.</u></p> <p>HR</p> <p>(Drafting Suggestions):</p> <p>(11) — EU Missions as set up in the Regulation 2021/695 should enable a transformative and systemic impact for society, by fostering cross-disciplinary, cross-sectoral, cross-policy and cross-border collaboration.</p>

Commission proposal	Drafting Suggestions and Comments
	<p>They should rely on research and innovation to develop the breakthrough technologies, services, products, and social innovations needed to achieve their ambitious objectives. In turn, EU Missions should accelerate the development, scaling, and deployment of innovative solutions and help create lead markets for new products and services. The Framework Programme should finance the research and innovation activities of the Missions, while the deployment and scaling up should be delivered through other EU programmes and national funding. [Ivan Munjin]</p> <p>HR (Comments):</p> <p>HR proposes one integrated point (no. 5.) for EU Missions.</p> <p>HU (Drafting Suggestions):</p> <p>EU Missions as set up in the Regulation 2021/695 should enable a transformative and systemic impact for society, by fostering cross-disciplinary, cross-sectoral, cross-policy and cross-border collaboration. <b>Strategic alignment should be foreseen with the EU Macro-Regional Strategies.</b> They should rely on research and innovation to develop the breakthrough technologies, services, products, and social innovations needed to achieve their ambitious objectives. In turn, EU Missions should accelerate the development, scaling, and deployment of innovative solutions and help create lead markets for new products and services. The Framework Programme should finance the research and innovation activities of the Missions, while the deployment and scaling up should be delivered through other EU programmes and national funding.</p> <p>HU (Comments):</p> <p>The EU Macro-regional Strategies have their own structures, governance and priorities, however not yet aligned with the EU research and innovation</p>

Commission proposal	Drafting Suggestions and Comments
	<p>priorities. EU Missions could well take up and align these priorities and act along those priority lines.</p> <p>SI (Drafting Suggestions):</p> <p>(11) — EU Missions as set up in the Regulation 2021/695 should enable a transformative and systemic impact for society, by fostering cross-disciplinary, cross-sectoral, cross-policy and cross-border collaboration. They should rely on research and innovation to develop the breakthrough technologies, services, products, and social innovations needed to achieve their ambitious objectives. In turn, EU Missions should accelerate the development, scaling, and deployment of innovative solutions and help create lead markets for new products and services. The Framework Programme should finance the research and innovation activities of the Missions, while the deployment and scaling up should be delivered through other EU programmes and national funding.</p>
<p>(12) Anchored in the Horizon Europe Strategic Plan 2025-2027<sup>1</sup>, the New European Bauhaus (NEB) Facility is a multi-annual funding tool designed to accelerate the transformation of neighbourhoods through sustainable and inclusive design. Its R&amp;I component should be funded by Horizon Europe while its roll-out component should be delivered through other EU programmes and national funding.</p>	<p>ES (Drafting Suggestions):</p> <p><b>12) — Anchored in the Horizon Europe Strategic Plan 2025-2027<sup>2</sup>, the New European Bauhaus (NEB) Facility is a multi-annual funding tool designed to accelerate the transformation of neighbourhoods through sustainable and inclusive design. Its R&amp;I component should be funded by Horizon Europe while its roll-out component should be delivered through other EU programmes and national funding.</b></p> <p>ES</p>

<sup>1</sup> Commission Decision C(2024)1741 of 20.03.2024.

<sup>2</sup> Commission Decision C(2024)1741 of 20.03.2024.

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

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Commission proposal	Drafting Suggestions and Comments
	<p><b>(Comments):</b>                      R&amp;I activities related to the NEB Facility (if needed) should be included in other parts of the Programme for the sake of simplification.</p> <p>FR  <b>(Comments):</b>  <u>Scrutiny reservation.</u></p>
<p><b>General Comments</b></p>	<p>FI  <b>(Comments):</b>                      The regulation does not define the types of partnerships (unlike the current framework programme, which lists three types) and this creates ambiguity about what kinds of partnerships are being planned.</p> <p>NL  <b>(Comments):</b>                      In general, the Horizon Europe regulation should be more clear about the link with the ECF, especially for pillar II. This may require the addition of articles.</p> <p>Furthermore, to ensure clarity between the rules of the ECF and Horizon Europe we propose that the ECF rules are the overarching rules and that all rules in relation to R&amp;I are to be set under Horizon. This way we avoid unclarity and it is the easiest way to negotiate clear rules which are applicable in relation to the specific needs of R&amp;I to ensure we achieve the goals of the ECF.</p>
<p>Proposal for a COUNCIL DECISION on establishing the Specific Programme implementing Horizon Europe - the Framework Programme for Research and Innovation for the period 2028-2034, laying down the rules for</p>	

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participation and dissemination under that Programme, and repealing Decision (EU) 2021/764	
<p style="text-align: center;"><i>Article 5</i> <b>European Partnerships</b></p>	<p>MT <b>(Comments):</b> Malta would like to reiterate its stance that well-functioning European Partnerships under HE 2021-2027 like PRIMA, not directly tied to the ECF policy windows, should receive support to continue operating beyond 2027. In this regard, we are seeking the answer to the question on what mechanism to decide which of the current Partnerships are going to continue their operations under the next Framework Programme will be used and who is going to take these decisions.</p>
<p>1. European Partnerships shall follow a clear lifecycle approach, including their selection, implementation and monitoring, and transitioning out of Regulation XXX [<i>reference to the Horizon Europe Regulation</i>] on the basis of the following:</p>	<p>ES <b>(Drafting Suggestions):</b> European Partnerships shall be selected following a competitive, open, non-discriminatory, and transparent procedure, on the basis of areas <b><u>proposed by the Commission and identified in a co-creation process together with MS before being implemented in work programmes</u></b>. In addition the requirements set out in Article 11 of Regulation (EU) Regulation XXX [<i>reference to the Horizon Europe Regulation</i>], candidate partnerships shall comply with the following selection criteria:</p> <p>ES <b>(Comments):</b> In order for the life cycle to be clear, it must be defined in advance in coordination with the MS. Clear stages should be defined, included, including exit strategies and measures for phasing-out from the Programme.</p>

Commission proposal	Drafting Suggestions and Comments
	<p>PL  <b>(Drafting Suggestions):</b>                      We suggest adding the following/ strengthening the message: <b>Selection criteria shall be published transparently, and partnerships failing to meet performance indicators may be suspended or terminated.</b></p> <p>PL  <b>(Comments):</b>                      We suggest reinforcing the message about transparency in the selection of new partnerships and their suspension/termination.</p>
<p>(a) European Partnerships shall be selected following a competitive, open, non-discriminatory, and transparent procedure, on the basis of areas proposed by the Commission. In addition the requirements set out in Article 11 of Regulation (EU) Regulation XXX [<i>reference to the Horizon Europe Regulation</i>], candidate partnerships shall comply with the following selection criteria:</p>	<p>BE  <b>(Drafting Suggestions):</b>                      (a) European Partnerships shall be selected following a competitive, open, non-discriminatory, and transparent procedure, <del>on the basis of areas proposed by the Commission.</del> In addition the requirements set out in Article 11 of Regulation (EU) Regulation XXX [<i>reference to the Horizon Europe Regulation</i>], candidate partnerships shall comply with the following selection criteria:</p> <p>BE  <b>(Comments):</b>                      The criteria set out in Article 11, such as European added value, alignment with EU priorities, the lifecycle or portfolio approach, ... shall guide the selection process.</p> <p>DE  <b>(Drafting Suggestions):</b>                      European Partnerships shall be selected following a competitive, open, non-discriminatory, and transparent procedure, on the basis of areas <b>proposed by</b></p>

