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WK 14102/2025 INIT

LIMITE

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CONTRIBUTION

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

N° prev. doc.: 13484/25
N° Cion doc.: ST 11765 2025 REV 1; ST 11749 2025 INIT

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 general provisions (Block 1)

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

WK 14102/2025 INIT

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EN

Horizon Europe Framework and Specific Programmes - Block 1 (General provisions)

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

Deadline: **20 October 2025 12.00**

Updated: **24/10/2025 13:59**

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 ondocx**

Thank you for your cooperation!

Presidency text ST 13484/25	Drafting suggestions and Comments
General Comments	IE (Comments): Ireland welcomes the first Presidency compromise text and the efforts to address the concerns raised by MS. We provide some initial drafting suggestions for consideration. Ireland maintains a general scrutiny reservation as the text evolves – in particular given the interlinkages between FP pillars and the ECF, nothing is agreed until everything is agreed. SE (Comments): SE asks for scrutiny reservation on the whole FP proposal.

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>It is vital that the EU with the Horizon Europe Programme attracts and retains top researchers, funds the best science, and generates the long- term, high- quality outputs that underpin productivity and competitiveness.</p> <p>On management, there should be coherence, coordination and governance arrangements across the Horizon Europe and the European Competitiveness Fund.</p> <p>Between the ECF and HE, we should strive for avoiding overlapping mandates, unclear division of responsibilities, and governance modalities.</p>
<p><u>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</u></p>	<p>SI (Drafting suggestions): Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing Horizon Europe X, 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>Title I – The Framework Programme for Research and Innovation</p>	
<p>Chapter I</p>	
<p>General Provisions</p>	
<p><i>Article 1 Subject matter</i></p>	

Presidency text ST 13484/25	Drafting suggestions and Comments
<p>1. This Regulation establishes Horizon Europe - the Framework Programme for Research and Innovation (the ‘Programme’) [for the period of the Multiannual Financial Framework (the ‘MFF’) 2028-2034] and sets out the rules for participation and dissemination concerning indirect actions under the Programme and determines the framework governing the Union support for Research and Innovation activities for the same duration. It also lays down the objectives of the Programme and its budget for that period, the forms of Union funding and the rules for providing such funding.</p>	<p style="text-align: center; opacity: 0.5; font-size: 48px; transform: rotate(-30deg);">PUBLIC</p>
<p>2. [The Programme shall be implemented through:</p>	
<p>(a) the Specific Programme established by Council Decision XX including the collaborative research activities of the policy windows as set out in the European Competitive Fund Regulation.</p>	<p>ES (Drafting suggestions): (a) the Specific Programme established by Council Decision XX including the collaborative research and innovation activities of the policy windows as set out in the European Competitive Fund Regulation.</p> <p>ES (Comments): Innovation should be added for consistency with article 4.</p>
<p>(b) the Specific Programme on defence research established by Regulation (EU)[XXX] [European Competitiveness Fund].</p>	
<p>3. This Regulation shall not apply to the Specific Programme on defence research referred to in paragraph 2, point (b). Activities to be carried out under this Specific Programme and which are laid down in Regulation (EU)[XXX][European Competitiveness Fund] shall aim to foster the</p>	

Presidency text ST 13484/25	Drafting suggestions and Comments
competitiveness, efficiency and innovation capacity of the European defence technological and industrial base.]	
4. The terms Horizon Europe, ‘the Programme’ and ‘Specific Programme’ used in this Regulation refer to matters relevant only to the Specific Programme referred to in paragraph 2, point (a), unless otherwise specified.	
Recitals	
<p>(1) It is an objective of the Union to strengthen its scientific and technological bases by strengthening the European research area (ERA) in which researchers, scientific knowledge and technology circulate freely and encouraging it to become more competitive, including in its industry, while promoting all research and innovation (R&I) activities to deliver on the Union's strategic priorities and commitments, which ultimately aim to promote peace, the Union's values and the well-being of its peoples.</p>	<p>DE (Drafting suggestions):</p> <p>1) It is an objective of the Union to strengthen its scientific and technological bases by funding excellent research and innovation and by strengthening the European research area (ERA) in which researchers, scientific knowledge and technology circulate freely and encouraging it to become more competitive, including in its industry, while promoting all research and innovation (R&I) activities to deliver on the Union's strategic priorities and commitments, which ultimately aim to promote peace, the Union's values and the well-being of its peoples.</p> <p>DE (Comments):</p> <p>DE: funding R&I should be added</p> <p>FR (Drafting suggestions):</p> <p>(1) It is an objective of the Union to strengthen its scientific and technological bases by strengthening the European research area (ERA) in which researchers, scientific knowledge and technology circulate freely and</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>encouraging it to become more competitive, including in its industry, thus contributing to the Union’s competitiveness and attractiveness while as well as promoting all research and innovation (R&I) activities to delivering on the Union's strategic priorities and commitments, which ultimately aim to promote peace, the Union's values and the well-being of its peoples.</p> <p>FR (Comments): <u>The ERA does not need to be more competitive, there seems to be a confusion with the contribution of R&I to the objective of reinforcing competitiveness. For instance, the ERA has no industry in itself. The wording is confusing.</u></p> <p><u>Besides, there is no contradiction between competitiveness and delivering on Union’s strategic priorities, especially since competitiveness is one of them.</u></p> <p>PL (Drafting suggestions): (1) It is an objective of the Union to strengthen its scientific and technological bases by strengthening the European research area (ERA) in which researchers, scientific knowledge and technology circulate freely and encouraging it to become more competitive, including in its industry, while promoting all research and innovation (R&I) activities to deliver on the Union's strategic priorities and commitments, which ultimately aim to promote peace, strengthen democracy and the Union's values and secure the well-being of its peoples.</p> <p>PL (Comments): The proposed changes aim to strengthen a focus on democracy, democratic processes and common European values.</p>
	SK

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>(Comments):</p> <p>SK would like to add a reference in recital part on addressing climate change and UN SDGs, proposal also made by Belgium (consistency with FP9).</p>
<p>(2) To deliver scientific, technological, economic, environmental and societal impact and to maximise the added value of the Union's R&I investments, the Union should invest in research and innovation through Horizon Europe - the Framework Programme for Research and Innovation for the period 2028-2034 (the 'Programme'), which should strengthen excellence, competitiveness, resilience, sustainability, scientific and technological leadership, and social cohesion.</p>	<p>AT</p> <p>(Comments):</p> <p>AT welcomes the amendments made by the Presidency.</p> <p>BE</p> <p>(Drafting suggestions):</p> <p>To deliver scientific, technological, economic, environmental and societal impact and to maximise the added value of the Union's R&I investments, the Union should invest in research and innovation through Horizon Europe - the Framework Programme for Research and Innovation for the period 2028-2034 (the 'Programme'), which should strengthen excellent research and innovation, competitiveness, resilience, sustainability, scientific and technological leadership, citizen's wellbeing and social cohesion, and tackle global challenges.</p> <p>BE</p> <p>(Comments):</p> <p>Reference to global challenges – which are European challenges – and the importance of the global science-policy agenda should be included.</p> <p>BG</p> <p>(Drafting suggestions):</p> <p>(2) To deliver scientific, technological, economic, environmental and societal impact and to maximise the added value of the Union's R&I investments, the Union should invest in research and innovation through Horizon Europe - the Framework Programme for Research and Innovation for the period 2028-2034 (the 'Programme'), which should strengthen</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>excellence, competitiveness, resilience, sustainability, scientific and technological leadership, and social cohesion, <u>by supporting and facilitating diffusion of knowledge throughout the Union, promoting collaborative links, engaging Union’s talent pool and attracting and retaining talents.</u></p> <p>CZ (Drafting suggestions):</p> <p>To deliver scientific, technological, economic, environmental and societal impact and to maximise the added value of the Union's R&I investments, the Union should invest in research and innovation through Horizon Europe - the Framework Programme for Research and Innovation for the period 2028-2034 (the ‘Programme’), which should strengthen scientific excellence, competitiveness, resilience, sustainability, scientific and technological leadership, and social cohesion.</p> <p>CZ (Comments):</p> <p>CZ welcomes reference to excellence however we need to be precise, so the addition to “scientific excellence”, or “excellence in RDI” would be welcomed.</p> <p>DE (Comments):</p> <p>DE: We support the insertions made by the Presidency.</p> <p>EE (Drafting suggestions):</p> <p>(2) To deliver scientific, technological, economic, environmental and societal impact and to maximise the added value of the Union's R&I investments, the Union should invest in research and innovation through Horizon Europe - the Framework Programme for Research and Innovation for the period 2028-2034 (the ‘Programme’), which should strengthen</p>

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	<p><u>excellence</u>, competitiveness, resilience, sustainability, <u>scientific and technological leadership</u>, and social cohesion, <u>and security in all its aspects</u>.</p> <p>EE (Comments): We support PL amendment proposal.</p> <p>ES (Comments): We support the new wording. It is important that recitals highlight excellence and scientific leadership.</p> <p>FR (Drafting suggestions): (2) To deliver scientific, technological, economic, environmental and societal impact and to maximise the added value of the Union's R&I investments, the Union should invest in research and innovation through Horizon Europe - the Framework Programme for Research and Innovation for the period 2028-2034 (the 'Programme'), which should strengthen <u>excellence</u>, competitiveness, <u>sovereignty</u>, resilience, sustainability, <u>scientific and</u> technological leadership, and social cohesion.</p> <p>FR (Comments): <u>Sovereignty is one of the Union's key priorities, as mentioned in the Versailles Declaration, and the FP contributes to this objective. It should be added to ensure consistency with art 3.1.</u> <u>On the other hand, social cohesion is not something that can be achieved by the FP in itself, even though many FP projects results have very positive – indirect - impacts on it.</u> <u>This creates confusion with the MFF Heading 1.</u></p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>HU (Drafting suggestions):</p> <p>(2) To deliver scientific, technological, economic, environmental and societal impact and to maximise the added value of the Union's R&I investments, the Union should invest in research and innovation through Horizon Europe - the Framework Programme for Research and Innovation for the period 2028-2034 (the 'Programme'), which should strengthen excellence, competitiveness, resilience, sustainability, scientific and technological leadership, and social cohesion.</p> <p>LT (Drafting suggestions):</p> <p>(2) To deliver scientific, technological, economic, environmental and societal impact and to maximise the added value of the Union's R&I investments, the Union should invest in research and innovation through Horizon Europe - the Framework Programme for Research and Innovation for the period 2028-2034 (the 'Programme'), which should strengthen excellence, competitiveness, resilience, sustainability, scientific and technological leadership, and social cohesion, <u>by supporting the creation, diffusion and transfer of advanced and excellent knowledge and technologies across the Union, facilitating collaborative links and engaging full Union's talent pool.</u></p> <p>PL (Drafting suggestions):</p> <p>(2) To deliver scientific, technological, economic, environmental and societal impact and to maximise the added value of the Union's R&I investments, the Union should invest in research and innovation through Horizon Europe - the Framework Programme for Research and Innovation for the period 2028-2034 (the 'Programme'), which should strengthen</p>

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	<p><u>excellence</u>, competitiveness, resilience, sustainability, <u>scientific and technological leadership</u>, and social cohesion and security in all its aspects.</p> <p>PL (Comments): PL wishes to reiterate its previous comments that security in its broadest understanding should be among the new Horizon Europe objectives.</p> <p>SI (Drafting suggestions): <u>(2) To deliver scientific, technological, economic, environmental and societal impact and to maximise the added value of the Union's R&I investments, the Union should invest in research and innovation through Horizon Europe - the Framework Programme for Research and Innovation for the period 2028-2034 (the 'Programme'), which should strengthen excellence, competitiveness, resilience, sustainability, scientific and technological leadership, and social cohesion, by supporting the creation, difusión and transfer of advanced and excellent knowledge and technologies across the Union, facilitating collaborative links engaging full Union's talent pool and attracting talent at all levels.</u></p> <p>SK (Drafting suggestions): (2) To deliver scientific, technological, economic, environmental and societal impact and to maximise the added value of the Union's R&I investments, the Union should invest in research and innovation through Horizon Europe - the Framework Programme for Research and Innovation for the period 2028-2034 (the 'Programme'), which should strengthen <u>excellence</u>, competitiveness, resilience, sustainability, <u>scientific and technological leadership</u>, and social cohesion, by supporting the creation, diffusion and transfer of advanced and excellent knowledge and</p>

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	<p><u>technologies across the Union, facilitating collaborative links, engaging full Union’s talent pool and attracting talent at all levels.</u></p> <p>HU (Drafting suggestions): <u>(3a) The Programme should aim to strengthen collaborative links in Europe thereby contributing to reducing the R&I divide, while respecting the principle of excellence.</u></p> <p>HU (Comments): HU supports SI’s proposal.</p> <p>LT (Drafting suggestions): <u>(3a) The Programme should aim to strengthen collaborative links in Europe thereby contributing to reducing the R&I divide, while respecting the principle of excellence.</u></p> <p>LT (Comments): Collaborative links are at the heart of Framework Programmes. We strongly believe this is an important recital that should be included here.</p> <p>MT (Drafting suggestions):</p>

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	<p><u>(3a) While fully respecting the overarching principle of excellence, the Programme should aim to close the internal R&I divide by ensuring that excellence is supported wherever it is located.</u></p> <p>MT (Comments): Malta feels that this addition would further bring to the fore the importance of closing the innovation divide.</p> <p>SE (Drafting suggestions): bis 2a) <u>The Programme should in particular support the creation, better diffusion and transfer of high-quality and excellent knowledge and high-quality technologies in the Union, attract and retain talents, facilitate collaborative links, support and strengthen the uptake and deployment of innovative and sustainable solutions, and address global challenges.</u></p> <p>SE (Comments): The excellence principle and on other core principles of the Framework Programme should be specified in the recitals.</p> <p>SI (Drafting suggestions): <u>3(a) The programme should aim to strengthen collaborative links in Europe thereby contributing to reducing the R&I divide, while respecting the principle of excellence</u></p> <p>SI (Comments):</p>

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	<p>As measures for spreading excellence and widening participation are part of the programme, its objectives should also be reflected in the recitals</p> <p>SK (Drafting suggestions): <u>(3a) The Programme should aim to strengthen collaborative links in Europe thereby contributing to reducing the R&I divide, while respecting the principle of excellence.</u></p>
<p>(5) In a rapidly changing economic, social and geopolitical environment, recent experience has shown the need for a more flexible multiannual financial framework and its Union spending programmes. To that effect, and in line with the objectives of the Programme, the funding should duly consider the evolving policy needs and Union’s priorities as identified in relevant documents published by the Commission, European Parliament resolutions and in Council conclusions, while ensuring sufficient predictability for the budget implementation.</p>	<p>AT (Comments): AT: The term “sufficient predictability” is unclear. Furthermore, the text does not consider the necessary predictability for applicants and beneficiaries.</p> <p>DE (Comments): DE: Could the Commission please elaborate on how sufficient predictability is ensured? Does “sufficient predictability” refer to member states contributions to the EU budget or the beneficiaries?</p> <p>ES (Drafting suggestions): (5) In a rapidly changing economic, social and geopolitical environment, recent experience has shown the need for a more flexible multiannual financial framework and its Union spending programmes. To that effect, and in line with the objectives of the Programme, the funding should duly consider the evolving policy needs and Union’s priorities as identified in relevant documents published by the Commission, European Parliament resolutions and in Council conclusions, while ensuring sufficient</p>

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	<p>predictability for the budget implementation with minimum budgets for each part of the Programme.</p> <p>ES (Comments):</p> <p>Recognising the importance of budgetary flexibility, it is difficult to maintain the balance between flexibility and predictability. It will be necessary to establish reasonable margins, but also to set minimums, otherwise there is no predictability. The budget should have minimum and unallocated cushions as part Horizon Europe (as it is mentioned for other parts of the MFF, COM (2025) 570 final.</p> <p>FR (Drafting suggestions):</p> <p>(5) In a rapidly changing economic, social and geopolitical environment, recent experience has shown the need for a more flexible multiannual financial framework and its Union spending programmes. To that effect, and in <u>In</u> line with the objectives of the Programme, the funding should duly consider the evolving policy needs and reflect <u>duly consider the evolving policy needs and reflect</u> Union’s priorities <u>in the field of R&I</u> as identified in relevant documents published by the Commission, European Parliament resolutions and in Council conclusions, while ensuring sufficient predictability for the budget implementation. <u>A particular attention should be paid to the most strategic economic sectors in order to reinforce Union’s strategic autonomy and sovereignty.</u></p> <p>FR (Comments):</p> <p><u>The current wording is too generic and does not take into account R&I specificities.</u> <u>We also call for considering the most strategic economic sectors to avoid a “spreading” effect of funding.</u></p> <p>MT</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>(5) In a rapidly changing economic, social and geopolitical environment, recent experience has shown the need for a more flexible multiannual financial framework and its Union spending programmes. To that effect, and in line with the objectives of the Programme, the funding should duly consider the evolving policy needs and Union’s priorities as identified in relevant documents published by the Commission, European Parliament resolutions and in Council conclusions, while ensuring sufficient predictability for the budget implementation. <u>All budgetary changes and adjustments to the Horizon Europe Framework Programme exceeding €xxx (the amount to be discussed during the Research Working Party) need to receive the approval of the Council or the Strategic Programme Committee of HE acting under the examination procedure.</u></p> <p>MT</p> <p>(Comments):</p> <p>Malta reiterates that the relocation and/or reassignment of significant Horizon Europe Framework Programme funds cannot be performed by the European Commission unilaterally. To limit such cases and provide a supervisory mechanism over these actions, the Member States represented in the Council should receive from the Commission a justification behind every proposed action, followed by a vote on approving the relocation and/or reassignment of funds. Malta would be happy to have a discussion on the appropriate amount with MS during the WP.</p> <p>PT</p> <p>(Drafting suggestions):</p> <p>5) In a rapidly changing economic, social and geopolitical environment, recent experience has shown the need for a more flexible multiannual financial framework and its Union spending programmes. To that effect, and in line with the objectives of the Programme, the funding should duly consider, and where appropriate/applicable, the evolving policy needs and</p>

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	<p>Union’s priorities as identified in relevant documents published by the Commission, European Parliament resolutions and in Council conclusions, while ensuring sufficient predictability for the budget implementation.</p> <p>PT (Comments): Applicable or Appropriate: the reason for the introduction of this part in the text is that there are parts of the programme which are policy-independent. To be decided if the best term to use is “applicable” or “appropriate”.</p>
	<p>LT (Comments): We are behind the other delegations that would like to emphasize the need to maintain the current trend of integrating SSH across the entire programme.</p> <p>SK (Comments): SK would like to emphasize the need to maintain the current trend of integrating SSH across the entire programme and not to neglect it.</p> <p>We call for the maintenance of the monitoring mechanism for SSH integration on an annual or, at most, biennial basis.</p>
<p>(7) The Programme should contribute to increasing public and private investment in R&I in Member States, thereby helping to reach an overall investment target of at least 3% of the Union's gross domestic product (GDP) in research and development. Member States’ investment in R&I should be assessed with the help of the framework for the coordination of economic, budgetary, employment and social policies within the Union – the European Semester process. Achieving that target would require Member States and the private sector to complement the Programme with their own reinforced investment actions in research, development and innovation. The Union has</p>	<p>BG (Drafting suggestions): (7) The Programme should contribute to increasing public and private investment in R&I in Member States, thereby helping to reach an overall investment target of at least 3% of the Union's gross domestic product (GDP) in research and development. Member States’ investment in R&I should be assessed with the help of the framework for the coordination of economic, budgetary, employment and social policies within the Union – the European</p>

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<p>made steady progress in increasing research and development investments but is lagging behind other global leaders. The 3% target mentioned above, set over two decades ago acknowledged the importance of research and development as a foundation for a knowledge-based society. While the target encouraged various Member States to set their own research and development intensity goals, significant disparities remain as only a few Member States have reached or exceeded their investment ambition.</p>	<p>Semester process. Achieving that target would require Member States and the private sector to complement the Programme with their own reinforced investment actions in research, development and innovation. The Union has made steady progress in increasing research and development investments but is lagging behind other global leaders and has still not closed the innovation gap. The 3% target mentioned above, set over two decades ago acknowledged the importance of research and development as a foundation for a knowledge-based society. While the target encouraged various Member States to set their own research and development intensity goals, significant disparities remain as only a few Member States have reached or exceeded their investment ambition.</p> <p>FR (Drafting suggestions):</p> <p>(7) The Programme should contribute to increasing public and private investment in R&I in Member States, thereby helping to reach an overall investment target of at least 3% of the Union's gross domestic product (GDP) in research and development. Member States' investment in R&I should be assessed with the help of the framework for the coordination of economic, budgetary, employment and social policies within the Union — the European Semester process. Achieving that target would require Member States and the private sector to complement the Programme with their own reinforced investment actions in research, development and innovation. The Union has made steady progress in increasing research and development investments but is lagging behind other global leaders. The 3% target mentioned above, set over two decades ago acknowledged the importance of research and development as a foundation for a knowledge-based society. While the target encouraged various Member States to set their own research and development intensity goals, significant disparities remain as only a few Member States have reached or exceeded their investment ambition.</p> <p>FR</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>(Comments):</p> <p><u>Although we support the target of 3% spending in R&I, investment choices are a matter for national policy and the EU can only encourage MS and other stakeholders to increase such investments.</u></p> <p><u>On the disparities among Member States in terms of investments in R&I, this is not deniable, however the sentence already states that most MS have not reached the 3% objective and this is the main concern to address in this para.</u></p> <p>HU</p> <p>(Drafting suggestions):</p> <p>(7) The Programme should contribute to increasing public and private investment in R&I in Member States, thereby helping to reach an overall investment target of at least 3% of the Union's gross domestic product (GDP) in research and development. Member States' investment in R&I should be assessed with the help of the framework for the coordination of economic, budgetary, employment and social policies within the Union – the European Semester process. Achieving that target would require Member States and the private sector to complement the Programme with their own reinforced investment actions in research, development and innovation. The Union has made steady progress in increasing research and development investments but is lagging behind other global leaders <u>and has not closed its internal innovation gap</u>. The 3% target mentioned above, set over two decades ago acknowledged the importance of research and development as a foundation for a knowledge-based society. While the target encouraged various Member States to set their own research and development intensity goals, significant disparities remain as only a few Member States have reached or exceeded their investment ambition.</p> <p>HU</p> <p>(Comments):</p> <p>We maintain our proposal regarding the internal innovation gap.</p>

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	<p>LT (Drafting suggestions):</p> <p>(7) The Programme should contribute to increasing public and private investment in R&I in Member States, thereby helping to reach an overall investment target of at least 3% of the Union's gross domestic product (GDP) in research and development. Member States' investment in R&I should be assessed with the help of the framework for the coordination of economic, budgetary, employment and social policies within the Union – the European Semester process. Achieving that target would require Member States and the private sector to complement the Programme with their own reinforced investment actions in research, development and innovation. The Union has made steady progress in increasing research and development investments but is lagging behind other global leaders <u>and has not closed its internal innovation gap</u>. The 3% target mentioned above, set over two decades ago acknowledged the importance of research and development as a foundation for a knowledge-based society. While the target encouraged various Member States to set their own research and development intensity goals, significant disparities remain as only a few Member States have reached or exceeded their investment ambition.</p> <p>LT (Comments):</p> <p>We must not neglect the situation that is in the EU and that impedes the overall competitiveness of the Union.</p> <p>MT (Drafting suggestions):</p> <p>(7) The Programme should contribute to increasing public and private investment in R&I in Member States, thereby helping to reach an overall investment target of at least 3% of the Union's gross domestic product (GDP) in research and development. Member States' investment in R&I should be</p>

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	<p>assessed with the help of the framework for the coordination of economic, budgetary, employment and social policies within the Union – the European Semester process. Achieving that target would require Member States and the private sector to complement the Programme with their own reinforced investment actions in research, development and innovation. The Union has made steady progress in increasing research and development investments but is lagging behind other global leaders. The 3% target mentioned above, set over two decades ago acknowledged the importance of research and development as a foundation for a knowledge-based society. While the target encouraged various Member States to set their own research and development intensity goals, significant disparities remain as only a few Member States have reached or exceeded their investment ambition. <u>The internal innovation divide remains.</u></p> <p>MT (Comments):</p> <p>Malta argues that this small addition would reiterate and highlight the full aims of the Programme.</p> <p>PL (Comments):</p> <p>PL supports HU intervention (RWP 9 October) to list the need to bridge the innovation gap within the EU among the Programme contributions in recital 7.</p> <p>SI (Drafting suggestions):</p> <p>“...Member States’ investment in R&I should be <u>followed through the established statistical activities at Union level and</u> assessed with the help of the framework for the coordination of economic, budgetary, employment and social policies within the Union – the European Semester process. Achieving that target would require Member States and the private sector to</p>

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	<p>complement the Programme with their own reinforced investment actions in research, development and innovation. The Union has made steady progress in increasing research and development investments but is lagging behind other global leaders <u>and has not closed its internal innovation divide.</u></p> <p>SK (Drafting suggestions):</p> <p>(7) The Programme should contribute to increasing public and private investment in R&I in Member States, thereby helping to reach an overall investment target of at least 3% of the Union's gross domestic product (GDP) in research and development. Member States' investment in R&I should be assessed with the help of the framework for the coordination of economic, budgetary, employment and social policies within the Union – the European Semester process. Achieving that target would require Member States and the private sector to complement the Programme with their own reinforced investment actions in research, development and innovation. The Union has made steady progress in increasing research and development investments but is lagging behind other global leaders <u>and has not closed its internal innovation gap.</u> The 3% target mentioned above, set over two decades ago acknowledged the importance of research and development as a foundation for a knowledge-based society. While the target encouraged various Member States to set their own research and development intensity goals, significant disparities remain as only a few Member States have reached or exceeded their investment ambition.</p>

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<p style="text-align: center;"><i>Article 2</i> Definitions</p>	<p>AT (Comments): GENERAL REMARK ON ART. 2: AT asks for a consistent approach to the definitions. Currently some instruments and action types like CSA, ERC, procurement etc. are defined in Article 2, others like RIA/IA not. We suggest including all definitions here. Even when RIA and IA will have the same funding rate, the actions have different focuses and targets and should therefore be based on clear definitions. We also need to ensure consistency with the definitions in the ECF (where applicable).</p>
<p>For the purposes of this Regulation, the following definitions apply:</p>	<p>DE (Comments): DE: We ask for a consistent approach for the definitions. Currently some instruments and action types like CSA, ERC, procurement etc. are defined in article 2, others like RIA/IA not. We suggest to include all definitions here. Even when RIA and IA will have same funding rate the actions have different focuses and aims and should therefore be defined in order to facilitate the proposal process for beneficiaries. We also need to ensure consistency with the definitions in the ECF (where applicable).</p>
	<p>PL (Comments): PL subscribes to the opinions that the definition of “moonshot” project should be included in this article.</p>
<p>(1) <i>‘research infrastructures’ are facilities that provide resources and services to conduct research and foster innovation in their fields, including</i></p>	<p>AT</p>

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<p><u><i>the associated human resources, major equipment or sets of instruments; knowledge-related facilities such as collections, archives or scientific data infrastructures; computing systems, communication networks and any other infrastructure of a unique nature and open to external users, essential to achieve excellence in R&I; they may, where relevant, be used beyond research, for example for education or public services and they may be 'single sited', 'virtual' or 'distributed';</i></u></p>	<p>(Drafting suggestions):</p> <p>(1) ‘research infrastructures’ are facilities that provide resources and services to conduct research and foster innovation in their fields, <u>including the associated human resources, major equipment or sets of instruments; knowledge-related facilities such as collections, archives or scientific data infrastructures; computing systems, communication networks and any other infrastructure of a unique nature and of European scale and interest and open to external users, essential to achieve excellence in R&I; they may, where relevant, be used beyond research, for example for education or public services and they may be 'single sited', 'virtual' or 'distributed';</u></p> <p>AT</p> <p>(Comments):</p> <p>AT: Scale and significance for the European level are the prerequisite for funding from the EU Framework Programme.</p> <p>We welcome the additions to the definition of research infrastructure, assuming that the definition in this form also covers research infrastructures partly used for economic purposes.</p> <p>BE</p> <p>(Comments):</p> <p>Welcome addition.</p> <p>ES</p> <p>(Drafting suggestions):</p> <p>(1) ‘research infrastructures’ are facilities that provide resources and services to conduct research and foster innovation in their fields, <u>including the associated human resources, major equipment or sets of instruments; knowledge-related facilities such as collections, archives or scientific data infrastructures; computing systems, communication networks and any other infrastructure of a unique nature and open to external users,</u></p>

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	<p><u><i>essential to achieve excellence in R&I; they may, where relevant, be used beyond research, for example for education, public services or for enabling industrial development and innovation or public services and they may be 'single sited', 'virtual' or 'distributed'.</i></u></p> <p>ES (Comments): <i>We would prefer not to include examples for greater clarity, to avoid misunderstandings (by not being exhaustive enough) and to leave it more open for possible developments. It should also include some reference to the possibility to have economic activities and should explicitly include the possibility of their use not only for academic research but also for industrial development and innovation.</i></p> <p>NL (Comments): NL does not agree with the new definitions (for both TI and RI) as proposed here. NL notices there are different definitions circulating for research as well as technology infrastructures and thinks the Horizon Europe regulation should not add to this confusion, but help reduce it. Could a comparative table be provided in which the currently used definitions (e.g. from ESFRI, GBER or the recent RTI Strategy) are listed side by side, so that from there uniform definitions can be established that may then apply to all documents (and groups)? That would work better than fragmentarily discussing and adding individual words.</p> <p>SE (Drafting suggestions): <i>research infrastructures' are facilities that provide resources and services to conduct research and foster innovation in their fields and that are essential to achieve excellence in R&I, including the associated human resources, major equipment or sets of instruments; knowledge-related facilities such</i></p>

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	<p><u>as collections, archives or scientific data infrastructures; computing systems, communication networks and any other infrastructure of a unique nature and open to external users, essential to achieve excellence in R&I; they may, where relevant, be used beyond research, for example for education or public services and they may be 'single sited', 'virtual' or 'distributed':</u></p> <p>SE (Comments): <i>The suggestion is based on the current FP.</i></p> <p>SI (Drafting suggestions): <i>'research infrastructures' are facilities, resources or services that support cutting edge provide resources and services to conduct research and foster innovation in their fields, including the associated human resources, major equipment or sets of instruments; knowledge-related facilities or resources such as collections, archives or scientific data infrastructures; computing systems, communication networks and any other infrastructure of a unique nature and open to external users, essential to achieve excellence in R&I; they may, where relevant, be used beyond research, for example for education or public services and they may be 'single sited', 'virtual' or 'distributed';</i></p> <p>SK (Comments): SK prefers to use the well-known and respected ESFRI definition: Research infrastructures (RIs) are facilities, resources or services of a specific nature that support cutting-edge research activities in their fields and include: - major scientific equipment, knowledge-based resources (collections, archives and scientific data);</p>

