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CONTRIBUTION

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

N° prev. doc.: 13656/25
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 Innovation Pillar (block 4)

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

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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 (doc. 13656/25)	Drafting suggestions and Comments
<p>General Comments</p>	<p>DE (Comments):</p> <p>DE: Some of these elements concern the connection between the ECF and Horizon Europe. In line with the mandates of these groups, this should primarily be discussed in the MFF AHWP and the MFF Subgroup 2.</p> <p>IE (Comments):</p> <p>Ireland welcomes the first Presidency compromise text and the efforts to address the concerns raised by MS.</p> <p>We provide some initial drafting suggestions for consideration.</p> <p>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.</p>

Presidency text (doc. 13656/25)	Drafting suggestions and Comments
	<p>NL (Comments): This is a first effort to streamline and adjust the text. NL keeps a scrutiny reservation to further shape these texts in the right direction to ensure a well functioning Framework Programme and thus properly develop R&I as a base to find solutions and knowledge to tackle societal and technological challenges and strengthen European Competitiveness</p> <p>SK (Comments): SK has a scrutiny reservation on all defence-related research provisions, while we still have questions for clarification related to the legal architecture and possibility to fund defence-related projects.</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>Chapter IV</p>	
<p>Innovation</p>	

Presidency text (doc. 13656/25)	Drafting suggestions and Comments
<p style="text-align: center;"><i>Article 16</i> <i>The European Innovation Council (EIC)</i></p>	<p>PT (Comments): PT considers that further clarification is needed to avoid overlapping actions between EIC Fund and ECF investment actions.</p>
	<p>HR (Comments): HR would appreciate a reintroduction of the grant-only option for funding.</p>
<p>1. The EIC shall identify, develop and scale up deep tech and disruptive innovation from research to deployment scale-up. It shall be implemented mainly through open bottom-up calls for proposals while ensuring a balanced portfolio of actions across thematic areas. This shall be complemented by targeted thematic and ‘Challenge’ calls in areas of potential strategic interest in close coordination and synergy with the ECF policy windows, in particular with the ECF InvestEU Instrument.</p>	<p>AT (Drafting suggestions): The EIC shall identify, develop and scale up deep tech and disruptive innovation from breakthrough research to breakthrough entrepreneurship deployment scale-up. It shall be implemented mainly through open bottom-up calls for proposals while ensuring a balanced portfolio of actions across thematic areas. This shall be complemented by targeted thematic and ‘Challenge’ calls in areas of potential strategic interest in close coordination and synergy with the ECF policy windows, in particular with the ECF InvestEU Instrument.</p> <p>AT (Comments): AT: The term ‘deployment’ seems too weak and therefore inappropriate (too much from the ‘research logic’ - in the sense that research project managers should also think towards deployment and valorisation - but EIC is far more than that). EIC paves the way from ‘breakthrough science (or breakthrough research) to ‘breakthrough entrepreneurship’, this is how EIC seems well explained in very short terms. Instead of ‘breakthrough entrepreneurship’ also ‘breakthrough innovation’ could be used, but ‘breakthrough entrepreneurship’ hits the EIC better.</p> <p>BE</p>

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	<p>(Drafting suggestions):</p> <p>The EIC shall identify, develop and scale up deep tech and disruptive innovation from research to deployment scale-up. It shall be implemented mainly through open bottom-up calls for proposals while ensuring a balanced portfolio of actions across thematic areas. This shall be complemented by targeted thematic and ‘Challenge’ calls in areas of potential strategic interest in close coordination and synergy with the ECF policy windows, in particular with the ECF InvestEU Instrument.</p> <p>BE</p> <p>(Comments):</p> <p>Request to retain the term “scale-up”. As deployment refers to activities beyond TRL 8, it falls outside the scope of FP10 instruments. It should therefore be supported under the ECF, in line with its own objectives.</p> <p>BG</p> <p>(Drafting suggestions):</p> <p>1. The EIC shall identify, develop and scale up all types of innovation, including deep tech and disruptive innovation from research to scale up deployment. It shall be implemented mainly through open bottom-up calls for proposals while ensuring a balanced portfolio of actions across thematic areas. This shall be complemented by targeted thematic and ‘Challenge’ calls in areas of potential strategic interest in close coordination and synergy with the ECF policy windows, in particular with the ECF InvestEU Instrument.</p> <p>BG</p> <p>(Comments):</p> <p>We prefer EIC is able to support all types of innovation, including to enable flexibility in the long term.</p> <p>Prefer bringing back “scale up”, as deployment activities should be supported by ECF.</p>

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	<p>We support using mainly open bottom-up calls.</p> <p>ES (Comments): We consider that TRL 9 which is full commercial deployment could be misleading here.</p> <p>FR (Drafting suggestions): 1. The EIC shall identify, develop and scale up deep tech and disruptive innovation from research to deployment scale-up. It shall be implemented both mainly through open bottom-up and challenge calls for proposals while ensuring a balanced portfolio of actions across thematic areas. This shall be complemented by targeted thematic and ‘Challenge’ calls in areas of potential strategic interest should be elaborated in close coordination and synergy with the ECF policy windows, in particular with the ECF InvestEU Instrument.</p> <p>FR (Comments): <u>To ensure consistency with recital 15 stating it should be implemented through “both” open and challenge approaches.</u> <u>We are still waiting from Commission feedback on how ‘Challenge’ calls will be developed “in close collaboration” with ECF policy windows.</u> <u>Regarding the articulation with the ECF InvestEU Instrument, we urge the Commission to share the paper as soon as possible.</u></p> <p>NL (Drafting suggestions): 1. The EIC shall identify, develop and scale up deep tech and disruptive innovation from research to scale-up deployment scale-up scale-up. It shall be</p>

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	<p>implemented mainly through open bottom-up calls for proposals while ensuring a balanced portfolio of actions across thematic areas. This shall be complemented by targeted thematic and ‘Challenge’ calls in areas of potential strategic interest in close coordination and synergy with the ECF policy windows, in particular with the ECF InvestEU Instrument.</p> <p>NL (Comments): The change from 'scale-up' to 'deployment' does not appear to be in line with the intended instruments of the EIC, and seems illogical given the planned activities under the InvestEU ECF instrument. NL strongly prefers the original ‘scale-up’.</p> <p>SI (Drafting suggestions): The EIC shall identify, develop and scale up <u>all types of innovation, focusing on</u> deep tech and disruptive <u>technologies innovation</u> from research to deployment, <u>paying attention to supporting women-led and youth-led star ups and facilitating their Access to finance and mentoring.</u> It shall be implemented mainly through open bottom-up calls for proposals <u>with regular cut-off dates per year</u> while ensuring a balanced portfolio of actions across thematic areas. This shall be complemented by targeted thematic and ‘Challenge’ calls in areas of potential strategic interest in close coordination and synergy with the ECF policy windows, in particular with the ECF InvestEU Instrument.</p> <p>SK (Drafting suggestions): 1. The EIC shall identify, develop and scale up deep tech and disruptive innovation from research to <u>deployment</u> scale-up. It shall be implemented mainly through open bottom-up calls for proposals <u>with regular cut-off dates per year</u> while ensuring a balanced portfolio of actions across thematic</p>

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	<p>areas. This shall be complemented by targeted thematic and ‘Challenge’ calls in areas of potential strategic interest in close coordination and synergy with the ECF policy windows, in particular with the ECF InvestEU Instrument.</p> <p><u>Particular attention will be paid to supporting women-led and youth-led start-ups and facilitating their access to finance and mentoring.</u></p> <p>SK (Comments): Encourages gender and age inclusivity in entrepreneurship (building on the European Competitiveness provision in this area), ensuring young people and women benefit from EIC support.</p> <p>MT (Comments): Malta reiterates its question on how Horizon Europe’s autonomy will be preserved and safeguarded in relation to its tight connection to the European Competitiveness Fund (ECF), including European Innovation Council’s (EIC) thematic orientation.</p> <p>We also reiterate our call on the European Commission to publish the Communication on the Competitiveness Coordination Tool (CCT) as soon as possible, to fully understand the mechanisms to align industrial and research policies and investments and the interplay between Horizon Europe and European Competitiveness Fund.</p> <p>PT (Comments): PT believes that the EIC must continue to privilege a bottom-up approach over a challenge approach calls, as this raises several questions: How are the areas of potential strategic interest to be defined? Which policy windows will be privileged? Who will decide, the Programme managers? The starting point should be the market or the technology?</p>

Presidency text (doc. 13656/25)	Drafting suggestions and Comments
	EE (Comments): EE supports MT proposal on pre-accelerator grant
2. The EIC shall may in particular provide the following types of support for high risk actions :	EE (Drafting suggestions): 2. The EIC shall may in particular provide the following types of support for deep tech and disruptive high risk innovation actions :
(a) Pathfinder grants for high-risk research, including early-stage research , proof of concept and prototyping;	SI (Drafting suggestions): (a) Pathfinder grants for high-risk research, including particularly early-stage research, proof of concept and prototyping;
(b) Transition grants to develop pathways to commercial development for research results, including the creation of spin-offs and start-ups;	
(c) Accelerator blended finance and investment-only support for single companies to develop, and bring to market their innovations;	ES (Drafting suggestions): (c) Accelerator blended finance and investment-only support for single companies to develop, and bring to market their innovations; ES (Comments): Investment only is not a solution for deep tech high-risk developments. If only capital is needed, those projects should be financed through the relevant ECF window.

Presidency text (doc. 13656/25)	Drafting suggestions and Comments
	<p>NL (Drafting suggestions): (c) Accelerator blended finance and investment-only support for single companies to develop, and bring to market their innovations, <u>in adequate connection with the Scaleup Europe Fund and the scaleup facility under the ECF</u>;</p> <p>NL (Comments): Here, it would be good to underline the connection with the ECF.</p> <p>SK (Comments): SK prefers to keep grant-only support among options.</p>
	<p>EE (Drafting suggestions): <u>(ca) Accelerator grants for single companies to develop and bring to market their innovations, where investment support is not immediately suitable due to market or maturity factors;</u></p> <p>EE (Comments): We propose to restore the grant-only option in the Accelerator, ensuring that start-ups not yet mature enough for immediate blended finance can access necessary development funding</p> <p>PT (Drafting suggestions): <u>(ca) Accelerator grant-only projects for single companies to develop, and bring to the market their innovations;</u></p>

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	PT (Comments): It is fundamental that deep tech companies that are still not ready for investment have the support of grant-only projects at EU level. The EU brings the level playing that will certainly boost their competitiveness and thus their investment journey.
(d) Incentives to procurers to test and provide first customers for deep tech and disruptive innovations;	SI (Drafting suggestions): Incentives to procurers to test and provide first customers for deep tech and disruptive innovations;
(da) <u>Flexible and agile measures to respond to new developments;</u>	DE (Drafting suggestions): (da) — Flexible and agile measures to respond to new developments; DE (Comments): DE: Not clear what this refers to. Please delete ES (Drafting suggestions): (da) <u>Flexible and agile Other measures to respond to new developments to be defined in coordination with the Programme Committee;</u> ES (Comments): It is not clear what is meant by this new point.