Commission proposal	Drafting Suggestions and Comments
	<p><u>the Commission and identified in a co-creation process together with MS before being implemented in work programmes.</u> In addition the requirements set out in Article 11 of Regulation (EU) Regulation XXX [<i>reference to the Horizon Europe Regulation</i>], candidate partnerships shall comply with the following selection criteria:</p> <p>DE  <b>(Comments):</b></p> <p>DE The participation of Member States and associated countries in the Strategic Coordinating Process for European Partnerships is essential to achieve true co-ownership of the partnerships. To this end, Member States and associated countries must jointly lead the processes of identifying and selecting partnerships with the Commission.</p> <p>ES  <b>(Comments):</b></p> <p>The procedure should be defined and also who is going to monitor and who will decide on it. The participation of Member States should be ensured.</p> <p>The criteria to be used should be defined here.</p> <p>FR  <b>(Drafting Suggestions):</b></p> <p>(a) European Partnerships shall be selected following a competitive, open, non-discriminatory, and transparent procedure, on the basis of areas <del>proposed-identified</del> by the Commission <u>and Member States, following a genuine co-creation process.</u> In addition the requirements set out in Article 11 of Regulation (EU) Regulation XXX [<i>reference to the Horizon Europe Regulation</i>], candidate partnerships shall comply with the following selection criteria:</p> <p>FR  <b>(Comments):</b></p>

Commission proposal	Drafting Suggestions and Comments
	<p><u>See comments above on the need for a co-creation process with Member States.</u></p> <p>PT (Comments): Who will selected the EP? Apart from the mentioned ‘moonshots’, what are the areas proposed by the Commission? How where these areas selected? Can the number of proposed areas increase, and if so, in what grounds?</p> <p>SI (Drafting Suggestions): European Partnerships shall be selected following a competitive, open, non-discriminatory, and transparent procedure, on the basis of areas proposed by the Commission, <b><u>in close cooperation with Member States</u></b>. In addition the requirements set out in Article 11 of Regulation (EU) Regulation XXX [reference to the Horizon Europe Regulation], candidate partnerships shall comply with the following selection criteria</p>
<p>i. portfolio relevance: overall consistency and coherence of the partnership portfolio shall be ensured, provided that candidates meet all selection criteria and demonstrate relevance as part of a strategic portfolio of actions;</p>	<p>AT (Drafting Suggestions): ... demonstrate relevance as part of a strategic portfolio of actions. <b><u>The portfolio should be managed in a way that keeps challenges clearly defined while also addressing key system-wide needs to support the entire ecosystem;</u></b></p> <p>AT (Comments): The overall partnership portfolio requires effective management to ensure that the addressed challenges are clearly delineated, and that systemic RDI activities are comprehensively covered.</p> <p>DE</p>

Commission proposal	Drafting Suggestions and Comments
	<p><b>(Drafting Suggestions):</b></p> <p>i. portfolio relevance: overall consistency and coherence of the partnership portfolio shall be <del>ensured</del> secured, <del>provided</del> <b>ensuring</b> that candidates <b>partnerships</b> meet all selection criteria and demonstrate relevance as part of a strategic portfolio of actions;</p> <p>DE <b>(Comments):</b></p> <p>DE: The formulation ‘provided that’ is a qualifier that only serves to undermine the previous clause, rather than to reinforce it, as was intended. Propose altering ‘candidates’ to ‘candidate partnerships’ to improve the clarity of the text.</p> <p>FR <b>(Comments):</b></p> <p><u>How will be defined the strategic nature of portfolio of actions, and based on which criteria?</u></p> <p>PT <b>(Comments):</b></p> <p>Ensuring coherence across partnerships is important, but the proposal doesn’t explain how this will be managed or who decides what is strategically relevant. This could lead to top-down decisions that don’t reflect national or regional priorities.</p>
<p>ii. critical mass: the partnerships’ budget (Union and partners’ contributions) shall match their duration, ensuring sufficient resources to fund at least one substantial call per year, each comparable in size to an average Horizon Europe call in the relevant thematic area;</p>	<p>DE <b>(Drafting Suggestions):</b></p> <p>ii. critical mass: the partnerships’ budget (Union and partners’ contributions) shall match their duration, ensuring sufficient resources to fund at least one substantial call per year, <del>each comparable in size to an average Horizon Europe call in the relevant thematic area;</del></p>

Commission proposal	Drafting Suggestions and Comments
	<p>DE  <b>(Comments):</b>                      DE: Without any clarity over ramifications of this – or clarity over the nature and scope of calls under FP10 – this is too narrow a specification to make at this stage. The very stipulation that annual calls of any magnitude are a requirement also negates the possibility for partnerships with a regulatory focus and that operate without calls.</p> <p>ES  <b>(Drafting Suggestions):</b>                      ii. critical mass: the partnerships’ budget (Union and partners’ contributions) shall match their duration, ensuring sufficient resources to fund at least one substantial call per year, <del>each comparable in size to an average Horizon Europe call in the relevant thematic area;</del></p> <p>ES  <b>(Comments):</b>                      It is not clear what an average HE call is. At this stage we are unsure what would be this comparable size</p> <p>FR  <b>(Drafting Suggestions):</b>                      ii. critical mass: the partnerships’ budget (Union and partners’ contributions) shall match their duration, ensuring sufficient resources to fund at least one substantial call per year, <del>each comparable in size to an average Horizon Europe call in the relevant thematic area;</del></p> <p>FR  <b>(Comments):</b>  <u>Without any clarity over ramifications of this – or clarity over the nature and scope of calls under FP10 – this is too narrow a specification to make at this stage.</u></p>

Commission proposal	Drafting Suggestions and Comments
	<p>PT                      (Comments):                      Clarification is needed concerning "partners' contribution". Can these contributions be in-kind and/or cash? How in-kind contributions will be "measured" and accountable?</p>
<p>iii. partners' composition: unless duly justified, the participation of public entities from at least five Member States and private entities representing substantial segments of their respective ecosystems is required, ensuring a broad and balanced involvement of key stakeholders;</p>	<p>AT                      (Comments):                      Does this provision foresee that <u>all</u> partnerships are jointly co-financed by public <u>and</u> private entities?</p> <p>DE                      (Drafting Suggestions):                      partners<sup>2</sup> composition: unless duly justified, the participation of public entities from at least five Member States and, <b>where appropriate</b>, private entities representing substantial segments of their respective ecosystems is required, ensuring a broad and balanced involvement of key stakeholders;</p> <p>DE                      (Comments):                      DE: The establishment of ecosystems built on the cooperation of national and regional programmes must remain possible</p> <p>ES                      (Drafting Suggestions):                      iii. partners' composition: unless duly justified, the participation of public entities from at least five Member States and/or private entities, <b>where relevant</b>, representing substantial segments of their respective ecosystems is required, ensuring a broad and balanced involvement of key stakeholders;</p> <p>ES</p>