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	<p>- e-Infrastructures (data and computing systems and networks); and</p> <p>- other tools essential for excellence in research and innovation.</p>
<p>(2) ‘technology infrastructures’ are facilities, equipment, capabilities and resources required to develop, test, upscale and validate technology <u>up to small scale production</u> - from pre-competitive applied research services up to demonstration and validation, <u>enabling and accelerating technological innovations towards societal/market adoption, fostering industrial competitiveness</u>;</p>	<p>AT (Drafting suggestions): (2) ‘technology infrastructures’ are facilities, equipment, capabilities and resources required to develop, test, upscale and validate technology up to small scale production <u>first industrial deployment</u> - from pre-competitive applied research services up to demonstration and validation, enabling and accelerating technological innovations towards societal/market adoption, fostering industrial competitiveness;</p> <p>AT (Comments): AT: It should be clarified that this refers to small scale <u>initial</u> production for final verification and production tests, not full commercial production.</p> <p>BE (Comments): Welcome addition.</p> <p>ES (Drafting suggestions): (2) ‘technology infrastructures’ are facilities, equipment, capabilities and resources required to develop, test, upscale, and validate and demonstrate technology <u>up to small scale production</u> - from pre-competitive applied research services up to demonstration and validation up to small scale <u>production, enabling and accelerating technological innovations towards societal/market adoption, fostering industrial competitiveness</u>;</p> <p>ES</p>

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	<p>(Comments):</p> <p><i>We support the inclusion of “smart scale production”, but we propose a change and the addition of “demonstrate” to be more general and for the sake of clarity.</i></p> <p><i>We also support the last sentence of the definition, in accordance with the European Strategy on Research and Technology Infrastructure. It is important to include the market adoption and competitiveness as part of this definition.</i></p> <p><i>We would prefer not to include examples (as mentioned previously), but if examples are to be included for the definition of research infrastructures we propose to include also examples here as part of this definition to make it homogeneous:</i></p> <p><i>“They include, amongst others, test beds, pilot lines, pilot plants and demonstration facilities, cleanrooms, and living labs.”</i></p> <p>FR</p> <p>(Drafting suggestions):</p> <p><i>(2) ‘technology infrastructures’ are facilities, equipment, capabilities and resources required to develop, test, upscale and validate technology up to small scale production - from pre-competitive applied research services up to demonstration and validation, enabling and accelerating technological innovations towards societal/market adoption, fostering <u>economical industrial competitiveness</u>.</i></p> <p>FR</p> <p>(Comments):</p> <p><i>We propose to use a more generic wording (economical) instead of industrial.</i></p> <p>NL</p> <p>(Comments):</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>NL does not agree with the new definitions (for both TI and RI) as proposed here. NL notices there are different definitions circulating for research as well as technology infrastructures and thinks the Horizon Europe regulation should not add to this confusion, but help reduce it. Could a comparative table be provided in which the currently used definitions (e.g. from ESFRI, GBER or the recent RTI Strategy) are listed side by side, so that from there uniform definitions can be established that may then apply to all documents (and groups)? That would work better than fragmentarily discussing and adding individual words.</p> <p>SI (Drafting suggestions): <i>...from pre-competitive applied research services up to demonstration and validation, enabling and accelerating technological innovations towards societal/market adoption, fostering industrial competitiveness;</i></p> <p>SI (Comments): <i>We continue to insist on deletion of Tis in the FP as they should be part of the ECF proposal and public intervention is only justified in case of market failure.</i></p> <p><i>They should not be understood to serve pre-competitive research needs, as this is the main mission of RIs.</i></p>
	<p>SK (Drafting suggestions): <u>(2a) 'Moonshots' are aspirational concepts through which various impacts of Union support are communicated to the general public and do not entail financial or operational implications;</u></p>

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<p>(3) <i>‘non-bankable’ means that the legal entity is not yet able to attract sufficient investment to fully implement its business plan and compete internationally;</i></p>	
<p>(4) <i>‘blended finance’ means financial support provided under the European Innovation Council (‘EIC’) consisting of a combination of a grant and an investment <u>in equity or other repayable form of support</u>;</i></p>	<p>ES (Comments): <i>We accept the new wording; it does not change the meaning.</i></p>
<p>(5) <i>‘deep tech’ means an innovation with the potential to deliver transformative solutions and that is based on cutting-edge advances in science, technology and engineering;</i></p>	<p>FR (Drafting suggestions): <i>(5) ‘deep tech’ means an innovation with the potential to deliver transformative solutions and that is based on cutting-edge advances in science, technology and engineering <u>and is characterised by the need to stay at the technological forefront by constant interaction with new ideas and results from the lab</u>;</i></p> <p>FR (Comments): <u><i>We suggest using the agreed wording from EIC work programme 2025.</i></u></p>
<p>(6) <i>‘European Partnership’ means an initiative, where the Union together with private and/or public partners commit to jointly supporting the development, implementation and evaluation of a programme of activities, and where the costs are shared between all partners;</i></p>	<p>DE (Drafting suggestions): <i>(6) ‘European Partnership’ means an initiative, where the Union together with private and/or public partners commit to jointly supporting the development, implementation and evaluation of a programme of activities, and where the costs are shared between all partners; <u>means an initiative, prepared with the early involvement of Member States and associated countries, where the Union together with private and/or public partners</u></i></p>

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	<p><u>(such as industry, universities, research organisations, bodies with a public service mission at local, regional, national or international level or civil society organisations including foundations and NGOs) commit to jointly supporting the development and implementation of a programme of R&I activities, including those related to market, regulatory or policy uptake;</u></p> <p>DE (Comments): DE suggests to use the definition of “European Partnerships” as in FP9, which is a broader approach for the instrument.</p> <p>FR (Drafting suggestions): (6) ‘European Partnership’ means an initiative, <u>prepared with the early involvement of Member States</u>, where the Union together with private and/or public partners commit to jointly supporting the development, implementation and evaluation of a programme of activities, and where the costs are shared between all partners;</p> <p>FR (Comments): <u>The wording from the current regulation ensures the early involvement of Member States when preparing and implementing partnerships – which represents a key success factor.</u></p> <p>HU (Drafting suggestions): (6) ‘European Partnership’, <u>prepared with early involvement with Member States</u>, means an initiative, where the Union together with private and/or public partners commit to jointly supporting the development, implementation and evaluation of a programme of activities, and where the costs are shared between all partners;</p>

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	<p>LT (Drafting suggestions): (6) 'European Partnership', <u>prepared with early involvement with Member States</u>, means an initiative, where the Union together with private and/or public partners commit to jointly supporting the development, implementation and evaluation of a programme of activities, and where the costs are shared between all partners;</p> <p>SI (Drafting suggestions): 'European Partnership' means an initiative, <u>prepared with the early involvement of Member States and Associated Countries</u> where the Union together with private and/or public partners commit to jointly supporting the development, implementation and evaluation of a programme of <u>research and innovation</u> activities, and where the costs are shared between all partners;</p> <p>SK (Drafting suggestions): (6) 'European Partnership', <u>prepared with early involvement with Member States and Associated Countries</u>, means an initiative, where the Union together with private and/or public partners commit to jointly supporting the development, implementation and evaluation of a programme of activities, and where the costs are shared between all partners;</p>
<p>(7) 'open access' means online access to results <u>research outputs</u>, provided free <u>of charge</u> to the end user;</p>	<p>AT (Drafting suggestions): (7a) 'research output' means the results generated by a given action to which access can be given in the form of scientific publications, data or</p>

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	<p><i>other engineered results and processes such as software, algorithms, protocols and electronic notebooks;</i></p> <p>AT (Comments):</p> <p>AT misses a definition for research output.</p> <p>BE (Drafting suggestions):</p> <p>(7) ‘open access’ means online access to results <u>research outputs are accessible online under fair and reasonable conditions and that research publications can be accessed free of charge, provided free of charge</u> to the end user;</p> <p>ES (Drafting suggestions):</p> <p>(7) ‘open access’ means online access to results <u>research outputs</u>, provided free <u>of charge</u> to the end user;</p> <p>ES (Comments):</p> <p><i>We support this insertion, in line with current definition in FP9.</i></p> <p><i>However, while the term open access it is traditionally associated with free access to scientific publications, in the RI domain the concept can be extended to include access to:</i></p> <ul style="list-style-type: none"> • <i>Research data generated by the infrastructures.</i> • <i>Services and equipment offered by the RI.</i> • <i>Software and tools developed within the framework of scientific projects.</i> <p><i>In this sense, open access does not necessarily imply that access is free of charge. There may be regulated access models, with fees, usage conditions,</i></p>

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	<p><i>or technical requirements—especially when it comes to specialized services or resource-intensive operations.</i></p> <p><i>Maybe the PCY and the COM could discuss the best option to solve this.</i></p>
<p>(8) ‘open science’ means an approach to the scientific process that includes early and open sharing of research, open access to and responsible management of results, reproducibility measures, and involving citizens and end users in research and innovation;</p>	<p>BE (Drafting suggestions):</p> <p>(8) ‘open science’ means an approach to the scientific process that includes early and open sharing of research outputs, open access to and responsible management of results, measures to enable reproducibility of research results measures, and involving citizens and end users in research and innovation;</p> <p>BE (Comments):</p> <p>FP9 terminology was clearer than the proposed new terminology. But the current definition can be further refined by referring to <u>all scientific disciplines and aspects of scholarly practices, the multilingual nature of scientific knowledge, and its purpose of serving both science and society</u> as well as <u>reference to FAIR</u> (Findable, Accessible, Interoperable, and Reusable) which is important. (cf. UNESCO Recommendation on open science: https://unesdoc.unesco.org/ark:/48223/pf0000383771)</p> <p>ES (Drafting suggestions):</p> <p>(8) ‘open science’ means an approach to the scientific process that includes early and open sharing of research, open access to and responsible management of results including data, reproducibility measures, and involving citizens and end users in research and innovation;</p> <p>SI</p>

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	<p>(Drafting suggestions):</p> <p><i>'open science' means an approach to the scientific process that includes early and open cooperative work and sharing of research, open access to and responsible management of results, reproducibility measures, and involving citizens and end users in research and innovation;</i></p>
<p>(9) <i>'pre-commercial procurement' means the public or private procurement of research and development services involving risk-benefit sharing under market conditions, and competitive development in phases, where there is a clear separation of the research and development services procured from the deployment of commercial volumes of end-products;</i></p>	<p>AT (Comments):</p> <p>AT: The definitions relating to procurement should be harmonized with the provisions of the Public Procurement Law. According to Commission statements in the RWP, procurement under Art. 33 of the Proposal would not fall within the scope of the Procurement Directives, due to their exemption for research and development services. However, this exemption of the Procurement Directives applies only where the <i>“benefits accrue exclusively to the contracting authority for its use in the conduct of its own affairs”</i>. As the current proposal clearly intends for contractors to retain their intellectual property rights, the exemption is not applicable. In principle, the Public Procurement Directive is applicable to Procurement under Art. 33 of the proposal.</p> <p>ES (Comments):</p> <p><i>We support the change.</i></p>
<p>(10) <i>'procurement of innovative solutions' means public or private procurement where procurers act as a launch customer for innovative goods or services which are not yet available on a large-scale commercial basis, and may include conformity testing;</i></p>	<p>AT (Comments):</p> <p><i>See above.</i></p> <p>ES</p>

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	<p>(Comments): We support the change.</p>
<p>(11) 'background' means any data, knowledge or know how whatever its form or nature, tangible or intangible, including any rights such as intellectual property rights, that is held prior to the accession to a given action;</p>	<p>BE (Drafting suggestions): (11) 'background' means any data, knowledge or know how whatever its form or nature, tangible or intangible, including any rights such as intellectual property rights, that is held prior to the accession to a given action <u>and (ii) identified by the beneficiaries in a written agreement as needed for implementing the action or for exploiting its results;</u></p> <p>BE (Comments): The definition of Background IP (art 2 FP regulation) needs to include “and (ii) identified by the beneficiaries in a written agreement as needed for implementing the action or for exploiting its results;” as in the current wording it might appear as all background should be open to the beneficiaries. This would be undesirable.</p> <p>FR (Drafting suggestions): (11) 'background' means any data, knowledge or know how whatever its form or nature, tangible or intangible, including any rights such as intellectual property rights, that is held prior to the accession to a given action <u>and identified by beneficiaries in written agreement as need for implementing the action or for exploiting its results;</u></p> <p>FR (Comments):</p>

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	<p><u>This second condition is important to avoid legal uncertainty and to prevent conflict between consortia partners.</u></p> <p>SI (Drafting suggestions): <i>'background' means any data, knowledge or know how whatever its form or nature, tangible or intangible, including any rights such as intellectual property rights, that is held prior to the accession to a given action and is relevant for its implementation.</i></p>
<p><u>(11a) 'dissemination' means the public disclosure of the result by appropriate means, other than resulting from protecting or exploiting the results, including by scientific publications in any medium;</u></p>	<p>BE (Comments): Welcome addition.</p> <p>ES (Comments): <i>We support the change.</i></p>
<p>(12) 'valorisation' means the use of results in further activities other than those covered by the action concerned, including commercial deployment;</p>	<p>AT (Drafting suggestions): (12) 'valorisation' means the use of results in further activities other than those covered by the action concerned, including commercial deployment as well as the transformation of results into products, services, policies, or societal solutions that benefit a wider range of stakeholders and society at large;</p> <p>AT (Comments): AT: The text should reflect on the concept of knowledge valorisation of the EC, reference to only commercial deployment is therefore not enough.</p>

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	<p>FR (Drafting suggestions):</p> <p>(12) 'valorisation' means the use of results in further <i>R&I</i> activities other than those covered by the action concerned, including commercial deployment <i>or in standardisation activities</i>;</p> <p>FR (Comments):</p> <p><i>We suggest using the wording from the current regulation.</i></p> <p>SI (Drafting suggestions):</p> <p>'valorisation' means the <i>process pf creating social and economic value from knowledge by linking different areas and sectors and by transforming data, know-how and research results into sustainable products, services, solutions and knowledge-based policies that benefit society</i> use of results in further activities other than those covered by the action concerned, including commercial deployment;</p>
<p><i>(12a) 'fair and reasonable conditions' means appropriate conditions, including possible financial terms or royalty-free conditions, taking into account the specific circumstances of the request for access, for example the actual or potential value of the results or background to which access is requested and/or the scope, duration or other characteristics of the exploitation envisaged;</i></p>	<p>FR (Drafting suggestions):</p> <p><i>(12a) 'fair and reasonable conditions' means appropriate conditions, including possible financial terms or royalty-free conditions, taking into account the potential rights and obligations attached to the results, as well as specific circumstances of the request for access, for example the actual or potential value of the results or background to which access is requested and/or the scope, duration or other characteristics of the exploitation envisaged;</i></p> <p>FR (Comments):</p>

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	<p><u>Some of the results may be subject to rights and obligations that go beyond what the partners may agree upon (international agreements rules).</u></p>
<p>(13) ‘international European research organisation’ means an international organisation, the majority of whose members are Member States or associated countries, whose principal objective is to promote scientific and technological cooperation in Europe;</p>	<p>ES (Drafting suggestions): (13) ‘international European research organisation’ means an international organisation, the majority of whose members are Member States or associated countries, whose principal objective is to promote scientific and technological cooperation in Europe for the benefit of European scientific and innovation community;</p> <p>ES (Comments): “In Europe” will exclude International Organisations like ESO with the main telescopes are located in the southern hemisphere at Chile</p>
	<p>DE (Drafting suggestions): <u>(13 a) legal entity’ means a natural person, or a legal person created and recognised as such under Union, national or international law, which has legal personality and the capacity to act in its own name, exercise rights and be subject to obligations, or an entity which does not have legal personality as referred to in point (c) of Article 200 (2) of the Financial Regulation;</u></p> <p>DE (Comments): DE: As the article on eligibility now includes this term it should also be defined here.</p>

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<p>(14) <i>‘for profit legal entities’ means a legal entity which by its legal form is for profit making or which has a legal or statutory purpose to distribute profits to its shareholders or individual members;</i></p>	
	<p>DE (Drafting suggestions): <i>(14a) ‘non-profit legal entity’ means a legal entity which by its legal form is non-profit-making or which has a legal or statutory obligation not to distribute profits to its shareholders or individual members;</i></p> <p>DE (Comments): DE: For non-profit legal entities some specific rules apply according to the Financial Regulation, e. g. according to article 195 FR the non-profit principle does not apply to non-profit organisations.</p>
<p>(15) <i>‘small or medium-sized enterprise’ or ‘SME’ means a micro, small or medium-sized enterprise as defined in Article 2 of the Annex to Commission Recommendation 2003/361/EC¹;</i></p>	
<p>(16) <i>‘small mid-cap’ means a small mid-cap enterprise as defined in point 2 of the Annex to Commission Recommendation (EU) 2025/1099²;</i></p>	<p>FR (Drafting suggestions): <i>(16) — ‘small mid-cap’ means a small mid-cap enterprise as defined in point 2 of the Annex to Commission Recommendation (EU) 2025/1099³;</i></p> <p>FR</p>

¹ Commission Recommendation 2003/361/EC of 6 May 2003 concerning the definition of micro, small and medium-sized enterprises (OJ L 124, 20.5.2003, p. 36).

² Commission Recommendation (EU) 2025/1099 of 21 May 2025 on the definition of small mid-cap enterprises (OJ L, 28.5.2025, p. 1)

³ ~~Commission Recommendation (EU) 2025/1099 of 21 May 2025 on the definition of small mid-cap enterprises (OJ L, 28.5.2025, p. 1)~~

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	<p>(Comments):</p> <p><u>The definition should be aligned with the definition of Omnibus I and IV (number of employees).</u></p>
<p>(16a) <i>[Placeholder for definitions on startups and scaleups]</i></p>	<p>ES</p> <p>(Comments):</p> <p>We support the inclusion of this placeholder. The definition of start-up and scale-up derived from the EU Innovation Act needs to be included here.</p>
	<p>FR</p> <p>(Drafting suggestions):</p> <p><u>(16b) ‘work programme’ means a document adopted by the Commission for the implementation of the specific programme in accordance with Article 18 of Decision (EU) XXXX or a document equivalent in content and structure adopted by a funding body;</u></p> <p>FR</p> <p>(Comments):</p> <p><u>This definition from the current regulation is essential to avoid misinterpretation and to insist on the need to respect the comitology procedure.</u></p>
<p>(17) <i>‘results’ means any tangible or intangible outcome of a given action, such as data, knowledge or know-how, whatever its form or nature and whether or not it can be protected, as well as any rights attached to it, including intellectual property rights;</i></p>	<p>FR</p> <p>(Drafting suggestions):</p> <p>(17) <i>‘results’ means any tangible or intangible outcome of a given action, such as data, knowledge or know-how, whatever its form or nature and whether or not it can be protected, as well as any rights <u>and obligations</u> attached to it, including intellectual property rights;</i></p> <p>FR</p> <p>(Comments):</p>

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	<p><u>Cf comment on 12(a) above</u></p>
<p><u>(17a) 'Competitiveness Seal' means a quality label awarded to a proposal submitted to a call for proposals that meets all the quality requirements set out in the award procedure but might receive support from other Union or national funding sources;</u></p>	<p>AT (Drafting suggestions): <i>"Competitiveness Seal' means a quality label awarded to a proposal submitted to a call for proposals <u>that meets all the quality requirements set out in the award procedure but might receive support from other Union or national funding sources</u> <u>which has passed all evaluation thresholds and met the quality requirements of the award procedure but could not be funded under that call due to budgetary constraints. Proposals awarded a Competitiveness Seal may receive support from other Union or national funding sources.</u>"</i></p> <p>AT (Comments): AT: In the current draft, the description seems more inclusive (regarding the financing options), but less precise as a quality/budget signal. It should ensure compatibility with the current SoE scheme.</p> <p>BE (Drafting suggestions): <i><u>(17a) 'Competitiveness Seal' means a quality label awarded to a proposal submitted to a call for proposals that meets all the quality requirements set out in the award procedure but could not be funded due to lack of budget available for that call for proposals in the work programme and might receive support from other Union or national funding sources;</u></i></p> <p>BE (Comments):</p>

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	<p>Renaming the Seal of Excellence to the Seal of Competitiveness will narrow the scope, which would not fit ERC and MSCA.</p> <p>We therefore either prefer two separate names, a more neutral alternative or keeping the current one, given that it is a well-established concept (the reasoning for keeping the name of the Framework Programme).</p> <p>BG (Drafting suggestions):</p> <p><i>(17a) 'Competitiveness Seal of Excellence' means a quality label awarded to a proposal submitted to a call for proposals that meets all the quality requirements set out in the award procedure but might receive support from other Union or national funding sources;</i></p> <p>BG (Comments):</p> <p>We prefer preserving the already widely used “Seal of Excellence” brand, which is familiar to both our community and administrations.</p> <p>DE (Drafting suggestions):</p> <p><u>[(17a) 'Competitiveness Seal' means a quality label awarded to a proposal submitted to a call for proposals that meets all the quality requirements set out in the award procedure but might receive support from other Union or national funding sources;]</u></p> <p>DE (Comments):</p> <p>DE:-What role will the Competitiveness Seal play in funding under Horizon Europe?</p> <p>EE (Drafting suggestions):</p>

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	<p><i>(17a) 'Competitiveness Seal' means a quality label awarded to a proposal submitted to a call for proposals that meets all the quality requirements set out in the award procedure but might receive support from other Union or national funding sources;</i></p> <p>EE (Comments): We insist on maintaining the established concept 'Seal of Excellence', which is familiar from the current Regulation, instead of the new term 'Competitiveness Seal', to maintain continuity and simplify coordination with national funding sources that support this mechanism</p> <p>ES (Drafting suggestions): <i>(17a) 'Competitiveness Seal' means a quality label awarded to a proposal submitted to a call for proposals that meets all the quality requirements set out in the award procedure but might receive support from other Union or national or regional funding sources;</i></p> <p>ES (Comments): <i>We support the inclusion of this definition for the sake of clarity.</i></p> <p>FR (Drafting suggestions): <i>(17a) 'Competitiveness Seal of Excellence' means a quality label awarded to a proposal submitted to a call for proposals that meets all the quality requirements exceeded all of the evaluation thresholds set out in the award procedure, but could not be funded due to a lack of budget available for that call of proposals, and might receive support from other Union or national funding sources;</i></p> <p>FR</p>

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	<p>(Comments):</p> <p><u>Since the conditions set out in Article 8(1) ECF only apply to awards procedures carried out under the ECF and is limiting the attribution of the Seal to ECF projects we propose having a Seal for Horizon projects also. We would be open to a modification of article 8 of the FEC to cover the whole Horizon Europe instead of modifying this article; nevertheless, the term “competitiveness” does not fit several part of Horizon Europe and might be confusing. It should also be made clear that only projects that have not been selected because of budget constraints should receive this label.</u></p> <p>HR</p> <p>(Comments):</p> <p>HR proposes introducing a minimum evaluation score threshold to ensure that only high-quality project proposals are eligible for the Seal. Furthermore, we continue to advocate for the term Seal of Excellence over Seal of Competitiveness, as it more accurately reflects the high evaluation standards and outstanding quality of the projects.</p> <p>PT</p> <p>(Comments):</p> <p>PT has expressed its concerns regarding the operationalisation of this seal, especially in multibeneficiary actions, where the mobilisation of national resources will require coordination at MS level. Additionally, PT has doubts regarding the applicability of this Seal to Horizon Europe actions, especially to parts of the Programme that are bottom-up, and based on scientific excellence only</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>‘Competitiveness Seal <i>of Excellence</i> means a quality label awarded to a proposal submitted to a call for proposals that meets all the quality</p>

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	<p>requirements set out in the award procedure but might receive support from other Union or national funding sources;</p> <p>SI (Comments):</p> <p>Keep Seal of Excellence, as it represent different Seal as so far presented Competitiveness Seal within ECF</p>
	<p>EE (Drafting suggestions):</p> <p><u>(17b) 'Seal of Excellence' means a quality label which shows that a proposal submitted to a call for proposals exceeded all of the evaluation thresholds set out in the work programme, but could not be funded due to lack of budget available for that call for proposals in the work programme and might receive support from other Union or national sources of funding</u></p>
<p>(18) 'ERC frontier research action' means a principal investigator-led research action, including ERC Proof of Concept, hosted by single or multiple beneficiaries receiving funding from the European Research Council (ERC);</p>	<p>ES (Drafting suggestions):</p> <p>(18) 'ERC frontier research action' means a principal investigator-led research action, including ERC Proof of Concept, hosted by single or multiple beneficiaries receiving funding from the European Research Council (ERC);</p> <p>ES (Comments):</p> <p>If Proof of Concept actions are to be extended to other parts of the Programme, should be general and not only part of ERC frontier research actions</p>
	<p>FR (Drafting suggestions):</p>

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	<p><i>(18a) 'research and innovation action' means an action primarily consisting of activities aiming to establish new knowledge or to explore the feasibility of a new or improved technology, product, process, service or solution. This may include basic and applied research, technology development and integration, testing, demonstration and validation on a small-scale prototype in a laboratory or simulated environment. It may also include large-scale product validation and market replication;</i></p> <p>FR (Comments):</p> <p><i>Since other actions are defined in this article, and since RIAs have been over the years the main action funded by pillar II, there is a need to clearly indicate the expectations and outcomes for such activities. The suggested definition takes into account the EC proposal to merge RIAs and IAs.</i></p>
<p><i>(19) —‘research and training action’ means an action geared towards the improvement of the skills, knowledge and career prospects of researchers, promoting mobility between countries, sectors or disciplines;</i></p>	<p>AT (Comments):</p> <p>AT: Why was the definition of the ‘research and training action’ (describing the MSCA funding instrument) removed?</p> <p>BG (Drafting suggestions):</p> <p><u>(19) ‘research and training action’ means an action geared towards the improvement of the skills, knowledge and career prospects of researchers, promoting mobility between countries, sectors or disciplines;</u></p> <p>BG (Comments):</p> <p>We see no advantages of deleting this. Prefer bringing back RTAs into the text, but can be flexible.</p>

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	<p>CZ (Comments): CZ would like to know the reason for deleting this text and if possible would prefer keeping it in the definitions.</p> <p>ES (Drafting suggestions): <i>'research, and training and mobility action' means an action geared towards the improvement of the skills, knowledge and career prospects of researchers, promoting mobility between countries, sectors or disciplines</i></p> <p>ES (Comments): We consider a definition of research, training and mobility action is needed in coherence with the structure of the programme and of the existence of ERC action definition. Besides, under sound drafting practice, a definition should not rely on a term that has no stand-alone definition or substantive treatment elsewhere. 'ERC Proof of Concept' appears nowhere else in the text and should therefore be defined or removed. Between the two, deletion is preferred, since 'ERC Proof of Concept' is, at present, an ERC call; cross-referencing specific calls is inappropriate in framework programme legislation</p> <p>FR (Drafting suggestions): <u><i>(19) 'training and mobility action' means an action geared towards the improvement of the skills, knowledge and career prospects of researchers, based on mobility between countries and, if relevant, between sectors or disciplines;</i></u></p> <p>FR</p>

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	<p>(Comments):</p> <p><u>MSCA Actions should also be defined in this Regulation, we suggest using the current wording under Horizon Europe 2021-2027.</u></p> <p>HR</p> <p>(Comments):</p> <p>HR strongly recommends retaining the definition of activities in the area of research and training within the text. This definition is essential as it delineates the types of projects eligible for funding under the MSCA scheme.</p> <p>NL</p> <p>(Comments):</p> <p>Why was this definition removed?</p> <p>SK</p> <p>(Drafting suggestions):</p> <p><u><i>†19) ‘research and training action’ means an action geared towards the improvement of the skills, knowledge and career prospects of researchers, promoting mobility between countries, sectors or disciplines;</i></u></p> <p>SK</p> <p>(Comments):</p> <p><i>SK would like to re-introduce the former paragraph.</i></p>
	<p>DE</p> <p>(Drafting suggestions):</p> <p><u>(19 a) ‘research action’ means an action primarily consisting of activities aiming to establish new knowledge or to explore the feasibility of a new or improved technology, product, process, service or solution. This may include basic and applied research, technology development and integration;</u></p>

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	<p><u>(19 b) 'innovation action' means an action consisting of activities such as testing, demonstration and validation on a small-scale prototype in a laboratory or simulated environment, aiming to produce plans and arrangements or designs for new, altered or improved products, processes or services, possibly including prototyping, testing, demonstrating, piloting, large-scale product validation and market replication;</u></p> <p><u>(19 c) 'training and mobility action' means an action geared towards the improvement of the skills, knowledge and career prospects of researchers, based on mobility between countries and, if relevant, between sectors or disciplines;</u></p> <p>DE (Comments): DE: Even when RIA and IA will have same funding rate the actions have different focuses and aims and should therefore be defined in order to facilitate the proposal process for beneficiaries. We propose to separate Research Actions (RI) and innovation Actions (IA)</p> <p>Same applies to a definition of actions in the MSCA context, which had been grouped together in the initial FP10 version. Therefore, a definition for training and mobility action should be added as well.</p>
<p>(20) <i>'coordination and support action' means an action contributing to the objectives of the Programme, excluding research and innovation (R&I) activities, except when undertaken under the component 'widening participation and spreading excellence' of the part IV 'European Research Area'; and bottom-up coordination without co-funding of research activities</i></p>	<p>AT (Comments): AT: If this definition of CSA does not apply in the 'widening' part of the programme, what definition of CSA applies there?</p>

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<p><i>from the Union that allows for cooperation between legal entities from Member States and associated countries in order to strengthen the ERA;</i></p>	<p>This definition in general does not provide a clear explanation of what a CSA actually is.</p> <p>DE (Comments):</p> <p>DE: If this definition of CSA does not apply in the ‘widening’ part of the programme, what definition of CSA applies there? At present this ‘definition’ says more about what a CSA is not, and when it does not apply, than it says about what a CSA is.</p>
	<p>ES (Drafting suggestions):</p> <p><i>20.a. 'research and innovation action' means an action primarily consisting of activities aiming to establish new knowledge or to explore the feasibility of a new or improved technology, product, process, service or solution. This may include basic and applied research, technology development and integration, and may cover a defined range of the TRL spectrum [1-9].</i></p> <p>ES (Comments):</p> <p><i>Research and Innovation actions should be defined in line with current regulation. RIAs are not defined in the financial regulation. Only “grant”</i></p>
<p>(21) <i>‘indirect actions’ means R&I related activities to which the Union provides financial support and which are undertaken by participants;</i></p>	
<p>(22) <i>‘direct actions’ means R&I related activities undertaken by the Commission through its JRC;</i></p>	

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<p>(23) <i>‘innovation ecosystem’ means an ecosystem which brings together at Union level organisations whose functional goal is to enable technology development and innovation and which encompasses relations between material resources (such as funds, equipment, and facilities, including research and technology infrastructures), institutional entities (such as higher education institutions and support services, research and technology organisations, companies, investors - including venture capitalists - and financial intermediaries) and national, regional and local policy-making and funding entities.</i></p>	<p>BE (Drafting suggestions): (23) <i>‘innovation ecosystem’ means an ecosystem which brings together at Union level organisations whose functional goal is to enable technology development and socio-economic innovation and which encompasses enables relations and collaborations between material resources (such as funds, equipment, and facilities, including research and technology infrastructures), institutional entities (such as higher education institutions and support services, research and technology organisations, companies = including SMEs, start-ups and scale-ups - investors - including venture capitalists - and financial intermediaries) and national, regional and local policy-making and funding entities.</i></p> <p>BE (Comments): Request to refer to a broader definition of innovation, in line with the EC valorization agenda.</p> <p>Suggested addition.</p> <p>DE (Drafting suggestions): (23) <i>‘innovation ecosystem’ means an ecosystem which brings together at Union level organisations whose functional goal is to enable technology development and innovation and which encompasses relations between material resources (such as funds, equipment, and facilities, including research and technology infrastructures), institutional entities (such as higher education institutions and support services, research and technology organisations, companies, investors - including venture capitalists - and financial intermediaries) and national, regional and local policy-making and funding entities.</i></p>