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	<p>FI (Comments): What does this refer to? Does it refer for example to new instruments, such as Advanced Innovation Challenge?</p> <p>FR (Comments): <u>We are still waiting for information on what this concept covers.</u></p> <p>IE (Drafting suggestions): <u>(da) — Flexible and agile measures to respond to new developments;</u></p> <p>IE (Comments): This is a very broad and ambiguous goal – it should be clarified or deleted.</p> <p>NL (Drafting suggestions): <u>(da) — Flexible and agile measures to respond to new developments;</u></p> <p>NL (Comments): NL understands the spirit behind this addition, however it is very unclear and broad.</p> <p>PT (Comments): Will this be the ARPA and DARP like envisaged approaches?</p> <p>HR (Comments):</p>

Presidency text (doc. 13656/25)	Drafting suggestions and Comments
	Unclear, too wide of a wording.
<p>(e) Business Accelerator Services to complement EIC funding by providing access, in complementarity and coordination with the Project Advisory referred to in Chapter III of the of the Regulation (EU) XXX [European Competitiveness Fund], to deep-tech expertise, <u>access and use of Research and Technology Infrastructures</u>, coaching and mentoring, <u>networking and</u> match making with investors, procurers, corporates and other innovation partners.</p>	<p>BE (Drafting suggestions): (e) Business Accelerator Services to complement EIC funding by providing access, in complementarity and coordination with the Project Advisory referred to in Chapter III of the of the Regulation (EU) XXX [European Competitiveness Fund], to deep-tech expertise, <u>access and use of Research and Technology Infrastructures</u>, coaching and mentoring, <u>networking and</u> match making with investors, procurers, corporates and other innovation partners <u>active at regional and national levels</u>.</p> <p>BE (Comments): “Access” is already mentioned in the beginning of the sentence.</p> <p>BG (Drafting suggestions): (e) Business Accelerator Services to complement EIC funding by providing access, in complementarity and coordination with the Project Advisory referred to in Chapter III of the of the Regulation (EU) XXX [European Competitiveness Fund], to <u>relevant and</u> deep-tech expertise, access and use of Research and Technology Infrastructures, coaching and mentoring, networking and match making with investors, procurers, corporates and other innovation partners.</p> <p>DE (Drafting suggestions): Business Accelerator Services (BAS) in particularly focusing on access and use of Research and Technology Infrastructures to complement EIC</p>

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	<p>funding by providing access, in complementarity and coordination with the Project Advisory referred to in Chapter III of the of the Regulation (EU) XXX [European Competitiveness Fund], to deep-tech expertise, <u>access and use of Research and Technology Infrastructures</u>, coaching and mentoring, <u>networking and</u> match-making with investors, procurers, corporates and other innovation partners. Business Accelerator Services to complement related activities of the European Competitiveness Fund.</p> <p>DE (Comments): DE: We see a clear duplication between the Business Acceleration Services (BAS) and the project advisory support activities of the ECF (Articles 26 ff of the ECF Regulation). Such duplication needs to be avoided. In our opinion, all services except for access and use of Research and Technology Infrastructures should be provided exclusively through the project advisory of the ECF.</p> <p>ES (Comments): We support the new wording to include a reference to TIs.</p> <p>FR (Drafting suggestions): (e) Business Accelerator Services to complement EIC funding by providing access, in complementarity and coordination with the Project Advisory referred to in Chapter III of the of the Regulation (EU) XXX [European Competitiveness Fund], to deep-tech expertise, <u>access and use of</u></p>

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	<p>Research and Technology Infrastructures, coaching and mentoring, networking and match making with investors, procurers, corporates and other innovation partners.</p> <p>FR (Comments): <u>We are cautious about the distinction between “specific and technical” BAS and a more generic Project Advisory. We ask the Commission to provide a ‘fiche’ on the topic.</u></p> <p>NL (Drafting suggestions): (e) Business Accelerator Services to complement EIC funding by providing access, in complementarity and coordination with the Project Advisory referred to in Chapter III of the of the Regulation (EU) XXX [European Competitiveness Fund], to deep-tech expertise, access and use of taking into account relevant Research and Technology Infrastructures, coaching and mentoring, networking and match making with investors, procurers, corporates and other innovation partners.</p> <p>NL (Comments): NL supports better embedding RTIs more integrally throughout of the FP and ECF (with a view to collaborative R&I). However, this doesn’t seem the most logical reference. How will this service provide access and use of RTIs?</p> <p>SK (Comments): In the context of the implementation and territorial scope of the Business Acceleration Services (BAS) and Project Advisory mechanisms under the EIC, SK advocates for the structured establishment of interconnected EIC Hubs across the Union.</p>

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	<p>This approach is intended to ensure balanced geographical representation and equitable access to EIC support structures for innovators and beneficiaries located in all Member States.</p> <p>Accordingly, SK proposes the inclusion of a binding provision that would oblige the EIC to ensure that a minimum, predefined percentage of BAS-related activities, including missions undertaken by programme managers and other advisory functions, are physically conducted across the territories of all Member States.</p> <p>Such a requirement would support the Union’s cohesion objectives as enshrined in Article 174 TFEU, by addressing disparities in innovation capacity and fostering inclusive growth across regions. Furthermore, it aligns with the principles of equal treatment and non-discrimination under Article 18 TFEU, ensuring that the benefits of EIC instruments are not disproportionately concentrated in a limited number of Member States.</p> <p>The operationalisation of this obligation could be facilitated through the designation of EIC Hubs as focal points for regional engagement, thereby enhancing local innovation ecosystems and strengthening the EIC's outreach and impact across the Union.</p> <p>MT (Comments):</p> <p>Malta supports inclusion of ‘access and use of Research and Technology Infrastructures’ in the scope of Business Accelerator Services’ actions.</p>
	<p>EE (Drafting suggestions):</p> <p><u>2(1) The specific types and modalities of support, including grants, investment mechanisms, and accompanying measures, shall be defined</u></p>

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	<p><u>in the EIC Work Programme to ensure maximum flexibility in responding to evolving market and technological needs.</u></p> <p>EE (Comments):</p> <p>We propose to increase the agility of the EIC and allow the Work Programme to define instruments based on market needs, reducing potential legislative rigidity.</p>
<p>3. The types of support referred to in paragraph 2 shall be combined flexibly in EIC Challenges developed and overseen by EIC Programme Managers. EIC Challenges shall be implemented using a portfolio approach where actions are selected based on their complementarities to achieve defined objectives and interact with each other under the supervision of EIC Programme Manager.</p>	<p>ES (Drafting suggestions):</p> <p>3. The types of support referred to in paragraph 2 shall be combined flexibly in EIC Challenges developed and overseen by groups of experts coordinated by EIC Programme Managers. EIC Challenges shall be implemented using a portfolio approach where actions are selected based on their complementarities to achieve defined objectives and interact with each other under the supervision of groups of experts coordinated by EIC Programme Manager.</p> <p>ES (Comments):</p> <p>Criteria for selection of actions should be transparent and clear for participants. There is an inherent risk in letting decisions in the hands of a single person. Programme Managers should coordinate a small board of experts, including experts from the relevant Programme Committee, to assist in the decision-making process.</p> <p>FI (Drafting suggestions):</p> <p>The types of support referred to in paragraph 2 shall be combined flexibly in EIC Challenges developed and overseen by EIC Programme Managers. EIC</p>

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	<p>Challenges shall be implemented using a portfolio approach where actions are selected based on their <u>excellence complementarities</u> to achieve defined objectives and interact with each other under the supervision of EIC Programme Manager.</p> <p>SI (Drafting suggestions):</p> <p>The types of support referred to in paragraph 2 shall be combined flexibly in EIC Challenges developed and overseen by EIC Programme Managers. EIC Challenges shall be implemented using <u>an ex ante</u> portfolio approach where <u>the call for proposal is designed to produce complemtnarity actions,</u> are selected based on their <u>evaluation score complementarities</u> to achieve defined objectives and interact with each other under the supervision of EIC Programme Manager. <u>The evaluation committee may propose adjustments to the proposals insofar as those adjustments are needed for the consistency of the portfolio approach. Those adjustments shall be in conformity with the conditions for participation and comply with the principle of equal treatment. The Programme Committee sal be informed of such cases.</u></p>
<p>4. All EIC investment support shall be implemented by one or more dedicated investment vehicles set up in line with the law of a Member State (the EIC Fund). The EIC Fund shall be structured in a way that it can attract other public or private investors in order to increase the leverage effect of the Union contribution.</p>	<p>BE (Comments):</p> <p>Concerning EIC all investments: Clarity is needed on what the implications of this would be. What is the ‘close coordination’? The PC of EIC is part of the FP, not the ECF (cf. art 18 reg FP vs art 83 reg ECF).</p> <p>DE (Drafting suggestions):</p> <p>All <u>blended</u> EIC investment and in <u>justified cases equity-only investments</u> support shall be implemented by one or more dedicated investment vehicles set up in line with the law of a Member State (the EIC Fund). The EIC Fund</p>

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	<p>shall be structured in a way that it can attract other public or private investors in order to increase the leverage effect of the Union contribution.</p> <p>FR (Comments): <u>Coordination between EIC Fund and InvestEU is essential, therefore we ask the Commission for a fiche on the link between InvestEU and EIC.</u></p> <p>PT (Comments): Clarification is needed concerning “(...) with the law of a Member State (the EIC Fund)”</p>
<p>5. The EIC may support innovation in critical technologies with focus on defence applications in close coordination with the ECF policy window ‘Resilience and Security, Defence Industry and Space’. In those cases, Articles 50 and 51 and 52 of the Regulation (EU) XXX [European Competitiveness Fund] shall apply. <u>Such support shall be subject to specific calls for proposals.</u></p>	<p>BE (Comments): STUDY RESERVATION</p> <p>DE (Drafting suggestions): The EIC may support innovation in critical technologies with focus on defence applications in close coordination with the ECF policy window ‘Resilience and Security, Defence Industry and Space’. In those cases, Articles 50 and 51 and 52 of the Regulation (EU) XXX [European Competitiveness Fund] shall apply. <u>Such support shall be subject to specific calls for proposals under the European Defense Fund (EDF).</u></p> <p>DE (Comments): DE: In general: scrutiny reserve on the topic of Defence.</p> <p>ES (Comments):</p>

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	<p>We support the change.</p> <p>FR</p> <p>(Drafting suggestions):</p> <p>5. The EIC may support innovation in critical technologies with focus on defence applications in close coordination with the ECF policy window ‘Resilience and Security, Defence Industry and Space’. In those cases, Articles 50 and 51 and 52 of the Regulation (EU) XXX [European Competitiveness Fund] shall apply. <u>Such support shall be subject to specific calls for proposals.</u></p> <p>FR</p> <p>(Comments):</p> <p><u>Scrutiny reservation: we do not oppose funding project with defence application but 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. We would welcome the advice of the Council legal service on that topic.</u></p> <p><u>In addition, an analysis from the Commission on the respective scope of EUDIS and this EIC Defence component as well as the articulation between the 2 instruments would be welcome.</u></p> <p><u>“A focus on defence application” does not mean anything.</u></p> <p>IE</p> <p>(Drafting suggestions):</p> <p>The EIC may support innovation in critical technologies with a focus on defence applications in close coordination with <u>if this support is funded solely from the budget of the ECF policy window</u> ‘Resilience and Security, Defence Industry and Space’. In those cases, Articles 50 and 51 and 52 of the Regulation (EU) XXX [European Competitiveness Fund] shall</p>