Commission proposal	Drafting Suggestions and Comments
	<p>(Comments):</p> <p>The participation of 5 Member States is not enough. A majority of countries of at least 15 (55%) is needed to demonstrate the existence of critical mass. It is not clear what “substantial segments” would mean. Sufficient representativity is needed.</p> <p>The combination of private and public co-financing, poses a significant complication in management, creating conflicts of interest. Has any mechanism been considered to ensure effective and efficient operation? Not always private entities are expected to take part. It is important to keep co-funded projects that tackle lower TRLs and still far from the market, in which private entities might not have interest.</p> <p>FR (Comments): <u>Scrutiny reservation.</u></p> <p>HR (Drafting Suggestions):</p> <p>iii. partners’ composition: <del>unless duly justified</del>, the participation of public entities from at least five Member States and private entities representing substantial segments of <b>Union’s their</b> respective ecosystems is required, ensuring a broad and balanced involvement of key stakeholders;</p> <p>HR (Comments):</p> <p>The criteria for embarking on a new partnership needs to provide extraordinary set of a actors in a consortia as it is an instrument used when no other instruments within the FP are working for reaching a certain goal it set for itself. We would appreciate even higher minimum number than 5 in this case.</p> <p>LT</p>

Commission proposal	Drafting Suggestions and Comments
	<p><b>(Comments):</b></p> <p>Is participation of public entities from “at least 5 MSs” sufficient, aiming for pan-European relevance?</p> <p>NL</p> <p><b>(Drafting Suggestions):</b></p> <p>partners’ composition: unless duly justified, the participation of public entities from at least five Member States and/or private entities representing substantial segments of their respective ecosystems is required, ensuring a broad and balanced involvement of key stakeholders;</p> <p>NL</p> <p><b>(Comments):</b></p> <p>Apart from cofounded partnerships, for partnerships based on article 185 TFEU participation of private entities should not be obligatory. Although leveraging private funding is very important, we should preserve the added value of partnerships also for public-public cooperation, where relevant and strategic.</p> <p>SI</p> <p><b>(Drafting Suggestions):</b></p> <p>partners’ composition: unless duly justified, the participation of public entities from <del>at least five</del> <b>at least 10</b> Member States and private entities representing substantial segments of their respective ecosystems is required, ensuring a broad and balanced involvement of key stakeholders;</p> <p>SI</p> <p><b>(Comments):</b></p> <p>participation from at least 5 MSs ensures some level of cross-border involvement, it may be insufficient to fully reflect the Union’s strategic relevance. For initiatives of Union-wide importance, a broader representation</p>

Commission proposal	Drafting Suggestions and Comments
	of MSs should be considered to ensure that funding effectively addresses Union-level priorities and maximizes impact.
<p>iv. pan-European relevance: partnerships shall have pan-European relevance, reflected in a balanced geographic distribution of partners among Member States;</p>	<p>BE (Drafting Suggestions):</p> <p>iv. pan-European relevance: partnerships shall have pan-European relevance, reflected in a balanced geographic distribution of partners among Member States <b><u>and their regions; partnerships contribute to Europe’s competitiveness and public-value outcomes for society;</u></b></p> <p>DE (Drafting Suggestions):</p> <p>pan-European relevance: partnerships shall have pan-European relevance, <del>reflected in a balanced geographic distribution of partners among Member States;</del></p> <p>DE (Comments):</p> <p>DE: The minimum limit of only five Member States under (iii) above would seem to undermine this point somewhat. If this is to be meaningful, the minimum cited above should be higher than only five.</p> <p>ES (Comments):</p> <p>The participation of 5 Member States is not enough. A majority of countries of at least 15 (55%) is needed to demonstrate the existence of critical mass and demonstrate `pan-European relevance. Ensure contribution of Associated Members, or other third countries if relevant, is allowed.</p> <p>FR</p>

Commission proposal	Drafting Suggestions and Comments
	<p>(Drafting Suggestions):</p> <p>iv. pan-European relevance: partnerships shall have pan-European relevance, <del>reflected in a balanced geographic distribution of partners among Member States;</del></p> <p>FR</p> <p>(Comments):</p> <p><u>Pan-European relevance is not only geographical; this is rather a question of generating genuine added-value at the EU level, producing results being beneficial for the Union as a whole. The involvement of at least 5 Member States is already mandatory (cf iii).</u></p> <p><u>The introduction of geographical criteria is not aligned with the excellence principle of the FP.</u></p> <p>HU</p> <p>(Drafting Suggestions):</p> <p>pan-European relevance: partnerships shall have pan-European relevance, reflected in a balanced geographic distribution of partners' <b>needs and priorities</b> among Member States;</p> <p>Explanation:</p> <p>HU</p> <p>(Comments):</p> <p>Not the partners but their priorities should be better reflected to assure the intention of participation.</p> <p>NL</p> <p>(Drafting Suggestions):</p>

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	<p><del>pan-European relevance: partnerships shall have pan-European relevance, reflected in a balanced geographic distribution of partners among Member States;</del></p> <p>NL (Comments): Relevance should be based on other criteria than balanced geographical distribution among Member States, e.g. strategic thematics, critical mass etc. It is also not concrete: when is participation ‘balanced’?</p> <p>PL (Comments): PL strongly supports this criterion</p>
<p>v. mission-orientation: partnerships shall formulate clear, measurable, time-bound objectives within the duration of Horizon Europe that will inform monitoring, assessment, and evaluation exercises;</p>	<p>NL (Drafting Suggestions): mission-orientation: partnerships shall formulate clear, measurable, time-bound objectives within the duration of <b>their funding period</b><del>Horizon Europe</del> that will inform monitoring, assessment, and evaluation exercises;</p> <p>NL (Comments): Will partnerships not be able to start later during the FP period? Could objectives therefore not be reached after the duration of Horizon Europe?</p> <p>SI (Drafting Suggestions): <b><u>Challenge based approach</u></b><del>mission-orientation: partnerships shall formulate specific, measurable objectives aimed at tackling clearly identified societal or technological challenges, with a time horizon aligned with the duration of Horizon Europe, to guide monitoring, assessment, and evaluation of their progress and impact</del> clear, measurable, time-bound</p>

Commission proposal	Drafting Suggestions and Comments
	<p>objectives within the duration of Horizon Europe that will inform monitoring, assessment, and evaluation exercises;</p> <p>SI (Comments):</p> <p>The challenge-based funding approach (in contrast to mission orientation with prescribed expected results) should foster activities towards a specific objectives (societal &amp; tech challenges), which can lead to more creative, interdisciplinary and effective solutions. Challenge-based partnerships should allow for better responsiveness to changing (societal) needs and challenges, as research topics and priorities are developed based on real-time needs and opportunities in R&amp;I (bottom-up/ via SRIAs), rather than being determined (solely) by political decision-makers (top-down).</p>
<p>vi. business plan: partners shall develop a business plan ex-ante, including a set of key performance indicators to track progress and a forward-looking transition strategy, including actions for phasing out from Horizon Europe funding;</p>	<p>AT (Drafting Suggestions):</p> <p>... including actions for phasing out from Horizon Europe funding, <b><u>and including clear strategies for translating research results into practical deployment, including plans to attract and effectively utilize financial resources to ensure the widespread rollout of solutions that deliver tangible societal benefits within the duration of Horizon Europe.</u></b></p> <p>DE (Drafting Suggestions):</p> <p><b>business plan sStrategic pPlanning dDocument:</b> partners shall develop a <b>strategic planning document</b> ex-ante, including a set of key performance indicators to track progress and a forward-looking transition strategy, including actions for phasing out from Horizon Europe funding;</p> <p>DE</p>