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	<p>DE (Comments): DE: Most innovation ecosystems exist at local/regional levels – still they might have EU added value – wording needs to be slightly revised</p> <p>SI (Drafting suggestions): <i>‘research and innovation ecosystem’ means an....</i></p> <p>SI (Comments): <i>See article 3.</i></p>
<p>(24) ‘knowledge triangle’ means the creation of networks between education institutions, research organisations and business with the aim to create support innovation ecosystems that cater for the creation of the development of an innovation pipeline from the inception of innovation through entrepreneurial education to the creation of startups and the growth of scale-ups.</p>	<p>BE (Drafting suggestions): <i>(24) ‘knowledge triangle’ means the creation and support of networks between education institutions, research organisations and business with the aim to create support innovation ecosystems that cater for the creation of the development of an innovation pipeline from the inception of innovation through entrepreneurial education to the creation of startups and the growth of scale-ups.</i></p> <p>DE (Comments): DE: We would like to understand why the definition had been weakened and now only foresees supporting and not creating activities?</p> <p>ES (Comments): <i>We support this new wording.</i></p>

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	<p>FR (Drafting suggestions): <i>(24) — ‘knowledge triangle’ means the creation of networks between education institutions, research organisations and business with the aim to create support innovation ecosystems that cater for the creation of the development of an innovation pipeline from the inception of innovation through entrepreneurial education to the creation of startups and the growth of scale-ups.</i></p> <p>FR (Comments): <u>This definition is not necessary since activities related to innovation ecosystems can take various forms.</u> <u>If this definition is maintained, we suggest replacing it by ‘knowledge square’.</u></p> <p>HU (Drafting suggestions): <i>(24) ‘knowledge triangle’ means the creation of networks- <u>the networks supported and fostered primarily by the European Institute of Innovation and Technology (EIT) and its Knowledge and Innovation Communities (KICs)</u> between education institutions, research organisations and business with the aim to create support innovation ecosystems that cater for the <u>creation of the development of</u> an innovation pipeline from the inception of innovation through entrepreneurial education to the creation of startups and the growth of scale-ups.</i></p> <p>HU (Comments): Hungary strongly insists on the specific inclusion of the European Institute of Innovation when reference is made to the knowledge triangle.</p>

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	<p>The EIT and its KICs serve as the primary instrument for fostering the effective integration of the knowledge triangle (education, research, and innovation) within the Union. The lack of explicit reference to the EIT and the KICs in the current draft creates unnecessary uncertainty regarding their future role and status. Furthermore, retaining only the generic reference to the 'knowledge triangle' alone leaves the budgetary aspects vague and unclarified.</p> <p>SE (Drafting suggestions):</p> <p>24) 'knowledge triangle' means the creation of networks between education institutions, research organisations and business <u>as well as public actors and civil society organisations</u> with the aim to create <u>support</u> innovation ecosystems that cater for the creation of <u>the development of</u> an innovation pipeline from the inception of innovation through entrepreneurial education to the creation of startups and the growth of scale-ups.</p> <p>SE (Comments):</p> <p><i>Public actors and civil society organisations may be added.</i></p> <p>SI (Drafting suggestions):</p> <p><i>knowledge triangle' means networks between education institutions, research organisations and business with the aim to support innovation ecosystems that cater for the development of an innovation pipeline from the <u>creation of knowledge to</u> inception of innovation through entrepreneurial education to the creation of startups and the growth of scale-ups.</i></p> <p>SK (Drafting suggestions):</p> <p>(24) 'knowledge triangle' means the creation of <u>networks</u> the networks <u>supported and fostered primarily by the European Institute of Innovation</u></p>

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	<p><u>and Technology (EIT) and its Knowledge and Innovation Communities (KICs)</u> between education institutions, research organisations and business with the aim to create support innovation ecosystems that cater for the creation of the development of an innovation pipeline from the inception of innovation through entrepreneurial education to the creation of startups and the growth of scale-ups.</p>
	<p>AT (Drafting suggestions):</p> <p>(25) ‘Collaborative research and innovation’ means research and innovation activities by at least three independent institutions from at least three EU member states or at least two EU member states and one associated country in high impact projects on societal challenges and/or competitiveness.</p> <p>DE (Drafting suggestions):</p> <p><u>(25) 'programme co-fund action' means an action to provide multi-annual co-funding to a programme of activities established or implemented by legal entities managing or funding R&I programmes, other than Union funding bodies; such a programme of activities may support networking and coordination, research, innovation, pilot actions, and innovation and market deployment actions, training and mobility actions, awareness raising and communication, dissemination and exploitation, and provide any relevant financial support, such as grants, prizes and procurement, as well as Horizon Europe blended finance or a combination thereof. The programme co-fund action may be implemented by those legal entities directly or by third parties on their behalf.</u></p> <p>DE (Comments):</p>

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	<p>DE (on para 25 (new)): Please add the definition of programme co-fund action as in FP9.</p> <p>ES (Drafting suggestions): <i>‘work programme’ means a document adopted by the Commission for the implementation of the specific programme in accordance with Article X of Decision [to be completed] or a document equivalent in content and structure adopted by a funding body.</i></p> <p>ES (Comments): We believe a definition of WP is needed</p> <p>PL (Drafting suggestions): (a new point: (25) ‘critical technology’ means a technology that meets either of the following conditions:</p> <p>(a) it brings to the internal market an innovative, emerging and cutting-edge element with significant economic potential; or</p> <p>(b) it contributes to reducing or preventing the strategic dependencies of the Union.</p> <p>PL (Comments):</p>

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	<p>In line with PL written comments, the proposed definition has been based on current STEP regulation – PL finds it important to define the critical technologies for the need of the Regulation and its Specific programme. The same definition should be also applied to the ECF.</p>
<p><i>Article 3</i> <i>Programme objectives</i></p>	<p>DE (Comments): DE: We highly welcome the addition on “scientific and technological excellence” as well as on “training and mobility of researchers” under the specific programme objective for FP10.</p>
<p>1. In line with the general and specific objectives of the European Competitiveness Fund, the Programme shall strengthen the EU’s prosperity, competitiveness, sovereignty and resilience, scientific and technological bases, and address global challenges based on excellent research and innovation across the Union.</p>	<p>AT (Drafting suggestions): In line with the general and specific objectives of the European Competitiveness Fund, the Programme shall set the specific rules for research and innovation funding to strengthen the EU’s prosperity, competitiveness, sovereignty and resilience, scientific and technological bases, and address global challenges based on excellent research and innovation and open competition across the Union.</p> <p>AT (Comments): AT: The Programme as such addresses the whole Union. We therefore do not see any need for adding the term “across the Union”. To the contrary, adding the term could lead to misinterpretation during the implementation of the Programme, e.g. by introducing geographical criteria.</p> <p>BE</p>

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	<p>(Drafting suggestions):</p> <p><u>Except for Pillar 1 and the ‘society’ component under Pillar 2, the programme shall,</u> in line with the general and specific objectives of the European Competitiveness Fund, the Programme shall strengthen the EU’s <u>prosperity,</u> competitiveness, <u>sovereignty, and resilience,</u> scientific <u>and</u> technological bases, and address global challenges based on excellent research and Innovation <u>and open competition across the Union.</u></p> <p>BE</p> <p>(Comments):</p> <p>A reformulation is necessary. HE is an independent programme with distinct objectives, and only a part of it is linked to the ECF. The mention “across the Union” is not needed in this point in the text. While it might be relevant in other parts, we want to be careful with regards to adding it everywhere throughout as it can be interpreted in several ways.</p> <p>BG</p> <p>(Comments):</p> <p>We insist on keeping ‘across the Union’, since we don’t see any links with ‘Widening’. We do support mentioning ‘across the Union’ where it makes sense. And we believe it makes sense here.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>1. In line with the general and specific objectives of the European Competitiveness Fund, the Programme shall <u>set the specific rules for research and innovation funding to</u> strengthen the EU’s <u>prosperity,</u> competitiveness, <u>sovereignty and resilience,</u> scientific <u>and</u> technological bases, and address global challenges based on excellent research and innovation <u>and open competition across the Union.</u></p> <p>DE</p>

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	<p>(Comments):</p> <p>DE: ECF sets the general rules, and Horizon sets the specific rules for R&I actions (see also German comments on the ECF regulation)</p> <p>DE: The regulation, and this article specifically, already applies to the whole Union (“shall strengthen the EU’s...”)</p> <p>EE</p> <p>(Comments):</p> <p>We support adding <i>across the Union</i> to the text</p> <p>FI</p> <p>(Drafting suggestions):</p> <p>1. In line with the general and specific objectives of the European Competitiveness Fund, the Programme shall <u>set the specific rules for research and innovation funding to</u> strengthen the EU’s <u>prosperity, competitiveness, sovereignty and resilience</u>, scientific <u>and</u> technological bases, and address global challenges based on excellent research and innovation <u>and open competition across the Union</u>.</p> <p>FI</p> <p>(Comments):</p> <p>The regulation, and this article specifically, already applies to the whole Union (“shall strengthen the EU’s...”), there is no need to specify this further, unless it has a different meaning (e.g. targeted geographical approach) which FI would not support outside the context of the widening instruments.</p> <p>It should be clear that the ECF sets the general rules, and Horizon sets the specific rules for R&I.</p> <p>FR</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>1. In line with the general and specific objectives of the European Competitiveness Fund, Tthe Programme shall strengthen the EU’s prosperity, competitiveness, sovereignty and resilience, sustainability, scientific and technological bases, and address global challenges based on excellent research and innovation across the Union. The objectives should be pursued in close collaboration with the European Competitiveness Fund.</p> <p>FR (Comments):</p> <p><u>The current wording tends to indicate a hierarchy of norms between the two regulations. We suggest another wording taking into account the need for articulation between the two programmes, and to reflect Horizon Europe’s objectives beyond ECF’s focus on competitiveness.</u></p> <p><u>Sustainability should be added to ensure consistency with recital 2.</u></p> <p><u>The added reference to the geographical dimension “across the Union” is unclear: does it relate to excellent R&I? To global challenges? To all the following objectives? We oppose any geographical dimension within the EU since we refer to the EU as a whole and believe in a genuine pan-European value of the FP.</u></p> <p>HU (Comments):</p> <p>HU agrees with those Member States who would favour defining the HE Framework Programme’s objectives based on its internal scope, instead of giving precedence to the European Competitiveness Fund's objectives.</p> <p>IE (Drafting suggestions):</p>

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	<p>1. In line with the general and specific objectives of the European Competitiveness Fund, the Programme shall set the specific rules for research and innovation to strengthen the EU’s prosperity, competitiveness, <u>sovereignty and resilience</u>, scientific and technological bases, and address global challenges based on excellent research and innovation and open competition <u>across the Union</u>.</p> <p>IE (Comments): The first insertion is to make clear that while the ECF sets the general rules, the FP should establish the specific rules for R&I. It is very important to explicit state in the Programme objectives that the Programme will be based on open competition. As the Regulation already applies to the whole Union, ‘across the Union’ should be deleted.</p> <p>LT (Comments): We fully support other delegations that this para deserves to be rewritten with more emphasis on R&I <i>per se</i>. We leave it in the hands of the Presidency to find the most elegant formulation.</p> <p>MT (Comments): MT reiterates its call on the European Commission to publish the communication on the Competitiveness Coordination Tool (CCT) as soon as possible, to better understand the interplay between Horizon Europe and the European Competitiveness Fund regulations.</p>

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	<p>Malta welcomes the addition of “across the Union” to the text of the paragraph.</p> <p>NL (Drafting suggestions):</p> <p>1. In line with the general and specific objectives of the European Competitiveness Fund, the Programme shall set the specific rules for research and innovation funding to strengthen the EU’s prosperity, competitiveness, sovereignty and resilience, scientific and technological bases, and address global challenges based on excellent research and innovation and open competition across the Union.</p> <p>NL (Comments):</p> <p>The regulation, and this article specifically, already applies to the whole Union (‘shall strengthen the EU’s...’), there is no need to specify this further, unless it has a different meaning (e.g. targeted geographical approach) which NL would not support outside the context of the widening instruments.</p> <p>It should be clear that the ECF sets the general rules, and Horizon sets the specific rules applicated to all R&I.</p> <p>PL (Comments):</p> <p>PL insists on keeping the wording “across the Union” in this place.</p> <p>PT (Drafting suggestions):</p> <p>1, In line with the general and specific objectives of the European Competitiveness Fund The Programme shall strengthen the EU’s competitiveness - including the alignment with the general and specific objectives of the European Competitiveness Fund - prosperity;</p>

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	<p>competitiveness, sovereignty and resilience, scientific and technological bases, and address global challenges based on excellent research and innovation across the Union.</p> <p>PT (Comments): The objectives should affirm Horizon Europe as a “self-standing” Programme. The suggested drafting also accommodates the dimension which is interlinked with the ECF Regulation.</p> <p>In addition, PT supports keeping the expression “across the Union</p> <p>SE (Drafting suggestions):</p> <p>1. In line with the general and specific objectives of the European Competitiveness Fund, the The Programme shall strengthen the EU’s <u>prosperity</u>, competitiveness, <u>sovereignty and resilience</u>, scientific <u>and</u> technological bases, and address global challenges based on excellent research and innovation, <u>and open competition across the Union</u>.</p> <p>SE (Comments): SE prefers that two legal acts are complementary but not bind specific objectives to one another. SE values the independence of ERC and MSCA as drivers for excellence.</p> <p>The regulation already applies to the whole Union, there is no need to specify this further. On the other hand, open competition should be highlighted in order to set out the approach applied for achieving excellence.</p>

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	<p>SI (Drafting suggestions):</p> <p><u>The general objective of the Programme is to deliver scientific, technological, economic and societal impact from Unions’s investment in R&I across the Union, to strengthen the scientific and technological base of the Union, strengthen the EU’s prosperity and Foster the competitiveness, sovereignty and resilience of the Union in all Member States including its industry, in</u> In line with the general and specific objectives of the European Competitiveness Fund, T<u>the Programme shall maximize Union added value by focusing on objectives and activities that cannot be effectively relaised by Member States acting alone but in coopertaion</u> strengthen the EU’s prosperity, competitiveness, sovereignty and resilience, scientific and technological bases, and address global challenges based on excellent research and innovation across the Union.</p> <p>SK (Drafting suggestions):</p> <p>1. In line with the general and specific objectives of the European Competitiveness Fund, the Programme shall strengthen the EU’s <u>prosperity, competitiveness, sovereignty and resilience, scientific and technological bases, and address global challenges based on excellent research and innovation across the Union.</u></p>
	<p>SK (Drafting suggestions):</p> <p>1. <u>The general objective of the Programme is to deliver scientific, technological, economic and societal impact from Union’s</u></p>

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	<p><u>investment in R&I across the Union, to strengthen the scientific and technological bases of the Union, strengthen the EU's prosperity and foster the competitiveness, sovereignty and resilience of the Union in all Member States including its industry, in line with the general and specific objectives of the European Competitiveness Fund. The Programme shall maximize Union added value by focusing on objectives and activities that cannot be effectively realized by Member states acting alone but in cooperation.</u></p>
<p>2. The specific objectives of the Programme are to:</p>	
	<p>BG (Drafting suggestions): <u>- Support training and mobility of researchers throughout Europe in order to attract and retain talent at all levels and foster attractive research careers and encourage brain circulation.</u></p>
<p>– <u>Develop, promote and advance scientific and technological excellence to support the creation and diffusion of high-quality new fundamental and applied knowledge, of skills, technologies and solutions.</u></p>	<p>AT (Comments): AT welcomes that the new text reflects excellence as a core principle of the programme, going beyond “high-quality knowledge”.</p> <p>BE (Drafting suggestions):</p>

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	<p>– <u>Develop, promote and advance scientific and technological excellence to support the creation and diffusion of research and innovation, high-quality new investigator-driven basic fundamental and applied research and knowledge, of skills, technologies and solutions.</u></p> <p>BE (Comments): Welcome addition. Through these amendments, there is consistent reference to excellent research and innovation. The definition of basic research is now consistent with the terminology used in art. 5.</p> <p>CZ (Comments): CZ welcomes this addition.</p> <p>DE (Drafting suggestions): Develop, promote and advance scientific and technological excellence to support the creation and diffusion of high-quality new fundamental and applied knowledge, of skills, technologies and solutions.</p> <p>DE (Comments):</p> <p>s</p> <p>FI (Drafting suggestions): Develop, promote and advance scientific and technological excellence to support the creation and diffusion of high-quality new fundamental and applied knowledge, of skills, technologies and solutions.</p> <p>IE</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>– <u>Develop, promote and advance scientific and technological excellence to support the creation and diffusion of high-quality new fundamental and applied knowledge, of talent, skills, technologies and solutions.</u></p> <p>PT</p> <p>(Drafting suggestions):</p> <p>Develop, promote and advance scientific and technological excellence to support frontier research, the creation and diffusion of high-quality new fundamental and applied knowledge, of skills, technologies and solutions.</p> <p>PT</p> <p>(Comments):</p> <p>A specific bullet point should include the ERC. The current draft does not mention frontier research.</p> <p>SE</p> <p>(Comments):</p> <p>SE appreciates the changes made.</p>
	<p>ES</p> <p>(Drafting suggestions):</p> <p>The Programme shall strengthen excellent basic and frontier research throughout the Union;</p> <p>The Programme shall contribute to the key societal challenges and the Sustainable Development Goals of the United Nations 2030 Agenda;</p> <p>The Programme shall contribute to the achievement of the Union’s objectives and strategic priorities by fostering the creation,</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>dissemination and transfer of excellent knowledge and cutting-edge technologies, attracting and fully mobilising talent at all levels, and by strengthening the Union’s capacity to address global challenges.</p> <p>ES (Comments): Additional point on excellence / EU policy goals/ key societal challenges and UN 2030 agenda Key societal challenges should be the driver. For this reason, it should be included at the beginning of the objective, not at the end.</p> <p>IE (Drafting suggestions): – <u>Support the realisation of the European Research Area (ERA).</u></p> <p>IE (Comments): We welcome the inclusion of supporting the realisation of the ERA as a separate objective. However, it should not be the last objective – it should be moved up here so that it is not coming after individual ERA priorities such as researcher careers and mobility</p>
<p>– Create high quality knowledge, skills and attractive careers for researchers and support the realisation of the European Research Area (ERA).</p>	
	<p>BE (Drafting suggestions): <u>The Programme shall contribute to the achievement of the Union’s objectives and strategic priorities by fostering the creation,</u></p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p><u>dissemination and transfer of excellent knowledge and cutting-edge technologies, attracting and fully mobilising talent at all levels, and by strengthening the Union’s capacity to address global challenges.</u></p> <p>BE (Comments): Support Spain’s position: adding a specific objective highlighting EU policy goals is appropriate.</p>
<p>– <u>Support training and mobility of researchers, to attract and retain talent at all levels and foster attractive research careers.</u></p>	<p>BG (Drafting suggestions): – Support training and mobility of researchers <u>throughout Europe</u>, to attract and retain talent at all levels and foster attractive research careers, <u>as well as promote and facilitate brain circulation and tackle brain drain.</u></p> <p>ES (Comments): Strongly support this insertion</p> <p>HU (Drafting suggestions): <u>Support training and mobility of researchers throughout Europe, to attract and retain talent at all levels and foster attractive research careers as well as encourage brain circulation and tackle brain drain.</u></p> <p>HU (Comments): Hungary firmly insists on the explicit inclusion of objectives to tackle brain drain and encourage brain circulation.</p> <p>LT (Drafting suggestions):</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>– – <u>Support training and mobility of researchers throughout Union, to attract and retain talent at all levels and foster attractive research careers as well as encourage balanced brain circulation.</u></p> <p>MT (Drafting suggestions): <u>Support training and mobility of researchers throughout Europe, to attract and retain talent at all levels and foster attractive research careers, as well as encourage brain circulation and tackle brain drain.</u></p> <p>MT (Comments): Malta supports the amendments that highlight the need to support training and mobility of researchers across the Union, encouraging brain circulation, and tackling the issue of brain drain.</p> <p>PL (Comments): Strong support to this new provision. PL supports also HU and other Member States intervention (RWP 9 Oct.) that the reference to the reduction of brain drain and fostering talent circulation across the EU should be added to this objective.</p> <p>SI (Drafting suggestions):</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>Support training and mobility of researchers throughout Europe, to attract and retain talent at all levels and foster attractive research careers, as well as encourage brain circulation and tackle brain drain.</p> <p>SK (Drafting suggestions):</p> <ul style="list-style-type: none"> - - <u>Support training and mobility of researchers throughout Europe, to attract and retain talent at all levels and foster attractive research careers as well as encourage brain circulation and tackle brain drain.</u>
<p>- Increase EU-wide and international collaborative research <u>and innovation</u>, knowledge sharing and valorisation.</p>	<p>AT (Comments):</p> <p>AT welcomes the addition of “innovation”.</p> <p>ES (Comments):</p> <p>Support. Research and innovation must go hand in hand and in coherence with article 3.</p> <p>FR (Drafting suggestions):</p> <ul style="list-style-type: none"> - Increase EU-wide and international collaborative research <u>and innovation</u>, knowledge sharing and valorisation. <p>FR (Comments):</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p><u>The role of the FP is not to increase international R&I, although international collaboration is essential.</u></p>
<p>– Align EU, national and regional priorities to create a pan-European research and innovation ecosystem.</p>	<p>FR (Drafting suggestions): – Align EU, national and regional priorities and connect to create a pan-European research and innovation ecosystems <u>by mobilising R&I knowledge, skills and talents.</u></p> <p>FR (Comments): <u>We suggest merging this objective with the following one to stress the importance of regional and national R&I ecosystems, and their key role in mobilising knowledge, skills and talents. Better connecting them contributes to reduce disparities – which, as previously mentioned, should not be an objective of the FP.</u></p> <p>SE (Comments): SE underlines its support for this objective and raises that the governance procedures should be designed in order to be supportive of such alignment between EU and national priorities.</p> <p>SI (Drafting suggestions): Align EU, national and regional priorities <u>and investments</u> to create a pan-European research and innovation ecosystem.</p> <p>SK (Drafting suggestions):</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>– Align EU, national and regional priorities and investments to create a pan-European research and innovation ecosystem.</p>
<p>– Reduce national and regional disparities in research and innovation capacity; and skills, and talent to strengthen innovation ecosystems.</p>	<p>AT (Drafting suggestions): Strengthen research and innovation ecosystems, by fostering excellence on European and national levels, thereby reducing disparities. Reduce national and regional disparities in research and innovation capacity, and skills, and talent to strengthen innovation ecosystems.</p> <p>AT (Comments): AT: The main target should be to strengthen the R&I ecosystems.</p> <p>DE (Drafting suggestions): — Reduce national and regional disparities in research and innovation capacity, and skills, and talent to strengthen innovation ecosystems. - <u>strengthen research and innovation ecosystems, by fostering excellence on European and national levels, thereby ultimately reducing disparities</u></p> <p>DE (Comments): DE: Horizon funding alone cannot reduce national and regional disparities, but it can be a consequence of strengthening the ecosystems.</p> <p>EE (Drafting suggestions):</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>– Reduce national and regional disparities in research and innovation capacity, and skills, and talent to strengthen innovation ecosystems with <u>specific measures dedicated to combat brain drain.</u></p> <p>EE (Comments): We support strengthening efforts to combat brain drain.</p> <p>FI (Drafting suggestions): Reduce national and regional disparities in research and innovation capacity, and skills, and talent to strengthen innovation ecosystems. <u>Strengthen research and innovation ecosystems, by fostering excellence on European and national levels, thereby ultimately reducing disparities.</u></p> <p>FI (Comments): We would lift strengthening R&I ecosystems as the primary goal here in line with the good NL formulation.</p> <p>FR (Drafting suggestions): Reduce national and regional disparities in research and innovation capacity, and skills, and talent to strengthen innovation ecosystems.</p> <p>IE (Drafting suggestions): – Strengthen research and innovation ecosystems, by fostering excellence at European and national levels, thereby ultimately reducing disparities Reduce national and regional disparities in research and innovation capacity, and skills, and talent to strengthen innovation ecosystems.</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>IE (Comments): FP funding alone cannot reduce national and regional R&I disparities but it can contribute to it by strengthening the R&I ecosystem.</p> <p>LT (Drafting suggestions): Reduce national and regional disparities in research and innovation capacity, and skills, and talent to strengthen innovation ecosystems.</p> <p>NL (Drafting suggestions): <u>Strengthen research and innovation ecosystems, by fostering excellence on European and national levels, thereby ultimately reducing disparities.</u> Reduce national and regional disparities in research and innovation capacity, and skills, and talent to strengthen innovation ecosystems.</p> <p>NL (Comments): It is unclear what this specific objective entails: reducing regional disparities should not be a goal in it self, that is the strengthening of ecosystems.</p> <p>SE (Drafting suggestions): <u>Strengthen research and innovation ecosystems by fostering excellence on European and national and regional levels, thereby ultimately reducing disparities.</u> Reduce national and regional disparities in research and innovation capacity, and skills, and talent to strengthen innovation ecosystems.</p> <p>SE</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>(Comments):</p> <p>Reducing regional disparities should not be a goal in itself. Cohesion policy belongs in another part of the MFF. Horizon Europe should not duplicate the convergence instruments.</p>
	<p>FR</p> <p>(Drafting suggestions):</p> <p>– <u>Contribute to the creation of informed, evidence-based effective, and responsive public policies across the Union and beyond.</u></p> <p>FR</p> <p>(Comments):</p> <p><u>This objective from the current regulation is of particular importance, especially regarding the lack of public trust in science and democracy, and the necessary fight against disinformation.</u></p>
<p>– Improve the Union’s position in research and innovation, with a specific focus on strategic technologies and disruptive innovation, facilitate the diffusion of innovative solutions through standardisation activities to foster competitiveness and address key societal challenges.</p>	<p>AT</p> <p>(Drafting suggestions):</p> <p>Improve the Union’s position in research and innovation, with a specific focus on key strategic technologies (e.g. those enabling the green and digital transitions) and disruptive innovation, facilitate the diffusion of innovative solutions through standardisation activities to foster competitiveness and address key societal challenges.</p> <p>ES</p> <p>(Drafting suggestions):</p> <p>– Improve the Union’s position in research and innovation, with a specific focus on strategic technologies and disruptive innovation, facilitate the diffusion of innovative solutions through standardisation activities to foster competitiveness and address key societal challenges.</p> <p>ES</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>(Comments):</p> <p>We support the inclusion of innovation and propose to change the wording. In relation to “innovative solutions”, we consider that should be left open and furthermore that standardisation activities should be covered by ECF. For this reason we propose to delete the reference to those activities here.</p> <p>FR</p> <p>(Drafting suggestions):</p> <p>– Improve the Union’s position in research and innovation, with a specific focus on strategic technologies sectors and disruptive innovation, facilitate the diffusion of innovative solutions including through standardisation activities to foster competitiveness; and address key societal challenges.</p> <p>FR</p> <p>(Comments):</p> <p><u>Standardisation is not the only way to diffuse innovative solutions.</u></p> <p>IE</p> <p>(Drafting suggestions):</p> <p>– Improve the Union’s position in research and innovation, with a specific focus on strategic research priorities, technologies and disruptive innovation, facilitate the diffusion of innovative solutions through standardisation activities to foster competitiveness and address key societal challenges.</p> <p>LT</p> <p>(Drafting suggestions):</p> <p>Improve the Union’s position in research and innovation, with a specific focus on strategic technologies and disruptive innovation, facilitate the diffusion of innovative solutions through standardisation activities to foster competitiveness in all Member States and address key societal challenges.</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>NL (Drafting suggestions): Improve the Union’s position in research and innovation, with a specific focus on strategic research priorities, technologies and disruptive innovation, facilitate the diffusion of innovative solutions through standardisation activities to foster competitiveness and address key societal challenges.</p> <p>PT (Drafting suggestions): Improve the Union’s position in research and innovation, with a specific focus on strategic technologies and disruptive innovation, facilitate the diffusion of innovative solutions through standardisation activities to foster competitiveness and address key societal challenges, and through support of open Research and Innovation.</p> <p>PT (Comments): Open Research and Innovation is missing.</p> <p>SE (Drafting suggestions): Improve the Union’s position in research and innovation, with a specific focus on strategic research priorities, technologies and disruptive innovation, facilitate the diffusion of innovative solutions through standardisation activities to foster competitiveness and address key societal challenges.</p> <p>SI (Drafting suggestions):</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>Improve the Union’s position in research and innovation, with a specific focus on strategic and disruptive technologies and disruptive innovation, facilitate the diffusion of innovative solutions through standardisation and exploitation activities to foster competitiveness and address key societal challenges.</p>
	<p>IE (Comments): What role will the FP have in supporting all types of innovation?</p>
<p>– De-risk and mobilise more private research and innovation financing, particularly for supporting deep tech and the scaling up of innovative startups and SMEs.</p>	<p>PL (Drafting suggestions): Enhance, de-risk and mobilise more private research and innovation financing, particularly for supporting critical technologies, deep tech and the scaling up of innovative startups and SMEs and research activities essential for breakthrough innovation.</p> <p>PL (Comments): It is important to enhance private sector to invest more in critical technologies and to support research projects with a strong potential for breakthrough innovation.</p>
<p>– Contribute to increasing public and private investment in research and innovation in Member States, thereby contributing to reach an overall expenditure of at least 3% of Union Gross Domestic Product (‘GDP’) in research and development.</p>	
<p>– <u>Support the realisation of the European Research Area (ERA).</u></p>	<p>AT (Comments):</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>AT welcomes this amendment made by the Presidency.</p> <p>BE (Drafting suggestions): – <u>Support the continuous refinementrealisation of the European Research Area (ERA).</u></p> <p>BE (Comments): The ERA exists, adapt to ‘continous refinement’.</p> <p>FR (Comments): <u>Full support to this added mention.</u></p> <p>IE (Drafting suggestions): <u>Support the realisation of the European Research Area (ERA).</u></p> <p>IE (Comments): This should not be the last objective – move up to the top as suggested above.</p> <p>SI (Drafting suggestions): Support the realisation of the European Research Area (ERA), <u>including through the implementation of the Pact for Research and Innovation.</u></p> <p>SK (Drafting suggestions): – <u>Support the realisation of the European Research Area (ERA) including through the implementation of the Pact for Research and Innovation.</u></p>

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	SK (Comments): SK would prefer to use a specific reference on the Pact for Research and Innovation.
<u>Recital</u>	
(3) [The Programme should be tightly connected with Regulation (EU) [XXX]* of the European Parliament and of the Council [European Competitiveness Fund] ⁴ by placing research and innovation at the heart of the Union’s economy and investment strategy.]	PT (Drafting suggestions): (3) [The Programme should be tightly connected with Regulation (EU) [XXX]* of the European Parliament and of the Council [European Competitiveness Fund] ⁵ in the part dedicated to Competitiveness , by placing research and innovation at the heart of the Union’s economy and investment strategy.] PT (Comments): The Programme is tightly connected to the regulation in the dimension dedicated to competitiveness, from a legal standpoint. The knowledge value chain is already explicit in the Regulation, and the drafting should target all sectoral policies to which investments are linked to. The narrative should be as inclusive as possible, as it also represents the means to increase MS investments in R&I

⁴ OJ C [...], [...], p. [...]

⁵ OJ C [...], [...], p. [...]