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	<p>apply. <u>Such support shall be subject to specific calls for proposals under the ECF.</u></p> <p>IE (Comments):</p> <p>We agree with other MS that the text needs to clearly and unequivocally state that defence applications will be funded from the ECF not from the FP. The EIC Accelerator structures should be used solely as a tool to enable the funding of defence applications under the ECF.</p> <p>NL (Drafting suggestions):</p> <p>5. <u>Notwithstanding its main focus on non-defence related activities,</u> the EIC may support innovation in critical technologies with focus on defence applications in close coordination with the ECF policy window ‘Resilience and Security, Defence Industry and Space’. In those cases, Articles <u>50 and 51 and 52</u> of the Regulation (EU) XXX [European Competitiveness Fund] shall apply. <u>Such support shall be subject to specific calls for proposals, specifying clear participation conditions, evaluation and eligibility criteria, responsibility agreements, implementation modalities, and monitoring mechanisms. Furthermore, accessibility for civilian actors, proportional security requirements, embedding ethical frameworks, and open science principles shall be safeguarded.</u></p> <p>NL (Comments):</p> <p>NL welcomes the proposed distinction between defence-related calls and other calls, but notes the absence of a description indicating that the main budgetary focus of the EIC lies with non-defence-related activities. In</p>

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	<p>addition, concerns regarding the implementation of defence projects are missing, for example in relation to security requirements and accessibility.</p> <p>SI (Drafting suggestions): The EIC may support innovation in critical technologies with focus on defence applications in close coordination with the ECF policy window ‘Resilience and Security, Defence Industry and Space’. In those cases, Articles 50 and 51 and 52 of the Regulation (EU) XXX [European Competitiveness Fund] shall apply. Such support shall be subject to specific calls for proposals.</p> <p>SI (Comments): Defence-only project should me mainstreamed in the ECF</p> <p>SK (Drafting suggestions): 5. — The EIC may support innovation in critical technologies with focus on defence applications in close coordination with the ECF policy window ‘Resilience and Security, Defence Industry and Space’. In those cases, Articles 50 and 51 and 52 of the Regulation (EU) XXX [European Competitiveness Fund] shall apply. Such support shall be subject to specific calls for proposals.</p> <p>SK (Comments): SK has scrutiny reservation. Defence-related projects should me mainstreamed in the ECF.</p> <p>MT (Comments):</p>

Presidency text (doc. 13656/25)	Drafting suggestions and Comments
	Malta reiterates that more clarity is needed on how “defence applications” are defined and how the calls will work in practice.
<u>Recitals</u>	
<p>(15) The European Innovation Council (EIC) should stimulate deep tech market-creating innovation. It should identify, develop and deploy these deep tech innovations through its instruments. Through coherent and streamlined support, the EIC should fill the vacuum in public support and private investment for critical and breakthrough technologies and deep tech innovation. The EIC should aim to bridge, integrate and accelerate through its instruments the innovator’s journey from research to market and enable the Union to have leading companies in emerging areas of technology to meet its social and economic objectives and avoid dependencies on other regions of the world. The EIC should support high risk, high-potential innovations and companies presenting such technological, scientific, financial, management or market risks that they are not yet considered to be fully bankable and therefore cannot raise the necessary level of investments to be globally competitive from the market. This should incorporate both an ‘open’ (bottom-up) and a ‘challenge’ driven approach, in close coordination and synergy with the European Competitiveness Fund and its policy windows. It should include a ‘DARPA’-like approach dedicated to supporting defence and dual use startups and their scaling up operating in full complementarity with the ECF InvestEU Instrument and the EU Defence Innovation Scheme (EUDIS) and CASSINI (Space entrepreneurship initiative) activities. The implementation should be done in close synergy and coordination with the European Competitiveness Fund.</p>	<p>AT (Drafting suggestions): 15) The European Innovation Council (EIC) should stimulate deep tech market-creating innovation. It should identify, develop and deploy these deep tech innovations through its instruments. Through coherent and streamlined support, the EIC should fill the vacuum in public support and private investment for critical and breakthrough technologies and deep tech innovation. The EIC should aim to bridge, integrate and accelerate through its instruments the innovator’s journey from research to market and enable the Union to have leading companies in emerging areas of technology to meet its social and economic objectives and avoid dependencies on other regions of the world. The EIC should support high risk, high-potential innovations and companies presenting such technological, scientific, financial, management or market risks that they are not yet considered to be bankable and therefore cannot raise the necessary level of investments to be globally competitive from the market. This should incorporate both an ‘open’ (bottom-up) and a ‘challenge’ driven approach, in coordination with the European Competitiveness Fund and its policy windows. <u>It should include ARPA-like elements, where high-risk projects are supported in stages, or discontinued, with a built-in linkage to corporate or public innovative procurement.</u> It should include a ‘DARPA’-like approach dedicated to supporting defence and dual use startups and their scaling up operating in full complementarity with the ECF InvestEU Instrument and the EU Defence Innovation Scheme (EUDIS) and CASSINI (Space entrepreneurship initiative) activities. Beyond dual-use purposes, a separate ECF-funded</p>

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	<p><u>element for ‘Defence only’ scaling projects could be established; while taking advantage of instrumentally using the EIC-instrument, the financial means for these ‘Defence-only’ projects must come from ECF, as any other ‘Defence-only’ research expenditure.</u> The implementation should be done in synergy with the European Competitiveness Fund.</p> <p>AT (Comments):</p> <p>AT: In the ‘explanatory memorandum’ (p.11), several elements of expansion of EIC are mentioned, the first of which refers to ‘ARPA-like’ elements, while the second refers to a ‘DARPA-approach’. While the latter is referred to in the ‘recital-15-draft’, the first (ARPA-like elements) is missing. AT urges to additionally include such reference. The ARPA-approach is sectorally open, and therefore even more important that the sectorally-focussed ‘DARPA-approach’.</p> <p>With respect to the ‘DARPA-approach’, AT rejects the financing of ‘Defence only’ projects financed through Horizon Europe.</p> <p>AT can support the opening towards ‘dual use’ projects (including EIC ‘DARPA’ approach), but AT is against using Horizon Europe’s budget for ‘Defence only’ projects, including in the EIC. I.e. AT does not agree with the proposed exemption from the rule for EIC with respect to ‘Defence only (AT suggests to follow the general rule NOT to finance ‘Defence only projects’ under Horizon Europe, including EIC).</p> <p>AT suggests to finance such projects through ECF-Defence-budget (like any other ‘Defence research projects being financed through the defence chapter of ECF). Instrumentally, it makes sense to use EIC Accelerator as an instrument, but with a different funding source than the Horizon Europe budget.</p> <p>BE</p>

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	<p>(Drafting suggestions):</p> <p>(15) The European Innovation Council (EIC) should stimulate deep tech market-creating innovation. It should identify, develop and deploy these disruptive, breakthrough and deep tech innovations through its instruments. Through coherent and streamlined support, the EIC should fill the vacuum in public support and private investment for critical and breakthrough technologies and deep tech innovation. The EIC should aim to bridge, integrate and accelerate through its instruments the innovator’s journey from research to market and enable the Union to have leading companies in emerging areas of technology to meet its social and economic objectives and avoid dependencies on other regions of the world. The EIC should support high risk, high-potential innovations and companies presenting such technological, scientific, financial, management or market risks that they are not yet considered to be fully bankable and therefore cannot raise the necessary level of investments to be globally competitive from the market. This should incorporate both an ‘open’ (bottom-up) and a ‘challenge’ driven approach, the latter in close coordination and synergy with the European Competitiveness Fund and its policy windows. It should include a ‘DARPA’-like approach dedicated to supporting defence and dual use startups and their scaling up operating in full complementarity with the ECF InvestEU Instrument and the EU Defence Innovation Scheme (EUDIS) and CASSINI (Space entrepreneurship initiative) activities. The implementation should be done in close synergy and coordination with the European Competitiveness Fund.</p> <p>BE</p> <p>(Comments):</p> <p>Welcome nuancing of the role of the ECF (although it remains unclear what this coordination means). The bottom-up part should not be linked with the ECF. Therefore it is necessary to include the word “the latter”.</p> <p>STUDY RESERVATION on the ‘DARPA’-like approach.</p>

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	<p>BG (Drafting suggestions):</p> <p>(15) The European Innovation Council (EIC) should stimulate deep tech market-creating innovation. It should identify, develop and deploy these deep tech innovations through its instruments. Through coherent and streamlined support, the EIC should fill the vacuum in public support and private investment for critical and breakthrough technologies and deep tech innovation. The EIC should aim to bridge, integrate and accelerate through its instruments the innovator’s journey from research to market and enable the Union to have leading companies in emerging areas of technology to meet its social and economic objectives and avoid dependencies on other regions of the world. The EIC should support high risk, high-potential innovations and companies presenting such technological, scientific, financial, management or market risks that they are not yet considered to be bankable and therefore cannot raise the necessary level of investments to be globally competitive from the market. This should incorporate both an ‘open’ (bottom-up) and a ‘challenge’ driven approach, in coordination with the European Competitiveness Fund and its policy windows. <u>The EIC should also contribute towards closing the innovation gap.</u> It should include a ‘DARPA’-like approach dedicated to supporting defence and dual use startups and their scaling up operating in full complementarity with the ECF InvestEU Instrument and the EU Defence Innovation Scheme (EUDIS) and CASSINI (Space entrepreneurship initiative) activities. The implementation should be done in synergy with the European Competitiveness Fund.</p> <p>DE (Drafting suggestions):</p> <ul style="list-style-type: none"> - This should incorporate both an ‘open’ (bottom-up) and a ‘challenge’ driven approach, in close close coordination and synergy and synergy

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	<p>with the European Competitiveness Fund and its policy windows. It should include a ‘DARPA’-like approach dedicated to supporting defence and dual use startups and their scaling up operating in full complementarity with the ECF InvestEU Instrument and the EU Defence Innovation Scheme (EUDIS) and CASSINI (Space entrepreneurship initiative) activities. The implementation should be done in close close synergy and coordination and coordination with the European Competitiveness Fund.</p> <p>DE (Comments): DE: We oppose the deletion as regards the close synergy and coordination with the European Competitiveness Fund. The exact complementarity and synergies between ECF and EIC need to be discussed primarily in the AWHP MFF / the MFF Subgroup 2.</p> <p>We believe that all scaling up investment need to be done under the ECF.</p> <p>Scrutiny reserve for defence.</p> <p>ES (Drafting suggestions): (15) The European Innovation Council (EIC) should stimulate deep tech market-creating innovation. It should identify, develop and deploy these deep tech innovations through its instruments. Through coherent and streamlined support, the EIC should fill the vacuum in public support and private investment for critical and breakthrough technologies and deep tech</p>

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	<p>innovation. The EIC should aim to bridge, integrate and accelerate through its instruments the innovator’s journey from research to market and enable the Union to have leading companies in emerging areas of technology to meet its social and economic objectives and avoid dependencies on other regions of the world. The EIC should support high risk, high-potential innovations and companies presenting such technological, scientific, financial, management or market risks that they are not yet considered to be fully bankable and therefore cannot raise the necessary level of investments to be globally competitive from the market. This should incorporate both an ‘open’ (bottom-up) and a ‘challenge’ driven approach, in close coordination and synergy with the European Competitiveness Fund and its policy windows. It should include a ‘DARPA’-like approach dedicated to supporting defence and dual use startups and their initial market deployment sealing-up operating in full complementarity with the ECF InvestEU Instrument and the EU Defence Innovation Scheme (EUDIS) and CASSINI (Space entrepreneurship initiative) activities. The implementation should be done in close synergy and coordination with the European Competitiveness Fund.</p> <p>ES (Comments): It is necessary to change scaling up, in coherence with article 16.1. We support the other changes in the recital.</p> <p>FR (Drafting suggestions): (15) The European Innovation Council (EIC) should stimulate deep tech market-creating innovation, <u>answering competitiveness and sovereignty needs</u>. It should identify, develop and deploy these deep tech innovations through its instruments. Through coherent and streamlined support, the EIC should fill the vacuum in public support and private investment for critical and breakthrough technologies and deep tech innovation. The EIC should</p>