Commission proposal	Drafting Suggestions and Comments
	<p>(Comments):</p> <p>DE suggests using a different terminology to avoid misunderstanding given that the partnerships are not businesses, and are in no way comparable to businesses.</p> <p>ES</p> <p>(Drafting Suggestions):</p> <p><b>business plan sustainability</b>: partners shall develop a <b>business sustainability</b> plan ex-ante, including a set of key performance indicators to track progress and a forward-looking transition strategy, including actions for phasing out from Horizon Europe funding;</p> <p>FR</p> <p>(Drafting Suggestions):</p> <p>vi. business <b>model plan</b>: partners shall <del>develop</del> <b>elaborate</b> a <b>business plan development strategy</b> ex-ante, including a set of key performance indicators to track progress and a forward-looking transition strategy, including actions for phasing out from Horizon Europe funding;</p> <p>FR</p> <p>(Comments):</p> <p><u>Even though we recognize it is important to define KPIs and a transition strategy ex ante, Partnerships are not KICs or businesses and cannot as such provide business plans ex ante.</u></p> <p>NL</p> <p>(Drafting Suggestions):</p> <p><del>business plan</del> <b>Strategic Research and Innovation Agenda</b>: partners shall develop a <del>business plan plan</del> <b>Strategic Research and Innovation Agenda</b> ex-ante, including a set of key performance indicators to track progress and a forward-looking transition strategy, including actions for phasing out from Horizon Europe funding;</p>

Commission proposal	Drafting Suggestions and Comments
	<p>NL (Comments): What is meant by ‘business plan’? Are we not talking about R&amp;I here?</p> <p>PT (Comments): A definition of what should be included in a “forward-looking transition strategy” is needed and how will it be assessed.</p>
<p>vii. openness and transparency: partnerships shall demonstrate openness and transparency regarding the identification of priorities and objectives – including expected results and impacts – and the engagement of partners and stakeholders across the entire value chain and from diverse sectors, backgrounds, and disciplines, including relevant international ones without affecting European competitiveness;</p>	<p>AT (Drafting Suggestions): including relevant international ones without affecting European competitiveness <b>and security</b></p> <p>AT (Comments): Relevant addition of security aspects</p> <p>DE (Drafting Suggestions): vii. openness and transparency: partnerships shall demonstrate openness and transparency regarding the identification of priorities and objectives – including expected results and impacts – and the engagement of partners and stakeholders across the entire value chain and from diverse sectors, backgrounds, and disciplines, including relevant international ones <del>without affecting European competitiveness</del>;</p> <p>DE (Comments): DE: The whole rationale behind FP10 is to ‘affect European competitiveness’. If the point here is to stipulate that private enterprises</p>

Commission proposal	Drafting Suggestions and Comments
	<p>participating as partners in specific Partnerships may not obtain an unfair competitive advantage over other enterprises in their sector as a benefit of their participation, then this must be formulated more precisely.</p> <p>FR (Drafting Suggestions):</p> <p>vii. openness and transparency: partnerships shall demonstrate openness and transparency regarding the identification of priorities and objectives – including expected results and impacts – and the engagement of partners and stakeholders across the entire value chain and from diverse sectors, backgrounds, and disciplines, including relevant international ones <del>without affecting European competitiveness</del> <u>provided that it respects the provisions under article 10 of the ECF regulation and article 21 of HE regulation</u>;</p> <p>FR (Comments):</p> <p><u>In the absence of clear explanation from the Commission on the mention ‘without affecting European competitiveness’, we can only assume it relates to the involvement of international partners which could undermine EU preference standards and research security.</u></p>
	<p>AT (Drafting Suggestions):</p> <p><b><u>SME and scale-up integration: Wherever relevant, partnerships shall formulate clear strategies to ensure the effective inclusion of SMEs and scale-ups in the innovation cycle, taking into account their specific needs and challenges, and define measurable objectives to track their engagement and impact within the duration of Horizon Europe</u></b></p>
<p>viii. legacy: in cases where candidate partnerships build on predecessor initiatives, the efficiency, effectiveness and impact of previous partnerships shall be demonstrated;</p>	<p>PT (Comments):</p>

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	<p>There may be room for discretion in how the efficiency, effectiveness, and impact of predecessor European partnerships are expected to be demonstrated. The proposal does not specify the methods or criteria to be used for this assessment. Clarifying the evaluation framework—such as the types of evidence required, performance benchmarks, and who conducts the assessment—would help ensure consistency, transparency, and fairness in the selection process.</p> <p>SI (Drafting Suggestions): legacy: in cases where candidate partnerships build on predecessor initiatives, the efficiency, effectiveness and impact <b>(scientific, technological, economic, societal, policy and capacity-building impact)</b> of previous partnerships shall be demonstrated;</p> <p>MT (Comments): Malta would like to inquire on what criteria to measure ‘efficiency, effectiveness and impact of previous partnerships’ will be used.</p>
<p>ix. throughout their implementation, European Partnerships shall ensure:</p>	<p>FR (Drafting Suggestions): <del>ix(b)</del> throughout their implementation, European Partnerships shall ensure;</p> <p>FR (Comments): <u>The following criteria are related to implementation and no longer to the selection process.</u></p>

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<p>x. internal transparent governance arrangements and internal rules, including codes of conduct, that ensure their functioning in an open and transparent manner;</p>	<p>DE (Comments): DE: This should also include appropriate funding for steering and coordination at all steering and coordination levels.</p> <p>ES (Drafting Suggestions): x. internal transparent governance arrangements and <b>harmonized</b> internal rules, including codes of conduct, that ensure their functioning in an open and transparent manner;</p> <p>FR (Drafting Suggestions): <del>ix.</del> internal transparent governance arrangements and internal rules, including codes of conduct, that ensure their functioning in an open and transparent manner;</p> <p>HR (Drafting Suggestions): x. internal, transparent governance arrangements and internal rules <b>that are consistent and as harmonized as possible</b>, including codes of conduct, that ensure their functioning in an open and transparent manner;</p> <p>HR (Comments): For a truly transparent overview and functioning of partnerships their portfolio is to be internally as harmonized as possible.</p>
<p>xi. continuous openness of the initiative through clear and transparent accession and exit criteria, including through open calls to potential new partner organisations</p>	<p>DE (Drafting Suggestions):</p>

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	<p>continuous openness of the initiative through clear and transparent accession and exit criteria, including e.g. through open calls to potential new partner organisations</p> <p>FR (Drafting Suggestions):</p> <p>ixi. continuous openness of the initiative through clear and transparent accession and exit criteria, including through open calls to potential new partner organisations</p> <p>PT (Comments):</p> <p>How will this be monitored and what measures can be envisaged to correct possible deviations of this openness? Some current JUs are perceived as 'closed clubs', where work programmes are defined by the (industry-driven) Governing Board, and only one project is funded per topic. It is very difficult for new stakeholders (for example, SMEs) to participate and take stock of these JUs' opportunities.</p>
<p>xii. flexibility through timely revisions of key documents such as the Strategic Research and Innovation Agendas (SRIAs) and transition strategies, adapted as necessary to ensure relevance and feasibility;</p>	<p>FR (Drafting Suggestions):</p> <p>xiii. flexibility through timely revisions of key documents such as the Strategic Research and Innovation Agendas (SRIAs) and transition strategies, adapted as necessary to ensure relevance and feasibility;</p>
<p>xiii. continuous monitoring shall include tracking progress towards a set of partnership-specific common indicators including partner contributions, cost efficiency, and openness to new partners. Partnership-specific common indicators shall build on the common indicators as defined under Regulation XXX</p>	<p>ES (Comments):</p> <p>Information to Member States of calls for proposals and participants should also be ensured.</p>