Presidency text ST 13484/25	Drafting suggestions and Comments
<p style="text-align: center;"><i>Article 4</i> <i>Programme structure</i></p>	
<p>3. [For the purposes of the Specific Programme referred to in Article 1(2), the Programme shall be structured in parts as follows, which contribute to the general and specific objectives set out in Article 3 and the policy windows of Regulation (EU) XXX [European Competitiveness Fund]]:</p>	
<p>(a) Part Pillar I ‘Excellent Science’, with the following components, in particular:</p>	<p>BG (Comments): Welcome deletion of “in particular”</p>
<p>(i) the European Research Council (ERC);</p>	
<p>(ii) Marie Skłodowska-Curie Actions (MSCA).</p>	
	<p>SI (Drafting suggestions): <u>(iii) Research infrastructures;</u></p>
<p>(iii) <i>Science for Union policies: non-nuclear direct actions of the Joint Research Centre (JRC).</i></p>	<p>BG (Comments): Welcome JRC in Pillar I. ES (Drafting suggestions): <i>(iii) — Science for Union policies: non-nuclear direct actions of the Joint Research Centre (JRC).</i></p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>ES (Comments): Although we fully support all the JRC activities and their planning and vision, and we recognised their efforts and high-quality work, we consider that the JRC should be under pillar IV. Beneficiaries do not understand the JRC could be seen as an excellence resource of funding nor complementary to mSCA or ERC. JRC’s activities can be sometimes excellent and always relevant but they are not in the frontier of science. They have a large portfolio of objectives and activities that do not match with the legislator ambition for this pillar.</p> <p>SE (Drafting suggestions): (iii) — <i>Science for Union policies: non-nuclear direct actions of the Joint Research Centre (JRC).</i></p> <p>SE (Comments): It would be more logical to place JRC in pillar 4 more aligned with ERA work, given the emphasis on science for policy.</p>
<p>(b) Part Pillar II ‘Competitiveness and Society’, with the following components, in particular:</p>	<p>ES (Comments): We respect the current discussion under the ECF. Nevertheless we consider the PCY has to open the debate on the need to divide into subcomponents the R&I part of each window.</p> <p>SE (Comments): SE suggests the Competitiveness and Society reproduce the MS involvement formula in current Regulation (EU) 2021/695 (Art. 6.6.ii: “early involvement</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>of Member States and extensive exchanges with the European Parliament, complemented by consultations with stakeholders and the general public”), and requests either reinstatement of equivalent wording or an explanation of how MS/EP/stakeholder engagement will be ensured.</p>
<p>i) ‘Competitiveness’, including research and innovation activities in support of policies the policy windows under the European Competitiveness Fund, such as:</p>	<p>BE (Drafting suggestions): ‘Competitiveness’, including research and innovation activities in support of linked with policies the policy windows as stipulated in under the European Competitiveness Fund work programmes of the following chapters, such as:</p> <p>BE (Comments): We would rather avoid implying any hierarchical relationship between the two programmes.</p> <p>ES (Comments): We support the change, it is clearer.</p> <p>FR (Drafting suggestions): ‘Competitiveness’, including research and innovation activities in support of policies objectives of the policy windows under the European Competitiveness Fund, such as:</p> <p>FR (Comments): <u>We propose to add a more precise reference to the policy windows.</u></p> <p>MT</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>(Comments):</p> <p>Malta calls for the adoption of separate work programmes for R&I elements of the ECF policy windows. We argue that the single work programmes under the European Competitiveness Fund will marginalise research activities and decrease excellence of Horizon Europe collaborative endeavours. Additionally, we call for the introduction of examination committee procedure to all work programmes.</p> <p>SE</p> <p>(Comments):</p> <p>SE would like a clarification of the word “including”. Does this mean that the HE can have a broader R&I scheme in this section? SE believes that the HE FP should stand on its own, build collaborative research bottom up, and coordinate priorities with the ECF through addressing the same “windows”.</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>‘Competitiveness’, including research and innovation activities in support of policies the policy windows under the European Competitiveness Fund, such as:</p> <p>SI</p> <p>(Comments):</p> <p>Link between HEU and ECF should be made only through the priorities (policy windows). Implementation of HEU should be programmed within HEU and thus keep the HEU autonomous programme</p>
<p>(1) collaborative research and innovation activities under Chapter IV ‘Clean Transition and Industrial Decarbonisation’ of the European Competitiveness Fund;</p>	<p>ES</p> <p>(Comments):</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>Policy windows are very broad and should be subdivided into different R&I thematic blocks to be defined.</p> <p>SE (Comments):</p> <p>SE maintains a specific reservation towards subparagraphs 1-4, for the reasons spelled out in the previous row.</p> <p>SI (Drafting suggestions):</p> <p>collaborative research and innovation activities addressing in particular priorities described under Chapter IV ‘Clean Transition and Industrial Decarbonisation’ of the European Competitiveness Fund;</p>
<p>(2) collaborative research and innovation activities under Chapter V ‘Health, Biotech, Agriculture and Bioeconomy’ of the European Competitiveness Fund;</p>	<p>ES (Comments):</p> <p>Policy windows are very broad and should be subdivided into different R&I thematic blocks to be defined.</p> <p>(2) (a) Health (2) (b) Biotechnology (2) (c) Bioeconomy (2) (d) Agriculture and Food security.</p> <p>LT (Drafting suggestions):</p> <p>collaborative research and innovation activities under Chapter V ‘Health, Biotech, Agriculture, Food Security and Bioeconomy’ of the European Competitiveness Fund;</p> <p>LT (Comments):</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p><u>Supplemented text as “Food security” is one of essential components of the green and digital transition and a key factor for Europe’s competitiveness and resilience.</u></p> <p>SI (Drafting suggestions): collaborative research and innovation activities addressing in particular priorities described under Chapter V ‘Health, Biotech, Agriculture and Bioeconomy’ of the European Competitiveness Fund;</p>
<p>(3) collaborative research and innovation activities under Chapter VI ‘Digital Leadership’ of the European Competitiveness Fund;</p>	<p>ES (Comments): Policy windows are very broad and should be subdivided into different R&I thematic blocks to be defined.</p> <p>SI (Drafting suggestions): collaborative research and innovation activities addressing in particular priorities described under Chapter VI ‘Digital Leadership’ of the European Competitiveness Fund;</p>
<p>(4) collaborative research and innovation activities under Chapter VII ‘Resilience and Security, Defence Industry and Space’ of the European Competitiveness Fund.</p>	<p>ES (Comments): Policy windows are very broad and should be subdivided into different thematic blocks for the different objectives of ECF Regulation article 3.2.d): 3.2.d) (1) Resilience; 3.2.d) (2) Not part of the HE Specific Programme 3.2.d) (3) Space 3.2.d) (4) Civil industrial security</p> <p>SI</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>collaborative research and innovation activities addressing in particular priorities described under Chapter VII ‘Resilience and Security, Defence Industry and Space’ of the European Competitiveness Fund.</p>
<p>ii) ‘Society’, including research and innovation activities, such as:</p>	<p>SI</p> <p>(Drafting suggestions):</p> <p>(5) ‘Society’, including collaborative research and innovation activities</p>
<p>(1) <i>global societal challenges;</i></p>	<p>AT</p> <p>(Comments):</p> <p>AT repeats its request for a structured process for identifying these global societal challenges.</p> <p>One critical field, especially given the current geopolitical situation, is research on the various dimensions of peace and security, such as conflict prevention, peacebuilding and peacekeeping.</p> <p>BE</p> <p>(Drafting suggestions):</p> <p>Global and societal challenges</p> <p>BG</p> <p>(Drafting suggestions):</p> <p>(1) global societal challenges;</p> <p>BG</p> <p>(Comments):</p> <p>We prefer focusing mainly on EU-relevant challenges.</p> <p>DE</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>global societal challenges; <u>democratic, inclusive, value-based and competitive European societies</u></p> <p>DE</p> <p>(Comments):</p> <p>DE: The title is very broad. It is not clear what “global societal challenges” exactly means.</p> <p>ES</p> <p>(Drafting suggestions):</p> <p>global societal challenges; Social and cultural transformations</p> <p>ES</p> <p>(Comments):</p> <p><i>global societal challenges is misleading for participants and R&I ecosystem, as all collaborative research & innovation activities under Policy Windows will surely address big societal challenges.</i></p> <p><i>Besides that,, the scope of activities described under this heading in the Decision text clearly has a focus on social and cultural transformation</i></p> <p><i>We suggest to adapt the heading to the reality of the text.</i></p> <p>FR</p> <p>(Comments):</p> <p><u>Scrutiny reservation. FR is still discussing internally about the architecture and content of the ‘Society’ component.</u></p> <p>MT</p> <p>(Comments):</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	Malta reiterates its request for clarification on what kind of actions fall under this component.
<p>(2) <i>EU Missions;</i></p>	<p>EE (Drafting suggestions): (2) — <i>EU Missions;</i></p> <p>EE (Comments): Missions have proven to be broad political initiatives, rather than purely R&I-focused activities, which often exceed the scope and capacity of the Framework Programme structure. Removing Missions from the Regulation's structure would allow the Framework Programme to concentrate its budget and governance on its core function—excellence-based R&I—while Missions could be managed as separate, cross-DG policy instruments where they can achieve better systematic impact.</p> <p>ES (Comments): Spain is currently assessing our national position regarding Missions (due to its interministerial dimension), which we have already expressed our serious concerns. We have a scrutiny reservation to all Missions references in the HE and SP regulations. Why is the ECF not linked to EU Missions? 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. Considering that EU Missions objectives should be accomplished in 2030, activities to be funded from 2028 onwards should be deployment and scaling up and therefore funded by ECF and not be a part of HE.</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>In any case, there is no need to include a specific section for EU Missions in the Programme, the R&I activities that need to be carried out will be included as part of the global societal challenges or the policy windows (where relevant). For these reasons we propose to remove EU Missions from the text.</p> <p>FR (Comments): <u>Scrutiny reservation. FR is still discussing internally about the architecture and content of the ‘Society’ component.</u></p> <p>MT (Comments): Malta requests clarification on what the link between the EU Missions and the Moonshots, particularly given the 2030 deadline for EU funding for the Missions (Art 15).</p> <p>SI (Drafting suggestions): <u>EU Missions; various dimensions of peace and security</u></p>
	<p>SI (Drafting suggestions): <u>(3) cultural and creativity</u></p>
(3) <i>the New European Bauhaus Facility;</i>	<p>BG (Comments): Still no final position on NEB Facility, but we see no need for explicitly mentioning it here, as it goes against flexibility.</p> <p>ES (Drafting suggestions): <u>(3) — <i>the New European Bauhaus Facility;</i></u></p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>ES (Comments): Activities to be funded from 2028 onwards should be funded by ECF and not be a part of HE. There is no need to make the European Bauhaus Facility explicit in the text.</p> <p>R&I activities related to NEB Facility that need to be carried out can be included as part of the global societal challenges or the policy windows (where relevant). For these reasons we propose to remove the NEB Facility from the text.</p> <p>FR (Comments): <u>Scrutiny reservation. FR is still discussing internally about the architecture and content of the ‘Society’ component.</u></p> <p>SE (Drafting suggestions): (3) — the New European Bauhaus Facility;</p> <p>SE (Comments): SE wishes to explore the potential implications of a possible relocating of the NEB facility, including its R&I component, to a relevant ECF window</p> <p>SI (Drafting suggestions): (3) (4) <i>the New European Bauhaus Facility;</i></p>
(c) Part Pillar III ‘Innovation’, with the following components, in particular:	<p>ES (Comments):</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	We support this change.
(i) the European Innovation Council (EIC);	
(ii) Innovation ecosystems including activities to foster the integration of the knowledge triangle – higher education, research and innovation, and business – across the Union.	<p>FR (Drafting suggestions):</p> <p>(ii) Innovation ecosystems including activities to foster the integration of the knowledge triangle—higher education, research and innovation, and business—across the Union.</p> <p>FR (Comments):</p> <p><u>We do not see the need to detail activities related to this instrument. It should be done in other articles, not at the level of the programme structure. Otherwise, all activities related to all instruments should be added to this article.</u></p> <p>HU (Drafting suggestions):</p> <p>(ii) Innovation ecosystems including activities <u>of the European Institute of Innovation and Technology (EIT)</u> to foster the integration of the knowledge triangle – higher education, research and innovation, and business – across the Union.</p> <p>HU (Comments):</p> <p>Hungary strongly insists on the specific inclusion of the European Institute of Innovation and Technology (EIT) when reference is made to the knowledge triangle.</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>The EIT and its KICs serve as the primary instrument for fostering the effective integration of the knowledge triangle (education, research, and innovation) within the Union. The lack of explicit reference to the EIT and the KICs in the current draft creates unnecessary uncertainty regarding their future role and status.</p> <p>SK (Drafting suggestions):</p> <p>(ii) Innovation ecosystems including activities <u>of the European Institute of Innovation and Technology (EIT)</u> to foster the integration of the knowledge triangle – higher education, research and innovation, and business – across the Union.</p>
<p>(d) Part Pillar IV ‘European Research Area’, with the following components, in particular:</p>	<p>ES (Comments):</p> <p>We support this change.</p> <p>MT (Comments):</p> <p>Malta reiterates its call on the European Commission to provide an explanation on what kind of actions are foreseen to strengthen the realisation of the European Research Area.</p>
	<p>ES (Drafting suggestions):</p> <p><i>Science for Union policies: non-nuclear direct actions of the Joint Research Centre (JRC).</i></p>
<p>(i) reforming and enhancing the European R&I system;</p>	<p>SI (Drafting suggestions):</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	(i) reforming and enhancing the European R&I system; <u>achieving strategic objectives of ERA</u>
(ii) <i>research and technology infrastructures;</i>	<p>SI (Drafting suggestions): <i>research and technology infrastructures</i></p> <p>SI (Comments): 1. We propose moving TIs to ECF 2. We propose moving RIs to pillar I of HE</p>
(iii) widening participation and spreading excellence.	<p>FR (Comments): <u>It should be into brackets, since it is part of the negotiation box.</u></p> <p>MT (Comments): Malta places a scrutiny reserve on the general concept of the division of Widening countries. We also have doubts about the methodology used for splitting the countries into Transition and Widening groups.</p>
	<p>DE (Drafting suggestions): <u>(iv) COST actions</u></p> <p>DE (Comments): COST actions should be mentioned in the programme structure.</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
<p style="text-align: center;"><i>Article 5</i> <i>Horizontal principles</i></p>	<p>IE (Comments): The principles must be aligned with the principles agreed in the Pact for R&I. All of the principles agreed in the Pact need to be explicitly referenced here (or under the ERA Pillar) – it shouldn't be just some of them. We do not want to suggest that some are more important than others.</p>
<p>The Programme shall:</p>	<p>IE (Comments): A provision on the ethos of the Programme needs to be added. We recognise that further discussion is required on how to reflect the policy debate at Council in September in the FP text.</p>
	<p>DE (Drafting suggestions): (aa): <u>be based on scientific excellence</u> DE (Comments): Additional point on excellence. SI (Drafting suggestions): <u>(a') focus primarily on civil applications while prudently allowing for research and innovation activities that may have potential defence application</u> SK (Drafting suggestions):</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p><u>(a0) focus primarily on civil applications, while prudently allowing for research and innovation activities that may have potential defence applications.</u></p> <p>SK (Comments): SK does not object to support also projects with possible dual-use applications, the focus of the programme should remain on civil applications.</p>
<p>(a) ensure a multidisciplinary approach, where appropriate, and provide for the integration of social sciences and humanities (SSH) across all components under the Programme, including specific calls for proposals on SSH related topics.</p>	<p>AT (Drafting suggestions): ensure a multidisciplinary approach, where appropriate, and provide for the integration of social sciences and humanities (SSH) across all components under the Programme as specified in Art. 4, including specific calls for proposals on SSH related topics.</p> <p>AT (Comments): AT: To emphasize that this also refers to the programme parts implemented in the ECF.</p> <p>LT (Drafting suggestions): (a) ensure a multidisciplinary approach, where appropriate, and provide for the systematic integration of social sciences and humanities (SSH) across all components. To this end, under the Programme shall include e-ing specific calls for proposals addressing-on SSH related topics</p> <p>LT (Comments):</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>We would like to stress more systemic integration of SSH across the FP.</p> <p>PT</p> <p>(Drafting suggestions):</p> <p>(a) ensure a multidisciplinary approach across all domains of science where appropriate, and provide for with particular focus on the integration of social sciences and humanities (SSH) across all components under the Programme, including specific calls for proposals on SSH related topics.</p> <p>PT</p> <p>(Comments):</p> <p>PT welcomes this approach. The integration of Social Sciences and Humanities (SSH) is of extraordinary importance to ensure that research and innovation activities under the Programme are not only technologically sound but also socially relevant, inclusive, and ethically grounded. However, with the competitiveness fund regulation and its policy Windows being dominant in the part dedicated to collaborative Research, not only SSH should be emphasised in the horizontal principles. “</p> <p>SE</p> <p>(Drafting suggestions):</p> <p>ensure a multidisciplinary approach, where appropriate, and provide for the integration of social sciences and humanities (SSH) across all activities funded components under the Programme, already at the drafting stage, including specific calls for proposals on SSH related topics</p> <p>SE</p> <p>(Comments):</p> <p>SE underlines its support for this formulation and the need for making sure that it is considered early in the drafting process across all activities funded under the Programme.</p> <p>SI</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>ensure a multidisciplinary approach, where appropriate, and provide for the systemic integration of social sciences and humanities (SSH) across all components. To this end under the Programme shall, including specific calls for proposals addressing on SSH related topics.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>(a) ensure a multidisciplinary approach, where appropriate, and provide for the systematic integration of social sciences and humanities (SSH) across all components. To this end under the Programme shall include e-ing specific calls for proposals addressing on SSH related topics</p> <p>SK</p> <p>(Comments):</p> <p>As mentioned during the RWP meeting on 9-10-2025, systematic and holistic integration of the SSH into the programme has a high importance for SK.</p>
<p>(b) advance scientific knowledge and contribute to the creation of informed, effective, and responsive public policies across the Union and beyond. The Programme shall actively promote the use of the results of publicly funded research and of scientific evidence in policy-making processes at all levels, fostering stronger links between research, innovation, and the development of evidence-informed public policies. This shall include encouraging collaborative mechanisms, R&I initiatives and science-for-policy interfaces connecting policy makers with the scientific community, as well as facilitating the use of research outcomes in shaping future legislative and regulatory frameworks at all levels. Special emphasis shall be placed on ensuring that scientific insights are accessible and relevant to decision makers and citizens, with instruments for the effective use of research results, policy briefs, and recommendations.</p>	<p>DE</p> <p>(Drafting suggestions):</p> <p>(b) advance scientific knowledge and contribute to the creation of informed, effective, and responsive societies and public policies across the Union and beyond. The Programme shall actively promote the use of the results of publicly funded research and of scientific evidence in policy-making processes at all levels, fostering stronger links between research, innovation, and the development of evidence-informed public policies. This shall include encouraging collaborative mechanisms, R&I initiatives and science-for-policy interfaces connecting policy makers with the scientific community, as well as facilitating the use of research outcomes in shaping future legislative and regulatory frameworks at all levels. Special emphasis shall be placed on ensuring that scientific insights are accessible and relevant</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>to decision makers and citizens, with instruments for the effective use of research results, policy briefs, and recommendations.</p> <p>FR (Drafting suggestions):</p> <p>(b) advance scientific knowledge and contribute to the creation of informed, effective, and responsive public policies across the Union and beyond. The Programme shall actively promote the use of the results of publicly funded research and of scientific evidence in policy-making processes at all levels, fostering stronger links between research, innovation, and the development of evidence-informed public policies. This shall include encouraging collaborative mechanisms, R&I initiatives and science for policy interfaces connecting policy makers with the scientific community, as well as facilitating the use of research outcomes in shaping future legislative and regulatory frameworks at all levels. Special emphasis shall be placed on ensuring that scientific insights are accessible and relevant to decision makers and citizens, with instruments for the effective use of research results, policy briefs, and recommendations.</p> <p>FR (Comments):</p> <p><u>The description is too detailed for a horizontal principle. We have added a reference to evidence-based public policies in the specific objectives (article 2) and move the related process in a recital.</u></p>
	<p>EE (Comments):</p> <p>.</p> <p>HU</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p><u>(ba) The Programme shall assist widening countries to increase their participation in it and to promote a broad geographical coverage including through providing for additional eligibility criteria in the work programme in order to take into account specific policy requirements or the nature and objectives of the action.</u></p> <p>HU (Comments): Current Regulation on Horizon Europe, Article 7(5) explicitly aimed to support and encouraging broader geographical participation, excellence through cooperation, and brain circulation. HU insists that this horizontal principle is maintained.</p> <p>LT (Drafting suggestions):</p> <p><u>(ba) The Programme shall assist widening countries to increase their participation in it and to promote a broad geographical coverage in collaborative projects, including through spreading scientific excellence, boosting new collaborative links, stimulating brain circulation [as well as through the implementation of Article 24(2) and Article 50(5)]. Those efforts shall be mirrored by proportional measures by Member States, including through setting attractive salaries for researchers, with the support of Union, national and regional funds. Without undermining the excellence criteria, particular attention shall be paid to geographical balance, subject to the situation in the field of R&I concerned, in evaluation panels and bodies such as boards and expert groups.</u></p> <p>LT (Comments): We would like to include here the current Horizon Europe Article 7(5).</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>MT (Drafting suggestions): <u>(new point) The Programme shall assist [Widening and Transition] countries to increase their participation and promote a broad geographical coverage, including through providing additional eligibility criteria in the work programmes, taking into account specific policy requirements and/or the nature and objectives of the action.</u></p> <p>MT (Comments): Malta argues that in line with the current Horizon Europe regulation [article 7(5)], supporting and encouraging broader geographical participation, excellence through cooperation, and brain circulation should be introduced in the text. This is a red line.</p> <p>SI (Drafting suggestions): (ba) The Programme shall assist widening countries to increase their participation in it and to promote a broad geographical coverage including through providing for additional eligibility criteria in the work programme in order to take into account specific policy requirements or the nature and objectives of the action.</p> <p>SI (Comments): SI suggests this horizontal principle is maintained in Horizon Europe.</p> <p>SK (Drafting suggestions):</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p><u>(ba) The Programme shall assist widening countries to increase their participation in it and to promote a broad geographical coverage including through providing for additional eligibility criteria in the work programme in order to take into account specific policy requirements or the nature and objectives of the action.</u></p> <p>SK (Comments): Current Horizon Europe, Article 7(5) explicitly aimed to support and encouraging broader geographical participation, excellence through cooperation, and brain circulation.</p> <p>We have carefully reviewed the FP10 proposal, but we could not identify similar provisions. Perhaps it has been addressed indirectly, but SK believes there is a need to reintroduce a clear reference.</p> <p>SK strongly supports to keep this horizontal principle to be maintained in the next Horizon Europe.</p>
<p><u>(ba) cover all parts of the research and innovation value chain, from basic curiosity-driven research to breakthrough innovation.</u></p>	<p>BG (Comments): Welcome this addition</p> <p>DE (Drafting suggestions): ba) cover all parts of the research and innovation value chain, from basic curiosity-driven research to breakthrough innovation, ensuring a balanced support across all Technology Readiness Levels up to TRL 8.</p> <p>DE (Comments):</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>DE: Additional point on TRL 8 as deliniation to ECF</p> <p>ES (Comments): We support the inclusion of this point. It should be noted that the Programme aims to promote both basic and applied research and innovation.</p> <p>FR (Comments): <u>Full support to this added mention</u></p> <p>IE (Comments): We welcome and support this new paragraph on the importance of supporting the whole R&I value chain.</p>
<p>(c) encourage open science practices including by ensuring open access to peer-reviewed scientific publications regarding results, as well as open access to research data and other results following the research security principle ‘as open as possible, as closed as necessary’.</p>	<p>BE (Drafting suggestions): encourage open science practices including by ensuring open access to peer-reviewed scientific publications regarding results, as well as open access to research data and other results research outputs resulting from actions under the Programme following the research security principle ‘as open as possible, as closed as necessary’ and while respecting the need for research security.</p> <p>BE (Comments): Research leads to more than results, while ‘as open as possible, as closed as necessary’ is not in itself a ‘research security’ principle.</p> <p>CZ (Comments):</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>CZ welcomes the addition of reference to “research security”.</p> <p>ES (Comments): ok</p> <p>IE (Drafting suggestions): (c) encourage open science practices including by ensuring open access to peer-reviewed scientific publications regarding results, as well as open access to research data and other results following the research security principle ‘as open as possible, as closed as necessary’ and aligned with research security policy.</p> <p>IE (Comments): While the ‘as open as possible principle’ is now applied to research security considerations, it has a broader application in the context of OS. This needs to be made clear in the text.</p> <p>As previously stated, Ireland strongly believes that a separate article on research security is required to ensure a clear and consistent approach across the FP. The FP will have an important role to play in implementing the 2024 Council Recommendation on research security.</p> <p>NL (Drafting suggestions): (c) encourage open science practices including by ensuring open access to peer-reviewed scientific publications regarding results, as well as open access to research data and other results following the research security principle ‘as open as possible, as closed as necessary’ , also applying to research security.</p>

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	<p>NL (Comments): As open as possible, as closed as necessary’ has always been the adagium of open science, which was also applied to research security. It does not make sense to insert research security here in this way, since for open science it means more than research security deliberations alone (e.g. privacy, confidentiality and IP).</p> <p>SI (Drafting suggestions): encourage open science practices including by <u>creating common European dataspace of research results</u>, ensuring open access to peer-reviewed scientific publications regarding <u>research</u> results, as well as open access to research data and other results following the research security principle ‘as open as possible, as closed as necessary’.</p> <p>SK (Drafting suggestions): (c) encourage open science practices including by <u>creating common European dataspace of research results</u> ensuring open access to peer-reviewed scientific publications regarding <u>research</u> results, as well as open access to research data and other results following the <u>research security</u> principle ‘as open as possible, as closed as necessary’.</p>
	<p>SE (Drafting suggestions): Cbis) <u>The Programme shall ensure the effective promotion of equal opportunities for all and the implementation of gender mainstreaming, including the integration of the gender dimension in R&I content. It shall aim to address the causes of gender imbalance. Particular attention shall be paid to ensuring, to the extent possible, gender balance in EC-</u></p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p><u>funded research groups, in evaluation panels and in other relevant advisory bodies such as boards and expert groups.</u></p> <p>SE (Comments): See comment next to recital 4.</p>
<p><u>(ca) ensure administrative simplification and the reduction of the burden for the applicants and beneficiaries.</u></p>	<p>AT (Comments): AT welcomes this additional text, stressing that simplification should be targeted at the efficient support of applicants and beneficiaries.</p> <p>BE (Drafting suggestions): <u>(ca) ensure administrative simplification and the reduction of the burden to the benefit of the applicants and beneficiaries.</u></p> <p>BE (Comments): This addition is welcomed, however suggestion to change: ‘to the benefit of’ – e.g. PUC is currently not considered to the benefit of applicants, in its current form.</p> <p>BG (Comments): Welcome this addition</p> <p>ES (Comments): We support this new point.</p>

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	<p>Nevertheless, it should be noted that the legal requirements arising to the Regulation, the Specific Programme or the implementing acts must be complied with.</p> <p>In relation to the requirements and simplification, it is not possible to know whether SMEs participate (of how much) if beneficiaries are not asked to justify and COM do not verify it. Or it is not possible to know how much EC funding beneficiaries receive unless coordinators report on payments.</p> <p>FR (Comments): <u>Full support to this added mention.</u></p> <p>NL (Drafting suggestions): <u>(ca) ensure a continuous effort to reduce administrative simplification and the reduction of the burden for the applicants and beneficiaries.</u></p> <p>NL (Comments): We fully support simplification for applicants and beneficiaries. However, simplification compared to what? The current programme?</p>
<p><u>(cb) ensure the effective promotion of equal opportunities for all and the implementation of gender equality, including the integration of the gender dimension in R&I content.</u></p>	<p>AT (Comments): AT welcomes the content of this additional text.</p> <p>DE (Comments): DE: We fully support the goal of gender equality . Could the Presidency please explain how this new paragraph relates to the Performance Regulation in which gender equality is dealt with horizontally?</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>ES (Drafting suggestions): <u>ensure the effective promotion of equal opportunities for all and the implementation of gender equality as cross-cutting principle, including the integration of the gender dimension in R&I content from an intersectoral perspective.</u></p> <p>ES (Comments): We support this insertion, and we suggest two addition to emphasize gender as something to be taken into account all across the programme and also the intersectoral perspective.</p> <p>FR (Comments): <u>Full support to this added mention.</u></p> <p>IE (Drafting suggestions): <u>cb) ensure the effective promotion of equal opportunities for all and the implementation of gender equality, including the implementation of gender equality policies and practices and the integration of the gender dimension in R&I content.</u></p> <p>IE (Comments): It is not clear what is meant by the ‘implementation of gender equality’</p> <p>NL (Drafting suggestions):</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p><u>(cb) ensure the effective promotion of equal opportunities for all and the implementation of gender equality, including the implementation of gender equality and the integration of the gender dimension in R&I content.</u></p> <p>NL (Comments): Textual suggestion that we think is clearer.</p> <p>PL (Comments): PL very strongly supports this new provision and insists it is not deleted. Legal act on HE is the appropriate place to include this horizontal principle, the right signal to all Framework Programme stakeholders needs to be sent from the level of the Regulation establishing HE.</p>
	<p>BG (Drafting suggestions):</p> <p><u>(d) The Programme shall assist widening countries to increase their participation in it and to promote a broad geographical coverage in collaborative projects, including through spreading scientific excellence, boosting new collaborative links, stimulating brain circulation as well as through the implementation of Article 24(2) and Article 50(5). Those efforts shall be mirrored by proportional measures by Member States, including through setting attractive salaries for researchers, with the support of Union, national and regional funds. Without undermining the excellence criteria, particular attention shall be paid to geographical balance, subject to the situation in the field of R&I concerned, in evaluation panels and bodies such as boards and expert groups</u></p> <p>DE (Drafting suggestions):</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>(cd) <u>The Programme shall ensure the effective promotion and integration of cooperation with third countries and international organisations and initiatives based on mutual benefits, the Union interests, international commitments and, where appropriate, reciprocity</u></p> <p>(ce) <u>Support the strengthening of EU’s security in particular by providing for the exploitation of research results towards security related applications and uses.</u></p> <p>(cf) <u>The Programme shall be implemented in synergy with other Union programmes while aiming for maximal administrative simplification.</u></p> <p>DE (Comments): DE: international cooperation, security-related research and synergies are missing here and should be added.</p> <p>EE (Drafting suggestions): <u>(cc) establish and maintain a unified framework of security, data protection, and Intellectual Property Rights (IPR) management rules for actions involving dual-use technologies or contributing to defence objectives under Pillar II (Competitiveness and Society), ensuring administrative simplification and consistency across relevant policy instruments.</u></p> <p>EE (Comments): The integration of dual-use and defence-related R&I introduces complexities related to security, confidentiality, export control, and IPR management. A unified framework is necessary to mitigate geopolitical risks and prevent</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	fragmentation, which would unduly burden researchers and SMEs, particularly in smaller Member States, and is essential for linking the Framework Programme effectively with the European Competitiveness Fund.
Recitals	
<p>(4) The Union should furthermore aim to eliminate inequalities, and to promote gender equality, between men and women, as well as to combat discrimination in accordance with Article 8 and Article 10 of the Treaty on the Functioning of the European Union (TFEU) and the Charter of Fundamental Rights of the European Union.</p>	<p>ES (Comments): We support the change, we consider it is more appropriate.</p> <p>SE (Comments): SE would support making this recital more operative, by finding a suitable place for its inclusion in Article 5. The current Article 7.6 of Horizon Europe could serve as a starting point for drafting text.</p>
	<p>FR (Drafting suggestions): <u>(4a) The Programme shall actively promote the use of the results of publicly funded research and of scientific evidence in policy-making processes at all levels. This shall include encouraging collaborative mechanisms, R&I initiatives and science-for-policy interfaces connecting policy makers with the scientific community, as well as facilitating the use of research outcomes in shaping future legislative and regulatory frameworks at all levels. Special emphasis shall be placed on ensuring that scientific insights are accessible and relevant to decision makers and citizens, with instruments for the effective use of research results, policy briefs, and recommendations.</u></p> <p>FR (Comments): <u>As previously mentioned, related processes to science for policy mechanisms need to be defined at the level of a recital rather than a paragraph of an</u></p>

Presidency text ST 13484/25	Drafting suggestions and Comments
<p>(18) The Programme should ensure the effective promotion and protection of values and principles of the European Research Area and the Pact for Research and Innovation⁶, notably ethics and integrity in research and innovation, freedom of scientific research, science for policy, gender equality and equal opportunities, non-discrimination, open science and the promotion of attractive research careers and mobility. In particular, the Programme should ensure the effective promotion of equal opportunities for all and the implementation of gender mainstreaming, including the integration of the gender dimension in R&I content. It should aim to address the causes of gender imbalance. Particular attention should be paid to ensuring, to the extent possible, gender balance in evaluation panels and in other relevant advisory bodies such as boards and expert groups.</p>	<p><u>article, to ensure consistency and equality between all objectives and horizontal principles.</u></p> <p>BG (Drafting suggestions):</p> <p>(18) The Programme should ensure the effective promotion and protection of values and principles of the European Research Area and the Pact for Research and Innovation , notably ethics and integrity in research and innovation, freedom of scientific research, science for policy, gender equality and equal opportunities, non-discrimination, open science and the promotion of attractive research careers and mobility. In particular, the Programme should ensure the effective promotion of equal opportunities for all and the implementation of gender mainstreaming, including the integration of the gender dimension in R&I content. It should aim to address the causes of gender imbalance. Particular attention should be paid to ensuring gender balance and geographical diversity in evaluation panels and in other relevant advisory bodies such as boards and expert groups.</p> <p>BG (Comments):</p> <p>We prefer keeping this important detail from Annex I of FP9 Specific Programme</p> <p>DE (Drafting suggestions):</p> <p>(18) The Programme should ensure the effective promotion and protection of values and principles of the European Research Area and the Pact for</p>

⁶ Council Recommendation (EU) 2021/2122 of 26 November 2021 on a Pact for Research and Innovation in Europe, OJ L 431, 2.12.2021, p. 1, ELI: <http://data.europa.eu/eli/reco/2021/2122/oj>.