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	<p>aim to bridge, integrate and accelerate through its instruments the innovator’s journey from research to market and enable the Union to have leading companies <u>and economic actors</u> in emerging <u>strategic areas of technologies</u> to meet its social and economic objectives and avoid dependencies on other regions <u>of the world</u>. The EIC should support high risk, high-potential innovations and companies presenting such technological, scientific, financial, management or market risks that they are not yet considered to be fully bankable and therefore cannot raise the necessary level of investments to be globally competitive from the market. This should incorporate both an ‘open’ (bottom-up) and a ‘challenge’ driven approach, in close coordination and synergy with the European Competitiveness Fund and its policy windows. It should include a <u>‘DARPA’-like challenge-based</u> approach dedicated to supporting defence and dual use startups, <u>based on ARPA-like practices</u>, and their scaling up operating in full complementarity with the ECF InvestEU Instrument and the EU Defence Innovation Scheme (EUDIS) and CASSINI (Space entrepreneurship initiative) activities. The implementation should be done in close synergy and coordination with the European Competitiveness Fund.</p> <p>FR <u>(Comments):</u> <u>See comments above on both the scrutiny reservation on the defence component and on the lack of information regarding the alignment with the ECF.</u> <u>Although we recognize the added-value of learning from best international practices, it is certainly not adequate to mention a US military agency in an EU regulation. We suggest a less confusing wording and are open to discussing a new generic wording that would not refer to an US agency.</u></p> <p>SI <u>(Drafting suggestions):</u></p>

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	<p>(15) The European Innovation Council (EIC) should stimulate deep tech market-creating innovation. It should identify, develop and deploy these deep tech innovations through its instruments. Through coherent and streamlined support, the EIC should fill the vacuum in public support and private investment for critical and breakthrough technologies and deep tech innovation. The EIC should aim to bridge, integrate and accelerate through its instruments the innovator’s journey from research to market and enable the Union to have leading companies in emerging areas of technology to meet its social and economic objectives and avoid dependencies on other regions of the world. The EIC should support high risk, high-potential innovations and companies presenting such technological, scientific, financial, management or market risks that they are not yet considered to be bankable and therefore cannot raise the necessary level of investments to be globally competitive from the market. This should incorporate both an ‘open’ (bottom-up) and a ‘challenge’ driven approach, in coordination with the European Competitiveness Fund and its policy windows. It should include a ‘DARPA’-like approach dedicated to supporting defence and dual use startups and their scaling up operating in full complementarity with the ECF InvestEU Instrument and the EU Defence Innovation Scheme (EUDIS) and CASSINI (Space entrepreneurship initiative) activities. The implementation should be done in synergy with the European Competitiveness Fund.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>(15) The European Innovation Council (EIC) should stimulate deep tech market-creating innovation. It should identify, develop and deploy these deep tech innovations through its instruments. Through coherent and streamlined support, the EIC should fill the vacuum in public support and private investment for critical and breakthrough technologies and deep tech innovation. The EIC should aim to bridge, integrate and accelerate through its instruments the innovator’s journey from research to market and enable the Union to have leading companies in emerging areas of technology to</p>

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	<p>meet its social and economic objectives and avoid dependencies on other regions <u>of the world</u>. The EIC should support high risk, high-potential innovations and companies presenting such technological, scientific, financial, management or market risks that they are not yet considered to be fully bankable and therefore cannot raise the necessary level of investments to be globally competitive from the market. This should incorporate both an ‘open’ (bottom-up) and a ‘challenge’ driven approach, in close coordination and synergy with the European Competitiveness Fund and its policy windows. It should include a ‘DARPA’-like approach dedicated to supporting defence and dual use startups and their scaling up operating in full complementarity with the ECF InvestEU Instrument and the EU Defence Innovation Scheme (EUDIS) and CASSINI (Space entrepreneurship initiative) activities. The implementation should be done in close synergy and coordination with the European Competitiveness Fund. <u>The EIC shall develop, maintain, and enforce comprehensive ethical guidelines and security standards applicable to all defence-related or dual-use projects receiving support. These standards shall cover, inter alia, data privacy, cybersecurity, the handling of dual-use technologies, environmental sustainability, and the societal impact of innovation.</u></p> <p>SK (Comments): SK recognizes the critical importance of dual-use research—defined as research intended for legitimate civilian use but which may also have potential military or security applications—as a foundational element in strengthening the European Union's long-term strategic resilience and technological sovereignty. In line with the principles enshrined in the European Charter of Fundamental Rights and the Union's commitment to promoting responsible research and innovation, Slovakia supports the continued development and application of dual-use research within a secure, ethical, and legally sound framework.</p>

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	<p>Given the increasing complexity and global interconnectedness of scientific and technological developments, the Slovak Republic urges the establishment and harmonization of robust ethical and security standards governing dual-use research, with particular emphasis on:</p> <ul style="list-style-type: none"> • Safeguarding the integrity of public research institutions; • Preventing undue foreign interference in the European research ecosystem; and • Mitigating risks of intellectual property theft and leakage of sensitive technologies. <p>This approach aligns with the Union’s broader objectives under the Horizon Europe programme and the EU Strategic Compass, ensuring that Europe remains a global leader in secure and ethical research and innovation.</p> <p>SK has scrutiny reservation. Funding for defence-related research should come primarily from the ECF.</p> <p>MT (Comments):</p> <p>Malta reiterates its request for more detail on the practical operationalisation of the mentioned ‘DARPA-like approach’.</p> <p>PT (Drafting suggestions):</p> <p>(15) The European Innovation Council (EIC) should stimulate deep tech market-creating innovation. It should identify, develop and deploy these deep tech innovations through its instruments. Through coherent and streamlined support, the EIC should fill the vacuum in public support and private investment for critical and breakthrough technologies and deep tech innovation. The EIC should aim to bridge, integrate and accelerate through its instruments the innovator’s journey from research to market and enable the Union to have leading companies in emerging areas of technology to</p>

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	<p>meet its social and economic objectives and avoid dependencies on other regions of the world. The EIC should support high risk, high-potential innovations and companies presenting such technological, scientific, financial, management or market risks that they are not yet considered to be fully bankable and therefore cannot raise the necessary level of investments to be globally competitive from the market. This should incorporate both an ‘open’ (bottom-up) and a ‘challenge’ driven approach, in close coordination and synergy with the European Competitiveness Fund and its policy windows. The majority of the budget should be dedicated to open bottom-up calls. It should include a ‘DARPA’-like approach dedicated to supporting defence and dual use startups and their scaling up operating in full complementarity with the ECF InvestEU Instrument and the EU Defence Innovation Scheme (EUDIS) and CASSINI (Space entrepreneurship initiative) activities. The implementation should be done in close synergy and coordination with the European Competitiveness Fund.</p> <p>PT (Comments): It is fundamental to guarantee that the majority of the budget is dedicated to open bottom-up calls. Additionally, the “challenge” calls should be thoroughly discussed within the Programme Committee.</p>
<p>(16) Deep-tech scale-up financing under the Scaleup Europe Fund announced in the Startup Scaleup Strategy, existing at the time of the entry into force of the present Regulation, should be carried out under the terms agreed in the MFF 2021-2027. All scaleup financing under this Fund under the MFF 2028-2034 should take place under the ECF.</p>	<p>DE (Comments): DE: We believe that all scaling up investment need to be done under the ECF.</p> <p>ES (Drafting suggestions):</p>

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	<p>(16) Deep-tech scale-up financing under the Scaleup Europe Fund announced in the Startup Scaleup Strategy, existing at the time of the entry into force of the present Regulation, should be carried out under the terms agreed in the MFF 2021-2027. All scaleup financing under this Fund under the MFF 2028-2034 should be funded by take place under the ECF.</p> <p>ES (Comments): We support the change and we add some clarity.</p> <p>FR (Drafting suggestions):</p> <p>(16) Deep-tech scale-up financing under the Scaleup Europe Fund announced in the Startup Scaleup Strategy, existing at the time of the entry into force of the present Regulation, should be carried out under the terms agreed in the MFF 2021-2027. All scaleup financing under this Scaleup Europe Fund under the MFF 2028-2034 should take place under the ECF.</p> <p>FR (Comments): <u>clarification</u></p> <p>NL (Comments): NL is not in favour of including activities under the Scaleup Europe Fund within the Scale-up Facility of the ECF. This would not be logical, as the Scaleup Europe Fund will already be operational when the Scale-up Facility starts. Of course, both instruments should be well aligned with each other.</p> <p>SI (Drafting suggestions):</p> <p>(16) Deep-tech scale-up financing under the Scaleup Europe Fund announced in the Startup Scaleup Strategy, existing at the time of the entry</p>

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	<p>into force of the present Regulation, should be carried out under the terms agreed in the MFF 2021-2027. All scaleup financing under this Fund under the MFF 2028-2034 should take place under the ECF.</p> <p>SI (Comments): No relevance to HEU</p>

<p style="text-align: center;"><i>Article 17</i> <i>Innovation Ecosystems</i></p>	<p>BE (Drafting suggestions): <i>Innovation Ecosystems and the European Institute of Innovation and Technology</i></p> <p>HU (Drafting suggestions):</p> <p style="text-align: center;"><i>Article 17</i> <i>Innovation Ecosystems and the European Institute of Innovation and Technology</i></p> <p>HU (Comments): We propose inserting a reference to the European Institute of Innovation and Technology (EIT) under Article 17, with the revised title: Article 17 – Innovation Ecosystems and the European Institute of Innovation and Technology. We strongly advise against postponing discussions on the EIT's future until the revision of its Regulation. Deferring this debate would come too late and would fail to align with the critical MFF timeline. Furthermore, the goal of text simplification must not be allowed to compromise the document's inherent quality and clarity.</p> <p>SK (Drafting suggestions):</p> <p style="text-align: center;"><i>Article 17</i> <i>Innovation Ecosystems and the European Institute of Innovation and Technology</i></p> <p>SK (Comments):</p>
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Presidency text (doc. 13656/25)	Drafting suggestions and Comments
	<p>We propose to include an explicit reference to the European Institute of Innovation and Technology (EIT). The EIT will serve as the primary EU instrument for fostering the integration of the knowledge triangle – higher education, research and innovation, and business – across the Union.</p>
<p>1. The Programme shall support organisations activities around strategic priorities to create competitive, robust, and connected and inclusive, transnational innovation ecosystems and framework conditions. Synergies with Union, national and regional programmes shall be pursued to this end.</p>	<p>AT (Drafting suggestions):</p> <p>The Programme shall support activities around strategic priorities to create competitive, robust, connected and inclusive, transnational innovation ecosystems and framework conditions. Synergies with Union, national and regional programmes shall be pursued to this end.</p> <p>AT (Comments):</p> <p>AT: The term “inclusive” is very broad and does not seem accurate in this context.</p> <p>BE (Drafting suggestions):</p> <p>1. The Programme shall support organisations activities around strategic priorities to create competitive, robust, and connected and inclusive, transnational innovation ecosystems and framework conditions. Synergies with Union, national and regional authorities programmes shall be designed in collaboration with national and regional authorities and pursued to this end.</p> <p>DE (Drafting suggestions):</p> <p>The Programme shall support organisations activities around strategic priorities to create competitive, robust, and connected and inclusive, transnational innovation ecosystems and framework conditions, including for connecting EIC beneficiaries with Research and</p>

