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WK 14448/2025 INIT

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WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Ad Hoc Working Party on the Multiannual Financial Framework (AHWP MFF) - European Competitiveness Fund
Subject:	Member States comments on proposal for a Regulation on establishing the European Regulation on establishing the European Competitiveness Fund (ECF), including the specific programme for defence research and innovation activities, repealing Regulations (EU) 2021/522, (EU) 2021/694, (EU) 2021/697, (EU) 2021/783, and amending Regulations (EU) 2021/696, (EU) 2023/588, (EU) [EDIP] (doc. 13413/25 chap. 1-3) - comments from AT, BG, CZ, DE, FI, HR, IE, IT, LT, LU, MT, PT, BE, HU, ES, SE, SI, EL, FR, PL

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LIMITE

EN

Proposal for a Regulation establishing the European Competitiveness Fund (doc. 13413/25)

From: AT, BG, CZ, DE, FI, HR, IE, IT, LT, LU, MT, PT, BE, HU, ES, SE, SI, EL, FR, PL

Deadline: 15 October 2025 COB

Updated: 27/10/2025 09:02

Guidelines to be followed

Please kindly provide your contributions in the table below.

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

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

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

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

Thank you for your cooperation!

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
General Comments	AT (Comments): Specific security and defence policies: AT would like the specific security and defence policies of certain Member States to be taken into account. Guarantee agreements: While the ECF regulation refers to guarantee agreements (GA) only in the definitions (Art. 2), the current InvestEU regulation specifies how GA are concluded and specifies requirements in InvestEU Art. 17 and 18 (e.g. content of GA, coverage of fees, costs). We would propose to include such drafting also under ECF InvestEU, e.g. as an annex to the regulation. Objectives/ market failures and suboptimal investment situations

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	The current InvestEU regulation (Annex V) provides for definitions of market failures, suboptimal investment situations, additionality and excluded activities. AT would propose to have such specification also for ECF InvestEU and the ECF in general. Collaborative R&I Austria stresses that collaborative R&I must be more strongly anchored as central to achieving EU objectives, and that the ECF objectives must explicitly include support for transnational collaborative research to avoid fragmentation with Horizon Europe and to fully capitalize in the potential of European R&I. Austria also asks the Commission to clarify in the basic act how the distinction between R&I and deployment will be defined, in order to safeguard the integrated innovation cycle DE (Comments): The following are first drafting suggestions and comments. We reserve the right to make further suggestions and comments in the negotiating process. Our general comments already sent to the presidency remain valid. FI (Comments): <u>FI: It is imperative to strengthen the clarity of the award criteria in ECF by adding and strengthening clauses on excellence, addressing market failures and ensuring non-distortion on the single market. This approach is pivotal for EU to enhance its global competitiveness and is now practically non-visible throughout the</u>

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	<u>regulation proposal. Finland also highlights the importance of leveraging private financing, implementing funding through open competition and that the MS role needs to be strengthened in the governance and design of the Work Programmes. Structure-wise the contents of the policy windows and the instruments provided by the proposal are not matching/coordinated and it is impossible to assess the budget implications of them. More clarity also in that respect is necessary. Clarity is also needed on how RDI activities in a seamless investment journey can be co-supported by ECF in order not to create a disruption in the journey between HE regulation and ECF regulation.</u> <u>These critical aspects cannot be left to be designed at the Work Programme level.</u> IE (Comments): Ireland considers the revised general objectives strengthen the policy aims of the European Competitiveness Fund (ECF). Article 3(ka) of the general objectives calls for supporting actions for the development, implementation, and monitoring of relevant Union legislation and policy to ensure the ECF achieves its aims. This provides a certain degree of flexibility for the ECF to adapt policy priorities which might change during the course of the seven-year budget period. The introduction of the examination procedure, which gives Member States more influence on the adoption of work programmes, is to be welcomed.

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	While the revised text has in places replaced “European” with “Union” [Article 3(1)(b)], it is important that there is consistency between the terms used. Ireland suggests that the term European preference should refer to European based production, making a strong contribution to the EU economy, as any narrowing of the eligibility criteria of the ECF to entities which are explicitly “EU-owned” may reduce the effectiveness of the ECF by limiting participation from globally integrated firms which contribute to innovation, employment, and regional development. MT (Comments): <u>Active Role of Member States</u> Malta is advocating for a very active role of Member States in the strategic direction and governance of the ECF. Malta is calling for the usage of the examination related to the work programmes for all the policy windows. We do understand that there might be some sensitivities in relation to security and defence. <u>All EU Member States benefit from the ECF</u> The importance that all Member States benefit from ECF by broadening European manufacturing excellency. <u>Small and Medium Sized Enterprises</u> Malta is of the belief that there is a need to strengthen the focus on SMEs in Chapters I, II and III of the ECF proposal because they are crucial for the EU's economic growth and climate goals, yet face significant challenges from inflation, energy prices, and a lack of tailored support. This strengthening should be done by ensuring simplified access to funding, providing integrated business advice for sustainability, and promoting inclusive policies. Malta calls for the establishment of dedicated and ring-fenced budget lines for SMEs, with clear targets and tangible measures to facilitate their participation, including front-loaded financing and financial incentives for consortia that

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	integrate traditional SMEs into strategic value chains. Malta would like to ensure that there is a dedicated but separate funding and financing streams both for Small and Medium Sized Enterprises and for Small Mid-Caps within the SMC category. The characteristics and requirements for SMEs are different compared to those of small mid-caps. Fast and predictable application and award processes are vital, especially for SMEs, start-ups, and scale-ups looking to grow into globally competitive players. There needs to be minimum levels of response times in the faster processing of applications by using more digital tools and Artificial Intelligence applications. Malta strongly advocates for the allocation of at least 30% of the ECF to be dedicated exclusively to SMEs. SMEs are the backbone of the EU's economy. They play a pivotal role in driving innovation, job creation, and sustainable economic growth. <u>Grants</u> When possible, grants should always be the first preference to assist businesses, accompanied by other financial instruments like loans and guarantees. <u>Definitions:</u> Harmonised SME definitions of 'small mid-caps' and 'mid-caps' to be aligned with headcounts brackets in state aid rules. Unified 'single undertaking' definition Flexibility in documentation and exemption from certain "in difficulty" tests for micro-SMEs under GBER. <u>European Investment Bank and InvestEU</u> Malta would like that in article 25, 75% of the allocation of the budget line would go towards the EIB Group and that the minimum would increase from EUR 10 billion to EUR 20 billion. MT is also calling for a review to take place in the middle of the programming period to reassess this 75%.

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	Since financial instruments involve long-term planning and need to involve stakeholder investment legal certainty, it is important that they are excluded from the annual work programme through ad hoc delegated act. Questions related to InvestEU and financial instruments: (a) With the loss of the SME Window under the current InvestEU window, is the access to finance for SMEs going to be less as this is going to be spread over four windows? (b) Some small EU Member States do not have export credit guarantee facilities, through the ECF InvestEU it is possible to create such a pan European Instrument? We are aware that under the current InvestEU a pilot was created concerning Ukraine. This was a real success being oversubscribed. PT (Comments): We consider that there is a general imbalance in the densification of some of the articles and measures in comparison to others. For example, article 20 goes into great detail about the accelerated and targeted actions for competitiveness and corresponding procedures, but, on the other hand, article 16, regarding the single market value chains builder, is very sparse in information on how it will be put in place. We also consider that the reference to SMEs is inconsistent, specially taken into consideration what is foreseen in article 29, and may bring confusion on how exactly some rules are applied specifically to them. We would like to see a clear general reference to the importance of achieving a balanced distribution within the application of the toolbox that is set out. It would be advisable, in the initial chapters, to make the connection between competitiveness and sustainability more explicit. As clearly stated in several key EU reference documents — including the Draghi Report and the Competitiveness Compass — this link is expected to serve as the main driver and distinguishing factor in enhancing the European economy. This relationship could be particularly highlighted in Article 3.

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	The interplay between ECF and Horizon Europe requires some more careful analysis. In general, it is necessary to ensure the participation of all Member States, inclusiveness for SMEs/start-ups and scale-ups and promote skills development in Member States. The ECF shall promote the competitiveness of the Union's outermost regions, through tailored measures that address their permanent structural constraints and leverage their unique territorial assets. This addition ensures alignment with Article 349 TFEU and reinforces the visibility and inclusion of outermost regions in strategic EU funding priorities. ES (Comments): The adoption of work programs under the ECF should be carried out through implementing acts via the examination procedure, in order to include the vote of the Member States. This comment is also relevant for the CEF Regulation proposal. Moreover, the mechanism provided in Articles 15.5 and 15.6 leaves the adoption of the work program in the hands of the Commission in the event of a crisis or if it has not been adopted by October 1st. This should be limited to clearly defined circumstances to ensure Member State participation in the process. As an additional reflection, it is important that both the regulation and the calls for proposals maintain a level playing field that enables fair competition By 2028, Horizon Europe Missions will already be in their deployment phase. Why has the Commission not included them within the scope of the ECF? EL

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	(Comments): Taking into account the clarifications provided And in view of further discussions on the topics listed by the Presidency, we maintain our general scrutiny reservation in particular regarding the following issues: 1) the very limited participation of MS in the governance of the fund. The ECF must be equipped with clear governance mechanisms, transparent decision-making procedures, and strong monitoring to avoid overlaps, ensure coherence, and guarantee alignment with the Union's long-term strategic objectives, such as the Green Deal, digital transition, and security. 2) the need to have in place adequate safeguards for the participation of third country entities, especially in areas related to strategic technologies or to security interests of the MS. 3) Maintaining fairness and balance in the geographical distribution of ECF resources. In particular, caution should be exercised regarding the potential concentration of resources to the disadvantage of smaller MS and less developed regions and the consequent broadening of the innovation gap. We should avoid substitution of smaller and simpler projects for major investments of a more strategic orientation, and avoid specific regions to be undermined. 4) We would like more information on the implementation procedure and modalities, as well as on the comitology procedures to be followed for ECF work programmes. We have taken note of the introduction of the examination procedure for the policy windows and call this to be taken forward also for Chapter III. PL (Drafting suggestions): <u>While promoting geographical balance in the implementation of the Fund ensures that all Member States can contribute to and benefit from strategic</u>

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	<u>technological and industrial projects, thus supporting the Union's resilience, competitiveness, innovation capacity, and cohesion</u>
Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on establishing the European Competitiveness Fund ('ECF'), including the specific programme for defence research and innovation activities, repealing Regulations (EU) 2021/522, (EU) 2021/694, (EU) 2021/697, (EU) 2021/783, and amending Regulations (EU) 2021/696, (EU) 2023/588, (EU) [EDIP]	IT (Drafting suggestions): Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on establishing the European Competitiveness Fund ('ECF'), including the specific programme for defence research and innovation activities, repealing Regulations (EU) 2021/522, (EU) 2021/694, (EU) 2021/697, ~~(EU) 2021/783~~, and amending Regulations (EU) 2021/696, (EU) 2023/588, (EU) [EDIP] IT (Comments): Italy advocates for the continuation of LIFE as a stand-alone programme with its own independent budget and Regulation. The proposed structure of the next MFF fails to adequately protect all objectives, priority areas of intervention, projects and beneficiaries of the existing LIFE Programme. PL (Comments): REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL 555(2025) Preamble On page 20 (33), the document highlights fisheries, aquaculture, etc., but does not include the processing and marketing

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	of agricultural products in the food chain alongside agriculture. This is crucial because it contributes to long-term food security, as mentioned in this point. The ECF objectives (Objective B) also clearly indicate the need to support reducing and counteracting strategic dependencies (food) and building resilience; On page 30 (78), the impact of SMEs on security, including food security, should be taken into account. This point only mentions green and digital transformation. The presence of SMEs in the market contributes to a sustainable impact on security, including food security, by dissipating risks. Art. 2 p. 33 (definitions) Definitions regarding the processing and marketing of agricultural products should be added to the glossary – referring to Annex 1 to the TFEU – which is related to determining support levels under state aid rules. Art. 3 p. 35 (objectives) (b) Food security is particularly important for preventing the EU's strategic dependence and strengthening its resilience and economic security, including through diversifying sources and markets, supporting, creating, strengthening, and protecting critical value chains and the EU's infrastructure – should be added as follows: „(b) reducing or preventing the Union’s strategic dependencies, and reinforcing the Union’s resilience, food and economic security, including through diversifying sources and markets, support to ramp up of European production of strategic technologies and creating, strengthening and protecting critical Union value chains and infrastructure”; On page 37, point 2, letter b, subpoint (3), the document emphasizes the importance of biocomponents, innovative products, and biochemicals. Attention should also be paid to innovative solutions in the area of food storage, processing, and packaging while maintaining key nutrients. On page 37, point 2, letter b, subpoint (4) IMPORTANT – it is necessary to add a reference to the agricultural product processing and marketing sector within the value chain as follows: “(4) For support to the agriculture, processing and marketing of agricultural products and food security in the value chain, the specific objective of fostering the competitiveness, sustainability, and resilience of the agriculture, fisheries and aquaculture, forestry and rural and coastal areas

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	and their role in the transition to a climate, neutral climate-resilient, water-smart, nature-positive economy and the protection of natural resources biodiversity while contributing to long term food security in the Union” just. 2 nie ma tego w drafcie) p. 38, point 2, letter c, subpoint (1) Agricultural products should be mentioned under raw materials – in the context of food security (1) For support to resilience of supply chains, the specific objectives of reinforcing Europe’s resilience by strengthening the Union capacity in exploration, extraction, processing and recycling of raw materials (including agricultural products) and diversifying supply sources and markets, and improving the timely availability of such products, including through the reduction of their delivery lead time, reservation of manufacturing slots or stockpiling of products, intermediate products or raw materials. page 60 Title CHAPTER V SUPPORT FOR HEALTH, BIOTECH, AGRICULTURE – should be added FOOD PRODUCTION AND BIOECONOMY “SUPPORT FOR HEALTH, BIOTECH, AGRICULTURE, FOOD PRODUCTION AND BIOECONOMY “ Art. 37 pkt 1 – p. 60 Should be added „food production” – as follows: „Support for Health, Biotech, Agriculture, Food Production and Bioeconomy policy shall be implemented in particular through the following activities” p. 61 pkt 1 lit g should be added the concept of processing and marketing of agricultural products within the supply chain as follows: “Fostering the competitiveness, the sustainability, the resilience and fairness of agriculture, processing and marketing of agricultural products,

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	fisheries, aquaculture, forestry sectors and rural and coastal areas, and contribute to long term food security in the Union” Art. 42 p. 64 Pkt 2 lit b There is no reference to the issue of food security (there is only economic security), therefore food security should be added; (b) purchasing of raw materials, in line with economic and food security needs and the green and digital transition objectives, in order to reduce the risk of supply disruptions for companies in the EU, including for establishing and managing stockpiles of critical raw materials in coordination with Member States and industry;
Chapter I	PT (Comments): <u>Chapter I - General Comments:</u> • Definition of clear and measurable objectives Highlight the importance of indicators linked to territorial competitiveness (including outermost regions such as the Azores and Madeira) and the integration of SMEs. • Compatibility with other programs (CEF, HE, InvestEU, Cohesion Fund) Request clarity on complementarity, ensuring that the FEC can finance deployment and infrastructure when other programs focus solely on R&D. • Equitable access and territorial inclusion Ensure that the Regulation includes decentralized projects (e.g. smart ports, peripheral logistics corridors, connectivity hubs, clean tech and renewables). • SME participation: The role of SMEs could be strengthened in article 3 regarding single market integration and territorial cohesion.