Commission proposal	Drafting Suggestions and Comments
<p>[reference to Performance Regulation] and set out in the biennial monitoring reports on the performance of European partnerships under Horizon Europe 2021-2027;</p>	<p>Common indicators are not sufficient.</p> <p>FR (Drafting Suggestions):</p> <p><del>(c) xiii. — European Partnerships shall ensure</del> continuous monitoring, <del>shall include</del> tracking progress towards a set of partnership-specific common indicators including partner contributions, cost efficiency, and openness to new partners. Partnership-specific common indicators shall build on the common indicators as defined under Regulation XXX [reference to Performance Regulation] and set out in the biennial monitoring reports on the performance of European partnerships under Horizon Europe 2021-2027;</p> <p>HU (Drafting Suggestions):</p> <p>continuous monitoring shall include tracking progress towards a set of partnership-specific common indicators including partner contributions, cost efficiency, and openness to new partners, <b>widening participation, private sector involvement or their possible engagement in the future.</b> Partnership-specific common indicators shall build on the common indicators as defined under Regulation XXX [reference to Performance Regulation] and set out in the biennial monitoring reports on the performance of European partnerships under Horizon Europe 2021-2027;</p> <p>HU (Comments):</p> <p>The monitoring should foresee a specific set of indicators focusing on widening countries participation and their engagement. Moreover, the EPs should allow and monitor private partners (possible) engagement depending on the sectors/areas.</p>

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	<p>IT  <b>(Drafting Suggestions):</b>                      continuous monitoring shall include tracking progress towards a set of partnership-specific common indicators including partner contributions, cost efficiency, and openness to new partners. Partnership-specific common indicators shall build on the common indicators as defined under Regulation XXX [<i>reference to Performance Regulation</i>] and set out in the biennial monitoring reports on the performance of European partnerships under Horizon Europe 2021-2027, <b>including environmental and social impact indicators aligned with the EU Taxonomy and SDG Framework</b></p> <p>PT  <b>(Comments):</b>                      Tracking progress with common indicators is certainly important, but if the proposal doesn't clarify how these indicators will be chosen or adapted to different types of partnerships it could lead to excessive reporting requirements, adding to the administrative burden diagnosed in HE 2021-2027.</p>
	<p>ES  <b>(Drafting Suggestions):</b>  <u><b>Detailed information on the evaluation process and results from all calls for proposals within European Partnerships, to be made available timely and accessible and in the same way as in general calls for proposals.</b></u></p> <p>ES  <b>(Comments):</b>                      In order to monitor and manage the programme, it is necessary to have the details of each call for proposals, including European Partnerships <a href="https://eur-lex.europa.eu/eli/dec/2021/764/oj/eng#anx_III">https://eur-lex.europa.eu/eli/dec/2021/764/oj/eng#anx_III</a></p>

Commission proposal	Drafting Suggestions and Comments
<p>xiv. European Partnerships shall launch their final calls before 31 December 2034. European Partnerships shall determine and implement the best mode of transition. Taking into account the transition strategies prepared ex-ante, partnerships shall undergo an independent assessment determining whether their objectives have been met, the suitability of the partnership approach, and their continued relevance for the Union’s policy priorities. This assessment should include a recommendation for the most effective policy intervention mode for any future actions.</p>	<p>DE (Drafting Suggestions):</p> <p>xiv. European Partnerships shall launch their final calls <u>cofunded with funds allocated from Horizon Europe (2028-2034)</u> before 31 December 2034. European Partnerships shall determine and implement the best mode of transition. Taking into account the transition strategies prepared ex-ante, partnerships shall undergo an independent assessment determining whether their objectives have been met, the suitability of the partnership approach, and their continued relevance for the Union’s policy priorities. This assessment should include a recommendation for the most effective policy intervention mode for any future actions.</p> <p>DE (Comments):</p> <p>DE: All indications from previous Partnership processes (FP9 and earlier) are that this is an unreasonably short timeframe to impose on a partnership.</p> <p>ES (Comments):</p> <p>If 31/12/2034 is the deadline for their final calls, it would be important to have a calendar plan, as this would set up the partnerships very early on FP10, so an eye is to be kept on those partnerships that are starting in current FP9, if they are expected to be continued</p> <p>FR (Drafting Suggestions):</p> <p>xiv. European Partnerships shall launch their final calls <u>co-funded with funds allocated under MFF (2028-20234)</u> before 31 December 2034. European Partnerships shall determine and implement the best mode of transition. Taking into account the transition strategies prepared ex-ante, partnerships shall undergo an independent assessment determining whether their</p>

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	<p>objectives have been met, the suitability of the partnership approach, and their continued relevance for the Union’s policy priorities. This assessment should include a recommendation for the most effective policy intervention mode for any future actions.</p> <p>PT  <b>(Comments):</b>                      Transition for what?</p> <p>Who will carry this independent assessment and how will the results be used?  <b>Side Note:</b> It should be clearly defined that the independent assessment will be carried out by an external entity with recognised expertise and that the results of this assessment should be used to inform decisions on renewal or termination, guide future policy interventions, and produce impact reports accessible to stakeholders.</p>
<p>(b) In the absence of renewal, European Partnerships shall implement appropriate measures based on their phasing-out actions identified in their transition strategies.</p>	<p>BE  <b>(Comments):</b>                      More info on how ‘phasing-out actions’ should be understood would be welcome – especially regarding partnerships who include a low or medium TRL focus.</p> <p>PL  <b>(Comments):</b>                      In many areas – especially health – there is no viable business model for self-financing. Therefore, co-funded partnerships should rather remain in this format, as phasing out EU support would deepen inequalities between countries and limit the participation of smaller states.</p> <p>PT</p>

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	<p><b>(Comments):</b></p> <p>Appropriate" is not defined and there's no guidance on how to support partnerships during the transition.</p> <p><b>Side Note:</b> In the absence of renewal, European Partnerships shall implement transition measures defined in their ex-ante strategy, including support mechanisms such as access to alternative funding instruments, integration into national programmes, or transformation into independent entities.</p>
<b>Chapter III</b>	
<b>Competitiveness and Society</b>	<p>BE</p> <p><b>(Comments):</b></p> <p>A clear overview should be provided in how FP9 thematic clusters flow into the proposed policy windows.</p> <p>Additionally, how does COM see the interaction between themes that touch upon both competitiveness and societal policy windows? (e.g. climate, mental health)</p>
<i>Article 11</i> <i>Collaborative research</i>	<p>ES</p> <p><b>(Drafting Suggestions):</b></p> <p>Article 11 <b>Collaborative research and innovation activities</b></p> <p>MT</p> <p><b>(Comments):</b></p> <p>Malta calls for all collaborative research work programmes to be adopted in the examination procedure with a greater role of the Member States.</p>