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	<p>Technology Infrastructures. Synergies with Union, national and regional programmes shall be pursued to this end.</p> <p>DE (Comments): DE: definition for inclusive is unclear</p> <p>ES (Drafting suggestions):</p> <p>1. The Programme shall support organisations activities around strategic priorities to create competitive, robust, and connected and inclusive, transnational innovation ecosystems and framework conditions. Synergies with Union, national and regional programmes shall be designed in collaboration with national and regional authorities and pursued to this end.</p> <p>ES (Comments): We acknowledge the efforts of the PCY, we consider there is still need to converge in the efforts to streamline the clarity of the innovation ecosystems. It is important that collaboration with national and regional authorities is sought.</p> <p>FI (Comments): Regarding the replacement of organisations by activities, what effect this might have in terms of budget?</p> <p>IE (Drafting suggestions):</p> <p>1. The Programme shall support organisations activities around strategic research and innovation priorities to create competitive, robust,</p>

Presidency text (doc. 13656/25)	Drafting suggestions and Comments
	<p>and connected and inclusive, transnational innovation ecosystems and framework conditions. Synergies with Union, national and regional programmes shall be pursued to this end.</p> <p>IE (Comments): It is important that the innovation ecosystem is not seen as separate to the R&I ecosystem.</p> <p>It is not clear what an ‘inclusive’ innovation ecosystem would mean. In the absence of clarity, it should be deleted.</p> <p>NL (Drafting suggestions): 1. The Programme shall support organisations activities around strategic research priorities and technology areas to create competitive, robust, and connected and inclusive, transnational innovation ecosystems and framework conditions. Synergies with Union, national and regional programmes shall be pursued to this end.</p> <p>NL (Comments): There is no clear definition for inclusive in this context: does it for instance refer to including all ecosystem partners across the whole knowledge value chain? Then we should explain that and be concrete, or otherwise leave it out.</p>

Presidency text (doc. 13656/25)	Drafting suggestions and Comments
<p>2. <i>The Programme shall support activities to foster the integration of the knowledge triangle – higher education, research and innovation, and business – across the Union.</i></p>	<p>AT (Drafting suggestions): 2. <i>The Programme shall support activities to foster the integration of the knowledge triangle – higher education, research and innovation, and business – across the Union, <u>including activities of the European Universities Alliances.</u></i></p> <p>AT (Comments): AT suggests adding a reference to the European University Alliances.</p> <p>General comment on the paragraph: If the knowledge triangle is emphasized through a separate paragraph, this raises a ‘budgetary question’. The proposed IE-envelope of 0,8 bn would not be sufficient to maintain the existing KICs and to foster additional activities.</p> <p>BE (Drafting suggestions): <i><u>The Programme shall support activities to foster the integration of the knowledge triangle – higher education, research and innovation, and business – across the Union. The European Institute of Innovation and Technology (EIT) serves as the primary instrument for fostering the integration of the knowledge triangle – higher education, research and innovation, and business – across the Union.</u></i></p> <p>DE (Drafting suggestions): The Programme shall support activities to foster the integration of the knowledge triangle – higher education, research and innovation, and business, <u>including innovative SMEs, to ensure the pathway from idea to market</u> – across the Union.</p>

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	<p>DE (Comments): DE: We support the comment of NL to stress and underline the role of innovative SMEs.</p> <p>ES (Comments): We are currently analysing our position towards EIT and the EU alliances. WE consider EU alliances a positive instrument. Regarding the EIT we consider we need to wait for the evaluation of the COM but consider it should be maintained with some improvements, avoiding any overlap with other instruments in and out of the FP and eliminating access to results of the EIT-KIC calls and more transparency as in the other partnerships.</p> <p>FR (Drafting suggestions): 2. <i>The Programme shall support activities to foster the integration of the knowledge triangle <u>square</u> – higher education, research and innovation, and <u>business and service to society</u> – across the Union. <u>European Universities Alliances play a key role in this regard, bringing together all stakeholders from their surrounding innovation ecosystems.</u></i></p> <p>FR (Comments): <u>On knowledge square, this is the agreed wording from the Council Conclusions (2021) on the European Universities initiative.</u> <u>We suggest referring to existing successful initiatives such as European Universities Alliances whose activities genuinely contribute to the integration of the knowledge square.</u></p> <p>HU</p>

Presidency text (doc. 13656/25)	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>2. The Programme shall support activities to foster the integration of the knowledge triangle – higher education, research and innovation, and business – across the Union.</p> <p>2. The European Institute of Innovation and Technology (EIT) serves as the primary instrument for fostering the integration of the knowledge triangle – higher education, research and innovation, and business – across the Union.</p> <p>The EIT may in particular provide the following types of support:</p> <p>(a) Developing and strengthening EIT Knowledge and Innovation Communities (KICs) to address strategic challenges by integrating higher education, research and innovation, and business;</p> <p>(b) Supporting the creation and scaling of innovative ventures by providing access to mentorship, incubation, and acceleration services within the EIT KICs;</p> <p>(c) Promoting entrepreneurial education and skills development to foster a new generation of innovators and leaders;</p> <p>(d) Expanding the EIT’s regional outreach and impact through enhanced collaboration with regional innovation ecosystems and Smart Specialization Strategies;</p> <p>(e) Developing and establishing more concrete synergies with other actions of the European Competitiveness Fund to bridge the innovation divide, in his role of integrating the innovation ecosystem.</p> <p>HU (Comments):</p>

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	<p>We suggest replacing the second paragraph with stating that the European Institute of Innovation and Technology (EIT) serves as the primary instrument for fostering the integration of the knowledge triangle. Following the model of the article on the European Innovation Council (EIC), we propose including a list of possible tasks for the EIT. We are flexible with the wording, as long as the EIT and the KICs remain explicitly mentioned in the Regulation, which is a redline for Hungary. The EIT’s ecosystem-based approach is indispensable in integrating the knowledge triangle. As Europe’s largest innovation ecosystem, the EIT fosters the integration of the knowledge triangle of higher education, research, and innovation across the Union and it plays a unique role in supporting the full innovation pipeline, from skills and early-stage ideas to market-ready solutions. Leaving out the EIT from the proposal risks uncertainty and diminishes the visibility of its proven capacity to deliver results, unlike other EU instruments which are explicitly mentioned. If the Commission aims to address the integration of the knowledge triangle through different or new instruments, it should clearly specify what these are and how they will effectively serve these objectives. HU is on the opinion that it is prudent to prioritize the utilization of existing assets, such as the EIT.</p> <p>NL (Drafting suggestions):</p> <p><i>2. The Programme shall support activities to foster the integration of the knowledge triangle – higher education, research and innovation, and business, <u>including innovative SMEs</u> – across the Union.</i></p> <p>NL (Comments):</p> <p>What kind of activities are foreseen under this programme objective? What would be the main instrument type?</p>

Presidency text (doc. 13656/25)	Drafting suggestions and Comments
	<p>SK (Drafting suggestions):</p> <p>2. — The Programme shall support activities to foster the integration of the knowledge triangle — higher education, research and innovation, and business — across the Union.</p> <p><u>2. The European Institute of Innovation and Technology (EIT) serves as the primary instrument for fostering the integration of the knowledge triangle – higher education, research and innovation, and business – across the Union.</u></p> <p><u>The EIT may in particular provide the following types of support:</u></p> <p><u>(a) Developing and strengthening EIT Knowledge and Innovation Communities (KICs) to address strategic challenges by integrating higher education, research and innovation, and business;</u></p> <p><u>(b) Supporting the creation and scaling of innovative ventures by providing access to mentorship, incubation, and acceleration services within the EIT KICs;</u></p> <p><u>(c) Promoting entrepreneurial education and skills development to foster a new generation of innovators and leaders;</u></p> <p><u>(d) Expanding the EIT’s regional outreach and impact through enhanced collaboration with regional innovation ecosystems and Smart Specialization Strategies;</u></p> <p><u>(e) Developing and establishing more concrete synergies with other actions of the European Competitiveness Fund to bridge the innovation divide, in his role of integrating the innovation ecosystem.</u></p> <p>SK (Comments):</p> <p>We propose to include an explicit reference to the European Institute of Innovation and Technology (EIT).</p>

Presidency text (doc. 13656/25)	Drafting suggestions and Comments
	<p>PT (Drafting suggestions):</p> <p>2. <i>The Programme shall support activities to foster the integration of the knowledge triangle – higher education, <u>entrepreneurship</u>, research and innovation, and business – across the Union.</i></p> <p>PT (Comments):</p> <p>Entrepreneurship is a crucial factor to boost innovation across the EU.</p>
<u>Recital</u>	
<p>(29) Support measures are needed to strengthen and better connect innovation ecosystems. Such measures should support organisations and innovators activities to create competitive, robust and connected innovation ecosystems and improve framework conditions through cooperation and knowledge exchange. They should help connect national, regional, and local ecosystems by removing barriers in the single market such as to help overcome market fragmentation, limited capital access and segmented national capital markets, slow innovation uptake and the underutilisation of innovation procurement.</p>	<p>BE (Drafting suggestions):</p> <p>(29) Support measures are needed to strengthen and better connect innovation ecosystems. Such coherent and streamlined measures should support organisations and innovators activities to create competitive, robust and connected innovation ecosystems and improve framework conditions through cooperation and knowledge exchange. They should help connect national, regional, and local ecosystems by removing barriers in the single market such as to help overcome market fragmentation, limited capital access and segmented national capital markets, slow innovation uptake and the underutilisation of innovation procurement. <u>They should foster the valorisation of research and innovation results across all Member States and regions. The European Institute of Innovation and Technology (EIT), primarily through its Knowledge and Innovation Communities (KICs) and by expanding its Regional Innovation Scheme, should aim to strengthen innovation ecosystems that tackle global challenges. This</u></p>

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	<p><u>should be achieved by fostering the integration of the knowledge triangle – higher education, research and innovation, and business.</u></p> <p>BE (Comments):</p> <p>Previous wording was more clear and action-related to take steps in realising the much needed single market.</p> <p>Adding coherent and streamlined + and foster the valorisation of research and innovation results across all Member States and regions</p> <p>ES (Drafting suggestions):</p> <p>(29) Support measures are needed to strengthen and better connect innovation ecosystems. Such coherent and streamlined measures should support organisations and innovators activities to create competitive, robust and connected innovation ecosystems and improve framework conditions through cooperation and knowledge exchange. They should help connect national, regional, and local ecosystems by removing barriers in the single market such as and foster the valorisation of research and innovation results across all Member States and regions to help overcome market fragmentation, limited capital access and segmented national capital markets, slow innovation uptake and the underutilisation of innovation procurement.</p> <p>ES (Comments):</p> <p>Many regions (either high or low performing innovators) have excellent universities or departments in specific sectors and create spin-offs or event start ups but they do not reach ecosystems which are already mature (includes the whole value chain). These new results from isolated centres (pockets of excellence) do not reach those ecosystems and our proposal is to</p>