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General Provisions	SI (Comments): The decarbonisation of the EU economy ensures its global competitiveness, contributes to strategic autonomy, and enables social justice. Decarbonisation must therefore remain the central priority of the ECF, which is why the resources from existing funds that feed into this pillar must be preserved or increased. We strongly oppose any reallocation of resources from the decarbonisation pillar to the other pillars
SECTION 1	

OBJECTIVES AND STRUCTURE OF THE FUND	BG (Comments): It is necessary to provide a clearer designation of the governance mechanisms, the allocation of funds and the support instruments, in order to ensure that the general objectives of the EU will be implemented in an inclusive and balanced manner, avoiding fragmentation and guaranteeing equal access for all Member States as well as a fair distribution among all categories of micro-, small and medium-sized enterprises, and mid-caps. SE (Comments): “Strategic” needs to be defined in this regulation. SE proposes the following definition: "Strategic refers to that which is assessed to significantly contribute to achieving the objective of increased competitiveness in the EU through innovation, productivity and economic growth. This can include reducing harmful dependencies that threaten EU's security and resilience, while simultaneously safeguarding open autonomy. What is considered “strategic” should be a horizontal, merit-based definition that does not distort competition between companies and sectors. EL (Comments): We consider that that there should be a discrete objective for the implementation of EU SME policy. Concerning SMEs, in recital 78, we should not limit the scope only to scaling firms, but we should include all SMEs. In this line we should make explicit reference to EU SME policy documents:

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	COM(2008) 394 Think small first A small business act for Europe, COM(2020)103 An SME Strategy for a sustainable and digital Europe, COM(2023)535 SME Relief Package. Moreover, we consider that there should be a discrete objective for the implementation of Chips Act Regulation (EU) 2023/1781 with a specific budget line, same for Net-Zero Industry Act Regulation (EU) 2024/1735, Critical Raw Materials Act Regulation (EU) 2024/1252, and other sectoral legislative frameworks with direct impact on EU strategic autonomy. We should build on existing legislative frameworks, link budget lines with concise agreed objectives, in order to achieve fast results in implementing EU industrial policy, and fostering EU competitiveness.
	IT (Drafting suggestions): Art. 1: 3. The Regulation also sets up a legal framework aiming at ensuring security of supply, removing investment obstacles, skills gap, and production bottlenecks and supporting the competitiveness of the Union's industrial base.

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<i>Article 3</i>	BE (Comments): There is a lack of consideration for the regional dimension and the territorial anchoring of innovation ecosystems . There is no mention of Smart Specialisation Strategies (S3), even though it is essential for the territorial anchoring of innovation (and industrial) policies . SI (Comments): SI would like to underline the importance of ensuring that competitiveness objectives do not undermine the principles of accessibility, equity and inclusion, particularly in the public health and social sectors We recommend that the Regulation explicitly integrates horizontal principles such as gender equality, social inclusion, and non-discrimination across all policy windows. Furthermore, the Fund should support the development of skills and employment opportunities in sectors undergoing green and digital transitions, with particular attention to vulnerable groups and regions. Digital transformation actions should ensure accessibility for all, including persons with disabilities and older persons, and promote inclusive digital public services.”

Objectives	DE (Comments): The orientation of the ECF, including the four windows, seems to be very suitable to us in principle. The question of detail and flexibility of the policy windows is strongly connected to the overarching award criteria, targets of the work programmes as well as governance of the ECF. Funding of the ECF must focus on support for actual key strategic technologies and activities. This requires clear priorities which areas contribute most effectively to the Union's competitiveness as well as security and resilience. A particular focus shall be put on strategic technologies contributing to the Union's open strategic autonomy. At the same time, we welcome the foreseen flexibility for the next MFF and the ECF. We deem it unwise to limit the ECF to those key strategic technologies that we can identify today since new challenges and technologies might arise between now and 2034. But such additional flexibility can only be possible if an effective governance structure is in place, especially with respect to overarching award criteria and targets of the work programmes. Key overarching / strategic decisions must not be determined in implementing acts, e.g. in the work programmes but in the Regulation itself. This concerns in particular the selection/award criteria of the ECF as well as the principles for prioritisation in the work programmes for all policy windows. Those criteria must ensure the additonality of support and apply the principles of excellence and competition. Mechanisms to ensure predictable support for actual key strategic technologies must be strengthened. In addition, MS must play a sufficient role in the strategic management of activities. Since the policy windows also include collaborative research in Horizon Europe, the reference to the Horizon Europe Regulation must either be made more clear or specific R&I objectives must be specified (such as advance scientific excellence, generate knowledge, create a pan-European research and innovation ecosystem etc.).

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	We welcome the link made between the general objectives and the specific policy windows IE (Comments): IE would welcome the inclusion of stronger language on public sector capacity-building. Also recommend integrating performance-based indicators and clear escalation mechanisms for governance dispute.
1. The general objective of the ECF is to ~~increase~~ strengthen the Union's competitiveness, notably in strategic sectors and technologies along the investment journey by:	AT (Comments): AT is against the subsummation of public health priorities under the objective of competitiveness. According to Art. 3 (1) of the TEU the promotion of health and well-being of the public is one of the objectives of the EU. Similarly, Art 9 and 168 TFEU require the insurance of a high level of protection of health and well-being in the implementation of all EU policies. AT therefore highlights the need to set clear stand-alone health objectives in the ECF. CZ (Comments): CZ believes that it is essential to ensure and subsequently uphold that the European Competitiveness Fund (ECF) is not solely focused on innovative solutions, but also facilitates, for instance within the framework of industrial (clean) transformation, the support for the implementation of available measures and technologies. This should apply regardless of the size of the business, and should contribute to achieving the European goals. The Czech Republic recognizes the critical situation of the European (especially energy-intensive) industry, which, on one hand, faces very limited technological options for significant emission reductions, while, on the other hand, is under

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	significant legislative pressure for rapid environmental and climate transformation. Therefore, the ECF should enable the expansion and appropriate complementing of the current funding opportunities. FI (Drafting suggestions): 1. The general objective of the ECF is to increase strengthen the ~~Union's~~ EU's global competitiveness, notably in strategic sectors and technologies along the investment journey by: FI (Comments): <u>All funding would need to have a general purpose of contributing to EU's global competitiveness</u> IT (Drafting suggestions): [...] along the investment ~~cycle journey~~ by: IT (Comments): It aligns the terminology with standard EU legal usage, ensuring consistency with other regulations and official documents LT (Drafting suggestions): 1. The general objective of the ECF is to ~~increase~~ strengthen the Union's European competitiveness, notably in strategic sectors and technologies across the Union and along the investment journey by: LT

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	(Comments): Lithuania considers that ECF should acknowledge and address the existing national and regional disparities in the European Union. SE (Drafting suggestions): The general objective of the ECF is to ~~increase~~ <u>strengthen the Union's</u> competitiveness and <u>ensuring European added value by promoting innovation, productivity and economic growth</u>, notably in [strategic] sectors and technologies along the investment journey by SE (Comments): This should be horizontal across the objectives. The focus of the ECF should be on promoting innovation, productivity and growth, in order to increase European competitiveness. SE considers that well-functioning markets with effective competition are what make companies competitive; it is important that support does not distort the market and competition between sectors or companies. Need further discussions on the meaning of “strategic technologies”. See brackets. SI (Drafting suggestions): The general objective of the ECF is to increase <u>strengthen the Union's</u> competitiveness, notably in strategic sectors, <u>defined by the policy windows, in knowledge production</u> and technologies along the investment journey by: SI

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	(Comments): We suggest adding a clarification of strategic sectors the EFC is dedicated to. If the investment journey is defined to include fundamental science it is not clear why only technologies are exemplified here. FR (Drafting suggestions): The general objective of the ECF is to strengthen the Union's competitiveness defined as the EU's capacity to raise productivity growth, high living standards and strategic autonomy in a rapidly evolving global landscape, notably in strategic sectors, including in terms of sovereignty, and technologies, resilience and industrial strength along the investment journey by: FR (Comments): La Commission devrait inclure une définition de la compétitivité. PL (Drafting suggestions): The general objective of the ECF is to strengthen the Union's long-term strategic resilience and competitiveness, by mobilising the innovative and productive potential of all Member States and notably in strategic sectors and technologies along the investment journey by: PL (Comments): The amendment highlights the need for a long-term, integrated approach to strengthening the Union's competitiveness. It emphasizes that the Union's strategic resilience requires the full utilization of the potential of all 27

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	Member States, their diversity, competences, and innovative capacities. In this way, the provision better reflects the objectives of the ECF as an instrument aimed not only at supporting strategic technologies but also at building lasting economic and industrial resilience across the Union.
(a) delivering technological, economic and environmental impact from the Union's investments, including by developing disruptive and incremental innovation, and emerging, cutting-edge, dual-use, and strategic technologies with significant economic potential, including by developing and accelerating their manufacturing and industrial deployment;	AT (Drafting suggestions): AT: delivering technological, economic ~~and~~ environmental and social impact AT (Comments): AT: Social security and stability are important preconditions for a strong workforce and competitive economy. Also, we need to uphold the European pillar of social rights – especially in times of economic hardship. CZ (Drafting suggestions): a) delivering technological, economic and environmental impact from the Union's investments, including by developing disruptive and incremental innovation, and emerging, cutting-edge, dual-use, and strategic technologies with significant economic potential, including by developing and accelerating their manufacturing, commercialization and industrial deployment; CZ (Comments): CZ believes that turning innovations into real, market-ready products and services is of the utmost importance. The EU shall increasingly focus its efforts on supporting the commercialization and scale-up of innovation. Therefore, we would also like to add it to the text.

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	DE (Drafting suggestions): a PT (Comments): It is important that these requirements, namely definitions of “strategic technologies” are carefully aligned with NZIA, CRMA and the future IAA, contributing towards the goals of simplification and clarity. Social impact should be highlighted as a way to guarantee “leaving no one behind”. It would be more clear to include “industrial and market deployment” in alignment with point 1 (c). BE (Drafting suggestions): delivering technological, economic, environmental impact from the Union's investments, including by developing excellent disruptive and incremental innovation, and emerging, cutting-edge, dual-use, and strategic technologies with significant economic potential, including by developing and accelerating their manufacturing and industrial deployment; BE (Comments): It is important to emphasise that ECF also uses excellence as a criterion for innovations. SE (Drafting suggestions):

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	(a) delivering technological, economic, social and environmental impact from the Union's investments, including by developing disruptive and incremental innovation, and emerging, cutting-edge, dual-use, and [strategic] technologies with significant productive economic potential, including by developing ~~and accelerating their~~ innovative manufacturing and industrial deployment; SE (Comments): The societal and social aspect of sustainable development should be emphasized. Is “incremental” innovation as relevant as “disruptive”? What is the role of incremental innovation in strengthening competitiveness and does it merit public funding (under what conditions)? Need further discussions on the meaning of “strategic technologies”. See brackets. SI (Drafting suggestions): delivering know-how, technological, economic and environmental impact from the Union's investments, including by supporting research and innovation and developing disruptive and incremental innovation, based on underlying research, and emerging, cutting-edge knowledge as well as, dual-use, and strategic technologies with significant societal and economic potential, including by developing and accelerating their manufacturing and industrial deployment without crowding out private investors and initiatives; SI (Comments):