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>Research and Innovation⁷, notably ethics and integrity in research and innovation, freedom of scientific research, excellence in science and innovation, European and international collaboration, science for policy, gender equality and equal opportunities, non-discrimination, open science and the promotion of attractive research careers and mobility. In particular, the Programme should ensure the effective promotion of equal opportunities for all and the implementation of gender mainstreaming, including the integration of the gender dimension in R&I content. It should aim to address the causes of gender imbalance. Particular attention should be paid to ensuring, to the extent possible, gender balance in evaluation panels and in other relevant advisory bodies such as boards and expert groups</p> <p>EE (Drafting suggestions):</p> <p>(18) The Programme should ensure the effective promotion and protection of values and principles of the European Research Area and the Pact for Research and Innovation⁸, notably ethics and integrity in research and innovation, freedom of scientific research, science for policy, gender equality and equal opportunities, non-discrimination, open science and the promotion of attractive research careers and mobility including measures to combat brain drain. In particular, the Programme should ensure the effective promotion of equal opportunities for all and the implementation of gender mainstreaming, including the integration of the gender dimension in R&I content. It should aim to address the causes of gender imbalance. Particular attention should be paid to ensuring, to the extent possible, gender balance in evaluation panels and in other relevant advisory bodies such as boards and expert groups.</p>

⁷ Council Recommendation (EU) 2021/2122 of 26 November 2021 on a Pact for Research and Innovation in Europe, OJ L 431, 2.12.2021, p. 1, ELI: <http://data.europa.eu/eli/reco/2021/2122/oj>.

⁸ Council Recommendation (EU) 2021/2122 of 26 November 2021 on a Pact for Research and Innovation in Europe, OJ L 431, 2.12.2021, p. 1, ELI: <http://data.europa.eu/eli/reco/2021/2122/oj>.

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>EE (Comments): To reinforce the Programme's commitment to fighting brain drain by explicitly mentioning the need for measures targeting brain drain also in the Recitals.</p> <p>IE (Comments): The FP principles must be aligned with the values and principles agreed in the Pact for R&I. Why are only some of the principles agreed in the Pact explicitly referenced here?</p>
	<p>FR (Drafting suggestions): <u>(18a) The Commission or the relevant funding body shall ensure that sufficient guidance and information is made available to all potential participants at the time of publication of the call for proposals, in particular the applicable model grant agreement.</u></p> <p>FR (Comments): <u>This principle – mentioned in the current regulation – is essential for beneficiaries and is in line with the horizontal objective related to simplification and reduction of the administrative burden for beneficiaries.</u></p>
<p>Article 6 Budget</p>	

Presidency text ST 13484/25	Drafting suggestions and Comments
<p>4. The indicative financial envelope of the Programme for the period 1 January 2028 to 31 December 2034 shall be EUR 175 002 000 000 in current prices.</p>	
<p>5. The indicative distribution of the amount referred to in paragraph 1 of this Article for the Specific Programme referred to in Article 1(2)(a), shall be:</p>	
<p>(a) EUR 44 079 000 000 for Part I ‘Excellent Science’, of which EUR 2 600 000 000 for non-nuclear direct actions of Joint Research Centre (JRC).</p>	
<p>(b) EUR 75 876 000 000 for Part II ‘Competitiveness and Society’, of which:</p>	
<p>i. EUR 68 270 000 000 for ‘Competitiveness’ of which:</p>	
<p>EUR 25 331 000 000 for collaborative research and innovation activities under Chapter IV ‘Clean Transition and Industrial Decarbonisation’ of the European Competitiveness Fund;</p>	
<p>EUR 19 650 000 000 for collaborative research and innovation activities under Chapter V ‘Health, Biotech, Agriculture and Bioeconomy’ of the European Competitiveness Fund;</p>	

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<p>EUR 16 854 000 000 for collaborative research and innovation activities under Chapter VI ‘Digital Leadership’ of the European Competitiveness Fund;</p>	
<p>EUR 6 435 000 000 for collaborative research and innovation activities under Chapter VII ‘Resilience and Security, Defence Industry and Space’ of the European Competitiveness Fund.</p>	
<p>ii. EUR 7 606 000 000 for ‘Society.</p>	
<p>(c) EUR 38 785 000 000 for Part III ‘Innovation’.</p>	
<p>(d) EUR 16 262 000 000 for Part IV ‘European Research Area’, of which EUR 5 387 000 000 for widening participation and spreading excellence.</p>	
<p>1. The amount referred to in paragraph 1 of this Article and the amounts of additional resources referred to in Article 7 may also be used for technical and administrative assistance for the implementation of the Programme, such as preparatory, monitoring, control, audit and evaluation activities, information technology systems and platforms, information and communication activities, including corporate communication on the political priorities of the Union, and all other technical and administrative assistance or staff-related expenses incurred by the Commission for the management of the Programme.</p>	

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<p>2. If necessary to enable the management of actions not completed by 31 December 2034, appropriations may be entered in the Union budget beyond 2034 to cover the expenses necessary and to enable the management of actions not completed by the end of the Programme.</p>	
<p>3. Budgetary commitments for actions extending over more than one financial year may be broken down into annual instalments over several years. ↓</p>	
<p><u>Recitals</u></p>	
<p>(31) [This Regulation lays down an indicative financial envelope for Horizon Europe, the Framework Programme for Research and Innovation for the period 2028-2034.]</p>	
<p style="text-align: center;"><i>Article 7</i> <i>Additional resources</i></p>	
<p>1. Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or other third parties, may make additional financial or non-financial contributions to the Programme. Additional financial contributions shall constitute external assigned revenue within the meaning of Article 21(2), points (a), (d), or (e) or Article 21(5) of Regulation (EU, Euratom) 2024/2509.</p>	<p>FR (Comments): <u>The possibility for Member States to provide additional resources must not be used to circumvent the ceilings of the multiannual financial framework by requesting additional contributions from Member States during the programming period.</u> <u>The French authorities consider that, given their importance, assigned revenues should be better taken into account in the annual budgetary procedure. More consolidated information should be provided to the budgetary authority.</u></p>

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	<p>SI (Drafting suggestions): Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or other third parties, may make additional financial or non-financial contributions to the Programme for carrying out reserach and innovtaion activities.....</p>
<p>2. Resources allocated to Member States under shared management may, at their request, be made available to the Programme. The Commission shall implement those resources directly or indirectly in accordance with Article 62(1), point (a) or (c) of Regulation (EU, Euratom) 2024/2509. They shall be additional to the amount referred to in Article 6(1) of this Regulation. Those resources shall be used for the benefit of the Member State concerned. Where the Commission has not entered into a legal commitment under direct or indirect management for additional amounts thus made available to the Programme, the corresponding uncommitted amounts may, at the request of the Member State concerned, be transferred back to one or more respective source programmes or their successors.</p>	<p>BE (Drafting suggestions): Resources allocated to Member States under shared management may, at their request, be made available to the Programme. The Commission shall implement those resources directly or indirectly in accordance with Article 62(1), point (a) or (c) of Regulation (EU, Euratom) 2024/2509. They shall be additional to the amount referred to in Article 6(1) of this Regulation. Those resources shall be used for the benefit of the Member State concerned. Such additional resources should be allocated exclusively to actions for R&I. Where the Commission has not entered into a legal commitment under direct or indirect management for additional amounts thus made available to the Programme, the corresponding uncommitted amounts may, at the request of the Member State concerned, be transferred back to one or more respective source programmes or their successors.</p> <p>BG (Drafting suggestions): 2. Resources allocated to Member States under shared management may, at their request, be made available to the Programme. The Commission shall implement those resources directly or indirectly in accordance with Article 62(1), point (a) or (c) of Regulation (EU, Euratom) 2024/2509. They shall be additional to the amount referred to in Article 6(1) of this Regulation. Those resources shall be used for the benefit of the Member</p>

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	<p>State concerned. Where the Commission has not entered into a legal commitment under direct or indirect management for additional amounts thus made available to the Programme, the corresponding uncommitted amounts may, at the request of the Member State concerned, be transferred back to one or more respective source programmes. <u>Financial contributions under [National and Regional Partnership Plans] shall be considered to be a contribution of the participating Member State to European Partnerships.</u></p> <p>BG (Comments):</p> <p>We prefer explicitly stating that co-funding through the National and Regional Partnership Plans will be considered as national financial contributions, as it is the case currently. This is crucial for Member States' ability to participate in partnerships.</p> <p>SK (Drafting suggestions):</p> <p>2. — Resources allocated to Member States under shared management may, at their request, be made available to the Programme. The Commission shall implement those resources directly or indirectly in accordance with Article 62(1), point (a) or (c) of Regulation (EU, Euratom) 2024/2509. They shall be additional to the amount referred to in Article 6(1) of this Regulation. Those resources shall be used for the benefit of the Member State concerned. Where the Commission has not entered into a legal commitment under direct or indirect management for additional amounts thus made available to the Programme, the corresponding uncommitted amounts may, at the request of the Member State concerned, be transferred back to one or more respective source programmes or their successors.</p> <p>2. <u>At the request of a Member State, EU funds allocated to it under shared management may be transferred to the Programme. The</u></p>

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	<p><u>Commission shall manage these funds directly or indirectly, in line with the Financial Regulation. These funds shall be in addition to the Programme’s regular budget and shall be used for the benefit of the Member State that transferred them, for R&I activities. If the Commission does not commit these funds to contracts, the Member State may request that the unspent amounts be returned to the original EU programme(s) from which they came.</u></p> <p>SK (Comments): Clear and simpler wording would be preferred.</p>
<p><i>Article 8</i> <i>Alternative, combined and cumulative funding</i></p>	
<p>1. The Programme shall be implemented in synergy with other Union programmes. An action that has received a Union contribution from another programme may also receive a contribution under this Programme. The rules of the relevant Union programme shall apply to the corresponding contribution or a single set of rules may be applied to all contributions and a single legal commitment may be concluded. If the Union contribution is based on eligible costs, the cumulative support from the Union budget shall not exceed the total eligible costs of the action and may be calculated on a pro-rata basis in accordance with the documents setting out the conditions for support.</p>	<p>ES (Drafting suggestions):</p> <p>1. The Programme shall be implemented in synergy with other Union programmes. An action that has received a Union contribution from another programme may also receive a contribution under this Programme. The rules of the relevant Union programme shall apply to the corresponding contribution. <u>Only where the objectives of the action cannot be achieved otherwise,</u> or a single set of rules may be applied to all contributions and a single legal commitment may be concluded. <u>When the action includes research and innovation activities, the rules of the Horizon Europe Programme will have preference over the other and shall be included in the relevant Work Programme indicating the budget contribution from each programme.</u> If the Union contribution is based on eligible costs, t The cumulative support from the Union budget shall not exceed the total eligible costs of the action and may be calculated on</p>

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	<p>a pro-rata basis in accordance with the documents setting out the conditions for support.</p> <p>ES (Comments):</p> <p>Amendment proposal:</p> <p>Reasons for the changes proposed:</p> <ul style="list-style-type: none"> - Clarification. - Transparency and predictability for beneficiaries. - The funds of HE should be only dedicated to R&I activities and there is a need to monitor its use. - Possibility of using different types of support. <p>Clear information is needed. When there is more than one programme contributing to an action, it must be specified how this will be done and how it will be decided whether common rules apply and who will decide on the funding (programme and body). In addition, the information must be clear to participants before proposals are submitted.</p> <p>In the 3rd sentence of the Com’s proposal we see as another predictability and transparency issue for the beneficiaries the fact that the WP or a specific call could choose between rules of the different EU funds used. Thus we prefer to prioritize the use of the respective fund unless the objectives of the action cannot be achieved otherwise. We believe R&I activities for an action should be prioritized with respect to other rules when one single set of rules is necessary.</p> <p>The last sentence of the Com’s proposal does not give certainty, especially for the capitals, the Union funding is always respecting the eligibility of costs, as this is clearly reflected in the Financial regulation articles 125, 180 and 186, so this should be removed from the text to avoid any</p>

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	<p>misinterpretation in view of using different funding models, such as lump sums, unit costs, and actual costs financing.</p> <p>FR (Drafting suggestions):</p> <p>1. The Programme shall be implemented in synergy with other Union programmes. An action that has received a Union contribution from another programme may also receive a contribution under this Programme, <u>provided that the contributions do not cover the same costs</u>. The rules of the relevant Union programme shall apply to the corresponding contribution or a single set of rules may be applied to all contributions and a single legal commitment may be concluded. <u>In the case where a single set of rules apply, further guidance and specific documents shall be made available for beneficiaries. Implementation bodies shall develop common standards and general understanding to avoid differences in application of rules.</u> If the Union contribution is based on eligible costs, the cumulative support from the Union budget shall not exceed the total eligible costs of the action and may be calculated on a pro-rata basis in accordance with the documents setting out the conditions for support.</p> <p>FR (Comments):</p> <p><u>A single set of rules can simplify the submission and management of proposals, but dedicated guidance should be developed. For example, the annotated model agreement for Horizon Europe gave rise to many errors and misunderstandings, as beneficiaries did not distinguish between the specific features of their programme and their funding instrument.</u></p> <p><u>To ensure genuine simplification with a single set of rules, it is essential that they are applied uniformly across the various DGs and agencies of the EC that will implement all the programs covered by this Single Rules Book. One example of this is the significant differences in the application of the lump</u></p>

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	<p><u>sum between the Horizon Europe programme and the Erasmus Plus programme. This Single Rules Book should not lead to uncertainty for beneficiaries, but rather to greater clarity.</u></p> <p>SE (Comments):</p> <p>SE’s support for a single set of rules depends on how such a set would be decided, and its suitability for Horizon Europe.</p> <p>SI (Drafting suggestions):</p> <p>The Programme shall be implemented in synergy with other Union programmes. An action that has received a Union contribution from another programme may also receive a contribution under this Programme, provided that double financing of the specific expense charged to the EU Budget is excluded. The rules of the relevant Union programme shall apply to the corresponding contribution or a single set of rules may be applied to all contributions and a single legal commitment may be concluded. <u>The use of contributions shall remain consistent with the legal bases and rules of the respective Union programmes, even when a single set of rules is applied to multiple contributions.</u> If the Union contribution is based on eligible costs, the cumulative support from the Union budget shall not exceed the total eligible costs of the action and may be calculated on a pro-rata basis in accordance with the documents setting out the conditions for support.</p>
<p>2. Award procedures under the Programme may be jointly conducted under direct or indirect management with Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or other third parties, provided the protection of the</p>	<p>ES (Drafting suggestions):</p>

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<p>financial interests of the Union is ensured. Such procedures shall be subject to a single set of rules and lead to the conclusion of single legal commitments. For that purpose, the partners to the joint award procedure may make resources available to the Programme in accordance with Article 7 of this Regulation, or the partners may be entrusted with the implementation of the award procedure, where applicable in accordance with Article 62(1), point (c), of Regulation (EU, Euratom) 2024/2509. In joint award procedures, representatives of the partners to the joint award procedure may also be members of the evaluation committee referred to in Article 153(3) of Regulation (EU, Euratom) 2024/2509.</p>	<p>2. Award procedures under the Programme may be jointly conducted under direct or , in exceptional and duly justified cases, under indirect management with Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or other third parties, provided the protection of the financial interests of the Union is ensured. Such procedures shall be subject to a single set of rules and lead to the conclusion of single legal commitments. For that purpose, the partners to the joint award procedure may make resources available to the Programme in accordance with Article 7 of this Regulation, or the partners may be entrusted with the implementation of the award procedure, where applicable in accordance with Article 62(1), point (c), of Regulation (EU, Euratom) 2024/2509. In joint award procedures, representatives of the partners to the joint award procedure may also be members of the evaluation committee referred to in Article 153(3) of Regulation (EU, Euratom) 2024/2509, without considering the contribution of resources during the evaluation, that should follow conditions set in Article 25.</p> <p>ES (Comments): Most of the budget should be managed by the EC and its executive agencies. Indirect management by other entities should only be used in exceptional and duly justified cases (like the JUs which is a single case but with several initiatives), and the need for this must be well justified and authorised by the Programme committee. It should be specified in this Regulation.</p> <p>Joint award procedures should follow Horizon Europe general rules, and the evaluation should be based on the excellence of the proposals (regardless of whether the entities providing funding participate in the evaluation committee). Award criteria and selection set out in Article 25 should be followed. The participation of other partners, providing resources or funding,</p>

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	<p>should not influence the assessment, which should be based on objectivity and equal opportunities.</p> <p>FR (Drafting suggestions):</p> <p>2. Award procedures under the Programme may be jointly conducted under direct or indirect management with Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or other third parties, provided the protection of the financial interests <u>and economic security</u> of the Union is ensured. <u>Each Member State shall have a right of veto on all issues concerning the use of its own national financial contribution and for applicants established in those Member States.</u> Such procedures shall be subject to a single set of rules and lead to the conclusion of single legal commitments. For that purpose, the partners to the joint award procedure may make resources available to the Programme in accordance with Article 7 of this Regulation, or the partners may be entrusted with the implementation of the award procedure, where applicable in accordance with Article 62(1), point (c), of Regulation (EU, Euratom) 2024/2509. In joint award procedures, representatives of the partners to the joint award procedure may also be members of the evaluation committee referred to in Article 153(3) of Regulation (EU, Euratom) 2024/2509.</p> <p>FR (Comments):</p> <p><u>To ensure the economic security of the Union, Member States should have a right of veto regarding applicants established on their territory and which could take part to joint award procedures. (See Chips regulation as an example)</u></p> <p>SI (Drafting suggestions):</p>

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	<p>..... In joint award procedures, representatives of the partners to the joint award procedure may also be members of the evaluation committee referred to in Article 153(3) of Regulation (EU, Euratom) 2024/2509 <u>only if they do not have a director indirect interest in any of the proposals under evaluation.</u></p>
	<p>LT (Drafting suggestions):</p> <p><u>2a. Financial contribution under programmes co-funded by the European Fund for Economic, Territorial, Social Cohesion, Agriculture and Rural, Fisheries and Maritime Prosperity and Security shall be considered to be a contribution of the participating Member State to European Partnerships and other co-funding initiatives.</u></p> <p>LT (Comments):</p> <p>Provision to guarantee that ERDF (and other) contributions by MSs are indeed counted for as contributions of this MS. financial contributions under programmes co-financed by the ERDF, the ESF+, the EMFAF and the EAFRD may be considered to be a contribution of the participating Member State to European Partnerships under points (b) and (c) of Article 10(1) of this Regulation, provided that the relevant provisions of the Common Provisions Regulation for 2021- 2027 and the fund-specific regulations are complied with.</p> <p>SI (Drafting suggestions):</p>

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	<p><u>2 (a) Financial contribution under programmes co-funded by the European Fund for Economic, Territorial, Social Cohesion, Agriculture and Rural, Fisheries and Maritim, Prosperity and Security may be considered to be a contribution of the participating Member State to European Partnerships.</u></p> <p>SK (Drafting suggestions):</p> <p><u>2a. Financial contribution under programmes co-funded by the European Fund for Economic, Territorial, Social Cohesion, Agriculture and Rural, Fisheries and Maritime Prosperity and Security shall be considered to be a contribution of the participating Member State to European Partnerships and other co-funding initiatives.</u></p> <p>SK (Comments):</p> <p>Provision to guarantee that ERDF (and other) contributions by MSs are indeed counted for as contributions of this MS.</p>
<p>3. Under this programme, in addition to the conditions set out in Article 8(1) and (2) of Regulation (EU) XXX [European Competitiveness Fund], a Competitiveness Seal shall be awarded only to high-quality actions that have not been financed under the Programme due to budgetary constraints.</p>	<p>BE (Comments):</p> <p>Request to rethink the ‘Seal of Competitiveness’. Renaming the Seal of Excellence to Seal of Competitiveness narrows the scope, which would not fit ERC and MSCA. We therefore either prefer two separate names, a more neutral alternative or keeping the current one, given that it is a well-established concept (the reasoning for keeping the name of the Framework Programme).</p>

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	<p>EE (Drafting suggestions):</p> <p>3. Under this programme, in addition to the conditions set out in Article 8(1) and (2) of Regulation (EU) XXX [European Competitiveness Fund], a Competitiveness Seal of Excellence shall be awarded only to high-quality actions that have not been financed under the Programme due to budgetary constraints.</p> <p>EE (Comments):</p> <p>Consistent change to ensure the <i>Seal of Excellence</i> mechanism is preserved across all relevant articles.</p> <p>FR (Drafting suggestions):</p> <p>3. Under this programme, in addition to the conditions set out in Article 8(1) and (2) of Regulation (EU) XXX [European Competitiveness Fund], a Competitivenessa Seal of Excellence shall be awarded only to high-quality actions that have not been financed under the Programme due to budgetary constraints.</p> <p>FR (Comments):</p> <p><u>Since the conditions set out in Article 8(1) ECF only apply to awards procedures carried out under the ECF and is limiting the attribution of the Seal to ECF projects only we propose having a Seal for Horizon projects also. We would be open to a modification of article 8 of the FEC to cover the whole Horizon Europe instead of modifying this article; nevertheless, the term “competitiveness” does not fit several parts of Horizon Europe and might be confusing.</u></p>

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	<p>LT (Comments): <u>Could you please specify what is meant by “high-quality actions”? Does it allow to set a new threshold (i.e. different from the one, allowing to receive funding)?</u></p> <p>PT (Comments): PT has expressed its concerns regarding the operationalisation of this seal, especially in multibeneficiary actions, where the mobilisation of national resources will require coordination at MS level. Additionally, PT has doubts regarding the applicability of this Seal to Horizon Europe actions, especially to parts of the Programme that are bottom-up, and based on scientific excellence only</p> <p>SE (Comments): SE does not see that the Competitiveness seal corresponds with the current Seal of Excellence and would support at stronger focus on excellence for applying the Competitiveness seal in the HE FP.</p> <p>SI (Drafting suggestions): Under this programme, in addition to the conditions set out in Article 8(1) and (2) of Regulation (EU) XXX [European Competitiveness Fund], a Competitiveness Seal of Excellence shall be awarded only to actions that meet the high-quality actions criteria of the evaluation process and that have not been financed under the Programme due to budgetary constraints.</p>
	<p>SE (Drafting suggestions):</p>

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	<p><u>bis) Under this programme, a seal of excellence shall be awarded to excellent proposals that have not been financed under the Programme due to budgetary constraints.</u></p> <p>SE (Comments): SE prefers to maintain the current Seal of Excellence in order not to lose the opportunities provided by this tool, to promote excellent research. The relevant articles should be adjusted accordingly.</p>
<p>4. The Member States may finance actions to which a Competitiveness Seal was awarded.</p>	<p>DE (Comments): DE: It should be clarified whether the EU funding rules would apply in such a case or whether state-aid restrictions would apply as national funding programmes are concerned</p> <p>ES (Comments): In order to facilitate the funding of proposals with the Competitiveness Seal, general rules (as for example GBER) should be revised to facilitate financing by Member States under the same conditions as Horizon Europe (as it is the case for the EIC Accelerator now where there is an exception).</p> <p>FR (Drafting suggestions): 4. The Member States, <u>regional or local authorities, third countries, international organisations or any other third parties</u> may finance actions to which a Competitiveness Seal <u>of Excellence</u> was awarded.</p> <p>FR (Comments): <u>Any kind of legal entity should be allowed to finance such projects; the text should not be that restrictive.</u></p>

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	<p>SI (Drafting suggestions): The Member States may finance actions to which a <u>Seal of Excellence</u> Competitiveness Seal was awarded <u>including with resources of European Fund for Economic, Territorial, Social Cohesion, Agriculture and Rural, Fisheries and Maritim, Prosperity and Security allocated to them under shared management.</u></p> <p>SK (Drafting suggestions): 4. The Member States may finance actions to which a Competitiveness Seal was awarded <u>including with resources of European Fund for Economic, Territorial, Social Cohesion, Agriculture and Rural, Fisheries and Maritime Prosperity and Security allocated to them under shared management.</u></p>

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<p style="text-align: center;"><i>Article 9</i> <i>Third countries associated to the Programme</i></p>	<p>BE (Comments): Clarity is needed regarding the dual-use principle and its implications for the association of third countries to the programme.</p> <p>DE (Comments): DE: It forms part of the ECF's Single Rulebook, but it is unclear to what extent the article applies to FP10. Both programmes have their own article on association which are not worded identically.</p> <p>For example, the ECF does not specify research-specific requirements, such as good scientific capacity. Does the ECF approach also apply to research and innovation activities within the policy windows? It is important that our partner countries can be associated quickly to the programme and under similar conditions as under the current programme.</p>
<p>1. The Programme may be opened to the participation of the following third countries through full or partial association, in accordance with the objectives laid down in Article 3 and in accordance with the relevant international agreements or any decisions adopted under the framework of those agreements and applicable to:</p>	<p>BE (Drafting suggestions): The Programme shallmay be opened to the participation of the following third countries through full or partial association, <u>to beneficiaries who respect human rights within the action itself as well as in general</u>, in accordance with the objectives laid down in Article 3 and in accordance with the relevant international agreements or any decisions adopted under the framework of those agreements and applicable to:</p> <p>IE (Drafting suggestions): 1. The Programme may shall be opened to the participation of the following third countries through full or partial association, in accordance</p>

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	<p>with the objectives laid down in Article 3 and in accordance with the relevant international agreements or any decisions adopted under the framework of those agreements and applicable to:</p> <p>IE (Comments):</p> <p>The current FP says ‘shall’ – so should this one while ensuring appropriate safeguards are in place.</p> <p>This issue warrants further consideration particularly given the emphasis at last month’s Council meeting on the importance of remaining as open as possible to transnational collaboration.</p> <p>NL (Drafting suggestions):</p> <p>1. The Programme, <u>including the R&I parts programmed in the context of the ECF, may shall</u> be opened to the participation of the following third countries through full or partial association, in accordance with the objectives laid down in Article 3 and in accordance with the relevant international agreements or any decisions adopted under the framework of those agreements and applicable to:</p> <p>NL (Comments):</p> <p><u>Openness is needed. EEA for example should always participate based on their agreements with the EU. Based on that, it cannot be “may”.</u></p> <p><u>Suggestion to clarify that this also applies to R&I parts of the WPs under the windows of the ECF.</u></p>

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<p>(a) members of the European Free Trade Association which are members of the European Economic Area, as well as European micro-states <u>Andorra, Monaco and San Marino</u>;</p>	<p>SI (Drafting suggestions): (a) members of the European Free Trade Association which are members of the European Economic Area, as well as European micro-states Andorra, Monaco, <u>Vatican City State</u> and San Marino;</p>
<p>(b) acceding countries, candidate countries and potential candidates;</p>	
<p>(c) European Neighbourhood Policy countries;</p>	
<p>(d) other third countries.</p>	
	<p>FR (Drafting suggestions): <u>1a. For indirect actions supporting innovation in critical technologies with defence applications, as referred to in article 16(5), article 50 of the Regulation (EU) XXX [European Competitiveness Fund] shall apply.</u></p>
<p>2. The association agreements for participation in the Programme shall:</p>	<p>FR (Comments): <u>We are still waiting for information from the Commission on how it intends to report on the monitoring and enforcement of the conditions set out in paragraph 2.</u></p>
<p>(a) ensure a fair balance as regards <u>between</u> the contributions and benefits of the third country participating in the Programme;</p>	

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<p>(b) lay down the conditions of participation in Programme, including the calculation of financial contributions, consisting of an operational contribution and a participation fee, to the Programme and its general administrative costs;</p>	
<p>(c) not confer on the third country any decision-making power in the Programme;</p>	
<p>(d) guarantee the rights of the Union to ensure sound financial management and to protect its financial interests.</p>	
<p>(e) where relevant, ensure the protection of security and public order interests of the Union.</p>	<p>CY (Drafting suggestions): where relevant, ensure the protection of security, defence and public order interests of the Union <u>and its Member States</u></p> <p>CY (Comments): (1) The protection of the interests of the Union and of the Member States is always relevant. (2) Where aspects related to defence are involved, this should be duly reflected in the text</p>
<p>3. For the purposes of paragraph 2, point (d), the third country shall grant the necessary rights and access required under Regulations (EU, Euratom) 2024/2509 and (EU, Euratom) No 883/2013, and guarantee that</p>	

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<p>enforcement decisions imposing a pecuniary obligation on the basis of Article 299 TFEU, as well as judgments and orders of the Court of Justice of the European Union, are enforceable.</p>	
<p>4. For the purpose of paragraph 1, point (d), association or partial association with other third countries shall only be possible if they fulfil all the following criteria:</p>	<p>CY (Drafting suggestions): For the purpose of paragraph 1, point (d), association or partial association with other third countries shall only be possible if they fulfil all the following criteria:</p> <p>CY (Comments): The criteria should apply horizontally to all third countries listed in paragraph 1</p> <p>FR (Comments): <u>We are still waiting for information from the Commission on how it intends to report on the monitoring and enforcement of the conditions set out in paragraph 4.</u></p> <p>IE (Comments): How will we ensure the requirements here are applied in the FP and the R&I components of the ECF?</p>
<p>(a) a good capacity in science, technology and innovation;</p>	
	<p>PL</p>