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	<p>improve the networking in the EU in specific and strategic sectors attracting these pockets of excellence.</p> <p>Our view when paying attention to the Regional Innovation Scoreboard is that low and emerging innovative regions are in all but 7 MS (including Belgium), thus it is affecting us all. It does not compete with widening measures because this is just CSAs (at the very top). It would also aim at improving synergies between funds and streamlining the current set of different measures (RIV, EIE, etc)</p> <p>HU (Drafting suggestions):</p> <p>(29) Support measures are needed to strengthen and better connect innovation ecosystems. Such measures should support organisations and innovators activities to create competitive, robust and connected innovation ecosystems and improve framework conditions through cooperation and knowledge exchange. They should help connect national, regional, and local ecosystems by removing barriers in the single market such as to help overcome market fragmentation, limited capital access and segmented national capital markets, slow innovation uptake and the underutilisation of innovation procurement. The European Institute of Innovation and Technology (EIT), primarily through its Knowledge and Innovation Communities (KICs) and by expanding its Regional Innovation Scheme, should aim to strengthen innovation ecosystems that tackle global challenges. This should be achieved by fostering the integration of the knowledge triangle – higher education, research and innovation, and business. Support schemes provided by the EIT should benefit EIC beneficiaries, while start-ups emerging from the EIT's KICs should have simplified and thereby faster access to EIC actions.</p> <p>HU (Comments):</p>

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	<p>The European Institute of Innovation and Technology (EIT) and the Knowledge and Innovation Communities (KICs) play a significant role in fostering innovation ecosystems and in creating synergies with Widening and the Innovation Pillar, yet they are not reflected in the proposal. Hungary therefore insists on the inclusion of a wording on the EIT.</p> <p>SK (Drafting suggestions):</p> <p>(29) Support measures are needed to strengthen and better connect innovation ecosystems. Such measures should support organisations and innovators activities to create competitive, robust and connected innovation ecosystems and improve framework conditions through cooperation and knowledge exchange. They should help connect national, regional, and local ecosystems by removing barriers in the single market such as to help overcome market fragmentation, limited capital access and segmented national capital markets, slow innovation uptake and the underutilisation of innovation procurement. <u>The European Institute of Innovation and Technology (EIT), primarily through its Knowledge and Innovation Communities (KICs) and by expanding its Regional Innovation Scheme, should aim to strengthen innovation ecosystems that tackle global challenges. This should be achieved by fostering the integration of the knowledge triangle – higher education, research and innovation, and business. Support schemes provided by the EIT should benefit EIC beneficiaries, while start-ups emerging from the EIT's KICs should have simplified and thereby faster access to EIC actions.</u></p> <p>MT (Comments):</p> <p>Malta argues that there is a strong potential for procurement to support innovation ecosystems. However, to be more effective, FP10 should address the practical barriers faced by smaller Member States, such as limited</p>

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	administrative capacity and small procurement volumes, which hinder participation in EU-supported innovation procurement instruments.
Chapter III	
European Innovation Council	
<p><i>Article 34</i> European Innovation Council specific rules</p>	<p>HU (Comments): Comment: Hungary strongly aligns with those Member States advocating for a more open, inclusive, and accessible European Innovation Council. The FP10 proposal must explicitly mandate the continuation of the EIC Pre-Accelerator programme to ensure consistent, dedicated support for widening countries, thereby upholding the commitment to a truly inclusive European Research Area.</p>
<p>1. In accordance with Article 20(2)(a)(i) of Regulation (EU) XXX [European Competitiveness Fund], and as specified in the work programme, EIC Transition grants may be awarded without calls for proposals upon recommendation of the programme manager and the advice of the external experts for the purpose of follow up funding for results generated by actions funded by the Programme and Horizon Europe Regulation No 695/2021.</p>	<p>BE (Drafting suggestions): In accordance with Article 20(2)(a)(i) of Regulation (EU) XXX [European Competitiveness Fund], and as specified in the work programme, EIC Transition grants may be awarded without calls for proposals upon recommendation of the EIC programme manager and the advice of the independent and external experts for the purpose of follow up funding for results generated by actions funded by the Programme and Horizon Europe Regulation No 695/2021.</p> <p>BE (Comments): To avoid conflict of interest.</p>

Presidency text (doc. 13656/25)	Drafting suggestions and Comments
	<p>BG (Drafting suggestions):</p> <p>1. In accordance with Article 20(2)(a)(i) of Regulation (EU) XXX [European Competitiveness Fund], and as specified in the work programme, EIC Transition grants may be awarded without calls for proposals upon recommendation of the programme manager and the advice of the external experts for the purpose of follow up funding for results generated by actions funded by the Programme and Horizon Europe Regulation No 695/2021, <u>if set out in the EIC Work Programme.</u></p> <p>BG (Comments):</p> <p>We believe Member States should be able to decide if and when to use this possibility via explicitly allowing it through the Work Programme.</p> <p>EE (Drafting suggestions):</p> <p>1. In accordance with Article 20(2)(a)(i) of Regulation (EU) XXX [European Competitiveness Fund], <u>and as specified in the work programme,</u> EIC Transition grants may be awarded <u>only in exceptional and duly justified cases, and subject to transparent evaluation criteria defined in the work programme,</u> without calls for proposals <u>upon recommendation of the programme manager and the advice of the external experts</u> for the purpose of follow up funding for results generated by actions funded by the Programme and Horizon Europe Regulation No 695/2021.</p> <p>EE (Comments):</p> <p>We propose to safeguard the principle of excellence and open competition as the primary basis for allocating funding in the Framework Programme, limiting the use of discretion to essential exceptions</p>

Presidency text (doc. 13656/25)	Drafting suggestions and Comments
	<p>ES (Drafting suggestions):</p> <p>1. In accordance with Article 20(2)(a)(i) of Regulation (EU) XXX [European Competitiveness Fund], and as specified in the work programme, EIC Transition grants may be awarded without calls for proposals upon recommendation of the programme manager and the advice of the external experts following clear and objective criteria for the purpose of follow up funding for results generated by actions funded by the Programme and Horizon Europe Regulation No 695/2021.</p> <p>ES (Comments):</p> <p>We support the new wording but consider also necessary to highlight that criteria for selection of actions should be clear and objective, ensuring equal opportunities. Although without open call, consortia should demonstrate a plan for bringing the technologies closer to the market.</p> <p>FI (Comments):</p> <p>Funding from EIC Transition should be based on open competition and excellence</p> <p>FR (Comments):</p> <p><u>Support to the added mentions, which improve clarity on the functioning of such calls.</u></p> <p>NL (Drafting suggestions):</p> <p>1. In accordance with Article 20(2)(a)(i) of Regulation (EU) XXX [European Competitiveness Fund], and as specified in the work programme, EIC Transition grants may be awarded without calls for</p>

Presidency text (doc. 13656/25)	Drafting suggestions and Comments
	<p>proposals <u>upon recommendation of the programme manager and the advice of the external experts</u> for the purpose of follow up funding for results generated by actions funded by the Programme and Horizon Europe Regulation No 695/2021.</p> <p>NL (Comments): The intention to make funding from the Transition Instrument available without a prior call based on open competition and excellence is unacceptable for NL.</p> <p>PT (Comments): The rationale for how this approach will be implemented needs further clarification. Will be something like Fast Track, as stated in §5? Additionally, it would be helpful to understand what types of external experts are being considered. Will these processes take into account recommendations from Project Officers involved in previous projects, in addition to those from the Programme Managers?</p> <p>HR (Drafting suggestions): 1. — In accordance with Article 20(2)(a)(i) of Regulation (EU) XXX [European Competitiveness Fund], and as specified in the work programme, EIC Transition grants may be awarded without calls for proposals <u>upon recommendation of the programme manager and the advice of the external experts</u> for the purpose of follow up funding for results generated by actions funded by the Programme and Horizon Europe Regulation No 695/2021.</p> <p>HR (Comments):</p>

Presidency text (doc. 13656/25)	Drafting suggestions and Comments
	We do not support funding, esp. that of actions from a previous FP, without competitive calls.
<p>2. The EIC Accelerator shall support only single beneficiaries and single investees who are SMEs, including <u>in particular</u> startups, and small mid-caps <u>that have high growth potential</u>.</p>	<p>BE (Comments): How will “high growth potential” be measured and evaluated”?</p> <p>BG (Drafting suggestions): 2. The EIC Accelerator shall support only single beneficiaries and single investees who are SMEs, including in particular startups, and, <u>in exceptional and duly justified cases</u>, small mid-caps that have high growth potential.</p> <p>BG (Comments): EIC should focus on support SMEs, incl. startups and scaleups. The support for small mid-caps should be exceptional.</p> <p>DE (Drafting suggestions): The EIC Accelerator shall support only single beneficiaries and single investees who are SMEs, including <u>in particular</u> startups. [REDACTED] small mid-caps may be supported. <u>that have high growth</u> [REDACTED]</p> <p>DE (Comments): DE: Germany sees start-ups and SMEs with disruptive and high-risk innovations as the primary target group for EIC Accelerator funding and EIC Fund investments. Small mid-caps should only be supported in justified cases and only if their innovations contribute to Europe's sovereignty and</p>

Presidency text (doc. 13656/25)	Drafting suggestions and Comments
	<p>resilience. Supporting midcaps in general means that these types of companies will compete with young start-ups for funding and investment. This will create a distortion in favor of mid-caps and will leave important startups without urgently needed funding and support.</p> <p>ES (Comments): We support the new wording to focus the EIC support in startups. Small mid-caps, as defined now, should not be supported by EIC.</p> <p>FR (Drafting suggestions): 2. The EIC Accelerator shall support only single beneficiaries and single investees who are SMEs, including in particular startups, and small mid-caps <u>that have high growth potential</u>.</p> <p>FR (Comments): <u>In the absence of clear criteria and processes to assess which small mid-caps have “high growth potential”, this provision is unclear for applicants and might deter them from submitting proposals.</u></p> <p>SI (Drafting suggestions): The EIC Accelerator shall support only single beneficiaries and single investees who are SMEs, including in particular startups, and in exceptional cases small mid-caps that have high growth potential.</p> <p>HR (Drafting suggestions):</p>

Presidency text (doc. 13656/25)	Drafting suggestions and Comments
	2. The EIC Accelerator shall support only single beneficiaries and single investees who are SMEs, including in particular startups, and, in exceptional cases , small mid-caps that have high growth potential .
3. Proposals for EIC Accelerator actions may be submitted by one or more legal entities intending to establish or support a potential recipient, with the prior agreement of that recipient. If the selected for funding, the grant and investment agreement shall be signed only with that recipient.	ES (Drafting suggestions): 3. Proposals for EIC Accelerator actions may be submitted by one or more legal entities intending to establish or support a potential recipient, with the prior agreement of that recipient. If the selected for funding, the grant and investment agreement shall be signed only with that recipient. ES (Comments): The Com was clear in their explanations that this was not used indeed. For the sake of simplification we consider that it is not necessary to include this point. Considering the type of company to be supported, it is not needed and it has not been used. MT (Comments): Malta inquires whether the ‘support’ mentioned in this sub-paragraph is intended in terms of investments or administrative support (i.e. consultancy agencies).
4. In the case of blended finance actions, the beneficiary and the investee may differ in the sense that the investee may be the holding or the parent company of the beneficiary.	
5. Funding bodies implementing Union Programmes, or national or regional programmes certified by the Commission, may directly submit a	DE