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	Without long-term support to research and cutting-edge knowledge there can be no disruptive innovation or technological breakthroughs. The position of research and innovation as drivers of European competitiveness should be much more emphasized, as well as the promotion of collaborative research. FR (Drafting suggestions): delivering technological, economic and environmental impact from the Union's investments, including by developing disruptive and incremental innovation, and emerging, cutting-edge, dual-use, and strategic technologies with significant economic potential, including by fostering excellent research, developing and accelerating their manufacturing, ~~and~~ industrial and market deployment FR (Comments): Emploi du même vocabulaire que dans les considérants et ajout de « market »
(b) reducing or preventing the Union's strategic dependencies, and reinforcing the Union's resilience, and economic security, including through diversifying sources and markets, support to ramp up of ~~European the~~ Union's production of strategic technologies and creating, strengthening and ~~protecting~~ safeguarding critical Union value chains and infrastructure;	DE (Drafting suggestions): (b) reducing or preventing the Union's strategic dependencies, and reinforcing the Union's resilience, and economic security, including through diversifying sources and markets, strengthening and establishing circular economy solutions and markets for secondary raw materials, support to ramp up of ~~European the~~ Union's production of strategic technologies and

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	creating, strengthening and ~~protecting~~ safeguarding critical Union value chains and infrastructure DE (Comments): Progress in circular economy is a key factor for the independence and resilience. IT (Drafting suggestions): reducing or preventing the Union's strategic dependencies, and reinforcing the Union's, resilience, and economic security, including through diversifying sources and markets, support for scale-up [...] IT (Comments): Clearer and more formal drafting LT (Drafting suggestions): b) reducing or preventing the Union's strategic dependencies, and reinforcing the Union's resilience, and economic security, including through diversifying sources and markets, support to ramp up of ~~European~~ the Union's production of strategic technologies and creating, strengthening and ~~protecting~~ safeguarding critical Union value chains and infrastructure, particularly from physical and cyber threats; LT (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	LT would like to highlight the importance of protection from physical and cyber threats. ES (Drafting suggestions): (b) reducing or preventing the Union’s strategic dependencies, and reinforcing the Union’s resilience, and economic security, including through diversifying sources and markets, support to ramp up of ~~European the~~ <u>Union’s production of strategic technologies, supporting the adoption of technologies, capabilities or solutions for supply crises of critical resources,</u> and creating, strengthening and ~~protecting~~ <u>safeguarding</u> critical Union value chains, infrastructure <u>and key industrial manufacturing capacities;</u> SE (Drafting suggestions): Reducing ~~or preventing~~ the Union’s strategic dependencies, and reinforcing the Union’s resilience, and economic security, including through diversifying sources and markets, support to ramp up of ~~European the~~ <u>Union’s innovative production of [strategic] technologies</u> and creating, strengthening and <u>safeguarding</u> ~~protecting~~ critical Union value chains and infrastructure; SE (Comments): Preventing the dependencies should be done with market-oriented solutions, including new free trade agreements, should be sought as far as possible in order to limit these dependencies. Need further discussions on the meaning of “strategic technologies”. See brackets.

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	Welcome change to safeguarding. FR (Drafting suggestions): b) reducing or preventing the Union's strategic dependencies, and reinforcing the Union's resilience, <u>sustainability, sovereignty, research</u> and economic security, including through diversifying sources and markets, support to ramp up of ~~European~~ <u>the Union's</u> production of strategic technologies, <u>integrating European preference</u> and creating, strengthening and ~~protecting~~ <u>safeguarding</u> critical Union value chains and infrastructure; PL (Drafting suggestions): (b) reducing or preventing the Union's strategic dependencies, and reinforcing the Union's resilience, and economic security <u>(including food and medical security)</u> including through diversifying sources and markets, support <u>for the to-ramp up and geographically balanced development of European the Union's technological and industrial capacities in strategic sectors,</u> ~~production of strategic technologies~~ and creating, strengthening and ~~protecting~~ <u>safeguarding</u> critical Union value ~~and delivery~~ chains and infrastructure; PL (Comments): The proposed modification aims to reflect the dual objective of the European Competitiveness Fund to both increase production capacity (ramp-up) and ensure the balanced development of the Union's industrial and technological base. By explicitly referring to balanced development, the text recognises the need to avoid excessive geographical concentration of strategic technologies and to foster the participation of all Member States in building Europe's long-term industrial resilience and competitiveness.

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	Poland emphasizes the need to support food security as the strategic base for economic security, including strengthening and reducing dependency of supply chains in agri-food sector. Poland recommends to add provisions regarding medicines safety. Critical Medicines Act (CMA) is mentioned in The Competitiveness Compass for the EU as an element of legislation aimed at strengthening the supply of critical medicines and their ingredients, thus reducing dependence on third countries.
(c) addressing market failures and suboptimal investment situations, including by crowding in private capital and institutional investors as well as public funding in a proportionate manner, while avoiding duplication and without crowding out private investors; serving as an integrated platform for delivering targeted financial support to companies across all development phases, including start-ups, scale-ups, and strategic companies, and including those actively pursuing manufacturing, industrial and market deployment;	AT (Drafting suggestions): addressing market failures and suboptimal investment situations, including by crowding in private capital and institutional investors ~~as well as public funding in a proportionate manner~~, while avoiding duplication and ~~without~~ crowding out private or other public investors; serving as an integrated platform for delivering targeted financial support to companies across all development phases, including start-ups, scale-ups, and strategic companies, and including those actively pursuing manufacturing, industrial and market deployment; AT (Comments): Crowding in of private and public sources should not be treated equally – we have to focus on the mobilisation of private capital. PT (Comments): Which guarantee mechanisms will be put in place to avoid the duplication of funding? Where will the concept of “strategic companies” be clearly outlined?

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	SE (Drafting suggestions): addressing market failures <u>that cannot be mitigated in a more efficient manner</u> and suboptimal investment situations, including by crowding in private capital and institutional investors as well as public funding in a proportionate manner, while avoiding duplication and without crowding out private investors; serving as an integrated platform for delivering targeted financial support to companies, across all development phases <u>including</u> start-ups, scale-ups, ~~and strategic companies,~~ <u>and</u> including those actively pursuing <u>innovative</u> manufacturing, industrial and market deployment; <u>crowding in private investments and institutional investors as well as public funding in, while avoiding duplication and without crowding out private investors;</u> SE (Comments): ”Manufacturing” and ”production” seem to be used interchangeably. Should be clarified whether there is a difference, alternatively text should be harmonised. Support can be justified if it deals with a clear market failure that cannot be addressed in a more efficient manner. This does not include suboptimal investment situations. Financial support should not be given to established manufacturing processes, as it risks counteracting the necessary adjustment of the economy. Crowding in private investments should be an objective in itself. SI

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Drafting suggestions): addressing market failures and suboptimal investment situations, including by crowding in private capital and institutional investors as well as public funding in a proportionate manner, while ~~avoiding~~ preventing duplication and without crowding out private investors; serving as an integrated platform for delivering targeted financial support to companies across all development phases, including start-ups, scale-ups, and strategic companies, and including those actively pursuing manufacturing, industrial and market deployment <u>with Union added value</u>; SI (Comments): It is not enough to try and avoid duplication. Duplication needs to be prevented. What will be the main driver for funding decisions under ECF that will ensure EAV, like pan-European collaboration is for FP? Who will select or determine strategic companies and based on what criteria? FR (Comments): La France souhaite obtenir davantage de précisions sur ce que recouvre la notion de « financement public de manière proportionnée ». Concernant le « soutien financier aux entreprises à toutes les phases de développement », nous soutenons l'accompagnement à toutes les étapes de développement des projets, y compris les phases en aval d'industrialisation et de commercialisation.

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	À cet égard, il conviendrait de promouvoir le concept de « préférence européenne », actuellement en discussion en vue de son introduction dans le cadre des IPCEI. L'idée serait de créer une réglementation « passerelle » entre les IPCEI, le RSE et le DMA. PL (Drafting suggestions): „(c) addressing market failures and suboptimal investment situations, including by crowding in private capital and institutional investors as well as public funding in a proportionate manner, while avoiding duplication and without crowding out private investors; serving as an integrated platform for delivering targeted financial support to companies across all development phases start-ups, scale-ups, and strategic companies, including those actively pursuing manufacturing ~~(including agri-food processing)~~, industrial and market deployment”.
(d) furthering the integration of Union capital markets in <u>alignment line</u> with the objective of delivering <u>the</u> Savings and Investments Union, including ~~solutions~~ <u>tools</u> to address the fragmentation of Union capital markets, eliminate barriers and create incentives for private investments and diversify and reinforce the sources of financing for Union enterprises in all the Member States, including those with less developed capital markets;	
(e) aligning research, innovation and industrial policy support to translate Union's research excellence into Union industrial strength on global markets and securing the future of manufacturing in Europe;	CZ (Comments): CZ - Note that, in relation to this objective, Article 7 would benefit substantially from a stronger articulation of its complementarities with FP10, as well as from a clearer explanation of the Competitiveness Coordination

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Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	Tool. We would also kindly request these issues being clarified in written response to our comments. DE (Drafting suggestions): (e) aligning research, innovation and industrial policy support to translate Union's research excellence into Union industrial strength on global markets and securing the future of manufacturing in Europe, <u>as well as supporting resilience and a just transition to a sustainable, decarbonised and digital economy;</u> DE (Comments): Research cannot and should not be reduced to supporting industrial strength alone, but also to supporting other important aspects of competitiveness mentioned in this document IT (Drafting suggestions): (e) aligning research, innovation and industrial policy support to translate Union's research excellence into Union industrial strength on global markets and securing the future of manufacturing in Europe, <u>in synergy with Horizon Europe. through complementarity between research and industrial deployment.</u> IT (Comments): It is recommended to explicitly acknowledge the structural and operational link between Horizon Europe and the ECF, to ensure coherence and simplification in implementation. This amendment reinforces the connection between research and industrialisation, recognising Horizon Europe as a driver of scientific and technological excellence.

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	LT (Drafting suggestions): aligning research, innovation and industrial policy support and reducing national disparities to translate Union's research excellence into Union industrial strength on global markets and securing the future of manufacturing in Europe; LT (Comments): As indicated above, Lithuania considers that ECF should acknowledge and address the existing national disparities in the European Union. Is the suggestion is too strict we could stay within this: "pooling resources of all MS and aligning...". PT (Comments): The approach to value chains should be a main focus of the ECF. Along with the need for strong investment in research and in innovation in areas and technologies essential for competitiveness, we also need to overcome the chronic difficulty in bringing innovation to the market. This dimension must be reinforced. SE (Drafting suggestions): (e) ~~aligning research, innovation and industrial policy support to~~ translating Union's research excellence into Union industrial strength on global markets and ~~securing~~ promoting the future of manufacturing in Europe; SE

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Comments): Focus on the objective rather than the means for reaching the objective as all necessary policy areas cannot be listed. The proposed objective is too narrow in relation to the benefits of excellent science. European manufacturing should be promoted through research, innovation and industrial policy SI (Drafting suggestions): <u>combining and</u> aligning research, innovation and industrial policy support to <u>support</u> ~~translate~~ Union's research excellence <u>and translate it</u> into Union industrial strength <u>and knowledge capacity</u> on global markets and securing the future of <u>the broader innovation-to-market ecosystem as well as of</u> manufacturing in Europe; SI (Comments): We should support research excellence and thereby enable its translation into concrete results that have global impact. FR (Drafting suggestions): aligning research, innovation and <u>EU's sectoral policies</u> ~~industrial policy~~ support to translate Union's research excellence into Union economical ~~industrial~~ strength on global markets and securing the future of production ~~manufacturing~~ in Europe ; PL

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Drafting suggestions): <u>aligning research, innovation and industrial policy support to translate the Union's research excellence into Union industrial strength on global markets, fostering cohesion of the Single Market, building strategic industrial value chains while shortening supply chains and securing the future of manufacturing in Europe.</u> PL (Comments): It's crucial for ensuring the ECF addresses the economic disparities within the Union like the EU's innovation divide and strengthens building value chains and shortens supply chains, which is important for building the resilient economy.
(f) developing Union cross-border and critical infrastructure ~~key to~~ essential for the Union's competitiveness, and strategic independence in particular for energy and transport, digital and security, defence and space infrastructure as well as social infrastructure, and related data and services;	AT (Drafting suggestions): (f) developing Union cross-border and critical infrastructure ~~to~~ essential for the Union's competitiveness, and strategic independence in particular for energy and transport, digital and security, defence ~~as well as~~ and space infrastructure ~~as well as~~ and social and health infrastructure, and related data and services; AT (Comments): To make sure that besides space infrastructure, space data and services are also mentioned Crossborder infrastructure (including systems for data collection, storage and exchange) is crucial to health security. CZ