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	<p>(Drafting suggestions):</p> <p>(new point) Respect of human rights, democratic principles, and shared European values, backed by democratic institutions, safeguarding the academic freedom and the freedom of science;</p> <p>PL</p> <p>(Comments):</p> <p>The EU should aim at association of the like-minded countries and this should be highlighted in a separate point.</p>
<p>(b) commitment to a rules-based open market economy, including fair and equitable dealing with intellectual property rights, respect of human rights, backed by democratic institutions;</p>	<p>PL</p> <p>(Drafting suggestions):</p> <p>(b) commitment to a rules-based open market economy, including fair and equitable dealing with intellectual property rights; respect of human rights, backed by democratic institutions;</p> <p>PL</p> <p>(Comments):</p> <p>The provision has been moved to the front to form a separate bullet point due to its importance.</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>commitment to a rules-based open market economy, including fair and equitable dealing with intellectual property rights and international law, respect of human rights, backed by democratic institutions;</p>
<p>(c) active promotion of policies to improve the economic and social well-being of citizens.</p>	<p>FI</p> <p>(Drafting suggestions):</p> <p>(c) active promotion of policies to improve the economic and social well-being of citizens;</p>

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	<p>CY (Drafting suggestions): + additional criterion</p> <p><u>() their association or partial association does not in any way contravene the security defence and public order interests of the Union and its Member States.</u></p> <p>FI (Drafting suggestions): d) <u>commitment to academic freedom.</u></p> <p>FR (Drafting suggestions): <u>(ca) respect of the shared values and principles as stated in the 2022 Conclusions on the principles and values for international cooperation in research and innovation.</u></p> <p>FR (Comments): <u>The respect of these values and principles should be mandatory before any association agreement is being negotiated. The three current criteria are not anymore sufficient regarding the geopolitical context.</u></p>
<p>5. The scope of association of each third country to the Programme shall take into account an analysis of the risks, notably those likely to affect the Union’s public order and security in relevant policy areas, including economic and research security, as well as benefits and the broader objective of driving economic growth and competitiveness of the Union through research and innovation. Accordingly, with the exception of EEA members, acceding countries, candidate countries and potential candidate countries,</p>	<p>BE (Drafting suggestions):</p> <p>The scope of association of each third country to the Programme shall take into account an analysis of the risks, notably those likely to affect the Union’s public order and security in relevant policy areas, including economic and research security, as well as benefits, <u>notably the strengthening of the Union’s excellence in research and innovation,</u></p>

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<p>third countries may be excluded from parts of the Programme in accordance with this Regulation or the association agreement itself.</p>	<p><u>including its capacity to attract and retain the best talents worldwide,</u> and the broader objective of driving economic growth and competitiveness of the Union through <u>research and</u> innovation. Accordingly, with the exception of EEA members, acceding countries, candidate countries and potential candidate countries, third countries may be excluded from parts of the Programme in accordance with this Regulation or the association agreement itself.</p> <p>CY (Drafting suggestions): The scope of association of each third country to the Programme shall take into account an analysis of the risks, notably those likely to affect the Union’s public order and security <u>and defence</u> in relevant policy areas, including economic and research security, as well as benefits and the broader objective of driving economic growth and competitiveness of the Union through innovation. Accordingly, with the exception of EEA members, acceding countries, candidate countries and potential candidate countries, third countries may be excluded from parts of the Programme in accordance with this Regulation or the association agreement itself.</p> <p>DE (Drafting suggestions): 5. The scope of association of each third country to the Programme shall take into account an analysis of the risks, notably those likely to affect the Union’s public order and security in relevant policy areas, including economic and research security, as well as benefits and the broader objective of driving economic growth and competitiveness of the Union through <u>research and</u> innovation. Accordingly, with the exception of EEA members, acceding countries, candidate countries and potential candidate countries, third countries may be excluded from parts of the Programme in accordance with this Regulation or the association agreement itself.</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>DE (Comments): DE: Welcome the insertion of “research”. The current practice of exclusion for ACs should not be continued – either a country is (partly) associated or it is not – otherwise we create additional legal uncertainties for applicants and beneficiaries,</p> <p>ES (Comments): We support the modification.</p>
<p>6. The association agreement setting out the conditions for participation in the Programme, shall, as far as possible, provide for the reciprocal participation of legal entities established in the Union in equivalent programmes of associated countries in accordance with the conditions laid down in those programmes.</p>	
<p>7. The conditions determining the level of the financial contributions referred to in paragraph 2, point (b) shall ensure a regular automatic correction of any significant imbalance compared to the amount that entities established in the associated country receive through participation in the Programme, taking into account the costs in the management, execution and operation of the Programme. The allocation of the financial contributions shall take into account the level of participation of the legal entities of the associated countries in each part of the Programme.</p>	<p>ES (Drafting suggestions): 7. The conditions determining the level of the financial contributions referred to in paragraph 2, point (b) shall ensure a regular automatic correction of any significant imbalance compared to the amount that entities established in the associated country receive through participation in the Programme, taking into account the costs in the direct and indirect management, execution and operation of the Programme. The allocation of the financial contributions shall take into account the level of participation of the legal entities of the associated countries in each part of the Programme.</p> <p>ES</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>(Comments):</p> <p>The costs of indirect management should also be taken into account for the calculation of the contributions. It is necessary to include it for clarification purposes.</p>
	<p>ES</p> <p>(Drafting suggestions):</p> <p>8. The Commission shall, on an annual basis, provide the Programme Committee with detailed information on the calculation and allocation of the financial contributions to the different components of the Programme, including the annual allocations from associated countries. The Commission shall transfer the corresponding share of the allocations coming from associated countries to the entities entrusted with budget implementation tasks, in particular to those established pursuant to Articles 185 and 187 of the TFUE.</p> <p>ES</p> <p>(Comments):</p> <p>There are two important issues regarding the contributions of third countries which is not reflected in the regulation and is currently having an impact in the JUs and the MS participation.</p> <p>On the one hand, the allocation of funds is not sufficiently transparent (between the different parts of Horizon Europe and the various calls for proposals); and on the other hand, there are problems with the participation of third countries in the Joint Undertakings, as they receive more funding from the calls than they contribute, which is to the detriment of the financing available to participants from the Member States in those initiatives. For that reason, we propose adding a new point to allocate contributions of AC to JUs.</p>
Recital	

Presidency text ST 13484/25	Drafting suggestions and Comments
<p>(21) Acknowledging the benefit derived from international cooperation towards addressing, among others, shared technological, economic, environmental and societal concerns, the Programme, should promote cooperation with third countries. International cooperation should <u>be based on shared values and principles and</u> aim to strengthen the Union’s competitiveness and excellence in R&I, including its capacity to attract and retain the best talents worldwide. Geo-political considerations including economic <u>and research</u> security should be at the centre of the approach and varying degrees of cooperation should be considered based on an overall assessment of the benefit that could be derived by the Union towards addressing its priorities and global challenges while safeguarding the Union’s values and interests. Association to all or parts of the Programme should remain the most comprehensive form of cooperation. For EIC defence related activities, only entities established in third countries associated with the European Competitiveness Fund for defence activities should be eligible for funding. The Programme may support activities financed by the Global Europe programme provided they comply with the rules and objectives of this Regulation in line with the provisions on synergies.</p>	<p>AT (Drafting suggestions): Acknowledging the benefit derived from international cooperation towards addressing, among others, shared technological, economic, environmental and societal concerns, the Programme, should promote cooperation with third countries. International cooperation should be based on shared values and principles and aim to strengthen the Union’s competitiveness and excellence in R&I, <u>its role in global science diplomacy</u>, including its capacity to attract and retain the best talents worldwide. Geo-political considerations including economic and research security should be <u>at the centre of the approach duly taken into account</u> and varying degrees of cooperation should be considered based on an overall assessment of the benefit that could be derived by the Union towards addressing its priorities and global challenges while safeguarding the Union’s values and interests.</p> <p>AT (Comments): AT welcomes the addition on shared values and principles. With a view to Science Diplomacy: The European Commission has recently launched a call for evidence for Science Diplomacy (Deadline 3rd November 2025). This call for evidence aims to inform the upcoming Council Recommendation on Science Diplomacy planned for 2026. The EU Framework Programmes are a main element of international cooperation and science diplomacy for the EU and therefore we strongly believe that the term Science Diplomacy should be part of this recital. The argument being that international cooperation is necessary and important for a number of societal challenges. Security issues should of course be</p>

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	<p>considered, but they should not be the center of reasoning when it comes to international collaboration.</p> <p>DE (Drafting suggestions):</p> <p>(21) Acknowledging the benefit derived from international cooperation towards addressing, among others, shared technological, economic, environmental and societal concerns, the Programme, should promote cooperation with third countries. International cooperation should be based on shared values and principles and aim to strengthen the Union’s competitiveness and excellence in R&I, including its capacity to attract and retain the best talents worldwide. Geo-political considerations including economic and research security should be at the centre of the approach and varying degrees of cooperation should be considered based on an overall assessment of the benefit that could be derived by the Union towards addressing its priorities and global challenges while safeguarding the Union’s values and interests. Association to all or parts of the Programme should remain the most comprehensive form of cooperation. For EIC defence related activities, only entities established in third countries associated with the European Competitiveness Fund for defence activities should be eligible for funding. The Programme may support activities financed by the Global Europe programme provided they comply with the rules and objectives of this Regulation in line with the provisions on synergies.</p> <p>DE (Comments):</p> <p>DE: international cooperation in R&I should not exclude in general countries that do not share our values</p> <p>ES (Drafting suggestions):</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>(21) Acknowledging the benefit derived from international cooperation towards addressing, among others, shared technological, economic, environmental and societal concerns, the Programme, should promote cooperation with third countries. International cooperation should be based on shared values and principles and aim to strengthen the Union’s competitiveness and excellence in R&I, including its capacity to attract and retain the best talents worldwide. Geo-political considerations including economic and research security should be at the centre of the approach and varying degrees of cooperation should be considered based on an overall assessment of the benefit that could be derived by the Union towards addressing its priorities and global challenges while safeguarding the Union’s values and interests. Association to all or parts of the Programme should remain the most comprehensive form of cooperation. For EIC defence related activities, only entities established in third countries associated with the European Competitiveness Fund for defence activities should be eligible for funding. The Programme may support research and innovation activities financed by the Global Europe programme provided they comply with the rules and objectives of this Regulation in line with the provisions on synergies.</p> <p>ES (Comments): We support the new wording but propose to include a clear message that Horizon Europe should only fund R&I activities.</p> <p>FR (Drafting suggestions): (21) Acknowledging the benefit derived from international cooperation towards addressing, among others, shared technological, economic, environmental and societal concerns, the Programme, should promote cooperation with third countries. International cooperation should be based on shared values and principles and contribute aim to strengthen the</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>Union’s competitiveness, <u>sovereignty</u> and excellence in R&I, including its capacity to attract and retain the best talents worldwide. Geo-political considerations including economic <u>and research</u> security should be at the centre of the approach and varying degrees of cooperation should be considered based on an overall assessment of the benefit that could be derived by the Union towards addressing its priorities and global challenges while safeguarding the Union’s values and interests. Association to all or parts of the Programme should remain the most comprehensive form of cooperation. For EIC defence related activities, only entities established in third countries associated with the European Competitiveness Fund for defence activities should be eligible for funding. The Programme may support activities financed by the Global Europe programme provided they comply with the rules and objectives of this Regulation in line with the provisions on synergies.</p> <p>FR <u>(Comments):</u></p> <p><u>While we do not oppose funding projects with defence application, we wonder if it could be implemented in practice with rules from a different programme applying to only a part of a FP instrument, but being funded by the FP. A request for clarification from the Council legal Service could be useful.</u></p> <p><u>Although international cooperation certainly should contribute to strengthen EU’s competitiveness, sovereignty (important also here, in the context of such geo-political considerations) and excellence, it will probably not be the aim of such cooperation with third countries partners, especially for research linked to global challenges.</u></p> <p><u>It is not necessary to indicate a preference for association to the Programme, it should be tailor-made designed.</u></p>

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	<p><u>Regarding synergies with Global Europe, such synergies should be encouraged, but we strongly oppose referring to the possibility that the FP could finance Global Europe activities. Under the current regulation, it is the reverse situation where the NDICI contributes to Horizon Europe activities linked to international collaboration.</u></p>
<p><i>Article 10</i> Implementation and forms of Union funding</p>	
<p>1. The Programme shall be implemented in accordance with Regulation (EU, Euratom) 2024/2509, under direct management or under indirect management with bodies referred to in Article 62(1), point (c) of that Regulation.</p>	<p>ES (Drafting suggestions):</p> <p>1. The Programme shall be implemented in accordance with Regulation (EU, Euratom) 2024/2509, under direct management or, in exceptional and duly justified cases, under indirect management with bodies referred to in Article 62(1), point (c) of that Regulation.</p> <p>ES (Comments):</p> <p>Indirect management should be limited and only to be used in exceptional and duly justified cases. Management should be the responsibility of the Commission and its executive agencies, and only in very exceptional and justified cases management may be delegated to other entities or bodies.</p> <p>FR (Drafting suggestions):</p> <p>1. The Programme shall be implemented in accordance with Regulation (EU, Euratom) 2024/2509, under direct management or under indirect management with bodies referred to in Article 62(1), point (c) of that Regulation.</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p><u>Where direct actions contribute to initiatives established under article 185 or 187 TFEU, that contribution should not be considered to be part of the financial contribution allocated to those initiatives.</u></p> <p>FR (Comments): <u>This provision – from the current regulation – is still particularly relevant for partnerships established under article 185/187 TFEU.</u></p>
	<p>ES (Drafting suggestions): Grants should be the main form of support in the Programme.</p> <p>ES (Comments): Although Union funding may take the form of grants, prizes, procurement, non-financial donations, and financial instruments, grants should be the main form of support. For clarity and predictability purposes for participants it should be included in this Regulation.</p> <p>LT (Drafting suggestions): <u>1a. Activities of the Programme shall be delivered primarily through open, competitive calls for proposals, including within European Partnerships.</u></p> <p>LT (Comments): It is important to stress the openness of all calls.</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>SI (Drafting suggestions): <u>1(a) Activities of the Programme shall be delivered primarily through open, competitive calls for proposals, including within European Partnerships</u></p> <p>SK (Drafting suggestions): <u>1a. Activities of the Programme shall be delivered primarily through open, competitive calls for proposals, including within European Partnerships</u></p>
<p>2. Union funding may be provided in any form in accordance with Regulation (EU, Euratom) 2024/2509, in particular through grants, prizes, procurement, non-financial donations, and financial instruments.</p>	<p>FR (Drafting suggestions): 2. Union funding may be provided in any form in accordance with Regulation (EU, Euratom) 2024/2509, in particular through grants, prizes, procurement, non-financial donations, and financial instruments. <u>Grants shall be the main form of support in the Programme.</u></p> <p>FR (Comments): <u>We are still waiting for examples from the Commission on current non-financial donations.</u></p> <p><u>Although we welcome the mention of grants as the main form of support in recital 32, we believe it should be mentioned in an article rather than a recital.</u></p> <p>SE</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>Union funding may be provided in any form in accordance with Regulation (EU, Euratom) 2024/2509, in particular through grants, <u>procurements and financial instruments awarded by competitive calls, while funding may also be provided through</u> prizes, procurement, <u>and</u> non-financial donations, and financial instruments.</p> <p>SE</p> <p>(Comments):</p> <p>SE proposes that competitive calls should remain the main mechanism for funding.</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>Union funding may be provided in any form in accordance with Regulation (EU, Euratom) 2024/2509, in particular through grants, <u>which shall constitute the principal form of support,</u> prizes, procurement, non-financial donations, and financial instruments.</p>
<p>3. [With the exception of financial instruments under the EIC (Fund) where Union support is provided in the form of a budgetary guarantee or a financial instrument, including where combined with non-repayable support in a blending operation, it shall be exclusively provided through the European Competitiveness Fund InvestEU Instrument and implemented in accordance with the applicable rules of the European Competitiveness Fund InvestEU Instrument through the contribution or guarantee agreements concluded for that purpose. Where the Programme makes use of the ECF InvestEU Instrument, it shall provide the provisioning for the budgetary guarantee and the financing to financial instruments, including when combined with non-repayable support in the form of a blending operation.]</p>	

Presidency text ST 13484/25	Drafting suggestions and Comments
<p>4. Where Union funding is provided in the form of a grant, funding shall be provided as financing not linked to cost, or as simplified cost options <i>in particular through lump sums as well as unit costs for personnel</i>, in accordance with Regulation (EU, Euratom) 2024/2509. Funding may be provided in the form of actual eligible cost reimbursement only where the objectives of an action cannot be achieved otherwise. Where it is necessary to enable other sources of funding including co-investments with national resources subject to State aid rules, funding shall be provided in the form of actual eligible cost reimbursement or simplified cost options.</p>	<p>AT (Drafting suggestions): [...] options <i>in particular through lump sums as well mainly as unit costs for personnel</i>, in accordance with Regulation (EU, Euratom) 2024/2509. <u>Personnel costs of public institutions shall be reimbursed as they are actually booked in their accounts.</u></p> <p>where the objectives of <u>a call or</u> an action cannot be achieved otherwise.</p> <p>AT (Comments): AT: Reimburse the personnel costs of public institutions as they are actually booked in their accounts without any further calculation formula or similar. This would be a REAL simplification for those group which is also the largest group doing research and innovation activities in the Framework programmes.</p> <p>There are areas where lump sum payments would hinder the implementation of a call or the building of a consortium. This would be the case if research organisations will not form consortia because lump sum payments are only made once work packages have been completed. However, in order to achieve quick results, it would often be necessary to collaborate with unfamiliar, new project partners. Lump sum could prevent this in certain areas, as funding is only received once all partners have delivered. With actual costs, everyone immediately receives the costs they have incurred and would be less dependent on the other consortium partners with regard to EU funding.</p> <p>This would be necessary for specific research/innovation areas to get results very quickly. Therefore the fast consortium building also with new partners would be a great help in this respect.</p> <p>BE</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>Where Union funding is provided in the form of a grant, funding mayshall be provided as <u>in the form of actual eligible cost reimbursement based on usual accounting practices of the beneficiary</u>, financing not linked to cost, or as simplified cost options <i>in particular through lump sums as well as unit costs for personnel</i>, in accordance with Regulation (EU, Euratom) 2024/2509. Funding may be provided in the form of actual eligible cost reimbursement only where the objectives of an action cannot be achieved otherwise. The type of funding should be chosen on the basis of the nature and objectives of the action, ensuring flexibility and effectiveness in implementation. Where it is necessary to enable other sources of funding including co-investments with national resources subject to State aid rules, funding shall be provided in the form of actual eligible cost reimbursement or simplified cost options.</p> <p>BE</p> <p>(Comments):</p> <p>BE recalls that the use of PUC and lump sum should remain options alongside other methods, not the default approach for all grants. Particularly PUC should allow for annual updates and offer enough flexibility to accommodate average costs per staff category, otherwise actual costs turn out higher than what was foreseen and beneficiaries lose, which may deter participation. While a legitimate demand for simplification, it should be more beneficiary oriented. We therefore request to leave the choice of cost reporting methodology to the RDI actors. Improved simplification measures must also be launched as pilots before being imposed as mandatory approaches.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>4. Where Union funding is provided in the form of a grant, funding shall be provided as financing not linked to cost, or as simplified cost options <i>in</i></p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p><i>particular through lump sums as well as unit costs for personnel</i>, in accordance with Regulation (EU, Euratom) 2024/2509. Funding may be provided in the form of actual eligible cost reimbursement only where the objectives of an action cannot be achieved otherwise. Where it is necessary to enable other sources of funding including co-investments with national resources subject to State aid rules, funding shall be provided in the form of actual eligible cost reimbursement or simplified cost options whenever it reduces the complexity for applicants and beneficiaries.</p> <p>DE (Comments): DE: All measures need to reduce complexity for the beneficiaries of the programme If this is not the case, the options should not be used.</p> <p>Concerning unit costs for personnel is the Commission referring to the unit costs in article 184 (7) and (8) Regulation 2024/2509 for SME owners and volunteers? Or does this include other unit costs for personnel? If yes, which ones?</p> <p>ES (Drafting suggestions): 4. Where Union funding is provided in the form of a grant, funding shall may be provided as financing not linked to cost, or as simplified cost options <i>in particular through lump sums as well as unit costs for personnel</i>, in accordance with Regulation (EU, Euratom) 2024/2509. Funding may be provided in the form of actual eligible cost reimbursement only where the objectives of an action cannot be achieved otherwise. Where it is necessary to enable other sources of funding including co-investments with national resources subject to State aid rules, funding shall be provided in the form of actual eligible cost reimbursement or simplified cost options.</p> <p>ES</p>

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	<p>(Comments):</p> <p>Lump sums may be one of the options, but not to be used generally. For large projects and/or higher TRLs is not the best option. It could be simpler for newcomers, but for frequent participants, especially for public organisations, is not a real simplification and uncertainty complicates the participation of new entities in consortia due to lack of confidence.</p> <p>When it is referred to unit costs for personnel, it would be good to learn more, if it is referred for MSCA or on a global approach for the whole FP10</p> <p>MT</p> <p>(Comments):</p> <p>MT supports the introduction of lump sums, as well as unit costs for personnel, as a default form of funding.</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>4. Where Union funding is provided in the form of a grant, funding shall be provided as financing not linked to cost, or as simplified cost options <i>in particular through lump sums as well as unit costs for personnel</i>, in accordance with Regulation (EU, Euratom) 2024/2509. Funding may be provided in the form of actual eligible cost reimbursement only where the objectives of an action cannot be achieved otherwise. Where it is necessary to enable other sources of funding including co-investments with national resources subject to State aid rules, funding shall be provided in the form of actual eligible cost reimbursement or simplified cost options.</p> <p>NL</p> <p>(Comments):</p> <p>NL is not in favour of exclusive use of unit costs for personnel and can only agree if we get a confirmation from the Commission that they are willing to change PUC practice in order to allow for more flexibility in adjusting the</p>

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	<p>salary levels, as well as to take into account the appropriate personnel function group (e.g. research staff) instead of an all personnel average. These adjustments would make it more in line with actual costs for Dutch participants.</p> <p>PL (Comments):</p> <p><u>PL comment on lump sums:</u> The program will be based primarily on lump sums as the primary form of project financing. This is a continuation of the European Commission's efforts under Horizon Europe and the previous Framework Programme, which increasingly utilized this type of financing, which is a significant simplification, very much welcomed by PL beneficiaries. PL thinks it is a change in the right direction, contributing to the simplification of the FP. For the unit costs for personnel to be widely used, a thorough review of the instrument assumptions and modifications would be necessary, particularly the method for determining unit costs.</p> <p><u>PL comment on unit costs for personnel:</u> Simplification of personnel costs in the actual cost system through the use of "personnel unit costs" would reduce the complexity of reporting and facilitate reporting mechanism. This system was introduced as an option in May 2024. However, from the perspective of Polish beneficiaries, it proved practically impossible to implement due to the rules for calculating unit costs so no Polish institution has used it up to date. Overall, this is a positive development, promoting simplification, but PL experts say the principles and details require further refinement.</p> <p>SE (Comments):</p>

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	SE supports DE and other countries emphasising that measures need to reduce complexity for the beneficiaries of the programme.
<p>5. For the purposes of Article 153(3) of Regulation (EU, Euratom) 2024/2509, the evaluation committee may shall be composed partially or fully of independent external experts.</p>	<p>AT (Comments): AT welcomes this amendment.</p> <p>BG (Drafting suggestions): 5. For the purposes of Article 153(3) of Regulation (EU, Euratom) 2024/2509, the evaluation committee shall be composed partially or fully of independent external experts. <u>The evaluation processes may allow oversight by independent observers. The evaluation process shall be designed to avoid conflicts of interest and bias. The transparency of the evaluation criteria and of the proposal scoring method shall be guaranteed.</u></p> <p>EE (Drafting suggestions): 5. For the purposes of Article 153(3) of Regulation (EU, Euratom) 2024/2509, the evaluation committee may shall be composed partially or fully of independent external experts.</p> <p>EE (Comments): Evaluation should be done by independent experts. Full stop.</p> <p>ES (Drafting suggestions): 5. For the purposes of Article 153(3) of Regulation (EU, Euratom) 2024/2509, the evaluation committee may shall be composed partially or</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>fully of independent external experts and shall be defined in the Work Programme.</p> <p>ES (Comments):</p> <p>It is necessary to define the composition of the evaluation committee in the Work Programme.</p> <p>FR (Drafting suggestions):</p> <p>5. For the purposes of Article 153(3) of Regulation (EU, Euratom) 2024/2509, the evaluation committee may shall be composed partially or fully of independent external experts, <u>or partially in duly justified cases.</u></p> <p>FR (Comments):</p> <p><u>The standard rule should be that evaluation committees are composed fully of independent external experts, except in duly justified cases or for specific activities like investment activities for EIC Accelerator.</u></p> <p>HU (Drafting suggestions):</p> <p>5. For the purposes of Article 153(3) of Regulation (EU, Euratom) 2024/2509, the evaluation committee may shall be composed partially or fully of independent external experts. <u>The evaluation process may be followed by independent observers. The Commission shall pay attention to ensuring, to the extent possible subject to the situation in the field of R&I concerned, gender and geographical balance in evaluation committees, as well as in other relevant advisory bodies such as boards and expert groups.</u></p> <p>HU</p>

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	<p>(Comments):</p> <p>HU supports SI's proposal- The provision regarding balances in committees and groups is still a vital part of the FP design and not replaced with similar provision in the Performance regulation</p> <p>LT</p> <p>(Drafting suggestions):</p> <p>5. For the purposes of Article 153(3) of Regulation (EU, Euratom) 2024/2509, proposals shall be evaluated by the evaluation committee which shall be composed of independent external experts. In duly justified cases, as set out in the work programme adopted by the Commission, the evaluation committee may shall be composed partially or fully of independent external experts.</p> <p>LT</p> <p>(Comments):</p> <p>We strongly believe that in RIA actions the panels composed of independent experts should remain as a default option.</p> <p>MT</p> <p>(Drafting suggestions):</p> <p>For the purposes of Article 153(3) of Regulation (EU, Euratom) 2024/2509, the evaluation committee may shall be composed partially or fully of independent external experts.</p> <p>MT</p> <p>(Comments):</p> <p>Malta believes that the evaluation committee should be composed of independent and external experts in its entirety.</p> <p>SI</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>For the purposes of Article 153(3) of Regulation (EU, Euratom) 2024/2509, the evaluation committee shall be composed partially or fully of independent external experts. <u>For EIC activities and in duly justified cases as set out in the work programme, the evaluation committee may be composed partially or, in the case of coordination and support actions, partially or fully of representatives of Union institutions or bodies as referred to in Article 153 of the Financial regulation. The evaluation process may be followed by independent observers. The Commission shall pay attention to ensuring, to the extent possible subject to the situation in the field of R&I concerned, gender and geographical balance in evaluation committees, as well as in other relevant advisory bodies such as boards and expert groups.</u></p> <p>SK</p> <p>(Drafting suggestions):</p> <p>5. For the purposes of Article 153(3) of Regulation (EU, Euratom) 2024/2509, the evaluation committee may <u>shall</u> be composed partially or fully of independent external experts. <u>The evaluation process may be followed by independent observers. The Commission shall pay attention to ensuring, to the extent possible subject to the situation in the field of R&I concerned, gender and geographical balance in evaluation committees, as well as in other relevant advisory bodies such as boards and expert groups.</u></p> <p>SK</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>(Comments):</p> <p>The provision regarding balances in committees and groups is still a vital part of the FP design and not replaced with similar provision in the Performance regulation</p>
	<p>BE</p> <p>(Drafting suggestions):</p> <p><u>6. Redress: an applicant may request an evaluation review of procedural aspects of an evaluation of its proposal or prize application within 30 days after the communication of evaluation results.</u></p> <p>BE</p> <p>(Comments):</p> <p>Currently no reference to redress procedure.</p>
Recitals	
<p>(26) Simplification in the Programme’s implementation is essential to ensure its accessibility and efficiency, particularly by reducing the administrative burden on beneficiaries and minimising the risk of errors. <i>To this end, the Programme should primarily rely on lump sums as the default form of Union funding.</i> Advancing efforts over the previous Framework Programmes to streamline funding rules and minimise errors, the reimbursement of personnel costs <i>should also be further simplified by using personnel unit costs</i>, which reduces complexity for participants and facilitates reporting. <u>Efforts should be made to reduce the reporting requirements for beneficiaries.</u></p>	<p>AT</p> <p>(Drafting suggestions):</p> <p>costs <i>should also be further simplified by using personnel unit costs, taking into account the respective actual costs and usual accounting principles.</i></p> <p>AT</p> <p>(Comments):</p> <p>AT: The current personnel cost option does not work in practice- nearly all participants reported that the current rules and conditions for PUC make their application far too complicated as well as financially disadvantageous. This because it was designed without taking into account the real circumstances of the beneficiaries. Any personnel unit cost must reflect the</p>

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	<p>real cost situation as closely as possible and not be artificially generated and forced upon organizations.</p> <p>Underlying calculations must be based on current values rather than past values. Additionally, participants should be allowed to factor future salary increases and inflation into the calculation of their PUC, making the method suitable for use in future projects.</p> <p>AT welcomes the additional sentence on the reduction of reporting requirements for beneficiaries.</p> <p>BE (Drafting suggestions):</p> <p>(26) Simplification in the Programme’s implementation is essential to ensure its accessibility and efficiency, particularly by reducing the administrative burden on beneficiaries and minimising the risk of errors. To this end, the Programme should primarily rely on lump sums as the default form of Union funding. Advancing efforts over the previous Framework Programmes to streamline funding rules and minimise errors, the reimbursement of personnel costs should also be further simplified by using personnel unit costs, which reduces complexity for participants and facilitates reporting. <u>Efforts should be made to reduce the reporting requirements for beneficiaries.</u></p> <p>BE (Comments):</p> <p>Adjust recital 26 cf. art. 10.</p> <p>Reduced complexity and reporting, yes, however the proposal to require PUC is not to the benefit of applicants - as we currently receive notice that PUC in its current form (using average personnel cost of the organization and without possibility to update yearly), would mean applicants could lose on participating.</p> <p>BG</p>

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	<p>(Drafting suggestions):</p> <p>(26) Simplification in the Programme’s implementation is essential to ensure its accessibility and efficiency, particularly by reducing the administrative burden on beneficiaries and minimising the risk of errors. To this end, the Programme should primarily rely on lump sums as the default form of Union funding. <u>It should, to extend possible, make use of two-stage submission procedure, and, where appropriate, anonymised proposals could be evaluated during the first stage of evaluation, in order to reduce administrative and resource burden on applicants. The evaluation process should be designed in a way to avoid conflicts of interest and bias.</u> Advancing efforts over the previous Framework Programmes to streamline funding rules and minimise errors, the reimbursement of personnel costs should also be further simplified by using personnel unit costs, which reduces complexity for participants and facilitates reporting. Efforts should be made to reduce the reporting requirements for beneficiaries.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>(26) Simplification in the Programme’s implementation is essential to ensure its accessibility and efficiency, particularly by reducing the administrative burden on beneficiaries and minimising the risk of errors. <i>To this end, the Programme should primarily rely on lump sums as the default form of Union funding.</i> Advancing efforts over the previous Framework Programmes to streamline funding rules and minimise errors, the reimbursement of personnel costs <i>should also be further simplified by using personnel unit costs, where appropriate,</i> which reduces complexity for participants and facilitates reporting. Efforts should be made to reduce the reporting requirements for beneficiaries.</p> <p>DE</p> <p>(Comments):</p>