Presidency text (doc. 13656/25)	Drafting suggestions and Comments
<p>proposal for a EIC Transition or EIC Accelerator call, where such proposals stem from a project review of an action funded by the certified programme and subject to conditions set out in the EIC work programme (EIC Plug_in and EIC Fast Track).</p>	<p>(Drafting suggestions):</p> <p>Funding bodies implementing Union Programmes, or national or regional programmes certified by the Commission, may directly submit a proposal for a EIC Transition or EIC Accelerator call, where such proposals stem from a project review of an action funded by the certified programme and subject to conditions set out in the EIC work programme (EIC Plug_in and EIC Fast Track).</p> <p>In accordance with Art 179 (2) of the TFEU, the programme should incentivise better links between regional, national and EU funding programmes that address R&I driven, potentially disruptive, deep-tech an non bankable innovation, in particular by establishing attractive and privileged access of regional, national and EU certified programmes to the EIC(EIC plug-In and EIC fast track).</p> <p>The design of the EIC-Plug-In and the certification of regional, national and EU funding programmes for the EIC Plug-In shall be implemented with a minimum amount of administrative burden for the applying programmes and include clear added value for potential applicants ie. by means of attractive funding conditions.</p> <p>DE (Comments):</p> <p>DE: Plug-In and Fast track are crucial to create the much needed interfaces of the different EU innovation ecosystems. However, to be successful, it will also be crucial that these interfaces are being created in an attractive and lean setup.</p> <p>MT (Comments):</p> <p>Malta requests more clarity with regards to this sub-paragraph, specifically on how the Plug-in applies to the EIC Transition.</p>

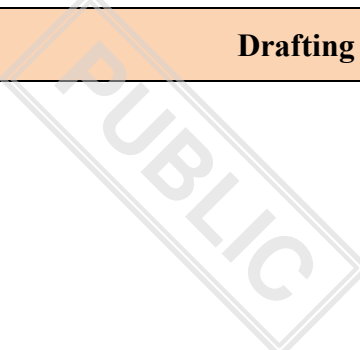
Presidency text (doc. 13656/25)	Drafting suggestions and Comments
<p>6. For the EIC Accelerator, the third evaluation criteria set out in Article 25(1) shall be replaced by the level of risk of the action, the quality and efficiency of the implementation, and the need for Union support.</p>	<p>MT (Comments): Malta seeks more clarity on the scoring and rationale for this paragraph. If there is higher risk, is there less chance of reward, or vice-versa?</p>
<p>7. Investments shall be made in non-bankable investees and jointly with co-investments by other private investors. However, where such support is not provided fully under the European Competitiveness Fund, support to bankable investees or without participation of other investors, may be provided in order to protect the Union’s strategic interests.</p>	<p>DE (Comments): DE: Scrutiny reserve.</p> <p>ES (Drafting suggestions): 7. Investments shall be made in non-bankable investees and jointly with co-investments by other private investors. However, where duly justified and where necessary to protect the Union’s strategic interests, such support investments may be undertaken in the absence of participation by other investors or EU funds such as the ECF. support is not provided fully under the European Competitiveness Fund, support to bankable investees or without participation of other investors, may be provided in order to protect the Union’s strategic interests.</p> <p>ES (Comments): We propose a new wording for clarification purposes.</p> <p>FR (Comments): <u>The EIC Fund and InvestEU must act in synergy and the financing decisions must be transparent to the MS, therefore we would like to ask the Commission for a fiche on the link between InvestEU and EIC.</u></p>

Presidency text (doc. 13656/25)	Drafting suggestions and Comments
	<p>NL (Comments): What will be the planned process to support bankable companies in order to protect the strategic interests of the Union?</p> <p>SI (Drafting suggestions): Investments shall be made in non-bankable investees and jointly with co-investments by other private investors. However, where such support is not provided fully under the European Competitiveness Fund, support to bankable investees or without participation of other investors, may be provided in order to protect the Union's strategic interests</p> <p>SI (Comments): Bankable investees, by definition, have the capacity to attract financing from private investors on market terms. Providing them with direct Union support risks distorting the market and crowding out private investment.</p> <p>PT (Comments): PT has a scrutiny reservation as other MS. PT considers that this might represent an overlap with ECF. PT also has reservations on using EIC to fund entities which could secure investments in the market.</p>
<p>8. By way of derogation from Article 212(2)(a) of Regulation (EU, Euratom) 2024/2509, the conditions concerning economic viability, shall not apply to EIC Accelerator investment actions.</p>	<p>PT (Comments): PT supports this exception.</p>

Presidency text (doc. 13656/25)	Drafting suggestions and Comments
<p>9. Blended finance actions shall be suspended, amended or, if duly justified, terminated if measurable milestones are not reached or if the beneficiary refuses the investment support without a duly justified reason.</p>	<p>FR (Comments): <u>The notion of ‘measurable milestones’ is unclear. We ask for examples from the Commission on what such milestones could be.</u></p> <p>SI (Drafting suggestions): Blended finance actions shall be suspended, amended or, if duly justified, terminated if measurable milestones are not reached, if results cannot be deployed in the Union or if the beneficiary refuses the investment support without a duly justified reason.</p>
<p>10. The EIC Fund may award follow-on investments <u>only in one of the two following cases:</u></p>	<p>BG (Drafting suggestions): 10. The EIC Fund may award follow-on investments only in one of the two following duly justified cases:</p> <p>ES (Drafting suggestions): 10. In exceptional and duly justified cases, tThe EIC Fund may award follow-on investments <u>in one of the two following cases:</u></p> <p>ES (Comments): Follow-on investments by EIC should be exceptional and duly justified cases as they should be part of the ECF. The necessity should be certified by an external entity. This article should be deleted or at least limited with the proposed change.</p> <p>FR</p>

Presidency text (doc. 13656/25)	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>10. The EIC Fund may award follow-on investments <u>only in one of the two following cases:</u></p> <p>SI</p> <p>(Drafting suggestions):</p> <p><u>Without prejudice to the use of competitive procedures,</u> tThe EIC Fund may award follow-on investments only in one of the two following cases:</p> <p>PT</p> <p>(Comments):</p> <p>Further clarification is needed on the conditions that will allow for this follow-on investments.</p>
(a) if needed to protect the Union's strategic assets, interests, autonomy or security; or	
(b) if subsequent funding rounds would not proceed or would proceed at significantly less favourable terms without EIC follow-on investment.	
	<p>FR</p> <p>(Drafting suggestions):</p> <p><u>Member States should be informed of such follow-on investments.</u></p>
11. The EIC work programme may set out additional limitations regarding the award of follow-on support, <u>notably regarding the size of that support.</u>	<p>ES</p> <p>(Comments):</p> <p>We support this change</p>
	<p>DE</p> <p>(Drafting suggestions):</p>

Presidency text (doc. 13656/25)	Drafting suggestions and Comments
	<p>12. Deinvestments of the EIC fund are being treated as reflows to the EIC fund and may not be used for non R&I purposes.</p> <p>DE (Comments):</p> <p>DE: In order to build up a strong and sustainable EIC fund, we need to ensure that deinvestments are being treated as reflows.</p> <p>SK (Drafting suggestions):</p> <p><u>12. The pre-EIC Accelerator, aimed at boosting innovation potential of early-stage deep-tech startups in less-R&I-advanced Member States, shall be accessible to both Widening and Transition countries.</u></p> <p>SK (Comments):</p> <p>SK supports MT and other MS that it is imperative that the EIC becomes more accessible to less-R&I-intense Member States. The pre-EIC Accelerator should receive a strong legal mandate to operate.</p> <p>MT (Drafting suggestions):</p> <p><u>12. The pre-EIC Accelerator, aimed at boosting innovation potential of early-stage deep-tech startups in less-R&I-advanced Member States, shall be accessible to both Widening and Transition countries.</u></p> <p>MT (Comments):</p> <p>Malta highlights that it is imperative that the EIC becomes more accessible to less-R&I-intense countries. The pre-EIC accelerator should receive a strong legal mandate to operate. The instrument shall be accessible for both widening and transition countries. This is a red line.</p>

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<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>	
<p>Chapter IV</p>	
<p>Innovation</p>	
<p><i>Article 12</i> <i>The European Innovation Council Board</i></p>	
<p>1. The European Innovation Council Board (EIC Board) shall advise the Commission on:</p>	
<p>(a) the overall strategy for the EIC component under Part III ‘Innovation’ of Horizon Europe, taking into account complementarities with the European Competitiveness Fund;</p>	<p>FR (Comments): <u>As previously mentioned, we need further information on how such complementarity with the ECF will be ensured.</u> <u>Measures to strengthen the role of programme manager are also needed in order to ensure complementarities with the ECF.</u></p>

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(b) the work programme for the implementation of the EIC actions, including criteria for assessment of proposals and the appropriate balance between the different types of funding support;	
(c) the identification of emerging technology trends from EIC's portfolios, and strategic portfolios of projects;	<p>FR (Drafting suggestions): (c) the identification of emerging technology trends from EIC's portfolios, and strategic portfolios of projects, <u>taking into account projects funded by other parts of Horizon Europe or by the European Competitiveness Fund;</u></p> <p>FR (Comments): <u>It should go beyond the scope of EIC's portfolios, and consider the whole coherence with other Horizon Europe and ECF projects.</u></p>
(d) the profile of EIC Programme Managers;	
(e) coordination with the Advisory Board on the European Competitiveness Fund Guarantees, Financial Instruments and Blending Operations established under the European Competitiveness Fund.	
2. The EIC Board may upon request from the Commission address recommendations to the Commission on:	
(a) any matter which, from an innovation perspective, may enhance and foster innovation eco-systems across the Union, the achievements and impact	

Presidency text (doc. 13656/25)	Drafting suggestions and Comments
of the objectives of the EIC, and the capacity of innovative firms to roll out their solutions;	
(b) identifying in cooperation with relevant Commission services, national and regional authorities and other relevant entities, possible regulatory barriers faced by entrepreneurs, in particular those awarded support under the EIC;	
(c) programming in other parts of the Specific Programme.	
3. The EIC Board shall act in the interest of achieving the objectives of the EIC. It shall act with integrity and probity and carry out its work efficiently and transparently.	
4. The EIC Board shall be composed of 15 to 20 independent high-level individuals drawn from various parts of Europe's innovation ecosystem, including entrepreneurs, corporate leaders, investors, innovation experts and managers , innovative researchers and technology transfer experts. The EIC Board shall contribute to outreach actions and its members shall strive to enhance the prestige of the EIC brand.	<p>ES (Drafting suggestions):</p> <p>4. The EIC Board shall be composed of 15 to 20 independent high-level individuals drawn from various parts of Europe's innovation ecosystem, including entrepreneurs, corporate leaders, investors, innovation experts and managers, innovative researchers and technology transfer experts. The EIC Board shall contribute to outreach actions and its members shall strive to enhance the prestige of the EIC brand in collaboration with National Contact Points.</p> <p>ES (Comments):</p> <p>Collaboration with NCPs should be sought.</p>