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Comments): CZ - What is the meaning of social infrastructure in this case? IE (Comments): IE query if there will be regulation and funding to support the development of these services? Data will also require standards to be set to allow interoperability and quality LT (Drafting suggestions): (f) developing <u>and strengtehnning</u> Union cross-border and critical infrastructure ~~key to~~ <u>essential for</u> the Union's competitiveness, ~~and~~ strategic independence <u>and resilience</u> in particular <u>for</u> energy and transport, digital and security, defence and space infrastructure as well as social infrastructure and related data and services <u>including through enhanced physical protection, preparedness and cybersecurity measures, with a view to ensuring the Union's security, the continuity of supply chains, and enhancing the ability to prevent, withstand and recover from disruptions and threats, including those of a hybrid nature</u> ; LT (Comments): Russia's continuing attacks on Ukrainian energy infrastructure, recent accidents of Russia's drones entering Lithuanian and Polish airspace once again demonstrate urgent need to be prepared to withstand threats for our critical energy security. Assets like pipelines, LNG terminals, interconnections and substations are now strategic targets, requiring urgent protection to ensure energy security and EU competitiveness. PT (Drafting suggestions):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	Developing Union cross-border, cluster cooperation and critical infrastructure (...)". PT (Comments): Clusters proved to be a powerful tool to enhance local synergies, economies of scale, promote collaborative innovation, and strengthen international competitiveness. These business ecosystems can foster sustainable value creation, stimulate knowledge transfer between scientific entities and companies, and accelerate the transition to circular and digital production models, improving the effectiveness and efficiency of resource's use. Thus, this dimension should be added. SI (Drafting suggestions): (f) developing Union cross-border and critical infrastructure ~~key to~~ essential for the Union's research excellence, competitiveness, and strategic independence in particular for energy and transport, digital and security, defence and space infrastructure as well as social infrastructure, and related data and services; FR (Drafting suggestions): (f) developing Union cross-border and critical infrastructure ~~key to~~ essential for the Union's competitiveness, and strategic independence in particular for energy and transport, digital and security, defence and space infrastructure as well as social infrastructure, and related data and services; FR (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	Il semble nécessaire de clarifier les interactions entre le Fonds Européen de Compétitivité (FEC), les PPNR et le Mécanisme pour l'interconnexion en Europe (MIE) dans les domaines des transports et des infrastructures énergétiques transfrontalières, afin de mieux comprendre comment ces fonds pourraient être mobilisés et pour quelles parties des projets en cours et à venir. PL (Drafting suggestions): (f) developing Union cross-border and critical infrastructure ~~key to~~ essential for the Union's competitiveness, and strategic independence in particular for energy and transport, digital and security, defence and space infrastructure as well as social infrastructure, water infrastructure, and related data and services; PL (Comments): Water infrastructure is an important element of critical infrastructure and is becoming increasingly important in the face of recurring water shortages and droughts.
(g) strengthening the competitiveness of SMEs and small mid-cap companies established in the Union and their ability to grow and scale up, in particular by improving their access to finance, including private investment, micro-finance and support to social enterprises as well as facilitating access to Union funding, through faster, simplified and harmonised procedures; and reducing and ensuring a proportionate reporting burden;	AT (Comments): Financing or funding measures for small mid-caps must not be at the expense of SMEs. SMEs (especially micro and small enterprises) cannot be compared to SMCs, not even in terms of their financing needs. At the same time, SMEs form the broad base of the European economy. AUT's concern is that SMCs will compete with SMEs for funding and financing, as access to and availability of financing for SMEs and SMCs are mentioned in one sentence. This has to be avoided.

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	BG (Drafting suggestions): (g) strengthening the competitiveness of SMEs established in the Union, improving their access to finance, in particular to micro-finance, and supporting social enterprises, as well as facilitating access to Union funding; (ga) providing opportunities for growth and scaling up of the SMEs and small mid-caps, in particular by facilitating their access to finance including private investment, through faster, simplified and harmonised procedures; reducing and ensuring a proportionate reporting burden; BG (Comments): In order to ensure broad accessibility for SMEs, it is necessary to establish a separate general objective related to access to finance and support for SME competitiveness, as well as the inclusion of specific measures within the Fund's specific objectives. The definition of a small mid-cap enterprise should refer to Regulation 651/2014 in order to ensure legal certainty and compliance with State aid rules. IE (Drafting suggestions): Amend end of paragraph: add "...and ensuring a proportionate reporting burden, <i>including a once-only principle for beneficiary data across Union instruments.</i>" IE (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	IE recommends the inclusion within the article of a “Once-only principle” focusing on reducing administrative burden for individuals and businesses. Suggested text amendment. IE would like to see reference to regional disparities in the geographical balance and the need for tailored support mechanisms in regions with lower SME density or capacity. IE would welcome clarity on the definition and eligibility criteria for small mid-cap companies to ensure transparency and avoid dilution of SME-focused measures. PT (Comments): Start-ups are sources of innovation, incremental and disruptive, and should be highlighted as an active part of the ecosystem. SI (Drafting suggestions): (g) strengthening the competitiveness of SMEs and small mid-cap companies established in the Union and their ability to grow and scale up, in particular by <u>strengthening entrepreneurial support environment as well as by</u> improving their access to finance, including private investment, micro-finance and support to social enterprises as <u>well as</u> facilitating access to Union funding, through faster, simplified and harmonised procedures; <u>and</u> reducing and ensuring a proportionate reporting burden; SI (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	Entrepreneurial support environment, such as networking, promotional, advisory...activities are as important as access to finance in order to strengthen the competitiveness of SMEs and therefore we suggest a reference in this objective.. FR (Comments): Les autorités françaises sont favorables à un soutien des PME et des entreprises de taille intermédiaires par la Fonds européen de compétitivité. Il convient par ailleurs de modifier la définition d'une ETI mentionnée à l'article 2(18) afin de ne plus faire référence à la recommandation de la Commission fixant un plafond à 750 employés mais à l'accord au Conseil augmentant ce plafond à 1000 employés dans les omnibus I et IV. Les autorités françaises effectueront des propositions écrites en ce sens. PL (Drafting suggestions): „(g) strengthening the competitiveness of SMEs as a priority (also understood as farmers in the agri-food sector) and also including small mid-cap companies established in the Union and their ability to grow and scale up, in particular by improving their access to finance, including private investment, micro-finance and support to social enterprises as facilitating access to Union funding, through faster, simplified and harmonised procedures; reducing and ensuring a proportionate reporting burden” PL (Comments): Poland emphasizes that farmers should also benefit from the proposed instruments. Furthermore, it is worth noting that, in accordance with the “Think Small First” principle set out in the SBA, the specific needs of SMEs should be duly taken into account. Given the particular characteristics of SMEs

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	— especially their structural limitations in terms of human and financial resources, which may hinder their access to funds from the ECF — it is proposed to amend the relevant provisions so that they explicitly reflect the need to grant SMEs preferential treatment compared to other categories of enterprises, such as SMCs
(h) addressing shortages of skills critical to all kinds of quality jobs in strategic sectors for EU competitiveness, through both horizontal and specific skills investment, contributing to the availability of skills in future emerging technologies, ~~and by pursuing to accompany investments with skills investment and indicate when it is included;~~	CZ (Comments): CZ -On what level of education system will the investments take place? DE (Drafting suggestions): (h) addressing shortages of skills critical to all kinds of quality jobs in strategic sectors for EU competitiveness, through both horizontal and specific skills investment, contributing to the availability of skills in future emerging technologies, ~~and by pursuing to accompany investments with skills investment and indicate when it is included,~~ and by pursuing to accompany investments with skills investment and indicate when it is included; DE (Comments): We demand the reinstatement of the last sentence. The possibility to align investments of companies with investment in skills is crucial for the success of tranformation processes. Those investments in training and continuing education have a positive impact on employment developments. IE (Drafting suggestions): promoting quality jobs and addressing shortages of skills critical to all kinds of ~~quality jobs employment~~ in strategic sectors for EU

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	competitiveness, through both horizontal and specific skills investment, contributing to the availability of skills in future emerging technologies IE (Comments): In addition to addressing skills shortages, the European Competitiveness Fund also aims to create quality jobs and employment in strategic sectors, and IE is of the view that this should be reflected in paragraph (h) of Article 3.1. It has been acknowledged that the competitive strength of the Union lies in its people. The Competitiveness Compass identifies promoting quality jobs as a horizontal enabler. PT (Comments): Skills are a very important dimension. We welcome the reference. SI (Drafting suggestions): (h) addressing current as well as future shortages of skills critical to all kinds of quality jobs in strategic sectors for EU competitiveness, through both horizontal and specific skills investment, contributing to the availability of skills in future emerging technologies, ~~and by pursuing to accompany investments with skills investment and indicate when it is included;~~ SI (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	We need to address not only current shortages but also foresee and address future trends and skills shortages. FR (Drafting suggestions): (h) addressing shortages of skills critical to all kinds of quality jobs in strategic sectors for EU competitiveness and sovereignty, through both horizontal and specific skills investment, contributing to the availability of skills in future emerging technologies, ~~and by pursuing to accompany investments with skills investment and indicate when it is included;~~
(i) ensuring the integration of the Single Market, including by supporting initiatives at any stage of the investment journey with positive spill-over effects for the Single Market and resilience of its value chains;	IT (Drafting suggestions): (i) ensuring the integration of the Single Market, including by supporting initiatives at any stage of the investment cycle journey with positive spill-over effects for the Single Market and resilience of its value chains; IT (Comments): It aligns the terminology with standard EU legal usage, ensuring consistency with other regulations and official documents SE (Drafting suggestions): (i) ensuring the further integration of the Single Market, including by supporting innovative initiatives at any stage of the investment journey with positive spill-over effects for the Single Market, with potential to increase productivity and resilience of its value chains, when support does not risk crowding out private investments;

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	SE (Comments): It is important to emphasize the continued development of the single market. Important to stress that all initiatives need to be productive. FR (Drafting suggestions): (i) ensuring the integration of the Single Market, including by supporting initiatives at any stage of the investment journey with positive spill-over effects for the Single Market and resilience of its value chains;
	SI (Drafting suggestions): <u>1) protecting, restoring and improving the quality of the environment, reducing pollution, halting and reversing biodiversity loss and tackling the degradation of terrestrial and marine ecosystems.</u> SI (Comments): Recital 23 should be reflected in the legal text, to ensure its applicability.
(j) — supporting actions for the development, implementation, and monitoring of relevant Union legislation and policy;	PL (Comments): .
(k) ensuring a just transition to a sustainable, decarbonised and digital economy that is fair and supporting supportive of workers and communities;	CZ (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	CZ - What is the real meaning of just transition in this context? Is it still, as for now, related just to coal regions? DE (Drafting suggestions): (k) ensuring a just transition to a sustainable, decarbonised and digital economy that is fair and ~~supporting~~ supporting supportive of workers and communities; DE (Comments): We reject the changed wording and demand a return to “supporting” as in our understanding only thereby actions under the ECF can be realized that allow for support of workers in transformation processes with the goal of contributing to competitiveness. The new wording limits the scope of this paragraph. IE (Drafting suggestions): ensuring a just transition to a sustainable, decarbonised and digital economy that is fair, safeguards job quality and, ~~and supporting~~ supportive protects workers, and is supportive of communities; IE (Comments): IE notes that the Council Recommendation on ensuring a fair transition towards climate neutrality was adopted at EPSCO (the employment and social Council) in June 2022.

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	IE is of the view that workers must be protected during the transition and the suggested IE text for inclusion in paragraph (k), Article 3.1 is reflective of the text of the 2022 Recommendation on climate neutrality. Suggested text amendments, LT (Drafting suggestions): k) ensuring a just transition to a sustainable, decarbonised and digital economy that is fair and ~~supporting~~ supportive of workers, ~~and~~ communities and businesses. LT (Comments): LT suggest adding businesses to emphasize their role in the green transition and necessary support. PT (Comments): Leaving no one behind is a major goal at EU level and this should be highlighted along the text. FR (Drafting suggestions): (k) ensuring a just transition to a sustainable, resilient, decarbonised and digital economy that is fair and ~~supporting~~ supportive of workers and communities PL (Drafting suggestions): (k) ensuring a just transition to a sustainable, low-emission, decarbonised and digital economy that is fair and ~~supporting~~ supportive of workers and communities, including in particular rural communities and communities in crisis;

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	PL (Comments): Transforming the economy towards a more sustainable one does not necessarily mean a decarbonized economy. The EU should seek improved methods and techniques for producing and processing fossil fuels to achieve a low- or zero-emission economy.
	CZ (Drafting suggestions): <u>(I) safeguarding balanced distribution of opportunities across the Union to unlock the full potential of all regions and ensuring that less-developed regions are effectively connected to EU value chains.</u> CZ (Comments): CZ - Although CZ recognize the importance of supporting excellence within the ECF, we believe that no Member State can be left behind. Moreover, further widening of disparities between Member States must be avoided. Ensuring geographically balanced participation and fostering integration of stakeholders from all Member States into wider European industrial and innovation value chains, whilst ensuring fair and effective access to support mechanisms within the ECF is therefore a fundamental prerequisite for strengthening the overall competitiveness and resilience of the EU. Thus, we propose to add new par. (I). IT (Drafting suggestions):

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	<u>l) protecting, restoring and improving the quality of the environment, including water, coast, sea and soil, reducing pollution, halting and reversing biodiversity loss and tackling the degradation of terrestrial and marine ecosystems.</u> SI (Drafting suggestions): <u>(l) promoting public health, strengthening health systems and enhancing health security;</u>
<u>(ka) supporting actions for the development, implementation, and monitoring of relevant Union legislation and policy.</u>	DE (Drafting suggestions): (ka) supporting actions for the development, implementation, and monitoring of relevant Union legislation and policy. <u>This shall exclude administrative expenditures of Union institutions.</u> DE (Comments): In which areas does COM intend to fund the development, implementation and monitoring of EU legislation with the ECF? Who could be the beneficiaries of this funding? Public administrations of the Member States? When this is linked to the consolidation of various funding programs, which we welcome in principle, it is important that key tasks of these programs are fulfilled more effectively and more efficiently by the ECF in order to leverage synergies. If this objective concerns administrative action of the COM, this should be reflected in the administrative expenditures in heading 4 of the MFF.
	AT (Drafting suggestions): NEW (l) <u>complementing Member States' actions to improve the health of people across the Union and to ensure a high level of health protection in</u>

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	<u>all Union policies and activities. The ECF shall pursue the following general objectives without prejudice to the other objectives set out in Art. 3 (1) (a)-(ka) and, where appropriate in line with the “One Health” approach: (i) improving and promoting health in the Union in order to reduce the burden of communicable and non-communicable diseases by supporting health promotion and disease prevention, reducing health inequalities, promoting healthy lifestyles and access to healthcare; (ii) Protecting people in the Union from serious cross-border health threats and strengthening the responsiveness of health systems and coordination between Member States to deal with serious cross-border health threats; (iii) improving the availability, accessibility and affordability of medicines, medical devices and crisis-relevant products in the Union and promoting innovation in such products; (iv) strengthening health systems by improving their resilience and resource efficiency</u> AT (Comments): AT considers that a new paragraph should be included defining the health priorities and objectives of the ECF. As one of the programmes following the EU4Health programme, AT considers it important to set out clear stand-alone health objectives in the ECF. CZ (Drafting suggestions): <u>enhancing environmental quality contributing to promoting biodiversity protection and nature restoration</u> CZ (Comments): We propose to add environmental protection as a standalone objective. Given the support declared under Clean transition and industrial decarbonisation window, it is appropriate that environmental protection is explicitly reflected

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	in the scope. The current proposal focuses primarily on technological solutions, overlooking their potential to contribute to environmental protection. EL (Drafting suggestions): <u>The Fund shall ensure balanced geographical coverage and equal access for all Member States, in particular for transition and less-developed regions, in line with Cohesion Policy principles</u>]. <u>[At least X % of the Fund's total resources shall be dedicated to SMEs to ensure a broad participation base across all regions.]</u> EL (Comments): Article 3 – Objectives of the Fund To guarantee that the Fund's implementation supports territorial cohesion and prevents excessive concentration of resources in already competitive regions. Insert new paragraph (3a): SMEs are the backbone of the EU economy and require specific targeting within the ECF to ensure real economy impact and inclusiveness. A high percentage of the budget, indicatively 30% should be dedicated to SMEs. PL (Drafting suggestions): To add.”(kb) Support for water-smart, nature-positive economy, including advanced wastewater treatment (e.g. fourth-stage purification) and water reuse technologies, in line with Directive (EU) 2024/3019 and Regulation (EU) 2020/741.