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	<p>DE: We welcome the adoption of lump-sum funding as the new standard. However, the 'personnel unit costs' approach should not be the default option.</p> <p>ES (Drafting suggestions):</p> <p>(26) Simplification in the Programme’s implementation is essential to ensure its accessibility and efficiency, particularly by reducing the administrative burden on beneficiaries and minimising the risk of errors. <i>To this end, the Programme should primarily may rely on lump sums as the default one form of Union funding.</i> Advancing efforts over the previous Framework Programmes to streamline funding rules and provide clear information to participants to minimise errors, the reimbursement of personnel costs <i>should also be further simplified by using personnel unit costs</i>, which reduces complexity for participants and facilitates reporting. <u>Efforts should be made to reduce the reporting requirements for beneficiaries.</u></p> <p>ES (Comments):</p> <p>Reducing errors by making the rules clearer and providing participants with more information is not the same as covering them up. Lump sums and unit costs are to be used as well as other types of funding, but not by default.</p> <p>FR (Drafting suggestions):</p> <p>(26) Simplification in the Programme’s implementation is essential to ensure its accessibility and efficiency, particularly by reducing the administrative burden on beneficiaries and minimising the risk of errors. <i>To this end, the Programme should primarily rely on lump sums as the default form of Union funding.</i> Advancing efforts over the previous Framework</p>

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	<p>Programmes to streamline funding rules and minimise errors, the reimbursement of personnel costs <i>should also be further simplified by using personnel unit costs</i>, which reduces complexity for participants and facilitates reporting. <u>Efforts should be made to reduce the reporting requirements for beneficiaries, as well as to accelerate and simplify the submission of proposals. Any introduction of pilot schemes should be implemented with the early involvement of Member States and should take into account beneficiaries' feedback.</u></p> <p>FR (Comments):</p> <p><u>Although we support all measures aiming at simplification, the focus should be not on minimising the risk of errors but rather to reduce the administrative burden of beneficiaries (in line with article 5 on horizontal principles).</u></p> <p><u>Other measures than lump sum funding should be defined as soon as possible to alleviate submission and management project costs for beneficiaries.</u></p> <p>HU (Drafting suggestions):</p> <p>(26) Simplification in the Programme's implementation is essential to ensure its accessibility and efficiency, particularly by reducing the administrative burden on beneficiaries and minimising the risk of errors. <i>To this end, the Programme should primarily rely on lump sums as the default form of Union funding. <u>It should to the extent possible make use of two stage submission procedure in order to reduce administrative and resource burden on applicants.</u></i> Advancing efforts over the previous Framework Programmes to streamline funding rules and minimise errors, the reimbursement of personnel costs <i>should also be further simplified by using personnel unit costs</i>, which reduces complexity for participants and facilitates reporting. <u>However, in cases where it provides a more accurate reflection of actual expenses or is more appropriate due to the nature of</u></p>

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	<p><u>the work, the use of actual costs should remain an option. Efforts should be made to reduce the reporting requirements for beneficiaries.</u></p> <p>HU (Comments): HU supports the proposals of SI and SK.</p> <p>LT (Drafting suggestions): (26) Simplification in the Programme’s implementation is essential to ensure its accessibility and efficiency, particularly by reducing the administrative burden on beneficiaries and minimising the risk of errors. <i>To this end, the Programme should primarily rely on lump sums as the default form of Union funding. <u>It should to the extent possible make use of two stage submission procedure in order to reduce administrative and resource burden on applicants.</u></i> Advancing efforts over the previous Framework Programmes to streamline funding rules and minimise errors, the reimbursement of personnel costs <i>should also be further simplified by using personnel unit costs</i>, which reduces complexity for participants and facilitates reporting. <u>Efforts should be made to reduce the reporting requirements for beneficiaries.</u></p> <p>LT (Comments): Two-stage procedure should be more mainstreamed.</p> <p>MT (Drafting suggestions): (26) Simplification in the Programme’s implementation is essential to ensure its accessibility and efficiency, particularly by reducing the administrative burden on beneficiaries and minimising the risk of errors. <i>To this end, the Programme should primarily rely on lump sums as the default form of Union funding. <u>The Programme shall make use of two stage</u></i></p>

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	<p><u>submission procedure and blind evaluation to reduce administrative and resource burden on the applicants and ensure broad objectivity of proposal assessment.</u> Advancing efforts over the previous Framework Programmes to streamline funding rules and minimise errors, the reimbursement of personnel costs <i>should also be further simplified by using personnel unit costs</i>, which reduces complexity for participants and facilitates reporting. <u>Efforts should be made to reduce the reporting requirements for beneficiaries.</u></p> <p>MT (Comments): Malta calls for the formal introduction of two-stage proposals and blind evaluation to reduce administrative burdens for the applicants and ensure broad objectivity of proposal assessment.</p> <p>NL (Drafting suggestions): (26) Simplification in the Programme’s implementation is essential to ensure its accessibility and efficiency, particularly by reducing the administrative burden on beneficiaries and minimising the risk of errors. <i>To this end, the Programme should primarily rely on lump sums as the default form of Union funding.</i> Advancing efforts over the previous Framework Programmes to streamline funding rules and minimise errors, the reimbursement of personnel costs <i>should also be further simplified by using personnel unit costs, which reduces complexity for participants and facilitates reporting.</i> <u>Efforts should be made to reduce the reporting requirements for beneficiaries, without compromising the necessary provisions needed to safeguard key aspects such as research security, ethics, integrity and open science.</u></p> <p>NL (Comments):</p>

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	<p>See previous statement about PUC.</p> <p>We agree efforts should be made to reduce reporting requirements, however we should also be clear about the needed standards (and therefore reporting) to safeguard, for instance, research security and integrity.</p> <p>SI (Drafting suggestions):</p> <p>Simplification in the Programme’s implementation is essential to ensure its accessibility and efficiency, particularly by reducing the administrative burden on beneficiaries and minimising the risk of errors. <i>To this end, the Programme should primarily rely on lump sums as the default form of Union funding. <u>It should, to the extent possible make use of two stage submission procedure in order to reduce administrative and resource burden on applicants.</u></i></p> <p>SK (Drafting suggestions):</p> <p>(26) Simplification in the Programme’s implementation is essential to ensure its accessibility and efficiency, particularly by reducing the administrative burden on beneficiaries and minimising the risk of errors. <i>To this end, the Programme should primarily rely on lump sums as the default form of Union funding. <u>It should to the extent possible make use of two stage submission procedure in order to reduce administrative and resource burden on applicants.</u></i> Advancing efforts over the previous Framework Programmes to streamline funding rules and minimise errors, the reimbursement of personnel costs <i>should also be further simplified by using personnel unit costs</i>, which reduces complexity for participants and facilitates reporting. <u>However, in cases where it provides a more accurate reflection of actual expenses or is more appropriate due to the nature of the work, the use of actual costs should remain an option. Efforts should be made to reduce the reporting requirements for beneficiaries.</u></p>

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	<p>SK (Comments): From the SK view, two-stage procedure is considered as one of major simplification for beneficiaries.</p> <p>In paralel to lump sums and personnel unit costs, SK would like to keep a possibility to use actual costs. Actual costs are more precise, bring less risk of underfunding and cover actual expenses. Actual costs are really incurred by the beneficiary; identifiable, verifiable, and recorded in the accounts. Actual costs allows flexibility in terms of high in reallocating budget among cost categories (subject to rules / amendments). If something costs more in one area and less in another, you can adjust (with justification). Therefore, SK would like to retain the actual costs model among alternatives which would certainly bring welcome flexibility.</p>
	<p>SI (Drafting suggestions): <u>26(a) The key elements of Horizon Europe 2021-2027 with its particular focus on excellence and, where applicable, on 'impact' and 'quality and efficiency of implementation', should be maintained. Proposals should continue to be selected based on the evaluation made by independent external experts. The evaluation process should be designed to avoid conflicts of interest and bias. In case of the two stage submission procedure, where appropriate, anonymised proposals could be evaluated during the first stage of evaluation. The Commission should continue to involve independent observers in the evaluation process, where applicable. In accordance with Article 200(7) of the Financial Regulation, applicants should receive feedback on the evaluation of their proposal, including, in particular, where applicable, the reasons for rejection.</u></p> <p>SK</p>

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	<p>(Drafting suggestions):</p> <p><u>The key elements of Horizon Europe 2021-2027 with its particular focus on excellence and, where applicable, on 'impact' and 'quality and efficiency of implementation', should be maintained. Proposals should continue to be selected based on the evaluation made by independent external experts. The evaluation process should be designed to avoid conflicts of interest and bias. In case of the two stage submission procedure, where appropriate, anonymised proposals could be evaluated during the first stage of evaluation. The Commission should continue to involve independent observers in the evaluation process, where applicable. In accordance with Article 200(7) of the Financial Regulation, applicants should receive feedback on the evaluation of their proposal, including, in particular, where applicable, the reasons for rejection.</u></p> <p>SK</p> <p>(Comments):</p> <p>According to SK, key feature of HEU evaluation framework needs to be continued in HEU 2028-2034.</p>
<p>(30) The actions supported under this Regulation should accelerate or boost investments by addressing market failures or sub-optimal investment situations, in a proportionate manner, avoiding duplication or crowding out, and by incentivising private funding, and have Union added-value. Without prejudice to the application of Articles 107 and 108 TFEU to national resources, this should also ensure consistency between the actions under the Programme and the State aid rules, thereby avoiding undue distortions of competition in the internal market.</p>	

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<p>(32) Regulation (EU, Euratom) 2024/2509⁹ applies to the Programme. It lays down the rules on the establishment and the implementation of the general budget of the Union, including the rules on grants, prizes, non-financial donations, procurement, indirect management, financial assistance, financial instruments and budgetary guarantees. <u>Grants should be the main form of support in the Programme.</u></p>	<p>ES (Comments): We support the inclusion of this sentence. It should also be included as part of the articles, as recitals are not legally binding.</p> <p>FR (Comments): <u>We believe it should be better placed in art 10.2 than in this recital.</u></p>
<p>(33) In view of ensuring consistency, a budgetary guarantee and financial instruments, including when combined with non-repayable support in blending operations, under this Programme should be implemented in accordance with Title X of the Financial Regulation and with technical arrangements, terms and conditions established by the Commission for the purposes of its application.</p>	
<p>(35) In accordance with Regulation (EU, Euratom) 2024/2509, Regulation (EU, Euratom) No 883/2013 of the European Parliament and of the Council¹⁰, Council Regulation (Euratom, EC) No 2988/95¹¹,(Euratom, EC)</p>	

⁹ Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council of 23 September 2024 on the financial rules applicable to the general budget of the Union (OJ L, 2024/2509, 26.9.2024, ELI: <http://data.europa.eu/eli/reg/2024/2509/oj>).

¹⁰ Regulation (EU, Euratom) No 883/2013 of the European Parliament and of the Council of 11 September 2013 concerning investigations conducted by the European Anti-Fraud Office (OLAF) and repealing Regulation (EC) No 1073/1999 of the European Parliament and of the Council and Council Regulation (Euratom) No 1074/1999,(OJ L248, 18.9.2013, p. 1.

¹¹ Council Regulation (EC, Euratom) No 2988/95 of 18 December 1995 on the protection of the European Communities financial interests (OJ L 312, 23.12.95, p.1).

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<p>No 2185/96¹² and (EU) 2017/1939¹³, the financial interests of the Union are to be protected through proportionate measures, including the prevention, detection, correction and investigation of irregularities and fraud, the recovery of funds lost, wrongly paid or incorrectly used and, where appropriate, the imposition of administrative sanctions. In particular, in accordance with Regulation (EU, Euratom) No 883/2013 and (Euratom, EC) No 2185/96 the European Anti-Fraud Office (OLAF) may carry out investigations, including on-the-spot checks and inspections, with a view to establishing whether there has been fraud, corruption or any other illegal activity affecting the financial interests of the Union. In accordance with Regulation (EU) 2017/1939, the European Public Prosecutor's Office (EPPO) is competent to investigate and prosecute fraud and other criminal offences affecting the financial interests of the Union as provided for in Directive (EU) 2017/1371 of the European Parliament and of the Council¹⁴. In accordance with Regulation (EU, Euratom) 2024/2509, any person or entity receiving Union funds is to fully cooperate in the protection of the Union's financial interests, to grant the necessary rights and access to the Commission, OLAF, the European Court of Auditors and, as appropriate, to the EPPO, and to ensure that any third parties involved in the implementation of Union funds grant equivalent rights.</p>	<p style="text-align: center; opacity: 0.5; font-size: 48px; transform: rotate(-30deg);">PUBLIC</p>
<p><i>Article 35</i> <i>Repeal</i></p>	

¹² Council Regulation (Euratom, EC) No 2185/96 of 11 November 1996 concerning on-the-spot checks and inspections carried out by the Commission in order to protect the European Communities' financial interests against fraud and other irregularities (OJ L292,15.11.96 , p.2).

¹³ Council Regulation (EU) 2017/1939 of 12 October 2017 implementing enhanced cooperation on the establishment of the European Public Prosecutor's Office ('the EPPO') (OJ L283, 31.10.2017,, p.1).

¹⁴ Directive (EU) 2017/1371 of the European Parliament and of the Council of 5 July 2017 on the fight against fraud to the Union's financial interests by means of criminal law (OJ L 198, 28.7.2017, p. 29).

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Regulation (EU) 695/2021 is repealed with effect from 1 January 2028.	
Recital	
(38) The Programme replaces the programme Horizon Europe established by Regulation (EU) 2021/695. Regulation (EU) 2021/695 should therefore be repealed.	
<i>Article 36</i> Transitional provisions	
1. This Regulation shall not affect the continuation or modification of the actions concerned, until their closure, under Regulation (EU) 695/2021, which shall continue to apply to the actions concerned until their closure.	
2. The financial envelope for the Programme may also cover technical and administrative assistance expenses necessary to ensure the transition between the Programme and the measures adopted under its predecessor, Regulation (EU) 695/2021.	DE (Comments): DE: How does the commission ensure that administrative costs during the transitional phase are limited to a minimum?
<i>Article 37</i> Entry into force and application	
This Regulation shall enter into force on the twentieth day following that of its publication in the Official Journal of the European Union.	
It shall apply from 1 January 2028.	

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This Regulation shall be binding in its entirety and directly applicable in all Member States.	
Done at Brussels,	
<i>For the European Parliament</i> <i>For the Council</i>	
The President The President	
Other recitals	
<p>(8) As in Horizon Europe, the OECD definitions regarding technological readiness levels (TRLs) should continue to be taken into account in the classification of technological research, product development and demonstration activities, and in the definition of types of action available in calls for proposals. Grants should not be awarded for actions where activities go above TRL 8. It should be possible for the work programme to allow grants for large scale product validation and market replication for a given call under the part ‘Competitiveness and Society’.</p>	<p>AT (Drafting suggestions): (8) As in Horizon Europe, the OECD definitions regarding technological readiness levels (TRLs) should continue to be taken into account in the classification of technological research, product development and demonstration activities, and in the definition of types of action available in calls for proposals Grants should not be awarded for actions where activities go above TRL 8.</p> <p><u>In parallel, the Societal Readiness Approach should be applied to ensure that innovations are not only technologically mature but also socially accepted. This two-fold approach will help bridge the gap between technological advancement and societal uptake, supporting responsible innovation and impact-oriented research.</u></p> <p>AT (Comments):</p>

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	<p>AT: Building on the existing efforts of the EC and the MS with regards to the current SRA pilot and considering that relying solely on TRLs risks overlooking societal acceptance, ethical implications, and user engagement that determine whether innovations are genuinely sustainable and impactful beyond their technical maturity, there is a necessity to include SRA into the text.</p> <p>ES (Drafting suggestions):</p> <p>(8) As in Horizon Europe, tThe OECD definitions regarding technological readiness levels (TRLs), where relevant, should continue to be taken into account in the classification of technological research, product development and demonstration activities, and in the definition of types of action available in calls for proposals. Grants should not be awarded for actions where activities go above TRL 8. It should be possible for the work programme to allow grants for large scale product validation and market replication for a given call under the part ‘Competitiveness and Society’.</p> <p>ES (Comments):</p> <p>TRLs are not in use in every sector, for this reason the wording should be changed to reflect that is a possibility, either “where relevant” is included or “shall” is changed to “may”.</p> <p>We support to delete the last sentence. Validation and market replication should be funded by the ECF, as part of the investment journey.</p> <p>FR (Drafting suggestions):</p> <p>(8) As in Horizon Europe, tThe OECD definitions regarding technological readiness levels (TRLs) should continue to be taken into account in the classification of technological research, product development</p>

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	<p>and demonstration activities, and in the definition of types of action available in calls for proposals. Grants should not be awarded for actions where activities go above TRL 8. <u>In addition, a close articulation between the Framework Programme and the European Competitiveness Fund will ensure a coherent investment journey.</u> It should be possible for the work programme to allow grants for large-scale product validation and market replication for a given call under the part ‘Competitiveness and Society’.</p> <p>FR (Comments): <u>The added-value of the European Competitiveness Fund, and its articulation with the FP, is to promote a coherent and seamless investment journey.</u></p>
	<p>SI (Drafting suggestions): <u>8(a) The Programme should support all stages of R&I especially within collaborative projects and in European Partnerships</u></p>
<p>(23) In light of increasing risks linked to natural hazards, health emergencies, technological accidents, evolving security threats, and other disruptions, it is essential to enhance the Union’s and Member States’ capability to anticipate, prepare for, and respond to crises and disasters. The Programme should support research that strengthen disaster risk and crisis management, invest in climate resilience, and enhance the resilience of vital societal functions, and build a more resilient, secure, and prepared Union, in line with the objectives of the EU Preparedness Union Strategy.</p>	<p>AT (Drafting suggestions): (23) In light of increasing risks linked to natural hazards, health emergencies, technological accidents, evolving security threats, and other disruptions, it is essential to enhance the Union’s and Member States’ capability to anticipate, prepare for, and respond to crises and disasters. The Programme should support research that strengthens <u>peace and security, such as conflict prevention, peacebuilding and peacekeeping</u>, disaster risk and crisis management, invest <u>both</u> in climate resilience <u>and effective climate change mitigation</u>, and enhance the resilience of vital societal functions, and build a more resilient, secure, and prepared Union, in line with the objectives of the EU Preparedness Union Strategy and <u>the European Green Deal</u>.</p>

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	<p>AT (Comments):</p> <p>AT welcomes that the term “peace” has been added in other parts of the compromise text, but stresses the need for research on the various dimensions of peace and security, such as conflict prevention, peacebuilding and peacekeeping.</p> <p>FR (Drafting suggestions):</p> <p>(23) In light of increasing risks linked to natural hazards, <u>climate change</u>, health emergencies, technological accidents, evolving security threats, and other disruptions, it is essential to enhance the Union’s and Member States’ capability to anticipate, prepare for, and respond to crises and disasters. The Programme should support research that strengthen disaster risk and crisis management, invest in climate <u>change knowledge and</u> resilience, and enhance the resilience of vital societal functions, and build a more resilient, secure, and prepared Union, in line with the objectives of the EU Preparedness Union Strategy.</p> <p>FR (Comments):</p> <p><u>Climate change is a major disruptor of EU economies, and represent a significant source of negative externalities. As such, fighting climate change and building knowledge on the topic contributes to improving EU’s resilience and competitiveness.</u></p>
	<p>BE (Drafting suggestions):</p> <p>(23b) <u>To improve the resilience of the EU citizens to any those risks, the Programme should support research in public health in order to strengthen population’s health and reducing inequalities.</u></p>

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	<p><u>Activities should support tackling the burden on the population of communicable and non-communicable diseases as well as their impact on health systems.</u></p>
<p>(24) Activities should reflect the importance of tackling the dramatic loss of biodiversity and contribute to the preservation and restoration of nature, ecosystems and their services. The integration of environmental science in activities is necessary to avoid damage to the environment, to maintain clean environment and to restore healthy ecosystems.</p>	<p>BE (Drafting suggestions): Activities should reflect the importance of tackling the dramatic loss of biodiversity and pollution crisis, and contribute to the preservation and restoration of nature, ecosystems and their services. The integration of environmental science in activities is necessary to avoid damage to the environment, to maintain clean environment and to restore healthy ecosystems.</p> <p>FR (Drafting suggestions): (24) Activities should reflect the importance of tackling the dramatic loss of biodiversity and contribute to the preservation and restoration of nature, <u>its</u> ecosystems and their services. The integration of environmental science in activities is necessary to avoid damage to the environment, to maintain clean environment and, to restore healthy ecosystems and to contribute to EU's competitiveness.</p> <p>FR (Comments): <u>See comment above.</u></p>
<p>(25) The Programme acknowledges climate change as one of the biggest global and societal challenge and climate action as a driver for industrial competitiveness and societal resilience. Activities should reflect the importance of tackling climate change in line with the Union's policies and commitments to implement the Paris Agreement.</p>	<p>BE (Drafting suggestions): The Programme acknowledges climate change as one of the biggest global and societal challenges and climate action as a driver for industrial competitiveness and societal resilience. Activities should reflect the</p>

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	<p>importance of tackling climate change to achieve transition towards climate neutrality in line with the Union’s policies and commitments to implement the Paris Agreement.</p> <p>FR (Drafting suggestions):</p> <p>(25) The Programme acknowledges climate change as one of the biggest global and societal challenge and climate action as a driver for EU’s industrial competitiveness and societal resilience. Activities should reflect the importance of tackling climate change in line with the Union’s policies and commitments to implement the Paris Agreement.</p> <p>FR (Comments):</p> <p><u>To align with general and specific objectives.</u></p> <p>SE (Drafting suggestions):</p> <p>(25) The Programme acknowledges climate change as one of the biggest global and societal challenge and climate action as a driver for industrial competitiveness and societal resilience. Activities should reflect the importance of tackling climate change in line with the Union’s policies and commitments to implement the Paris Agreement.</p> <p>SE (Comments):</p> <p>SE questions the deletion of the Paris agreement which may send unintended signals.</p>
<p>(36) [The Programme is to be implemented in accordance with Regulation (EU) XXX of the European Parliament and of the Council [Performance Regulation] which establishes the rules for the expenditure tracking and the</p>	<p>DE (Comments):</p>

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<p>performance framework for the budget, including rules for ensuring a uniform application of the principles of ‘do no significant harm’ and gender equality referred to in Article 33(2), points (d) and (f), as well as the provisions on accessibility for persons with disabilities reflected in Articles 17.3, 20.4 and 21.1 of Annex I, of Regulation (EU, Euratom) 2024/2509 respectively and in line with the accessibility requirements of Annex I and III of directive 2019/882, rules for monitoring and reporting on the performance of Union programmes and activities, rules for establishing a Union funding portal, rules for the evaluation of the programmes, as well as other horizontal provisions applicable to all Union programmes such as those on information, communication and visibility.]</p>	<p>DE: Should not only be mentioned in the recitals but at a more central and prominent part. Either an own article or as part of the horizontal principals, see comment above at the horizontal principles.</p>
<p>(37) Pursuant to Article 85(1) of Council Decision (EU) 2021/1764¹⁵, persons and entities established in overseas countries and territories are eligible for funding subject to the rules and objectives of the Programme and possible arrangements applicable to the Member State to which the relevant overseas country or territory is linked.</p>	
<p><u>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</u></p>	

¹⁵ Council Decision (EU) 2021/1764 of 5 October 2021 on the association of the Overseas Countries and Territories with the European Union including relations between the European Union on the one hand, and Greenland and the Kingdom of Denmark on the other (Decision on the Overseas Association, including Greenland) (OJ L 355, 7.10.2021, p. 6–134).

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Chapter I	
General Provisions	
<i>Article 1</i>	
<i>Subject matter</i>	
<p>1. This Decision establishes the Specific Programme implementing Horizon Europe - the Framework Programme for Research and Innovation for the period of the multiannual financial framework (the ‘MFF’) 2028-2034 (the ‘Specific Programme’) as set out in Article 1 (2) point (a) of Regulation XXX [<i>reference to the Horizon Europe Regulation</i>].</p>	
<p>2. [This Decision lays down the budget of the Specific Programme for the period 2028-2034, the rules for implementation of the Specific Programme and the activities to be carried out under the Specific Programme.]</p>	
<p>3. The definitions, objectives, structure and budget of Horizon Europe - the Framework Programme for Research and Innovation set out in Regulation XXX [<i>reference to the Horizon Europe Regulation</i>] also apply to the Specific Programme.</p>	<p>ES (Comments): Considering that ECF Regulation also applies, a reference may also be included.</p>
<u>Recital</u>	
<p>(1) In accordance with Article 182(3) of the Treaty on the Functioning of the European Union (TFEU), Horizon Europe – the Framework Programme for Research and Innovation for the period 2028-2034 (‘Horizon Europe’),</p>	

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<p>established by Regulation XXX [<i>reference to the Horizon Europe Regulation</i>] of the European Parliament and of the Council, is to be implemented through Specific Programmes which define the detailed rules for their implementation, fix their duration and provide for the means deemed necessary.</p>	
<p style="text-align: center;"><i>Article 2</i> Operational objectives</p>	
<p>1. The Specific Programme shall contribute to the general and specific objectives set out in Article 3 of Regulation XXX [<i>reference to the Horizon Europe Regulation</i>](.</p>	
<p>2. The Specific Programme has the following operational objectives:</p>	<p>SE (Drafting suggestions):</p> <p>Add the following operational objectives:</p> <p><u>to strengthen excellent basic and frontier research; to reinforce and spread excellence, including by fostering wider participation throughout the Union</u></p> <p><u>to increase collaboration links in European R&I and across sectors and disciplines, including social sciences and humanities (SSH);</u></p> <p><u>to strengthen international cooperation;</u></p> <p><u>to strengthen the gender dimension across the Specific Programme</u></p> <p>SE (Comments):</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>SE proposes to maintain these operational objectives from the current FP9</p> <p>SE (Drafting suggestions): <u>(bis) Strengthen excellent basic and frontier research;</u></p> <p>SE (Comments): SE supports FR and other countries emphasising the FP should be solely based on the excellence principle.</p>
<p>(a) foster the production of high-quality excellent scientific research and world-leading research institutions <u>across the Union;</u></p>	<p>AT (Drafting suggestions): (a) foster the production of excellent scientific research and world-leading research institutions <u>based on open competition across the Union;</u></p> <p>AT (Comments): AT: The regulation already applies to the whole Union, there is no need to specify this further, unless it has a different meaning (e.g. targeted geographical approach) which AT (in line with other MS) would not support outside the context of the widening instruments.</p> <p>BE (Drafting suggestions): (a) strengthen strengthen foster the production of high-quality excellent scientific research and world-leading research institutions <u>across the Union;</u></p> <p>DE (Drafting suggestions): (a) foster the production of high-quality excellent scientific research and world-leading research institutions <u>based on open competition across the Union;</u></p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>EE (Comments): We support keeping <i>across the Union</i> in the text.</p> <p>ES (Comments): We support the new wording.</p> <p>FI (Drafting suggestions): (a) foster the production of high-quality excellent scientific research and world-leading research institutions, <u>based on open competition across the Union</u></p> <p>FI (Comments): The regulation already applies to the whole Union, there is no need to specify this further, unless it has a different meaning (e.g. targeted geographical approach) which FI would not support outside the context of the widening instruments.</p> <p>FR (Drafting suggestions): (a) foster the production of high-quality excellent scientific research and world-leading research institutions <u>across the Union</u>;</p> <p>FR (Comments): <u>See comment above on the need to have a pan-European approach.</u></p>

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	<p>IE (Drafting suggestions):</p> <p>(a) foster the production of high-quality excellent scientific research and world-leading research institutions, based on open competition across the Union;</p> <p>IE (Comments):</p> <p>It is very important to explicit state in the objectives that the Programme will be based on open competition.</p> <p>As the Regulation already applies to the whole Union, ‘across the Union’ should be deleted.</p> <p>MT (Comments):</p> <p>Malta welcomes the addition of ‘across the Union’ to the text of the paragraph.</p> <p>NL (Drafting suggestions):</p> <p>(a) foster the production of high-quality excellent scientific research and world-leading research institutions, based on open competition across the Union;</p> <p>NL (Comments):</p> <p>The regulation already applies to the whole Union, there is no need to specify this further, unless it has a different meaning (e.g. targeted geographical approach) which NL would not support outside the context of the widening instruments.</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>PL (Comments): Support. Balanced development of research institutions in the whole EU should be fostered via the Framework Programme, PL strongly supports keeping “across the Union” in the text.</p> <p>PT (Comments): PT supports keeping the expression “across the Union”</p> <p>SE (Drafting suggestions): foster the production of high-quality excellent scientific research and world-leading research institutions, <u>based on open competition across the Union</u>;</p> <p>SE (Comments): The regulation already applies to the whole Union, there is no need to specify this further. On the other hand, open competition should be highlighted in order to set out the approach applied for achieving excellence.</p>
	<p>FR (Drafting suggestions): <u>(aa) reinforce the link between research, innovation, and, where appropriate, education and other policies;</u></p> <p>FR (Comments): <u>This objective stated in the current Regulation is still relevant.</u></p>

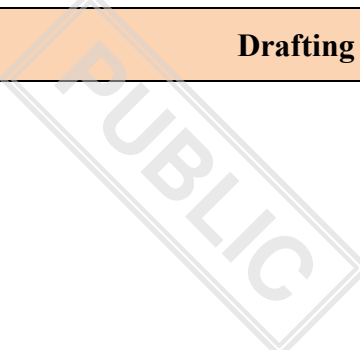
Presidency text ST 13484/25	Drafting suggestions and Comments
(b) support the mobility and training and career development of researchers;	
(c) attract and retain excellent researchers in Europe;	
(d) foster collaboration and multidisciplinary, including with Social Sciences and Humanities (SSH) to generate new knowledge;	
	<p>FR (Drafting suggestions): <u>(da) promote responsible and ethical R&I;</u></p> <p>FR (Comments): <u>This current objective is still relevant, especially regarding the deployment of the use of AI technologies and applications.</u></p>
(e) enhance knowledge valorisation;	<p>FR (Drafting suggestions): (e) enhance knowledge valorisation <u>and encourage exploitation of R&I results, in particular in Europe;</u></p> <p>FR (Comments): <u>This current objective is even more salient today, and should be strengthened. It is consistent with article 10 of the ECF regulation, which also applies to this Programme.</u></p>
	<p>FR (Drafting suggestions):</p>