Commission proposal	Drafting Suggestions and Comments
<p>Collaborative research activities referred to in Chapter I of Regulation XXX [reference to the Horizon Europe Regulation] shall cover, in particular, the following research and innovation activities:</p>	<p>SK (Comments): How will the Horizon Europe collaborative research topics be agreed and coordinated with the policy windows under the European Competitiveness Fund? What will the role of the Programme Committees be in this process? What is the impact of this change on the position of the National Contact Points (NCPs) in terms of their future functioning and cooperation?</p>
<p>(a) under ‘Competitiveness’, research and innovation activities of the policy windows described in Chapters IV to VII of the European Competitiveness Fund:</p>	<p>AT (Drafting Suggestions): under ‘Competitiveness’, research and innovation activities of the policy windows described in Chapters IV to VII of the European Competitiveness Fund, <b><u>in line with the horizontal principles of multidisciplinary research and SSH integration established in the regulation for Horizon Europe (Art. 5).</u></b></p> <p>AT (Comments): It is unclear how SSH integration can be ensured also for R&amp;I activities implemented under the ECF. Therefore, there is a need to add a reference to SSH intergration.</p> <p>ES (Comments): Detailed information of the R&amp;I activities to be funded under the Programme should be included here and coordinated with ECF. Policy windows are too wide anshould be divided.</p> <p>FR (Drafting Suggestions):</p>

Horizon Europe Framework Programme and Specific Programme bracketed proposals Block III Pilar II + Partnerships

From: AT, BE, CZ, DE, EE, ES, FI, FR, HR, HU, IE, IT, LT, NL, PL, PT, SI, SK, MT

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	<p>(a) under ‘Competitiveness’, research and innovation activities <del>of corresponding to</del> the policy windows described in Chapters IV to VII of the European Competitiveness Fund:</p> <p>HR  <b>(Drafting Suggestions):</b></p> <p>(a) under ‘Competitiveness’, research and innovation activities of the policy windows described in Chapters IV to VII of the European Competitiveness Fund, <b><u>including EU Missions</u></b></p> <p>PT  <b>(Comments):</b></p> <p>The coordination between these two regulations is pivotal and the way MS are going to be involved is critical.</p> <p>MT  <b>(Drafting Suggestions):</b></p> <p>(a) under ‘Competitiveness’, research and innovation activities <b><u>in the following areas: Clean Transition and Industrial Decarbonisation; Health, Biotech, Agriculture and Bioeconomy; Digital Leadership; Resilience and Security, Defence Industry and Space; synergistic to</u></b> of the policy windows described in Chapters IV to VII of the European Competitiveness Fund, <b><u>but with independent work programmes:</u></b></p> <p>MT  <b>(Comments):</b></p> <p>Malta asserts that collaborative research under Horizon Europe regulation should not be subordinate to the European Competitiveness Fund work programmes. We are calling for a greater independence of the European Framework Programme for Research and Innovation.</p>
(b) under ‘Society’, research and innovation activities, such as:	AT

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	<p>(Comments):</p> <p><b>General comment:</b> AT considers this as a very important part of the programme, which should receive adequate attention and resources.</p> <p>ES</p> <p>(Comments):</p> <p>How are societal challenges going to be coordinated with ECF policy windows to avoid overlapping?</p>
<p>(i) activities aimed at accomplishing priorities for global societal challenges:</p>	<p>DE</p> <p>(Drafting Suggestions):</p> <p>(i)activities aimed at accomplishing priorities for <del>global societal challenges</del> <b><u>democratic, inclusive, value-based and competitive European societies</u></b></p> <p>DE</p> <p>(Comments):</p> <p>DE: The “global societal challenges” part of “societies” focuses on issues such as strengthening democracies and promoting inclusive socio-economic transformations. The current title “global societal challenges” however is very broad and therefore can be misleading</p> <p>FR</p> <p>(Comments):</p> <p><u>Scrutiny reservation</u></p> <p>IT</p> <p>(Drafting Suggestions):</p> <p>activities aimed at accomplishing priorities for global societal challenges, <b>including citizen science and participatory research approaches to foster societal relevance and acceptance:</b></p> <p>PT</p>

Commission proposal	Drafting Suggestions and Comments
	<p>(Comments):</p> <p>This is mostly an SSH-driven agenda? Societal Challenges must be approached in all its dimensions and beyond SSH</p>
<p>– strengthening democratic values and foundations, civic engagement, the rule of law and fundamental rights, by fostering resilient, pluralistic societies, and the integrity of the information and media space and countering polarisation, disinformation, hate speech, discrimination, and xenophobia, in a rapidly evolving world of geopolitical shifts;</p>	<p>AT</p> <p>(Drafting Suggestions):</p> <p>strengthening democratic values and foundations, civic engagement, the rule of law, fundamental rights <b><u>and security</u></b>, by fostering resilient, pluralistic <b><u>and peaceful</u></b> societies, <b><u>the role of culture and creativity in strengthening such societies</u></b>, and the integrity of the information and media space and countering <b><u>foreign interference</u></b>, polarisation, disinformation, hate speech, discrimination, and xenophobia, in a rapidly evolving world of geopolitical shifts; <b><u>fostering research on peace and security, such as conflict prevention, peacebuilding and peacekeeping</u></b>.</p> <p>AT</p> <p>(Comments):</p> <p>AT strongly advocates for including research on peace and security in the future Horizon Europe to <b><u>foster the understanding of conflict prevention, peacebuilding and peacekeeping</u></b> especially in the context of the current geopolitical challenges.</p> <p>foreign interference is one important aspect in this context</p> <p>BE</p> <p>(Drafting Suggestions):</p> <p>– strengthening democratic values and foundations, civic engagement, the rule of law and fundamental rights, by fostering resilient, pluralistic societies, <b><u>considering history, memory, heritage, media literacy, cultural</u></b></p>

Commission proposal	Drafting Suggestions and Comments
	<p><b>participation</b>, and the integrity of the information and media space and countering polarisation, disinformation, hate speech, discrimination, and xenophobia, in a rapidly evolving world of geopolitical shifts;</p> <p>DE  <b>(Drafting Suggestions):</b>                      strengthening democratic values and foundations, civic engagement, the rule of law and fundamental rights, by fostering resilient, pluralistic societies <b><u>(taking into consideration the role of cultural heritage and cultural identity)</u></b></p> <p>DE  <b>(Comments):</b>                      DE: Article 15 (1) of the regulation lists “culture and creativity” as one area that should be taken up here. Research on cultural contexts, cultural identity, and cultural heritage is essential for addressing societal challenges and developing solutions.</p> <p>FR  <b>(Comments):</b>  <u>Scrutiny reservation</u></p> <p>HR  <b>(Drafting Suggestions):</b>                      strengthening democratic values and foundations, civic engagement, <b><u>democratic institutions</u></b> and the rule of law and fundamental rights, by fostering resilient, pluralistic societies, and the integrity of the information and media space and countering polarisation, disinformation, hate speech, discrimination, and xenophobia, in a rapidly evolving world of geopolitical shifts;</p> <p>PT  <b>(Drafting Suggestions):</b></p>