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	<u>promoting an inclusive approach that reflects the diversity and varying innovation levels across each Member State's economies, democratising excellence and impact in the development and deployment of strategic technological and industrial capacities. A broader and more geographically diverse participation base will strengthen innovation diffusion, ensure fair competition and enhance Europe's strategic autonomy.</u> PL (Comments): This addition reflects the need to support Member States in implementing legally binding EU water legislation and to finance from the EU budget innovative, capital-intensive infrastructure projects in the water sector. It is essential to ensure that the implementation of the ECF does not lead to a concentration of resources and industrial capacities in a limited number of advanced Member States or regions. Such an outcome would risk undermining one of the Union's core principles — economic, social and territorial cohesion — and could weaken the resilience of the EU's single market as a whole
SECTION 2	

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
SINGLE RULEBOOK	DE (Comments): We welcome the single rulebook in principle since recipients of funding only have to meet a single set of requirements. This leads to a reduction of bureaucracy. However, the exact details are unclear to us yet. Efficiency benefits in practice will depend on how often case-by-case rules will be needed. IT (Comments): We believe it would be appropriate to have further clarification on the effective implementation of the single rulebook.
	FI (Drafting suggestions): <u>FI suggest new article X: General award criteria and procedure</u> <u>ECF funding shall be based on open competition and the main award criteria should refer to excellence, impact and quality as well as highest relevance for European competitiveness.</u> FI (Comments): <u>See general comments in the beginning.</u>

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
Article 5	IT (Comments): With regard to Articles 5 to 8, the issue arises of a possible relationship between the Competitiveness Fund and the National Single Fund/NRP, which should ideally be guided by a logic of reciprocity. MT (Comments): Malta stresses the need for proportionality and avoidance of excessive administrative burdens, given limited administrative capacity. Important to ensure grants remain available alongside financial instruments, as Malta's market size and underdeveloped capital markets limit access to equity/venture funding. PT (Comments): It is recommended to establish transparent criteria for the use of additional contributions from Member States to maintain equity between MS and promoters.
Additional resources	
1. Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or other third parties, may make additional financial or non-financial contributions available to the ECF, or <u>to</u> any of its specific activities or objectives referred to in Article 3(2), including specific contributions to the ECF InvestEU Instrument budgetary guarantee and financial instruments as referred to in Article 21. Additional financial contributions shall constitute	HR (Drafting suggestions): HR: HR suggest additional amendment: <i>Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or other third parties, may make additional financial or non-financial contributions</i>

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
external assigned revenue within the meaning of Article 21(2), points (a), (d), or (e) or Article 21(5) of Regulation (EU, Euratom) 2024/2509.	<i>available to the ECF, or to any of its specific activities or objectives referred to in Article 3(2), including specific contributions to the ECF InvestEU Instrument budgetary guarantee and financial instruments as referred to in Article 21, ensuring that such contributions do not undermine the balanced functioning of the Fund across all Member States. Additional financial contributions shall constitute external assigned revenue within the meaning of Article 21(2), points (a), (d), or (e) or Article 21(5) of Regulation (EU, Euratom) 2024/2509.</i> HR (Comments): HR proposes this addition to safeguard against the risk that voluntary contributions could distort the Fund in favour of more advanced Member States, ensuring fair access for all. LU (Drafting suggestions): 1. Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or other third parties, may make additional financial or non-financial contributions available to the ECF, or to any of its specific activities or objectives referred to in Article 3(2), including specific contributions to the ECF InvestEU Instrument budgetary guarantee and financial instruments as referred to in [Article 21] or to advisory support in Chapter III. Additional financial contributions shall constitute external assigned revenue within the meaning of Article 21(2), points (a), (d), or (e) or Article 21(5) of Regulation (EU, Euratom) 2024/2509. MT (Drafting suggestions): 1. Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	other third parties, may make additional financial or non-financial contributions available to the ECF, or to any of its specific activities or objectives referred to in Article 3(2), including specific contributions to the ECF InvestEU Instrument budgetary guarantee and financial instruments as referred to in [Article 21] or to advisory support in Chapter III. Additional financial contributions shall constitute external assigned revenue within the meaning of Article 21(2), points (a), (d), or (e) or Article 21(5) of Regulation (EU, Euratom) 2024/2509. FR (Comments): La possibilité offerte aux États membres de fournir des ressources supplémentaires ne doit pas être utilisée pour contourner les plafonds du cadre financier pluriannuel en sollicitant des contributions additionnelles de leur part au cours de la période de programmation. PL (Drafting suggestions): <u>1.</u> Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or other third parties, may make additional financial or non-financial contributions available to the ECF, or to any of its specific activities or objectives referred to in Article 3(2), including specific contributions to the ECF InvestEU Instrument budgetary guarantee and financial instruments as referred to in Article 21. Additional financial contributions shall constitute external assigned revenue within the meaning of Article 21(2), points (a), (d), or (e) or Article 21(5) of Regulation (EU, Euratom) 2024/2509, encouraging

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	<u>active participation of all Member States in line with the objective of leveraging the Union's full innovative and industrial potential-</u> PL (Comments): Justification in General comments
2. Resources allocated to Member States under shared management may, at their request, in accordance with Article X of Regulation (EU) [XXX][<i>NRPF regulation</i>], be made available to the ECF. The Commission shall implement those resources directly or indirectly in accordance with Article 62(1), point (a) or (c) of Regulation; (EU, Euratom) 2024/2509. ~~They~~ Those resources shall be additional to the amount referred to in Article 4- ~~Those resources and~~ shall be used for the benefit of the Member State concerned. Where the Commission has not entered into a legal commitment under direct or indirect management for additional amounts thus made available to the ECF, the corresponding uncommitted amounts may, at the request of the Member State concerned, be transferred back to one or more respective chapters of the Plan or their successors.	DE (Drafting suggestions): ...[or their successors.] DE (Comments): Horizontal issue, needs to be put in brackets. FI (Drafting suggestions): 2. Resources allocated to Member States under shared management may, at their request, in accordance with Article X of Regulation (EU) [XXX][<i>NRPF regulation</i>], be made available to the ECF. The Commission shall implement those resources directly or indirectly in accordance with Article 62(1), point (a) or (c) of Regulation; (EU, Euratom) 2024/2509. ~~They~~ Those resources shall be additional to the amount referred to in Article 4- ~~Those resources and~~ shall be used for the benefit of the Member State concerned. Where the Commission has not entered into a legal commitment under direct or indirect management for additional amounts thus made available to the ECF, the corresponding uncommitted amounts may, at the request of the Member State concerned, be transferred back to one or more respective chapters of the Plan or their successors. <u>The additional resources</u>

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Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	referred to in paragraph 1 and 2 should not have any impact on the allocation of EFC funding. FI (Comments): <u>We see that the additional resources may be significant and thus could start to play a significant role in the programming of the ECF money. When the sources and dynamics of these additional resources are still unknown, we have to safeguard the independent status of ECF award procedures and programming.</u> MT (Drafting suggestions): (2) Resources allocated to Member States under shared management may, at their request, in accordance with Article X of Regulation (EU) [XXX][NRPF regulation], be made available to the ECF. The Commission shall implement those resources directly or indirectly in accordance with Article 62(1), point (a) or (c) of Regulation, (EU, Euratom) 2024/2509. Those resources shall be additional to the amount referred to in Article 4-and shall be used for the benefit of the Member State concerned. <u>Where implemented through the ECF InvestEU Instrument those resources shall be subject to the corresponding rules of the ECF InvestEU Instrument, which shall replace the relevant NRPP provisions.</u> Where the Commission has not entered into a legal commitment under direct or indirect management for additional amounts thus made available to the ECF, the corresponding uncommitted amounts may, at the request of the Member State concerned, be transferred back to one or more respective chapters of the Plan or their successors. BE (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	The opening to additional resources can strengthen the Fund's flexibility and responsiveness, but there is a need for clear governance to avoid that it leads to a more unlevel playing field in the internal market. SE (Drafting suggestions): Resources allocated to Member States under shared management may, at their request, in accordance with Article X of Regulation (EU) [XXX][<i>NRPF regulation</i>], be made available to the ECF. The Commission shall implement those resources directly or indirectly in accordance with Article 62(1), point (a) or (c) of Regulation, (EU, Euratom) 2024/2509 and while respecting the Rule of Law conditionality and state aid rules. ~~They~~ Those resources shall be additional to the amount referred to in Article 4-~~Those resources~~ and shall be used for the benefit of the Member State concerned. Where the Commission has not entered into a legal commitment under direct or indirect management for additional amounts thus made available to the ECF, the corresponding uncommitted amounts may, at the request of the Member State concerned, be transferred back to one or more respective chapters of the Plan or their successors. FR (Drafting suggestions): 2. Resources allocated to Member States under shared management may, at their request, in accordance with Article X of Regulation (EU) [XXX][<i>NRPF regulation</i>], be made available to the ECF. The Commission shall implement those resources directly or indirectly in accordance with Article 62(1), point (a) or (c) of Regulation, (EU, Euratom) 2024/2509. ~~They~~ Those resources shall be additional to the amount referred to in Article 4-~~Those resources~~ and shall be used for the benefit of the Member State concerned. Where the Commission has not entered into a legal commitment under direct or indirect management for additional amounts thus made available to the ECF, the corresponding uncommitted amounts may, at the

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	request of the Member State concerned, be transferred back to one or more respective chapters of the Plan ~~or their successors~~ FR (Comments): Formulation plus claire pour éviter les retards dans le transfert vers les programmes sources. PL (Drafting suggestions): „----and shall be used for the benefit of the Member State concerned, meaning that they shall be obligatorily allocated to projects implemented on the territory of that Member State or to projects in which it has a significant participation” PL (Comments): It is necessary to clarify the principle of “for the benefit of the Member State concerned” (“These measures should be used for the benefit of the Member State concerned”) — meaning the mandatory allocation of these funds to projects implemented within the territory of that Member State or with its substantial participation. This provision undermines the distinct objectives, assumptions, and logic of various EU programmes. Different management systems still exist for centrally managed programmes and funds under shared management. Moreover, the process of transferring funds is complex, time-consuming, and currently unpopular.

Proposal for a Regulation establishing the European Competitiveness Fund (doc. 13413/25)

From: AT, BG, CZ, DE, FI, HR, IE, IT, LT, LU, MT, PT, BE, HU, ES, SE, SI, EL, FR, PL

Deadline: 15 October 2025 COB

Updated: 27/10/2025 09:02

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	We understand the need for flexibility in managing the EU budget; however, the Commission should at the same time justify and maintain the logic of individual programmes and provide tools that are easy to implement.
	FR (Drafting suggestions): The resources allocated to the Fund under this article are subject of an estimate within the draft annual budget, separate from the budget appropriations and broken down by type of resource. They are taken into account in the budgetary management of the Fund. FR (Comments): Les autorités françaises estiment qu'en raison de leur importance, les recettes affectées devraient être prises davantage en compte dans la procédure budgétaire annuelle. Des informations plus consolidées devraient être fournies à l'autorité budgétaire.

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
<i>Article 6</i>	IT (Comments): Article 11 of COM(2025) 565 (Additional resources and use of resources) provides both for the possibility that the Single Fund may also be financed with additional resources coming from EU institutions (para. 1), and for the possibility that National Plans may transfer resources to EU directly managed programmes (para. 2). Article 64, para. 5 provides that the European Commission and the Member States shall ensure coordination, coherence and synergies between the Single Fund and other Union programmes and instruments. To this end, operations may receive support from other Union programmes and instruments, provided that such support does not cover the same costs. Considering this, it seems appropriate that the text make explicit the principle of reciprocity and the bidirectional flow of resources, in order to maximise the territorial impact of EU funding. In particular, the possibility that resources from the Competitiveness Fund may be transferred to National Plans or used to finance national projects in overbooking could be explicitly provided for either in Article 6 or in Article 7. PT (Comments): Advocate for the application of single rules and a single legal commitment whenever possible in combined financing. Additionally, coordinated auditing is proposed to avoid double monitoring by different programmes.
Alternative, combined and cumulative funding	PT (Comments): Can the COM detail cases where cumulative funding is allowed?