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	<p><u>(ea) strengthen the gender dimension across the Specific Programme;</u></p> <p>FR (Comments): <u>This current objective is still relevant.</u></p>
<p>(f) connect and develop research and technology infrastructures across the European Research Area (ERA) to provide transnational access;</p>	<p>ES (Drafting suggestions): (f) connect and develop research and technology infrastructures ecosystem across the European Research Area (ERA) to provide transnational access;</p> <p>ES (Comments): In line with the RTI Strategy</p>
<p>(g) support the creation and scale-up of deep tech and innovative start-ups;</p>	<p>FR (Drafting suggestions): (g) support the creation and scale-up of deep tech and innovative <u>companies, in particular</u> start-ups;</p> <p>FR (Comments): <u>Current wording.</u></p>
<p>(h) foster technology uptake and demonstration of disruptive innovation;</p>	
<p>(i) increasing the participation of research organisation from the widening countries and transition countries referred to in Article 19 of Regulation XXX [reference to the Horizon Europe Regulation] ;</p>	<p>ES (Drafting suggestions):</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>(i) increasing the participation of research organisations from the widening countries and transition countries referred to in Article 19 of Regulation XXX [<i>reference to the Horizon Europe Regulation</i>];</p> <p>ES (Comments): TYPO organisations</p> <p>FR (Comments): <u>This objective should be in brackets.</u></p> <p>SE (Drafting suggestions):</p> <p>i) — increasing the participation of research organisation from the widening countries and transition countries referred to in Article 19 of Regulation XXX [<i>reference to the Horizon Europe Regulation</i>];</p> <p>SE (Comments): This issue is too specific to be a general operational objective. It is better handled within the Horizon Europe regulation</p>
<p>(j) foster open science and ensure visibility to the public and open access to results where possible, <u>including appropriate exceptions</u>.</p>	<p>BE (Drafting suggestions): foster open science and ensure visibility to the public and open access to results, <u>including appropriate exceptions, where possible.</u></p> <p>BE (Comments): Following the principle ‘as open as possible, as closed as necessary’.</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>CZ (Drafting suggestions): <u>(k) promote gender equality and inclusiveness across the Programme and include gender dimension in the activities funded by the Programme, where relevant</u></p> <p>CZ (Comments): <u>CZ would welcome the addition of point (k) with reference to gender equality. We perceive this as an important aspect of the Programme which should not be omitted.</u></p> <p>ES (Drafting suggestions): i strengthen the gender dimension across the Specific Programme</p> <p>ES (Comments): In accordance with drafting suggestions in Regulation</p>
<p>3. The Specific Programme shall also address collaborative research and innovation activities under the policy windows of the European Competitiveness Fund.</p>	<p>ES (Comments): We support the new wording. Research and innovation must go hand in hand and in coherence with article 3.</p> <p>FR (Drafting suggestions): 3. The Specific Programme shall also address collaborative research and innovation activities under the policy windows of the European Competitiveness Fund.</p> <p>FR</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>(Comments):</p> <p><u>While the programme will address collaborative R&I activities under the policy windows of the ECF (as stated in article 1 FP), this is definitely not an operational objective (title of this article) but a way to achieved those operational objectives. It should be rather moved or deleted.</u></p> <p>IE</p> <p>(Drafting suggestions):</p> <p>3. The Specific Programme shall also address implement the collaborative research and innovation activities under the policy windows of the European Competitiveness Fund.</p> <p>IE</p> <p>(Comments):</p> <p>The text needs to be clearer on the role of the SP.</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>he Specific Programme shall also implement the address collaborative research and innovation activities under the policy windows of the European Competitiveness Fund.</p> <p>NL</p> <p>(Comments):</p> <p>We still wonder what is meant by ‘address’ in the context of this Specific Programme. We would prefer it if the SP would be very clear about the relation with the ECF when it comes to collaborative R&I. This may need a new sub-article, here or elsewhere.</p>
Recital	

Presidency text ST 13484/25	Drafting suggestions and Comments
<p>(2) Regulation XXX[<i>reference to the Horizon Europe Regulation</i>] sets out the general and specific objectives of Horizon Europe, the structure and the broad lines of activities to be carried out, while this Specific Programme implementing Horizon Europe (the ‘Specific Programme’) should define the operational objectives and the activities which are specific to parts of Horizon Europe. The provisions on implementation set out in Regulation XXX apply fully to the Specific Programme.</p>	
<p style="text-align: center;"><i>[Article 3 Budget</i></p>	
<p>1. In accordance with Article 6(1) of Regulation XXX [<i>reference to the Horizon Europe Regulation</i>], the indicative financial envelope for the implementation of the Specific Programme for the period 2028 to 2034 is set at be EUR 175 002 000 000 in current prices.</p>	
<p>2. The amount referred to in paragraph 1 of this Article shall be distributed among the parts as set out with Article 6(2) of Regulation XXX [<i>reference to the Horizon Europe Regulation</i>].</p>	
<p><u>Recital</u></p>	
<p>(4) This Council Decision lays down an indicative financial envelope for the Specific Programme.</p>	<p>ES (Drafting suggestions): 4) This Council Decision lays down an indicative financial envelope for the Specific Programme, including minimum amount for each component. ES</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>(Comments):</p> <p>Recognising the importance of budgetary flexibility, it is difficult to maintain the balance between flexibility and predictability. It will be necessary to establish reasonable margins, but also to set minimums, otherwise there is no predictability. The budget should have minimums and unallocated cushions as part Horizon Europe (as it is mentioned for other parts of the MFF, COM (2025) 570 final.</p>
<p><i>Article 4</i> <i>Work programmes</i></p>	<p>BE (Comments):</p> <p>Clarity is still needed on the procedure, who sets the priorities, and to have the required attention for the importance of lower/middle TRL 3/4-6 within pillar II and the FP as a whole.</p> <p>MT (Comments):</p> <p>Malta calls for the adoption of separate work programmes for R&I elements of the ECF policy windows. We argue that the single work programmes under the European Competitiveness Fund will marginalise research activities and decrease excellence of Horizon Europe collaborative endeavours. Additionally, we call for the introduction of examination committee procedure to all work programmes.</p> <p>PT (Comments):</p> <p>PT would like to reserve a specific drafting in the next iteration as the current drafting compromises the governance model of Horizon Europe based on co-design and co-creation principles between COM and MS.</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
<p>1. The Specific Programme shall be implemented by the work programmes referred to in paragraph 2 of this Article in accordance with Article 110 of Regulation (EU, Euratom) 2024/2509.</p>	<p>ES (Drafting suggestions):</p> <p>1. The Specific Programme shall be implemented by the work programmes referred to in paragraph 2 of this Article in accordance with Article 110 of Regulation (EU, Euratom) 2024/2509. The Commission shall regularly and from an early stage inform the Committee referred to in Article XX of the overall progress of the implementation of the indirect actions of the Specific Programme, also to allow that Committee to provide early appropriate input on the preparation of the work programmes.</p> <p>ES (Comments):</p> <p>The Programme Committee should be informed and consulted.</p> <p>FR (Drafting suggestions):</p> <p>1. The Specific Programme shall be implemented by the work programmes referred to in paragraph 2 of this Article in accordance with Article 110 of Regulation (EU, Euratom) 2024/2509. <u>The Commission shall regularly and from an early stage inform the Committee referred to in article 18 of the overall progress of the implementation of the indirect actions of the Specific Programme, also to allow that Committee to provide early appropriate input on the preparation of the work programmes.</u></p> <p>FR (Comments):</p> <p><u>As stated in the current regulation, the Commission needs to give the Committee access to information as soon as possible to help delivering better-informed decisions.</u> <u>The preparation of the work programmes should closely involve Member States.</u></p>

Presidency text ST 13484/25	Drafting suggestions and Comments
<p>Without prejudice to the first subparagraph, the work programmes may shall in particular set out:</p>	<p>ES (Comments): We support the change.</p> <p>FR (Drafting suggestions): Without prejudice to the first subparagraph, the work programmes may shall in particular set out.</p>
<p>(a) actions and associated budget;</p>	<p>FR (Drafting suggestions): (a) <u>set out</u> actions and associated budget <u>for each action and an indicative implementation timetable</u>;</p> <p>FR (Comments): <u>The Regulation should specify details related to work programme as much as possible to clarify and ensure consistency of rules to the benefit of applicants.</u></p>
	<p>ES (Drafting suggestions): aa) Form and type of funding</p> <p>ES (Comments): Work programmes shall also define the form and type of funding.</p>
<p>(b) eligibility and award criteria;</p>	<p>BE (Drafting suggestions):</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>Eligibility and award criteria, <u>including rules for dealing with ex aequo proposals, taking into consideration the objectives of the call for proposals.</u></p> <p>BE (Comments): There should be clear criteria for what to do in case of ex aequo scores.</p> <p>ES (Drafting suggestions): (b) additional eligibility and award criteria;</p> <p>ES (Comments): Eligibility and award criteria should be general to ensure predictability. The Work programmes should define only additional criteria.</p> <p>FR (Drafting suggestions): (b) recall eligibility and award criteria <u>and the relative weight of the different award criteria;</u></p> <p>FR (Comments): <u>Eligibility criteria shall not be defined at the level of the work programme, except in exceptional circumstances and if duly justified. It should be defined in this Regulation, as well as award criteria. The work programme should only recall such criteria, but not ‘set out’ criteria.</u></p>
(c) a single co-financing rate per action;	<p>ES (Drafting suggestions): (c) a single co-financing rate per action;</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>ES (Comments): The reference to co-funding is misleading when HE funds up to 100%. We consider that funding is more appropriate.</p> <p>FR (Drafting suggestions): (c) <u>set out</u> a single co-financing rate per action <u>and per type of entity</u>;</p>
<p>(d) rules applicable to actions concerning more than one specific objective;</p>	<p>ES (Drafting suggestions): (d) — rules applicable to actions concerning more than one specific objective;</p> <p>ES (Comments): Rules applicable to the different specific objectives of this Programme should be the same. It is misleading, it should be clarified or deleted.</p> <p>FR (Drafting suggestions): (d) <u>recall</u> rules applicable to actions concerning more than one specific objective;</p>
<p>(e) actions to which specific rules apply, in particular on ownership of results, valorisation and dissemination, transfer and licensing as well as access rights to results.</p>	<p>FR (Drafting suggestions): (e) <u>specify</u> actions to which specific rules apply, in particular on <u>research security and</u> ownership of results, valorisation and dissemination, transfer and licensing as well as access rights to results.</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	FR (Comments): <u>To ensure consistency with art 10 of the ECF regulation.</u>
2. The Commission shall adopt separate work programmes, by means of implementing acts, for the implementation of actions under the following components, as set out in Article 1(3):	
(a) the European Research Council (ERC), for which the draft work programme shall be established by the ERC Scientific Council under Article 7(9)(a)(ii), in accordance with Article 18(3). The Commission shall depart from the draft work programme established by the ERC Scientific Council only in accordance with Article 7(4), second subparagraph; in that case, the Commission shall adopt the work programme by means of an implementing act in accordance with Article 18(4); the Commission shall duly motivate that;	AT (Drafting suggestions): for which the draft work programme shall be established AT (Comments): AT: In line with the provisions for current Horizon Europe Programme, only the term “work programme” should be used. SE (Drafting suggestions): the European Research Council (ERC), for which the draft work programme shall be established by the ERC Scientific Council under Article 7(9)(a)(ii), in accordance with Article 18(3). The Commission shall depart from the draft work programme established by the ERC Scientific Council only in

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>accordance with Article 7(4), second subparagraph; in that case, the Commission shall adopt the work programme by means of an implementing act in accordance with Article 18(34); the Commission shall duly motivate that</p> <p>SE (Comments):</p> <p>The Scientific Council should be in control of the ERC work programme from draft to approval.</p>
	<p>SE (Drafting suggestions):</p> <p><u>abis) collaborative research and innovation activities relevant to the European Competitiveness Fund policy windows.</u></p> <p>SE (Comments):</p> <p>This proposal is in line with SE’s comments expressed under general comments. These activities should be developed in work programmes under HE. They may need additional work programmes for collaborative research activities addressing challenges and solutions spanning across several policy windows.</p> <p>Regarding the handling of part II work programmes, the proposed changes in (c) could also be a way forward and possibility to handle work programmes in different areas like the clusters of present HE regulation.</p>
<p>(b) the European Innovation Council (EIC), for which the work programme shall be prepared following the advice of the EIC Board under Article 12(1)(b), in accordance with Article 18(4);</p>	

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<p>(c) Marie Skłodowska-Curie Actions (MSCA), <i>global societal challenges, EU Missions, New European Bauhaus Facility</i>, innovation ecosystems, reforming and enhancing the European R&I system, research and technology infrastructures, widening participation and spreading excellence, in accordance with Article 18(4);</p>	<p>ES (Drafting suggestions): e) Marie Skłodowska-Curie Actions (MSCA), <i>global societal challenges,</i> <i>ca) social and cultural transformations,</i> <i>cb) EU Missions,</i> <i>New European Bauhaus Facility,</i> cc) innovation ecosystems, reforming and enhancing the European R&I system, cd) research infrastructures ce) technology infrastructures, ce) widening participation and spreading excellence, in accordance with Article 18(4);</p> <p>ES (Comments): In line with the amendment proposed for the regulation. We may accept this text although we would prefer to have a line per programme.</p> <p>(c) MSCA (ca) Social and cultural transformations (cb) EU Missions R&I etc</p> <p>Different work programmes are needed, the activities are very diverse and different configurations for the Programme Committee are foreseen (article 18). For reasons already mentioned, there is no need to include the NEB facility, nor different (or specific) work programmes for them. Spain is currently assessing our national position regarding Missions (due to its interministerial dimension), which we have already expressed</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>our serious concerns. We have a scrutiny reservation to all Missions references in the HE and SP regulations.</p> <p>It is important to establish a dedicated and independent part of the WP for Research Infrastructures and another for Technology Infrastructure, as the topics and interested parties can differ significantly and discussing them jointly may hinder focused and effective analysis.</p> <p>FR (Comments): <u>Scrutiny reservation, FR is still discussing this article internally.</u></p> <p>HR (Drafting suggestions): Marie Sklodowska-Curie Actions (MSCA), each global societal challenges, EU Missions, New European Bauhaus Facility, innovation ecosystems, reforming and enhancing the European R&I system, research and technology infrastructures, widening participation and spreading excellence, in accordance with Article 18(4);</p> <p>HR (Comments): HR - To ensure efficient programme implementation, we recommend that each Global Challenge be accompanied by a dedicated work programme. This would enhance clarity and focus in addressing specific thematic priorities.</p> <p>SE (Drafting suggestions): (c) Marie Sklodowska-Curie Actions (MSCA), <u>Competitiveness and Society including</u> global societal challenges, EU Missions, New European Bauhaus Facility, innovation ecosystems, reforming and enhancing the</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>European R&I system, research and technology infrastructures, widening participation and spreading excellence, in accordance with Article 18(4);</p> <p>SE (Comments):</p> <p>SE propose to include part II with ‘Competitiveness’, including research and innovation activities in support of the European Competitiveness Fund, see also comments to proposed texts in HE FP article 4(b)i),</p> <p>SE would like to explore the option (and possible benefits and implications) of having the NEB facility, given its level applied research, in an ECF policy window.</p> <p>SI (Drafting suggestions):</p> <p>Marie Skłodowska-Curie Actions (MSCA), global societal challenges, EU Missions, New European Bauhaus Facility, innovation ecosystems, achieving strategic objectives of ERA reforming and enhancing the European R&I system, research and technology infrastructures, widening participation and spreading excellence, in accordance with Article 18(4);</p>
<p>(d) the JRC, for which the multi-annual work programme shall take into account the opinion provided by the Board of Governors of the JRC referred to in Commission Decision 96/282/Euratom.</p>	
	<p>FR (Drafting suggestions):</p> <p><u>2a. The Commission shall adopt, by means of implementing acts the following measures:</u></p> <p><u>(a) the decision on the approval of the funding of indirect actions, where the estimated amount of the Union contribution under the Specific</u></p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p><u>Programme is equal to or more than EUR 2,5 million, with the exception of actions under the “ERC”;</u> <u>(b) the decision on the approval of the funding of actions involving the use of human embryos and human embryonic stem cells.</u> <u>Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 14(4).</u></p> <p>FR (Comments): <u>This current provision is still relevant, since Member States should be consulted on such matters.</u></p>
<p>3. [The research and innovation activities referred to under the policy windows described in Chapters IV to VII of Regulation XXX [<i>reference to the European Competitiveness Fund Regulation</i>] shall be included in a specific dedicated part of the work programmes implementing the corresponding specific objectives referred to in Article 3(2), points (a) to (d) of Regulation XXX [<i>reference to the European Competitiveness Fund Regulation</i>]. Those work programmes shall be adopted in accordance with Articles 15 and 84 of Regulation XXX [<i>reference to the European Competitiveness Fund Regulation</i>].]</p>	
	<p>DE (Drafting suggestions):</p> <p>4. The Commission shall adopt, by means of implementing acts the decision on the approval of the funding of actions involving the use of human embryos and human embryonic stem cells. Those implementing acts shall be adopted in accordance with the examination procedure.</p> <p>DE (Comments):</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>DE: It is of outmost relevance for the regulations for funding of research projects involving human embryos or human embryonic stem cells (hESCs) that in addition to the exclusion rules regarding the eligibility of projects defined in Article 21 (10) of the draft Horizon Europe (FP10) Regulation, Member States must be responsibly involved on a case by case basis in the review process of research projects involving hESCs consistent with the regulations of FP9 (Examination Procedure).</p> <p>The current draft does not reflect this need. A paragraph regulating and specifying the involvement of Member States in a case by case review process of research projects involving hESCs (Examination Procedure) needs to be added here and as well as to the Regulations of the ECF.</p> <p>Furthermore a supplementary protocol declaration concerning the funding regulations of hESCs according to FP9 is required by Germany and must also apply to the ECF.</p>
Recital	
<p>(5) In order to ensure uniform conditions for the implementation of the Specific Programme through work programmes, implementing powers should be conferred on the Commission. Those powers should be exercised in accordance with Regulation (EU) No 182/2011 of the European Parliament and of the Council¹⁶.</p>	
Chapter VI	

¹⁶ Regulation (EU) No 182/2011 of the European Parliament and of the Council of 16 February 2011 laying down the rules and general principles concerning mechanisms for control by Member States of the Commission’s exercise of implementing powers, OJ L 55, 28.2.2011, p. 13–18.

Presidency text ST 13484/25	Drafting suggestions and Comments
Transitional and final provisions	
<p><i>Article 18</i> <i>Committee procedure</i></p>	<p>HU (Comments): HU supports BG’s proposal for using Article 5(4)(b) of Regulation (EU) 182/2011 (no-opinion clause) in order to strengthen the role of Member States in implementation of the Programme.</p> <p>MT (Comments): MT supports the proposal for using Article 5(4)(b) of Regulation (EU) 182/2011 (no-opinion clause) in order to strengthen the role of Member States in implementation of the Programme.</p> <p>PT (Comments): PT reserves its position regarding this article</p> <p>SI (Comments): SI can support the BG proposal for using Article 5(4)(b) of Regulation (EU) 182/2011 (no-opinion clause) in order to strengthen the role of Member States in implementation of the Programme.</p> <p>SK (Comments): SK supports proposal for using Article 5(4)(b) of Regulation (EU) 182/2011 (no-opinion clause) in order to strengthen the role of Member States in implementation of the Programme.</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
<p>1. The Commission shall be assisted by a committee. That committee shall be a committee within the meaning of Regulation (EU) No 182/2011.</p>	<p>IE (Comments): Greater clarity is required on how the governance structures for the programming and comitology for Pillar 2 and the all-important transnational R&I collaboration be managed within the ECF structures. To ensure meaningful MS involvement, the examination procedure must apply for the adoption of the Work Programmes. It is also essential to continue the long-established process of national thematic experts having a central role in the design of thematic R&I Work Programmes to ensure that they reflect MS priorities as well as those of the Commission.</p>
<p>2. The committee may convene in the following configurations, having regard to the subject matter to be discussed:</p>	<p>SE (Drafting suggestions): <u>Strategic</u> General configuration: <u>strategic</u> overview of the implementation of the Specific Programme <u>and coherence across its individual work programmes</u>; SE (Comments): SE supports FR and other countries suggesting to maintain the current strategic configuration and its purpose of overseeing coherence.</p>
<p>General configuration: overview of the implementation of the Specific Programme;</p>	<p>AT (Comments): AT: There is a need for a body that keeps an overview of the implementation of RTI activities across ECF and Horizon Europe, and</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>that can offer advice to the Commission in the form of strategic orientation on RTI activities of the Union and Member States.</p> <p>Such cooperation with the Member States is necessary to deliver on the programme objectives of both programmes, which aim at aligning EU, national and regional R&I priorities (HE Art. 3(2)) as well as the R&I and industrial policy (ECF Art. 3(1)(e)).</p> <p><i>In addition, following the latest ERAC meeting (16-17 October, Copenhagen), AT strongly requests an in-depth debate about the process for joint priority setting from now on.</i></p> <p>DE (Comments):</p> <p>DE: MS need to be involved in the decision-making processes in all parts of the implementation of the programme, including the “Competitiveness” part programmed via the European Competitiveness Fund. For meaningful involvement, it is necessary to apply the examination procedure for the adoption of the Work Programmes.</p> <p>The ministries responsible for R&I (if necessary with the involvement of other experts), who can assess the research needs and the current state of research, must be involved in the decision-making process of pillar II of Horizon Europe. This requires at least sub-configurations of the thematic programme committees on R&I.</p> <p>In addition, at the technical level it should be ensured that real experts for the specific areas can provide input to the decision-making.</p> <p>Also, a clear link between the Horizon Europe programme committees and those of the ECF policy windows must be established so that for the entirety</p>

Presidency text ST 13484/25	Drafting suggestions and Comments
	<p>of R&I policy, as bundled in the independent Horizon Europe, MS involvement is ensured.</p> <p>FR (Drafting suggestions): General Strategic configuration: <u>strategic</u> overview of the implementation of the Specific Programme <u>and coherence across its individual work programmes</u>;</p> <p>FR (Comments): <u>The Committee should be consulted on strategic matters as well as on the overall coherence of the work programme.</u></p> <p>SI (Drafting suggestions): General configuration: overview of the implementation of the Specific Programme, <u>oversight over the connection and complementarities with the Specific Programme and the four policy Windows of the European Competitiveness Fund (ECF)</u></p> <p>SK (Drafting suggestions): General configuration: overview of the implementation of the Specific Programme, <u>oversight over the connection and complementarities with the Specific Programme and the four policy windows of the European Competitiveness Fund (ECF);</u></p>
ERC;	

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MSCA;	
<p><i>Global societal challenges, EU Missions, New European Bauhaus Facility;</i></p>	<p>BE (Drafting suggestions): Global and societal challenges, EU Missions, New European Bauhaus Facility;</p> <p>DE (Drafting suggestions): <u>Global societal challenges democratic, inclusive, value-based and competitive European societies</u></p> <p>DE (Comments): DE: a single programme configuration does not leave enough room for co-creation of work programmes; we suggest to establish 3 programme configurations: one for each thematic area</p> <p>EE (Drafting suggestions): <i>Global societal challenges, EU Missions, New European Bauhaus Facility;</i></p> <p>ES (Drafting suggestions): <i>social and cultural transformations</i> <i>Global societal challenges, EU Missions, New European Bauhaus Facility;</i></p> <p>ES (Comments): A separate configuration for social and cultural transformation is be needed.</p>

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	<p>We propose having 2 separate configurations here as the scope of Missions w are completely different</p> <p>FR (Comments): <u>Scrutiny reservation, FR is still discussing internally about the architecture of this pillar.</u></p> <p>MT (Comments): Malta highlights the need to convene different committee configurations for each of the global societal challenges, EU Missions etc., in order to ensure the most effective operationalisation of the Framework Programme.</p>
	<p>ES (Drafting suggestions): <i>EU Missions</i></p> <p>ES (Comments): Spain is currently assessing our national position regarding Missions (due to its interministerial dimension), which we have already expressed our serious concerns. We have a scrutiny reservation to all Missions references in the HE and SP regulations.</p>
EIC and innovation ecosystems;	
Research and technology infrastructures;	
	MT

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	<p>(Drafting suggestions):</p> <p><u>Open Science and the European Open Science Cloud (EOSC);</u></p> <p>MT</p> <p>(Comments):</p> <p>MT argues that a separate committee configuration should be added to discuss the matters of Open Science and the European Open Science Cloud (EOSC).</p>
<p>Reforming and enhancing the European R&I system and widening participation and spreading excellence.</p>	<p>FR</p> <p>(Comments):</p> <p><u>The last part related to Widening should be in brackets. If a Widening component still exists in the Programme, it should be discussed in another configuration than “Reforming and enhancing the European R&I system”.</u></p>
	<p>BG</p> <p>(Drafting suggestions):</p> <p><u>2a. Ad-hoc meetings could be organised with different Programme Committee configurations and/or with Committees established by other acts on horizontal and/or cross-cutting issues.</u></p>
<p>3. Where reference is made to this paragraph, Article 4 of Regulation (EU) No 182/2011 shall apply.</p>	
<p>4. Where reference is made to this paragraph, Article 5 of Regulation (EU) No 182/2011 shall apply.</p>	<p>BG</p> <p>(Drafting suggestions):</p> <p>4. Where reference is made to this paragraph, Article 5 <u>and Article 5 (4)(b)</u> Regulation (EU) No 182/2011 of C shall apply.</p> <p>BG</p> <p>(Comments):</p>

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	<p>We believe that Member States need to have a stronger role in the overall implementation and oversight of the programme, given the vastly increased flexibility throughout the programme implementation. Advisory Procedure should apply on to ERC Programme Committee.</p>
<p>5. Where the opinion of the committee is to be obtained by written procedure, that procedure shall be terminated without result when, within the time-limit for delivery of the opinion, the chair of the committee so decides or a simple majority of committee members so request.</p>	<p>BG (Drafting suggestions):</p> <p>5. Where the opinion of the committee is to be obtained by written procedure, Article 5(4)(b) of Regulation (EU) No 182/2011 shall apply that procedure shall be terminated without result when, within the time limit for delivery of the opinion, the chair of the committee so decides or a simple majority of committee members so request.</p> <p>BG (Comments):</p> <p>Same as above.</p>
	<p>BG (Drafting suggestions):</p> <p><u>5a. The Commission shall regularly and on request/demand inform the Committee of the overall progress of the implementation of the Specific Programme and shall provide it with timely information on all actions and components proposed or funded under [Horizon Europe Regulation] and [European Competitiveness Fund Regulation] and their externalised parts, including detailed information and analysis of the statistics of the individual calls.</u></p> <p>ES (Drafting suggestions):</p> <p>The Commission shall regularly inform the Committee of the overall progress of the implementation of the Specific Programme and shall</p>

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	<p>provide it with timely information on all actions and components proposed or funded under the programme and its externalised parts, including detailed information and analysis of the statistics of the individual calls.</p> <p>ES (Comments): In line with current regulation HE</p>
<p>6. In accordance with international agreements concluded by the Union, representatives of third countries or international organisations may be invited as observers in the meetings of the Specific Programme committee under the conditions laid down in its rules of procedure, taking into account security and public order of the Union or its Member States.</p>	
	<p>ES (Drafting suggestions): In the case of the implementing acts to be adopted under Article XX) where the Committee delivers no opinion, the Commission shall not adopt the draft implementing act and the third subparagraph of Article 5(4) of Regulation (EU) No 182/2011 shall apply.</p> <p>ES (Comments): The case of no opinion is a possibility that should be taken into account and included here.</p> <p>FR (Drafting suggestions):</p>

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	<p><u>6a. The Commission shall regularly inform the Committee of the overall progress of the implementation of the Specific Programme and shall provide it with timely information on all actions and components proposed or funded under Regulation (XXX) and its externalised parts, as specified in Annex (XXX) of this Decision, including detailed information and analysis of the statistics of the individual calls.</u></p> <p>FR (Comments):</p> <p><u>We recall the provision under the current Regulation to enable the Committee to adopt better-informed decisions, and to ensure transparency and openness of the implementation processes.</u></p>
Recital	
<p>(6) The advisory and examination procedures set out in Regulation (EU) No 182/2011 of the European Parliament and of the Council should be used for the adoption of the work programmes given the important financial implications of the Specific Programme.</p>	<p>EE (Drafting suggestions):</p> <p>(6) The advisory and examination procedures set out in Regulation (EU) No 182/2011 of the European Parliament and of the Council should be used for the adoption of the work programmes given the important financial implications of the Specific Programme.</p> <p>EE (Comments):</p> <p>We insist on using the examination procedure throughout the Programme</p> <p>ES (Drafting suggestions):</p> <p>(6) The advisory and examination procedures set out in Regulation (EU) No 182/2011 of the European Parliament and of the Council should be used for the adoption of the work programmes given the important financial implications of the Specific Programme.</p>

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	<p>ES (Comments): Although this is also dependent on the ECF regulation, we believe the 1st PCY text has already progressed enough at the ECF WP and we can suggest this.</p> <p>MT (Drafting suggestions): (6) The advisory and examination procedures set out in Regulation (EU) No 182/2011 of the European Parliament and of the Council should be used for the adoption of the work programmes given the important financial implications of the Specific Programme.</p> <p>MT (Comments): Malta reiterates that that all work programmes should be adopted in the examination procedure with a stronger role of the Member States. It is in line with current developments of negotiations on the draft ECF regulation.</p>
	<p>FR (Comments): <u>We support the addition of an annex to the decision on information to be provided by the Commission</u></p> <p><u>ANNEX (XXX)</u></p> <p><u>INFORMATION TO BE PROVIDED BY THE COMMISSION IN ACCORDANCE WITH ARTICLE 14(7) OF THIS DECISION</u></p> <p><u>1. Information on individual projects, enabling the monitoring of the entire lifetime of each proposal, covering in particular:</u></p>

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	<p><u>2. Information on the outcome of each call and project implementation, covering in particular:</u></p> <ul style="list-style-type: none"> - <u>evaluation scores of proposals and deviations from those scores in their ranking list, based on their contribution to the achievement of specific policy objectives, including the constitution of a consistent portfolio of projects;</u> - <u>requested adjustments to the proposals;</u> - <u>outcome of negotiations on grant agreements;</u> - <u>project implementation, including payment data and outcome of projects;</u> - <u>proposals retained by independent expert evaluation, but rejected by the Commission in accordance.</u> <p><u>3. Information on programme implementation, including relevant information at the level of Horizon Europe, the Specific Programme, each specific objective and related themes as well as the synergies with other relevant Union programmes.</u></p> <p><u>4. Information on the execution of the Horizon Europe budget, including commitments and payments for all European Partnerships as well as financial balances between the Union and all associated countries.</u></p>
<p><i>Article 19</i> Repeal</p>	
<p>Decision (EU) No 764/2021 is repealed with effect from 1 January 2028.</p>	
<p>Recital</p>	

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<p>(7) The Specific Programme replaces the Horizon Europe Specific Programme established by Council Decision (EU) No 2021/764¹⁷. Council Decision (EU) 2021/764 should therefore be repealed.</p>	
<p><i>Article 20</i> <i>Transitional provisions</i></p>	
<p>1. This Decision shall not affect the continuation or modification of the actions concerned, until their closure, under Decision (EU) 2021/764/EU, which shall continue to apply to those actions until their closure.</p>	
	<p>FR (Drafting suggestions): <u>1a. Where necessary, any remaining tasks of the Committee established by Decision (EU) 2021/764/EU shall be undertaken by the Committee referred to in article 18 of this Decision.</u></p>
<p>2. The financial envelope for the Specific Programme may also cover technical and administrative assistance expenses necessary to ensure the transition between the Specific Programme and the measures adopted under its Decision (EU) 2021/764.</p>	<p>DE (Comments): DE: How does the commission ensure that administrative costs during the transitional phase are limited to a minimum?</p> <p>FR (Comments): <u>We are still waiting for an estimate of this financial envelope from the Commission.</u></p>

¹⁷ Council Decision (EU) 2021/764 of 10 May 2021 establishing the Specific Programme implementing Horizon Europe – the Framework Programme for Research and Innovation, and repealing Decision 2013/743/EU (OJ L 167I, 12.5.2021, p. 1, ELI: <http://data.europa.eu/eli/dec/2021/764/oj>)

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<p><i>Article 21</i> <i>Entry into force and application</i></p>	
<p>This Decision shall enter into force on the twentieth day following that of its publication in the Official Journal of the European Union.</p>	
<p>It shall apply from 1 January 2028.</p>	
<p>Done at Brussels,</p>	
<p><i>For the Council</i></p>	
<p>The President</p>	
<p><u>Other recital</u></p>	
<p>(8) The Specific Programme should be implemented in compliance with the principle of the rule of law and the rights and principles set out in the Charter of Fundamental Rights of the European Union and be in line with the international obligations of the Union and the Member States arising from the international instruments to which they are party, including Human rights instruments such as the UN Convention on the Rights of Persons with disabilities.</p>	