Commission proposal	Drafting Suggestions and Comments
	<p>– strengthening democratic values and foundations, civic engagement, the rule of law and fundamental rights, by fostering resilient, pluralistic societies, <b>safeguarding trust in science and evidence, protecting</b> and the integrity of the information and media space and countering polarisation, disinformation, hate speech, discrimination, and xenophobia, in a rapidly evolving world of geopolitical shifts;</p> <p>SI (Drafting Suggestions):</p> <p>strengthening democratic values and foundations, civic engagement, the rule of law and fundamental rights, by fostering resilient, pluralistic <b>and peaceful</b> societies, <b>the role of culture and creativity in strengthening such societies</b>, and the integrity of the information and media space and countering polarisation, disinformation, hate speech, discrimination, and xenophobia, in a rapidly evolving world of geopolitical shifts; <b>fostering research on peace and security, such as conflict prevention, peacebuilding and peacekeeping</b></p> <p>SK (Drafting Suggestions):</p> <p>- strengthening democratic values and foundations, civic engagement, the rule of law, fundamental rights <b>and security</b>, by fostering resilient, pluralistic <b>and peaceful</b> societies, <b>the role of culture and creativity in strengthening such societies</b>, and the integrity of the information and media space and countering <b>foreign interference</b>, polarisation, disinformation, hate speech, discrimination, and xenophobia, in a rapidly evolving world of geopolitical shifts, <b>fostering research on peace and security, such as conflict prevention, peacebuilding and peacekeeping;</b></p>
<p>– promoting social inclusion, social and economic transformations, inclusive societies and social cohesion and tackling inequalities to create opportunities for all, taking into consideration rural areas’ specificities, addressing demographic change and intergenerational fairness,</p>	<p>AT (Drafting Suggestions):</p>

Commission proposal	Drafting Suggestions and Comments
<p>including well-managed migration and mobility, supporting mental health and societal well-being, including for young people;</p>	<p>promoting social inclusion, social and economic transformations <b>(incl. the triple transition)</b>, inclusive societies and social cohesion and tackling inequalities to create opportunities for all, taking into consideration rural areas’ specificities, addressing demographic <b>and climatic</b> change and intergenerational fairness, including well-managed migration and mobility, supporting <del>mental health</del> <b>(incl. mental health)</b> and societal well-being, including for young people</p> <p>AT <b>(Comments):</b></p> <p>Health is also covered by the ECF, but <b>AT is concerned about the future of research and innovation activities, which are not fully focussed on developing new products for the market.</b></p> <p>For instance, we <b>need to maintain support to R&amp;I activities in the field of public health.</b> We need research into how public health can be improved and, for example, how citizens can be better motivated to participate in prevention and screening programmes. Research findings on such issues are less relevant to the development of commercial products, but they are of great importance for the advancement of society.</p> <p>AT also regrets that the proposal does not address the <b>societal challenges that will come with the climate crisis and ecological challenges.</b> These aspects need to be integrated.</p> <p>BE <b>(Drafting Suggestions):</b></p> <ul style="list-style-type: none"> <li>– promoting social inclusion, social and economic transformations, inclusive societies and social cohesion and tackling inequalities to create opportunities for all, taking into consideration rural areas’ specificities, addressing <b>climate and</b> demographic change and intergenerational fairness,</li> </ul>

Commission proposal	Drafting Suggestions and Comments
	<p>including well-managed migration and mobility, supporting mental health and societal well-being, including for young <b>and ageing</b> people;</p> <p>DE  <b>(Drafting Suggestions):</b></p> <p>promoting social inclusion, social and economic transformations, inclusive societies, <b>decent work</b> and social cohesion and tackling inequalities to create opportunities for all, taking into consideration rural areas’ specificities <b>and the challenges of climate change and the depletion of natural resources in its impact on society</b>, addressing demographic change and intergenerational fairness, including well-managed migration and mobility, supporting mental health and societal well-being, including for young people;</p> <p>DE  <b>(Comments):</b></p> <p>The importance of occupational safety and humane work design has not been specifically mentioned to date, so an addition has been made in this regard.</p> <p>DE: The challenges posed by climate change and, for example, the decline in water availability have a major impact on societies and may lead to conflicts in the future.</p> <p>ES  <b>(Drafting Suggestions):</b></p> <p>promoting social inclusion, social and economic transformations, inclusive societies and social cohesion and tackling inequalities <b>based on gender, race and social class</b> to create opportunities for all, taking into consideration rural areas’ specificities, addressing demographic change and intergenerational fairness, including well-managed migration and mobility, supporting mental</p>

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	<p>health and societal well-being, <b>throughout the lifecourse</b> including for young people;</p> <p>ES (Comments): Ensure that childhood and aging populations are also included.</p> <p>FR (Comments): <u>Scrutiny reservation</u></p> <p>HR (Drafting Suggestions): promoting <del>social inclusion</del>, social and economic transformations <b>and social inclusion</b>, inclusive societies and social cohesion and tackling inequalities to create opportunities for all, <del>taking into consideration rural areas' specificities</del>, addressing demographic change and intergenerational fairness, including well-managed migration and mobility, supporting mental health and societal well-being <b>for all, including vulnerable groups</b> including for <del>and</del>-young people.</p> <p>HR (Comments): <b>HR suggests</b> changes that are more closely aligned with the main objectives and terminology of Cluster 2.</p> <p>PT (Drafting Suggestions): – promoting social inclusion, social and economic transformations, inclusive societies and social cohesion and tackling inequalities to create opportunities for all, taking into consideration rural areas' specificities, addressing demographic change and intergenerational fairness, including well-managed migration and mobility, supporting <b>physical and</b> mental</p>

Commission proposal	Drafting Suggestions and Comments
	<p>health and societal well-being, including for young people <b><u>and strengthening preparedness for health crises;</u></b></p> <p>AT  <b>(Drafting Suggestions):</b></p> <p><b><u>- Advancing climate science and strengthening the knowledge base needed to support actionable solutions for driving the global transition towards a climate-neutral and climate-resilient society. Research should address key knowledge gaps on climate change, its associated impacts, and risks for the European economy, society and nature.</u></b></p> <p><b><u>- fostering activities to combat biodiversity loss/degradation and the increasing frequency of natural disasters and extreme weather events;</u></b></p> <p>AT  <b>(Comments):</b></p> <p><b>NEW:</b> The proposal overlooks the most urgent societal challenge: the climate crisis. Robust climate science is essential to deepen our understanding of the evolving climate and to design effective mitigation and adaptation strategies across multiple timeframes and spatial scales. Such scientific insights are crucial to fostering resilience, thereby safeguarding European competitiveness, prosperity, and social cohesion.</p> <p><b>NEW:</b> Ecosystem considerations and economic competitiveness must be considered together: 50% of economic output in Europe depends on functioning ecosystems.</p>
<p>– fostering a value-based and competitive Europe by advancing future-ready skills, and driving inclusive innovation that empowers people, facilitates societal acceptance of technologies and supports sustainable growth that benefits all.</p>	<p>BE  <b>(Drafting Suggestions):</b></p> <p>– fostering a value-based and competitive Europe by advancing future-ready <b><u>and creative</u></b> skills, and driving inclusive innovation that empowers</p>