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
1. The ECF shall be implemented in synergy with other Union programmes. An action that has received a Union contribution from another programme may also receive another contribution under the ECF. The rules of the relevant Union programme shall apply to the corresponding contribution or a single set of rules may be applied to all contributions and a single legal commitment may be concluded. If the Union contribution is based on eligible costs, the cumulative support from the Union budget shall not exceed the total eligible costs of the action and may be calculated on a pro-rata basis in accordance with the documents setting out the conditions for support.	AT (Drafting suggestions): 1. The ECF shall be implemented in synergy with other Union programmes. An action that has received a Union contribution from another programme may also receive another contribution under the ECF. The rules of the relevant Union programme shall apply to the corresponding contribution or a single set of rules may be applied to all contributions and a single legal commitment may be concluded. If the Union contribution is based on eligible costs, the cumulative support from the Union budget shall not exceed the total eligible costs of the action and may be calculated on a pro-rata basis in accordance with the documents setting out the conditions for support. <u>Such synergies shall not undermine the predictability and planning security of Union research and innovation activities.</u> CZ (Comments): CZ - How will the risk of double financing be prevented? DE (Drafting suggestions): 1. The ECF shall be implemented in synergy with other Union programmes. An action that has received a Union contribution from another programme may also receive another contribution under the ECF. The rules of the relevant Union programme shall apply to the corresponding contribution or a single set of rules may be applied to all contributions and a single legal commitment may be concluded. <u>As concerns eligibility in the section on the defence industry, this single set of rules needs to be those of the ECF.</u> If the Union contribution is based on eligible costs, the cumulative support from the Union budget shall not exceed the total eligible costs of the action and may be calculated on a pro-rata basis in accordance with the documents setting out the conditions for support.

Proposal for a Regulation establishing the European Competitiveness Fund (doc. 13413/25)

From: AT, BG, CZ, DE, FI, HR, IE, IT, LT, LU, MT, PT, BE, HU, ES, SE, SI, EL, FR, PL

Deadline: 15 October 2025 COB

Updated: 27/10/2025 09:02

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	DE (Comments): How will it be decided whether the rules of the relevant programmes or a single set of rules apply to the action? Who will draft the single set of rules? For actions of the ECF concerning the defence industry, it is important that contributions from another programme will not lead to a general waiver of well-balanced restrictions. FI (Comments): <u>FI: Many unclarities: Are the Union programmes referred here meaning only directly managed programmes? Is the single set of rules referring to the single rulebook or some case by case set of rules, or some MFF-level set of rules? What is the single legal commitment referring to?</u> MT (Comments): Malta argues that the text “<i>The rules of the relevant Union programme shall apply to the corresponding contribution or a single set of rules may be applied to all contributions and a single legal commitment may be concluded</i>” is ambiguous and needs to be amended to clarify the circumstances under which either scenario (the rules of the relevant Union programme applying to the corresponding contribution or a single set of rules applying to all contributions) would be applied. PT (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	The concept of an action receiving contributions from more than one programme needs to be clarified and further detailed regarding its purpose and requirements. BE (Comments): The possibilities for synergies and cumulation are positive, but rules must be harmonised and real administrative simplification ensured for beneficiaries. There is a risk of increased complexity if cumulative rules are not sufficiently clear and harmonised, especially for small actors. FR (Drafting suggestions): The ECF shall be implemented in synergy with other Union programmes. An action that has received a Union contribution from another programme may also receive another contribution under the ECF, <u>provided that the contributions do not cover the same costs</u>. The rules of the relevant Union programme shall apply to the corresponding contribution or a single set of rules may be applied to all contributions and a single legal commitment may be concluded, <u>in such case the single set of rules shall include, but no be limited to, the rules of the ECF detailed in the present regulation. In the case of a single set of rules, further guidance and specific documents could be available to beneficiaries. Implementation bodies shall develop common standards and general understanding to avoid differences in application of rules.</u> If the Union contribution is based on eligible costs, the cumulative support from the Union budget shall not exceed the total eligible costs of the action and may be calculated on a pro-rata basis in accordance with the documents setting out the conditions for support. <u>Union contribution from another programme that complements the funding granted under action referred to in article 44(1) shall fulfil conditions provided under articles 50 and 51 of the ECF regulation.</u>

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	FR (Comments): Un ensemble unique de règles peut simplifier la soumission et la gestion des propositions, mais des orientations spécifiques doivent être élaborées. Par exemple, le modèle d'accord annoté pour Horizon Europe a donné lieu à de nombreuses erreurs et malentendus, les bénéficiaires ne faisant pas la distinction entre les caractéristiques spécifiques de leur programme et leur instrument de financement. Pour garantir une véritable simplification grâce à un ensemble unique de règles, il est essentiel que celles-ci soient appliquées de manière uniforme dans les différentes DG et agences qui mettront en œuvre tous les programmes couverts par ce règlement unique. Toute contribution de l'Union provenant d'un autre programme et complétant le financement accordé au titre de l'action visée à l'article 44 paragraphe 1 devra remplir des conditions spécifiques liées aux actions de l'industrie de défense (prévues aux articles 50 et 51 du FEC).
2. Award procedures under the ECF may be jointly conducted under direct or indirect management with Member States, Union institutions, their departments, bodies and agencies, third countries international organisations, international financial institutions, or other third parties, provided the protection of the financial interests of the Union as well as of the security and defence interests of the Union and its Member States is ensured. Such procedures shall be subject to a single set of rules and lead to the conclusion of single legal commitments. For that purpose, the partners may make resources available to the ECF in accordance with Article 5 of this Regulation, or the partners may be entrusted with the implementation of the	AT (Drafting suggestions): (...)Such procedures shall be subject to a single set of rules, <u>applicable to all partners, including the Executive Agencies of the European Commission</u>, and lead to the conclusion of single legal commitments. (...) AT (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
award procedure, where applicable, in accordance with Article 62(1), point (c), of Regulation (EU, Euratom) 2024/2509. In joint award procedures representatives of the partners to the joint award procedure may also be members of the evaluation committee referred to in Article 153(3) of Regulation (EU, Euratom) 2024/2509.	Currently, different Executive Agencies establish different reporting rules for beneficiaries even within the same funding programme (e.g. Horizon Europe). Establishing a “single rule book” for the agencies would be a major step towards the promised simplification. AT wants to raise the question whether the type of Joint Actions and Direct Grants currently funded under EU4Health will be included in the direct and indirect management of the ECF. AT wants to highlight the importance of preserving funding for the type of Joint Actions and Direct Grants currently included in EU4Health. LU (Drafting suggestions): 2. Award procedures under the ECF may be jointly conducted under direct or indirect management with Member States, Union institutions, their departments, bodies and agencies, the EIB Group, third countries international organisations, international financial institutions, or other third parties, provided the protection of the financial interests of the Union as well as of the security and defence interests of the Union and its Member States is ensured. Such procedures shall be subject to a single set of rules and lead to the conclusion of single legal commitments. For that purpose, the partners may make resources available to the ECF in accordance with Article 5 of this Regulation, or the partners may be entrusted with the implementation of the award procedure, where applicable in accordance with Article 62(1), point (c), of Regulation (EU, Euratom) 2024/2509. In joint award procedures representatives of the partners to the joint award procedure may also be members of the evaluation committee referred to in Article 153(3) of Regulation (EU, Euratom) 2024/2509. MT (Drafting suggestions):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	2. Award procedures under the ECF may be jointly conducted under direct or indirect management with Member States, Union institutions, their departments, bodies and agencies third countries international organisations, international financial institutions, or other third parties, provided the protection of the financial interests of the Union as well as of the security and defence interests of the Union and its Member States is ensured. Such procedures shall be subject to a single set of rules and lead to the conclusion of single legal commitments. For that purpose, the partners may make resources available to the ECF in accordance with Article 5 of this Regulation, or the partners may be entrusted with the implementation of the award procedure, where applicable in accordance with Article 62(1), point (c), of Regulation (EU, Euratom) 2024/2509. In joint award procedures carried out by the Union institutions, their departments, bodies and agencies, representatives of the partners to the joint award procedure may also be members of the evaluation committee referred to in Article 153(3) of Regulation (EU, Euratom) 2024/2509. PT (Comments): We believe there is a need to be clear about the role of national intermediate bodies or of national promotional banks. Clarification is needed. SI (Drafting suggestions): 2. Award procedures under the ECF may be jointly conducted under direct or indirect management with Member States, Union institutions, their departments, bodies and agencies, third countries international organisations, international financial institutions, or other third parties, provided the protection of the financial interests of the Union, and its values as enshrined in the Treaties respected, as well as of the security and defence interests of the Union and its Member States is ensured. Such procedures

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	shall be subject to a single set of rules and lead to the conclusion of single legal commitments. For that purpose, the partners may make resources available to the ECF in accordance with Article 5 of this Regulation, or the partners may be entrusted with the implementation of the award procedure, where applicable in accordance with Article 62(1), point (c), of Regulation (EU, Euratom) 2024/2509. In joint award procedures representatives of the partners to the joint award procedure may also be members of the evaluation committee referred to in Article 153(3) of Regulation (EU, Euratom) 2024/2509. SI (Comments): Can the Comission clarify the difference between direct and indirect management with Member States. What third countries international organisations are meant here? FR (Drafting suggestions): Award procedures under the ECF may be jointly conducted under direct or indirect management with Member States, Union institutions, their departments, bodies and agencies, third countries international organisations, international financial institutions, or other third parties, provided the protection of the financial interests of the Union as well as of the security and defence interests of the Union and its Member States is ensured. <u>Each Member State shall have a right of veto on all issues concerning the use of its own national financial contribution and for applicants established in those Member States.</u> Such procedures shall be subject to a single set of rules and lead to the conclusion of single legal commitments, <u>in such case the single set of rules shall include, but no be limited to, the rules of the ECF detailed in the present regulation.</u> For that purpose, the partners may make resources available to the ECF in accordance with Article 5 of this

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	Regulation, or the partners may be entrusted with the implementation of the award procedure, where applicable, in accordance with Article 62(1), point (c), of Regulation (EU, Euratom) 2024/2509. In joint award procedures representatives of the partners to the joint award procedure may also be members of the evaluation committee referred to in Article 153(3) of Regulation (EU, Euratom) 2024/2509. FR (Comments): Afin de garantir la sécurité économique de l'Union, les États membres devraient disposer d'un droit de veto concernant les candidats établis sur leur territoire et susceptibles de participer à des procédures d'attribution conjointes. Cette disposition reflète le règlement EuroHPC. Les règles de ce fond devrait s'appliquer dans tous les cas à une contribution de ce fonds à une action. Quel type d'“institutions financières internationales” ou de “tiers” pourrait être chargé des procédures d'attribution ? Quel type d'appels pourrait être financé au moyen de procédures d'attribution conjointes ? Comment l'autonomie stratégique serait-elle garantie dans de tels cas – au-delà de la seule protection des intérêts financiers ou des questions liées à la sécurité ?
	PT (Drafting suggestions): Add a new paragraph: The Comission shall take appropriate measures to foster the synchronisation and alignment of national supporting instruments to Competitiveness Seal projects, ensuring the conditions to support, namely, transnational

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	projects, PT (Comments): Taking into account the lessons learnt through STEP Seal, namely in what concerns the challenges providing alternative or combined funding to transnational projects, it is proposed that the Commission actively coordinates the national funding calls, taking into account the Eureka network experience, in which the secretariat ensures the synchronisation and alignment of national supporting instruments and the funding of those projects. SI (Drafting suggestions): <u>(New article)</u> <u>“European Partnerships”</u> <u>1. Where necessary to achieve the objectives set out in Article 3, activities under this Regulation may be implemented through European Partnerships, by default through the work programmes.</u> <u>2. European Partnerships shall be based on a Memorandum of Understanding, agreed and signed between the partners, stipulating:</u> <u>a) the results to be delivered, which shall be clear, measurable, time-bound;</u> <u>b) reporting requirements</u> <u>c) the related commitments from all partners;</u> <u>d) governance arrangements with a mechanism for partners to discuss and agree on the partnerships’ programming and activities.</u> <u>3. In duly justified cases European Partnerships will be implemented by entrusting budget implementation tasks from various Union funding</u>

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	<u>programmes to bodies established pursuant to Articles 185 and 187 TFEU, in accordance with Article 62(1), point (c), of Regulation (EU, Euratom) 2024/2509.</u> <u>4. For European Partnerships established pursuant to paragraphs 2 and 3 of this Article, support from the Programme shall be conditional upon efficient use of Union financing, a proportionate financial contribution from other partners at least matching the Union contribution and voting rights for the Union in the governing bodies ensuring protection of the interests of the Union in the partnership. For that purpose, Joint Undertakings shall be established through a single establishing act ensuring harmonised rules.</u> <u>5. European Partnerships shall:</u> <u>a) be established only in cases where Union action alone or other forms of support under the Programme cannot achieve the desired objectives.</u> <u>b) be established for the purpose of addressing challenges that require a critical mass of resources and a unified and coordinated approach, both in terms of programming and implementation, across actors.</u> <u>c) align with and assist in the implementation of major Union policies and policy initiatives.</u> <u>d) be selected in a competitive manner based on a set of quantifiable lifecycle criteria and a strong portfolio approach, resulting in a coherent set of initiatives.</u> <u>e) be based on ex ante, long-term and formal commitments from all partners to contribute financially to the resources of the European Partnership, which shall be centrally managed, except in duly justified cases.</u> <u>f) require a clear lifecycle approach, including an upfront plan for the implementation of the initiative with a strategy for gradually or fully phasing out from Union funding.</u> <u>6. Contributions from Partners other than the Union shall take the following forms:</u> <u>a) financial contributions to the operational budget of the initiative;</u>

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	<u>b) co-financing by the Partners of their own participation, or that of their members, in projects funded through the initiative.</u> <u>7. All Partners other than the Union shall provide information on the structure, membership and activities developed within the partnership. In cases where partnerships are concluded with representative organisations and associations, this shall include regular information on their membership.</u> SI (Comments): European partnerships should be an important instrument for implementation of ECF's objectives, so we suggest to mirror their provisions to FP10 regulation:
Article 7	PT (Comments): Supports coherence between ECF and regional programmes. Ensure coordination mechanisms including regional competitiveness plans for outermost regions. Reinforce the need for Work Programmes to include 'complementarity maps' that clarify, for each call, which funding source covers specific phases (R&D vs. deployment vs. ramp-up). The aim is to avoid overlaps and gaps between the ECF and programs such as Horizon Europe, InvestEU Instrument, or the Connecting Europe Facility (CEF). It is also recommended that each Work Programme include a coordinated timetable with initiatives such as CEF-Digital and the Digital Europe Programme (DEP), in order to continue projects already launched and avoid funding disruptions.