Presidency text (doc. 13656/25)	Drafting suggestions and Comments
	<p>FR (Drafting suggestions):</p> <p>4. The EIC Board shall be composed of 15 to 20 independent high-level individuals drawn from various parts of Europe's innovation ecosystem, including entrepreneurs, corporate leaders, investors, innovation experts and managers, innovative-innovation researchers and technology transfer experts. The EIC Board shall contribute to outreach actions and its members shall strive to enhance the prestige of the EIC brand</p> <p>SI (Drafting suggestions):</p> <p>The EIC Board shall be composed of 15 to 20 independent high-level individuals drawn from various parts of Europe's innovation ecosystem, including representatives of research and knowledge base, entrepreneurs, corporate leaders, investors, innovation experts and managers, innovative researchers and technology transfer experts. The EIC Board shall contribute to outreach actions and its members shall strive to enhance the prestige of the EIC brand</p> <p>SI (Comments):</p> <p>Research representatives bring deep understanding of frontier science and emerging technologies. They can help evaluate whether innovations proposed have a solid scientific or technological foundation.</p>
<p>5. The members of the EIC Board shall be appointed by the Commission, following an open call for nominations or for expressions of interest, and taking into account the need for balance in expertise, gender, age and geographical and thematic distribution.</p>	<p>BE (Drafting suggestions):</p> <p>5. The members of the EIC Board shall be appointed by the Commission, following an open call for nominations or for expressions of interest, and taking into account the need for balance in expertise, gender,</p>

Presidency text (doc. 13656/25)	Drafting suggestions and Comments
	<p>age and geographical <u>and thematic</u> distribution <u>and representativity of the key stakeholders active in deep-tech ventures (among others, incl. RPOs).</u></p> <p>BE (Comments):</p> <p>The EIC instruments should develop stronger links to EU RTOs' own ventures and technology infrastructures. This effort has been too limited so far. Key RTOs' venture managers should be invited to the EIC Board to that effect.</p>
<p>6. Their term of office shall be limited to two years, renewable twice.</p>	
<p>7. The EIC Board shall have a President who shall be a high-profile public figure linked to the world of innovation, with a <u>proven experience</u> <u>and</u> solid understanding of developing innovations from research to market and scale-up.</p>	<p>SI (Drafting suggestions):</p> <p>The EIC Board shall have a President who shall be a high-profile public figure linked to the world of innovation, with a proven experience and solid understanding of developing innovations from research to market and scale-up, <u>innovation management or technology commercialization.</u></p> <p>SK (Drafting suggestions):</p> <p>The EIC Board shall have a President who shall be a high-profile public figure linked to the world of innovation, with a proven experience and solid understanding of developing innovations from research to market and scale-up, <u>innovation management or technology commercialization.</u></p>
<p>8. The EIC Board President shall have the status of an independent special adviser and shall be appointed by the Commission following a transparent recruitment process. The term of office of the EIC Board</p>	<p>ES (Drafting suggestions):</p>

Presidency text (doc. 13656/25)	Drafting suggestions and Comments
<p>President shall be limited to a maximum of four two years, extendable renewable once for up to 2 years.</p>	<p>8. The EIC Board President shall have the status of an independent special adviser and shall be appointed by the Commission following a transparent recruitment process. The term of office of the EIC Board President shall be limited to a maximum of four two years, extendable renewable once up to 2 years up to 4 years for up to 2 years.</p> <p>ES (Comments): Fully support and extend this for analogy to ERC</p> <p>IE (Comments): We welcome and support the amendments to the EIC Board President mandate to revert to the current 4+4 years.</p> <p>SK (Comments): SK has preference for the EIC president's mandate to be of the same length as the ERC president's stems from a desire to maintain consistency and parity between leadership roles. Having equal mandate lengths helps ensure comparable terms of accountability, continuity, and strategic planning, while some flexibility is allowed to accommodate specific circumstances.</p> <p>PT (Comments): PT considers that the two-year term is preferable, as it helps maintain freshness and dynamism. Considering the board's role, a maximum of four years would be preferable. A new president can bring renewed vision and ideas, and an eight-year term is excessively long.</p>
<p>9. The EIC Board President shall chair the EIC Board, prepare its meetings, assign tasks to members and may establish dedicated sub-groups.</p>	

Presidency text (doc. 13656/25)	Drafting suggestions and Comments
The EIC Board President shall represent the EIC Board’s views in the world of innovation and act as an interlocutor with the Commission.	
10. The Commission shall establish a EIC Board code of conduct addressing, in particular, the avoidance of conflicts of interest and breach of confidentiality. The members of the EIC Board shall agree to abide by the code of conduct upon assuming office.	
11. The Commission shall provide administrative support to the EIC Board and the EIC Board President.	
	PT (Drafting suggestions): <u>11a. EIC Board shall work closely with the EIC Programme Committee Configuration</u> PT (Comments): PT supports that the MS should complement EIC Board advisory services.
<i>Article 13 Innovation Ecosystems</i>	
The Specific Programme shall support:	
(a) the establishment and support of connected hubs across the Union, providing innovators, start-ups and scale-ups access to resources, services and partners, including investment opportunities, first buyers of R&I and	BE (Drafting suggestions): (a) the establishment and support of connected hubs that contribute to fostering the valorisation of research and innovation results across the

Presidency text (doc. 13656/25)	Drafting suggestions and Comments
<p>innovative solutions, corporates, experimentation facilities, research and technology infrastructures, entrepreneurial talent, coaching and mentoring;</p>	<p>Union, providing researchers, innovators, start-ups and scale-ups access to resources, services and partners, including investment opportunities, first buyers of R&I and innovative solutions, corporates, experimentation facilities, research and technology infrastructures, entrepreneurial talent, coaching and mentoring;</p> <p>BE (Comments): <i>Question:</i> are we referring here to the instrument of Pillar IV?</p> <p>ES (Drafting suggestions): (a) the establishment and support of connected hubs that contribute to fostering the valorisation of research and innovation results across the Union, providing researchers, innovators, start-ups and scale-ups access to resources, services and partners, including investment opportunities, first buyers of R&I and innovative solutions, corporates, experimentation facilities, research and technology infrastructures, entrepreneurial talent, coaching and mentoring;</p> <p>ES (Comments): In coherence with amendment in art 13.</p>
<p>(b) activities to develop pan-European innovation ecosystems in key thematic areas, integrating and boosting strengths and potentials, support the development of innovation skills and early-stage venture building, fostering the integration of the knowledge triangle – higher education, research and innovation, and business – across the Union;</p>	<p>AT (Drafting suggestions): (b) activities to develop and support pan-European innovation ecosystems such as European Universities Alliances in key thematic and strategic areas, integrating and boosting strengths and potentials, support the development of innovation skills and early-stage venture building, to fostering the integration of the knowledge triangle – higher education,</p>

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	<p><i>research and innovation, and business – as well as service to society –</i> across the Union;</p> <p>BE (Drafting suggestions):</p> <p>(b) activities to develop pan-European innovation ecosystems connecting regional ecosystems in key thematic areas, integrating and boosting strengths and potentials, support the development of innovation skills and early-stage venture building, <i>fostering the integration of the knowledge triangle – higher education, research and innovation, and business –</i> across the Union;</p> <p>BG (Comments):</p> <p>We would like to reiterate that we need to consider mentioning EIT sooner or later, since the possible revision of EIT Regulation timeline is not in sync with the Horizon Europe negotiations timeline. If EC decides to or not to revise EIT Regulation in Q4/2026, then it would be too late to add EIT to the Horizon Europe Regulation. If Commission, however, would revise EIT Regulation in Q1 or even Q2 of 2026, the we would be willing to wait.</p> <p>FR (Drafting suggestions):</p> <p>(b) activities to support and further develop pan-European innovation ecosystems networks such as European Universities’ Alliances in key thematic with a focus on strategic areas, integrating and boosting strengths and potentials, support the development of innovation skills and early-stage venture building, to fostering the integration of the knowledge triangle square – higher education, research and innovation, and business, and service to society – across the Union;</p> <p>FR (Comments):</p>

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	<p><u>We suggest referring to existing successful initiatives such as European Universities Alliances whose activities genuinely contribute to the integration of the knowledge square.</u></p> <p>HU (Drafting suggestions):</p> <p>(b) activities of the European Institute of Innovation and Technology to develop pan-European innovation ecosystems in key thematic areas, <u>integrating and boosting strengths and potentials</u>, support the development of innovation skills and early-stage venture building, <i>fostering the integration of the knowledge triangle – higher education, research and innovation, and business</i> – across the Union;</p> <p>HU (Comments):</p> <p>The reference regrading EIT is essential as it plays a pivotal role to foster the pan-European innovation ecosystem.</p> <p>PT (Drafting suggestions):</p> <p>[...] support the development of innovation skills, <u>entrepreneurship</u> and early-stage venture building</p> <p>PT (Comments):</p> <p>PT considers that entrepreneurship is key for the knowledge triangle</p>
<p>(c) programmes to support innovative SMEs, start-ups and scale-ups to expand and access international markets through market viability studies, place-based innovation tools, collaboration <u>on</u> <u>ve</u> <u>in</u> research and innovation,</p>	<p>BE (Drafting suggestions):</p>

Presidency text (doc. 13656/25)	Drafting suggestions and Comments
<p>exchange of talents, tailored mentorship, access to global investor networks, regulatory guidance, localized marketing support, and soft-landing services in target countries;</p>	<p>(c) programmes to support innovative SMEs, start-ups and scale-ups to expand and access international markets through market viability studies, place-based innovation tools, collaboration <u>on</u> <u>ve</u> <u>in</u> research and innovation, exchange of talents, access to research and technology infrastructures and facilities, tailored mentorship, access to global investor networks, regulatory guidance, localized marketing support, and soft-landing services in target countries;</p> <p>BE (Comments): This text should be adapted to the new ambitions set in the new EC Communication on RTIs, also aiming at supporting access by SMEs to RTIs.</p> <p>DE (Drafting suggestions): programmes to support innovative SMEs, start-ups and scale-ups to expand and access international markets through market viability studies, place-based innovation tools, collaboration <u>on</u> <u>ve</u> <u>in</u> research and innovation, exchange of talents, tailored mentorship, access to global investor networks, Research and Technology Infrastructures reregulatory guidance, localized marketing support, and soft-landing services in target countries;</p>
<p>(d) other actions to support the development of innovation ecosystems and connectivity including studies, benchmarking, mutual learning between innovation actors and coordination of innovation policies.</p>	<p>BE (Drafting suggestions): (d) other actions to support the development of innovation ecosystems and connectivity including studies, benchmarking, mutual learning between innovation actors and coordination of innovation policies, notably on the basis of regional smart specialisation strategies.</p>
	<p>BE (Drafting suggestions):</p>

Presidency text (doc. 13656/25)	Drafting suggestions and Comments
	<p><u>The EIT may in particular provide the following types of support:</u></p> <ul style="list-style-type: none"><u>(a) Developing and strengthening EIT Knowledge and Innovation Communities (KICs) to address strategic challenges by integrating higher education, research and innovation, and business;</u><u>(b) Supporting the creation and scaling of innovative ventures by providing access to mentorship, incubation, and acceleration services within the EIT KICs;</u><u>(c) Promoting entrepreneurial education and skills development to foster a new generation of innovators and leaders;</u><u>(d) Expanding the EIT's regional outreach and impact through enhanced collaboration with regional innovation ecosystems and Smart Specialization Strategies;</u><u>(e) Developing and establishing more concrete synergies with other actions of the European Competitiveness Fund to bridge the innovation divide, in his role of integrating the innovation ecosystem.</u>