Commission proposal	Drafting Suggestions and Comments
	<p>people, facilitates societal acceptance of technologies and supports sustainable growth that benefits all <b><u>a just green transition</u></b>.</p> <p>DE  <b>(Drafting Suggestions):</b>                      fostering a value-based and competitive Europe by <b><u>by harnessing cultural heritage as well as</u></b> advancing future-ready skills, and driving inclusive innovation that empowers people, facilitates societal acceptance of technologies and supports sustainable growth that benefits all.</p> <p>DE  <b>(Comments):</b>                      DE: Research on Europe’s cultural heritage is important for understanding European values and can be a resource for fostering innovation</p> <p>ES  <b>(Drafting Suggestions):</b>                      fostering a value-based and competitive Europe by advancing future-ready skills, and driving inclusive innovation that empowers people and <b>address diverse needs</b>, facilitates societal acceptance of <b>bias-free</b> technologies and supports sustainable growth that benefits all.</p> <p>FR  <b>(Comments):</b>  <u>Scrutiny reservation</u></p>
	<p>BE  <b>(Drafting Suggestions):</b>                      - <b><u>Safeguarding the Union’s cultural heritage and exploring the potential of cultural and creative sectors by developing and using advanced technologies; enhancing access to cultural heritage by supporting the establishment of a European cultural heritage</u></b></p>

Commission proposal	Drafting Suggestions and Comments
	<p><b><u>collaborative space; and promoting its role in sustainable development, cultural tourism, social innovation and inclusion.</u></b></p> <p>BE  <b>(Comments):</b>                      To be added as separate priority area.</p> <p>ES  <b>(Drafting Suggestions):</b>  <b>Support and strengthen the European cultural heritage and the cultural and creative innovative ecosystems</b></p> <p>ES  <b>(Comments):</b>                      According to Regulation text Art.15.1. Collaborative research will include “addressing societal challenges, including culture and creativity,”. Why culture and creativity is not included below? I should be included, as well as the cultural heritage and cultural and creative industries</p> <p>We miss a specific mention to cultural heritage</p>
<p>(ii) EU Missions: activities supporting EU Missions referred to in Article 15(5) of Regulation XXX [<i>reference to the Horizon Europe Regulation</i>].</p>	<p>EE  <b>(Drafting Suggestions):</b>  <del>(ii) EU Missions: activities supporting EU Missions referred to in Article 15(5) of Regulation XXX [<i>reference to the Horizon Europe Regulation</i>].</del></p> <p>ES  <b>(Comments):</b>                      R&amp;I activities related to EU Mission (if needed) should be included in other parts of the Programme for the sake of simplification.                      So far there is no positive evaluation on the continuation of the Missions.                      Missions currently complicate the Fp program and clearly overlap. Beyond</p>

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	<p>we have not seen any reference to Missions in the rest of the MFF 2028-2034 package.</p> <p>FR (Comments): <u>Scrutiny reservation</u></p> <p>HR (Drafting Suggestions): <del>(ii) — EU Missions: activities supporting EU Missions referred to in Article 15(5) of Regulation XXX [reference to the Horizon Europe Regulation].</del></p> <p>IT (Drafting Suggestions): (ii) EU Missions: activities supporting EU Missions referred to in Article 15(5) of Regulation XXX [reference to the Horizon Europe Regulation], <b>with active involvement of local authorities and communities to ensure contextual relevance and long-term sustainability</b></p>
<p>(iii) activities in the context of the New European Bauhaus (NEB) Facility, established with the Horizon Europe Strategic Plan 2025-2027<sup>3</sup>, shall deliver on the objectives of the New European Bauhaus, in particular supporting activities to foster the development and scaling up of innovative research solutions for the transformation of neighbourhoods into sustainable, inclusive and beautiful places.</p>	<p>BE (Drafting Suggestions): (iii) activities in the context of the New European Bauhaus (NEB) Facility, established with the Horizon Europe Strategic Plan 2025-2027, shall deliver on the objectives of the New European Bauhaus, in particular supporting activities to foster the development and scaling up of innovative research</p>

<sup>3</sup> Commission Implementing Decision C(2024)1741 of 20 March 2024 on adopting the 2025-2027 strategic research and innovation plan under the Specific Programme implementing Horizon Europe – The Framework Programme for Research and Innovation.

Commission proposal	Drafting Suggestions and Comments
	<p>solutions <u>up to Technology Readiness Level 7</u> for the transformation of neighbourhoods into sustainable, inclusive and beautiful places.</p> <p>BE  <b>(Comments):</b></p> <p>Should NEB be included in Pillar II, it is important to clarify the specific Technology Readiness Levels (TRLs) that will be targeted. We question whether ‘development and scaling up of innovative research solutions’ fit with the description of the Regulation that stated: “The Programme shall support the R&amp;I component of the New European Bauhaus Facility.” If support extends to TRL 8–9, it would be more appropriate for such activities to be funded through the ECF.</p> <p>EE  <b>(Drafting Suggestions):</b></p> <p>(iii) activities in the context of the New European Bauhaus (NEB) Facility, established with the Horizon Europe Strategic Plan 2025-2027<sup>4</sup>, shall deliver on the objectives of the New European Bauhaus, in particular supporting activities to foster the development and scaling up of innovative research solutions for the transformation of neighbourhoods into sustainable, inclusive and beautiful <b>user-friendly</b> places.</p> <p>EE  <b>(Comments):</b></p> <p>In our view legal texts should aim to define rights, duties and facts with unambiguous language. Using term “beautiful” would introduce an unacceptable level of ambiguity and subjectivity. Also, we believe that the user-friendliness is more important than the way the neighbourhoods look.</p>

<sup>4</sup> Commission Implementing Decision C(2024)1741 of 20 March 2024 on adopting the 2025-2027 strategic research and innovation plan under the Specific Programme implementing Horizon Europe – The Framework Programme for Research and Innovation.

Commission proposal	Drafting Suggestions and Comments
	<p>Still, having said this, we have nothing against beautiful places or beauty as such.</p> <p>ES (Drafting Suggestions):</p> <p><del>iii) activities in the context of the New European Bauhaus (NEB) Facility, established with the Horizon Europe Strategic Plan 2025-2027<sup>5</sup>, shall deliver on the objectives of the New European Bauhaus, in particular supporting activities to foster the development and scaling up of innovative research solutions for the transformation of neighbourhoods into sustainable, inclusive and beautiful places.</del></p> <p>ES (Comments):</p> <p>R&amp;I activities related to the NEB Facility (if needed) should be included in other parts of the Programme for the sake of simplification.</p> <p>FR (Comments):</p> <p><u>Scrutiny reservation</u></p> <p>IT (Drafting Suggestions):</p> <p>(iii) activities in the context of the New European Bauhaus (NEB) Facility, established with the Horizon Europe Strategic Plan 2025-2027<sup>6</sup>, shall deliver on the objectives of the New European Bauhaus, in particular supporting activities to foster the development and scaling up of innovative research solutions for the transformation of neighbourhoods into sustainable, inclusive</p>

<sup>5</sup> Commission Implementing Decision C(2024)1741 of 20 March 2024 on adopting the 2025-2027 strategic research and innovation plan under the Specific Programme implementing Horizon Europe – The Framework Programme for Research and Innovation.

<sup>6</sup> Commission Implementing Decision C(2024)1741 of 20 March 2024 on adopting the 2025-2027 strategic research and innovation plan under the Specific Programme implementing Horizon Europe – The Framework Programme for Research and Innovation.

**Horizon Europe Framework Programme and Specific Programme bracketed proposals Block III Pilar II + Partnerships**

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

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<b>Commission proposal</b>	<b>Drafting Suggestions and Comments</b>
	and beautiful places, with active involvement of local authorities and communities to ensure contextual relevance and long-term sustainability