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
Coordination	DE (Comments): The interplay between the ECF and other programs within heading 2, in particular Horizon Europe, as well as with heading 1/NRPP and heading 3/Global Europe is key. The connection between those must be consistent and coherent while taking into account the specific needs of individual programs. We deem it necessary to specify how the coherence / the interplay between the different elements of the new MFF will be designed in practice. We need more information from the COM on the planned steering and coordination mechanism for this discussion. We should discuss this issue in more detail. PT (Comments): We do not see any reference to the need to ensure coordination with the future Competitiveness Coordination Tool. Clarification needed. We do not see any reference to the Industrial Decarbonisation Bank. Clarification needed.
	MT (Comments): Malta calls 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 the Horizon Europe and the European Competitiveness Fund.

Proposal for a Regulation establishing the European Competitiveness Fund (doc. 13413/25)

From: AT, BG, CZ, DE, FI, HR, IE, IT, LT, LU, MT, PT, BE, HU, ES, SE, SI, EL, FR, PL

Deadline: 15 October 2025 COB

Updated: 27/10/2025 09:02

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
1. The Commission shall ensure the consistent implementation of the European Competitiveness Fund, the Framework Programme for Research and Innovation and the Innovation Fund.	AT (Drafting suggestions): 1. The Commission shall ensure the consistent implementation of the European Competitiveness Fund, the Framework Programme for Research and Innovation and the Innovation Fund. <u>In the area of research and innovation, the Commission shall be assisted by the “general configuration” as laid down in Article 18(2) of the Regulation (EU) XXX [Horizon Europe].</u> AT (Comments): More details on the “general configuration” of Horizon Europe shall be formulated in the Horizon Europe Regulation. AT is in favour of a body that keeps an overview of the implementation of RTI activities across ECF and Horizon Europe, and that can offer advice to the Commission in the form of strategic orientation on RTI activities of the Union and Member States. Such cooperation with the Member States is necessary to deliver on the programme objectives of both programmes, which aim at aligning EU, national and regional R&I priorities (HE Art. 3(2)) as well as the R&I and industrial policy (ECF Art. 3(1)(e)). In such context, AT refers also to the comments made hereinbelow under Art. 14.2. The issues and mechanisms of coordination and governance are closely connected, and important aspects remain to be clarified. CZ (Drafting suggestions): The Commission, <u>together with the Member States,</u> shall ensure the consistent implementation of the European Competitiveness Fund, the

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	Framework Programme for Research and Innovation and the Innovation Fund. CZ (Comments): CZ is of the opinion that the role of the Member States should be strengthened here. The Member States are crucial actors in the comitology and Programme Committees and shall be seen as an equal partner to the Commission with regard to the implementation of the mentioned programmes. HR (Drafting suggestions): HR: HR suggests additional amendment. <i>1. The Commission and Member States shall ensure the consistent implementation of the European Competitiveness Fund, the Framework Programme for Research and Innovation and the Innovation Fund.</i> HR (Comments): Clear reference to the inclusion of MS in this coordination would be highly appreciated. IE (Comments): Should InvestEU be mentioned here? IT (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	Italy keeps a general reservation on the interaction between ECF and other programmes, in particular Horizon Europe, as well as their governance. Increased flexibility should be underpinned by robust governance and involvement of the Council in relevant configurations, in the planning of activities, the adjustment of priorities as well as the implementation of the budget. Specifically, the connection between Pillar II of Horizon Europe and the four policy windows of the European Competitiveness Fund (ECF) will help ensure that collaborative research supports competitiveness objectives. However, the coordination mechanisms between the existing instruments for financing research and development in enabling technologies remain unclear, particularly the boundaries with Horizon Europe and the Innovation Fund, which is also expected to involve private financing. It will also be important to assess how the connection and shared governance between Horizon Europe and the ECF will be established. Furthermore, the potential impact on initiatives likely to fall within the scope of the fund — notably AI gigafactories and the implementation of the European Quantum Strategy — will need to be carefully examined. MT (Drafting suggestions): The Commission shall ensure the consistent implementation of the European Competitiveness Fund, the Framework Programme for Research and Innovation and the Innovation Fund. <u>Overlaps between Competitiveness Fund and Horizon Europe shall be avoided through adoption of separate work programmes. The work programmes of the Framework Programme for Research and Innovation shall exclusively address R&I elements, including the ECF policy windows' research activities, while the European Competitiveness Fund work programmes shall focus on innovation deployment and market uptake.</u>

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	MT (Comments): Malta argues that single work programmes of the policy windows under the European Competitiveness Fund will marginalise research activities and decrease excellence and effectiveness of Horizon Europe collaborative endeavours. We are calling for adoption of synergistic, but separate work programmes for both Horizon Europe and ECF. PT (Comments): Does this mean that there will be 3 different Work Programmes (1 for ECF, 1 for HE and 1 for IF)? How the Work programming will be implemented? We must be clear about the needed coherence with Horizon Europe. How the policy windows will align with the Competitiveness component of Pillar II in HE? No reference is made to this. ES (Drafting suggestions): 1. The Commission shall ensure the consistent implementation <u>and effective coordination</u> of the European Competitiveness Fund, the Framework Programme for Research and Innovation and the Innovation Fund. SI (Drafting suggestions): 1. The Commission shall ensure the consistent implementation of the European Competitiveness Fund, the Framework Programme for Research and Innovation and the Innovation Fund <u>in close cooperation with Member States to align national and EU-level efforts.</u>

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	FR (Comments): Les autorités françaises souhaitent poser une réserve d'examen s'agissant des mécanismes de gouvernance visant à assurer la cohérence et la mise en œuvre des différents instruments, ainsi que sur les modalités d'association du Conseil et des parties prenantes.
	DE (Drafting suggestions): <u>1a. For the collaborative research and innovation activities of the policy windows, with the exception of the specific programme for defence research and innovation, the rules set out in Article 7, 8, 11, 15 (2), 21, 22 23-33 and [placeholder]regulation XXX(EU) Horizon Europe regulation] should apply.</u> <u>1b. In view of existing state aid requirements the Commission shall make any effort to ensure a simple, streamlined procedure aiming for a parallel decision on state aid approval where required.</u> DE (Comments): Concerning 1a: If the rules of the ECF Regulation were to apply to collaborative research as well, they would have to be significantly expanded to cover R&I-specific needs. We therefore suggest to add a reference to specific Horizon Europe Rules instead of copying the Horizon Europe Rules into the ECF Regulation. We see this relevant i.a. for Art. 7, 8, 11, 15(2), 21, 22 and 23 to 33.

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	This is of outmost relevance for the regulations for funding of research projects involving human embryos or human embryonic stem cells (hESCs). The exclusion rules regarding the eligibility of projects defined in Article 21 (10) of the draft Horizon Europe (FP10) Regulation, as well as the supplementary protocol declaration that is required by Germany according to that of FP9, must also apply to the ECF. Furthermore, Member States must be jointly responsibly involved on case by case basis in the review process of research projects involving hESCs; the implementing provisions in this regard should be consistent with those of FP9. Concerning. 1b: This can ensure that there are no delays in the implementation and no increase of complexity in procedures.
2. The Commission and Member States shall, in a manner commensurate ~~to~~ with their respective responsibilities, facilitate coordination and coherence between the European Competitiveness Fund and national and regional partnership plans on common competitiveness priorities in selected key areas and projects deemed of strategic importance and of common European interest.	CZ (Comments): CZ – How does the Commission envisage that this coordination and coherence will be achieved in practice, what concrete form or mechanism will this coordination take, and in which thematic areas or types of projects is such coordination and coherence considered? DE (Comments): We must ensure coherence of heading 1 and heading 2, i.a. as concerns investment opportunities to strengthen competitiveness, innovation and growth. The interplay must be clearly regulated so that both headings complement each other in the best possible way and in the sense of a European added value. FI (Comments):

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	<u>FI This cannot leave to an unbalanced situation where countries with more resources to spend in their NRPs would dominate in selecting the key areas and projects in the Work Programmes. We are scrutinizing this and think that article 6 and 7 are much dependent also on how HE, Performance Framework and the future single basic act is evolving.</u> HR (Drafting suggestions): HR: HR suggest additional amendment. <i>The Commission and Member States shall, in a manner commensurate to their respective responsibilities, facilitate coordination and coherence between European Competitiveness Fund and national and regional partnership plans on common competitiveness priorities in selected key areas and projects deemed of strategic importance and of common European interest, with particular attention to ensuring balanced benefits for all regions and Member States.</i> HR (Comments): HR proposes this addition to strengthen the alignment between EU and national strategies, while ensuring that benefits are not concentrated in already advanced hubs. IE (Drafting suggestions): The Commission and Member States shall, in a manner commensurate to with their respective responsibilities, facilitate coordination and coherence between the European Competitiveness Fund and national and regional partnership plans on common competitiveness priorities in selected key areas and projects deemed of strategic importance and of common European

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	interest. The Commission shall ensure appropriate Member State representation in decision making processes where appropriate IE (Comments): IE notes it is important that there is a fair balance of representation between EC and MS's in key decisions. The Digital Europe Programme (DEP) Committee and the Connecting Europe Facility (CEF) Committee are good examples of how this process is tried and trusted. Suggested text amendment PT (Comments): Where will these “common competitiveness priorities in selected key areas and projects deemed of strategic importance and of common European interest” be defined and is there a potential link to IPCEIs? Could this be made clearer? We would appreciate some clarifications regarding how the foreseen coordination between ECF and NRPP will be implemented. SE (Drafting suggestions): The Commission and Member States shall, in a manner commensurate ~~to~~ with their respective responsibilities, facilitate coordination and coherence between the European Competitiveness Fund and national and regional partnership plans on common competitiveness priorities ~~in selected key areas and projects deemed of strategic importance and of common European interest.~~ SE (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	Well-functioning markets with effective competition are what make companies competitive; it is important that support does not distort the market and competition between sectors or companies. SI (Drafting suggestions): 2. The Commission and Member States shall, <u>on a voluntary basis, if there is value added for Member States</u> in a manner commensurate ~~to~~ with their respective responsibilities, facilitate coordination and coherence between <u>the</u> European Competitiveness Fund and national and regional partnership plans on common competitiveness priorities in selected key areas and projects deemed of strategic importance and of common European interest. EL (Drafting suggestions): 2. The Commission and Member States shall, in a manner commensurate with their respective responsibilities, facilitate coordination and coherence between the European Competitiveness Fund and national and regional partnership plans on common competitiveness priorities in selected key areas and projects deemed of strategic importance and of common European interest, <i>taking into account the Partnership Agreements and the Regional Operational Programmes under Cohesion Policy.</i> EL (Comments): This addition ensures institutional consistency with the governance structures of Cohesion Policy, explicitly linking the ECF to the existing Partnership Agreements and Operational Programmes, thus preventing overlaps or parallel mechanisms and reinforcing complementarity with cohesion objectives. FR

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Drafting suggestions): The Commission and Member States shall, in a manner commensurate ~~to~~ with their respective responsibilities, facilitate coordination and coherence between ~~the~~ the European Competitiveness Fund and national and regional partnership plans on common competitiveness priorities in selected key areas and projects deemed of strategic importance and of common European interest. FR (Comments): Les autorités françaises souhaitent poser une réserve d'examen, cf commentaire ci-dessus, s'agissant des modalités de gouvernance en matière de coordination entre les différents instruments européens. Quel serait l'association du Strategic stakeholder board à cet égard ? PL (Drafting suggestions): 2. The Commission and Member States shall, in a manner commensurate to with their respective responsibilities, facilitate coordination and coherence between the European Competitiveness Fund and national and regional partnership plans on common competitiveness priorities in selected key areas and projects deemed of strategic importance and of common European interest. ~~This coordination shall pay particular attention to ensuring a fair geographical balance and distribution of benefits across the Union~~
3. The ECF ~~will~~ shall be implemented in synergy with other Union funds, including the Global Europe Fund, in particular to support global competitiveness, ensure diversified supply sources, and strengthen export potential and opportunities of European companies.	PT (Comments): Is the Innovation Fund included in these synergies with other Union Funds? How will these synergies be established?

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	FR (Drafting suggestions): The ECF ~~will~~ shall be implemented in synergy and complementarity with other Union funds, including the Global Europe Fund, in particular to support global competitiveness and reducing dependencies, ensure diversified supply sources, and strengthen export potential and opportunities of European companies ; <u>as well as the Connecting Europe Facility and the Single Market Program. It should also ensure synergies with Erasmus+ and the Framework Programme for Research and Innovation regarding skills development by contributing to activities aiming at developing skills in the strategic sectors identified by ECF policy windows.</u> FR (Comments): Les autorités françaises souhaitent poser une réserve d'examen, cf commentaire ci-dessus, s'agissant des modalités de gouvernance en matière de coordination entre les différents instruments européens. Quel serait l'association du Strategic stakeholder board à cet égard ?
	SI (Drafting suggestions): <u>(New article)</u> <u>“Collaborative research and innovation”</u> <u>In supporting collaborative research and innovation, the programme shall:</u> <u>1. support the entire value chain, balancing both ends of the TRLs scale, while paying particular attention on strengthening the middle TRL range.</u>

Proposal for a Regulation establishing the European Competitiveness Fund (doc. 13413/25)
 From: AT, BG, CZ, DE, FI, HR, IE, IT, LT, LU, MT, PT, BE, HU, ES, SE, SI, EL, FR, PL

Deadline: *15 October 2025 COB*
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Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	2. <u>Implement measures to ensure a balanced geographical coverage through scientific excellence, brain circulation, and new collaborations, supported by complimentary efforts by Member States.</u> 3. <u>integrate SSH disciplines across all policy windows, with specific calls for SSH topics where appropriate.</u> <u>streamline administrative procedures and use a two-stage submission and evaluation procedure to reduce the burden for applicants and beneficiaries.</u>
<i>Article 8</i>	

Competitiveness Seal	CZ (Comments): CZ - <i>General comment:</i> The Competitiveness Seal must include state aid exemptions similar to the Horizon Europe Seal of Excellence, in line with Article 25a to 25d of the GBER, and with stable and predictable rules. FI (Comments): <u>FI: Does this Seal apply to collaborative research?</u> HR (Comments): Horizon Europe regulation states that « in addition to the conditions set out in Article 8(1) and (2) of Regulation (EU) XXX [European Competitiveness Fund], a Competitiveness Seal shall be awarded only to high-quality actions that have not been financed under the Programme due to budgetary constraints. » This would then exclude any other parts of Horizon Europe programme that have not been assessed in an award procedure under the ECF : from Excellent Science to Innovation. This sets a precedent compared to the practice of Seal of Excellence awarding in previous and current FP IT (Comments): The introduction of the provisions on the competitiveness seal are positive but should be consistent with the investment journey principle. PT (Comments): Please clarify the attribution of the Competitiveness Seal – is it like the Seal of Excellence or the STEP Seal? If so, it is fundamental to set the rules –

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	minimums of excellence to attribute the Seal and coordination between MS to assign the necessary resources to fund collaborative research projects. Will this apply for consortia and also for single beneficiaries? For consortia of multi-country participants setting a coordination structure that guarantees the synchronization of the funding is pivotal to guarantee the project funding.
1. A Competitiveness Seal may be awarded to high-quality actions which shall comply ~~at least~~ with the following cumulative conditions:	AT (Drafting suggestions): ...they have been assessed in an award procedure under the ECF including collaborative research and innovation projects evaluated under Horizon Europe rules DE (Comments): We welcome this change to “cumulative”. PT (Comments): How will these “high-quality actions” be defined? How this Competitiveness Seal articulates with the Seal of Excellence under the HE? Taking into consideration the STEP Seal experience so far, namely the bottlenecks identified by its interim evaluation, we would appreciate how the Competitiveness Seal will overcome those implementation challenges, namely in what concerns the support to multi-country projects by NRPP or other national funds, the distinct eligibility criteria, application procedures, co-financing rates, timelines or the lack of specific State aid treatment for Competitiveness Seal Projects. BE

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Drafting suggestions): 1. A Competitiveness Seal ~~may~~ shall be awarded to high-quality actions which shall comply ~~at least~~ with the following <u>cumulative</u> conditions: BE (Comments): Every project that complies should receive a Competitiveness Seal. SE (Drafting suggestions): A Competitiveness Seal may be awarded to high-quality <u>proposals or</u> actions which shall comply <u>at least</u> with the following <u>cumulative</u> conditions: SE (Comments): It is unclear if the Seal may be awarded proposals or decided actions/projects. In ECF recital 47 “projects contributing to the objectives of the ECF” is mentioned, when the ECF art. 17 refers to “proposals” meeting “all” the quality requirements, while art. 8 stats “minimum” quality requirements. This should be clarified. It is desirable that the application of the Competitiveness seal more clearly complements the application of the “excellence”-oriented Copmetitiveness Seal in the HE FP. As it is now seems to be two versions of the Seal and ideally the Seal for the HE FP should be an Seal of Excellence to make things clearer. FR (Comments):

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	Quelles seraient les modalités de décision pour l'octroi d'un tel label ?
(a) they have been assessed in an award procedure under the ECF;	DE (Drafting suggestions): (a)they have been positively assessed in an award procedure under the ECF; FI (Comments): <u>is this referring to HE as well? is the seals awarded in HE also under this MFF applicable? We are scrutinising against the answers.</u> SE (Drafting suggestions): (a) they have been assessed in an award procedure under the ECF or Horizon Europe; SE (Comments): Article 8(3) of 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 states that Under this programme, in <u>addition to the conditions set out in Article 8(1) and (2) of Regulation (EU) XXX</u> [European Competitiveness Fund], a Competitiveness Seal shall be awarded only to high-quality actions that have not been financed under the Programme due to budgetary constraints. But if Article 8(1) of the ECF states

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	that an action have to be assessed in an award procedure under the ECF, no action assessed in an award procedure under the HE will be accepted. Or will the award process for Competitiveness Seals in Horizon Europe calls for proposals, be handled in ECF? c.f. recit 47 and HE-FP Article 23 (2) FR (Drafting suggestions): a) they have been assessed in an award procedure under the ECF <u>or Horizon Europe:</u> FR (Comments): Le label de compétitivité s'appliquera également à Horizon Europe, et cet article est explicitement cité dans le règlement Horizon Europe.
(b) they comply with the minimum quality requirements of that award procedure;	DE (Drafting suggestions): (b)they comply with the minimum quality requirements of that award procedure <u>as set out in the work programmes ;</u> DE (Comments): The minimum quality criteria need to be specified. ES (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	The notion of ‘minimum requirements’ appears too broad and would benefit from further clarification.
	SE (Drafting suggestions): (c) they comply with state aid regulations SE (Comments): It is important that state aid rules remain applicable within the seal SI (Drafting suggestions): <u>c) they achieve at least 80% of the maximum score across the evaluation criteria of the award procedure</u> SI (Comments): A clear and uniform threshold should be agreed and defined in advance PL (Drafting suggestions): „c)Member States shall establish national registries of sealed projects to facilitate visibility, matchmaking, and funding opportunities.” PL (Comments): There is no mechanism for tracking or promoting approved projects at the national level that would help Poland identify and support high-potential projects meeting EU standards but lacking funding, as well as improve transparency and coordination. In Poland, publicly available statistics on approved (as well as submitted) project proposals under the Horizon Europe

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	Programme are collected and monitored: https://www.kpk.gov.pl/analizy-i-statystyki
2. The work programme or the documents related to the award procedure may set out additional conditions <u>to award a Competitiveness Seal</u> .	IT (Drafting suggestions): The work programme or the documents related to the award procedure may set out additional conditions <u>to award a Competitiveness Seal. Projects positively evaluated under Horizon Europe may also be awarded the Seal, provided they meet the strategic and quality criteria set out in this Regulation.</u> IT (Comments): This facilitates continuity and recognition for Horizon Europe projects transitioning into ECF support
3. Member States may support projects which have been awarded a seal, or may provide support through the ECF by making additional resources available to the ECF in accordance with Article 5(1) or (2).	DE (Comments): Under which conditions can MS support projects with a competitiveness seal? I.e. as concerns state aid regulation. HR (Drafting suggestions): HR: HR suggest additional amendment. <i>Member States may support projects which have been awarded a seal, or may provide support through the ECF by making additional resources available to the ECF in accordance with Article 5(1) or (2). Particular attention should be given to SMEs and projects in less advanced regions.</i> BE (Drafting suggestions):

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	3. Member States, <u>Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or other third parties</u> may support projects which have been awarded a seal, or may provide support through the ECF by making additional resources available to the ECF in accordance with Article 5(1) or (2). BE (Comments): Not only Member States can support projects with a seal, other players can do so as well. The amendment clarifies this. ES (Comments): There will be a need for clarity regarding the conditions and their alignment with the GBER, including potential exceptions where appropriate. SE (Drafting suggestions): Member States may support <u>actions</u> ~~projects~~ which have been awarded a seal, or may provide support through the ECF by making additional resources available to the ECF in accordance with Article 5(1) or (2). SE (Comments): Actions are referred to above. SI (Drafting suggestions): 3. Member States may support projects which have been awarded a seal, or may provide support through the ECF by making additional resources available to the ECF in accordance with Article 5(1) or (2), <u>including resources of European Fund for Economic, Territorial, Social Cohesion,</u>

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	<u>Agriculture and Rural, Fisheries and Maritime Prosperity and Security allocated to them under shared management.</u> PL (Drafting suggestions): „a) Member States may receive preferential co-financing rates or technical assistance when supporting sealed projects. Member States may prioritize sealed projects in national aid programmes and benefit from streamlined notification procedures” PL (Comments): We propose adding the following sub-point to ~~this~~ paragraph 3.
4. Strategic projects under CRMA, NZIA, ~~CMA~~ <u>Critical Medicines Act</u> and other strategic projects identified in Union legislation that fulfil the conditions in paragraph 1, will be directly granted the Competitiveness Seal.	FI (Comments): <u>FI: What is the meaning of article 8(1)(b) and 8(4), do these articles mean that the quality of previous award procedures will be somehow assessed? For example for projects granted a strategic status under NZIA or CRMA.</u> PT (Comments): Here we must keep in mind the difficulty that Member States have encountered with the definition of these strategic projects, specially regarding NZIA. Is it understood that future IAA’s projects can be included in “other strategic projects identified in Union legislation that fulfil the conditions in paragraph 1”? This must be clarified. BE (Comments): Strange to write some in full and leave others abbreviated

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	ES (Drafting suggestions): 4. Strategic projects for the Union under CRMA, NZIA, ~~CMA~~ Critical Medicines Act and other strategic projects identified in Union legislation that fulfil the conditions in paragraph 1, will be directly granted the Competitiveness Seal. EL (Drafting suggestions): Strategic projects under CRMA Critical Raw Materials Act Regulation (EU) 2024/1252, NZIA Net-Zero Industry Act Regulation (EU) 2024/1735, ~~CMA~~ Critical Medicines Act and other strategic projects identified in Union legislation, including Integrated production facilities and Open EU foundries regulated in the Chips Act Regulation (EU) 2023/1781 that fulfil the conditions in paragraph 1, will be directly granted the Competitiveness Seal. EL (Comments): We should make specific reference to Chips Act. PL (Drafting suggestions): „a) Strategic projects shall be listed in a publicly accessible EU registry and monitored for impact, with regular updates shared and approved by the Member States.” PL (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	Lack of clarity regarding the identification and monitoring of strategic projects. It is necessary to improve accountability and enable Poland to align national funding with the EU's strategic priorities. There is no link to State aid exemptions or accelerated procedures. The proposal enhances Poland's access to EU strategic instruments and reduces regulatory uncertainty for high-impact projects. We propose the following wording for an additional sub-point under paragraph 4.
<i>Article 9</i>	MT (Comments): Malta stresses the need for proportionality and avoidance of excessive administrative burdens, given limited administrative capacity. Important to ensure grants remain available alongside financial instruments, as Malta's market size and underdeveloped capital markets limit access to equity/venture funding. PT (Comments): Protect supply chains and critical technologies from high-risk third-country interference. Foresee automatic exclusions in critical domains (cyber, communications, space, munitions).

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
Eligibility	DE (Comments): We believe that there is merit in combining eligibility criteria with the possibility of association of third countries in order to ensure a balance between EU industrial policy interests and cooperation with partners. This creates planning security. However, we need to examine this in more detail, also with regard to potential exceptions and the specifics of the defense sector. At least the criteria and parameters should be laid down at the level of the Regulation and not in the work programs. FR (Comments): Les autorités françaises estiment qu'un meilleur encadrement des actions éligibles à ce fonds est nécessaire.
1. Eligibility criteria shall be set to support achievement of the general and specific objectives referred to in Article 3 of this Regulation, in accordance with Regulation (EU, Euratom) 2024/2509 and apply to all award procedures under the ECF.	AT (Comments): In reference to our comments concerning Art. 3, AT wants to point out that fulfilling the health priorities as described above - improving and promoting health; protecting people from cross-border health threats; improving access to health care; improving the affordability and accessibility of medicines, medical devices and crisis-relevant products; reducing inequalities in health and health care; and strengthening health systems – should be a crucial eligibility criteria. Therefore, we consider it of utmost important that health criteria are included in the eligibility criteria SE (Drafting suggestions): Eligibility criteria shall be set to support achievement of in line with the general and specific objectives referred to in Article 3 of this Regulation, in

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	accordance with Regulation (EU, Euratom) 2024/2509 and apply to all award procedures under the ECF. <u>The eligibility criteria should include excellence criteria, ensuring non-distortiton on the single market and addressing market failures in all award procedures.</u> SI (Drafting suggestions): 1. Eligibility criteria shall be set to support achievement of the general and specific objectives referred to in Article 3 of this Regulation, in accordance with Regulation (EU, Euratom) 2024/2509 and apply to all award procedures under the ECF, <u>except for the rules for collaborative research and innovation activities, which are set out in the regulation establishing Horizon Europe.</u> FR (Drafting suggestions): 1. Eligibility criteria shall be set with early involvement of Member States to support achievement of the general and specific objectives referred to in Article 3 of this Regulation, in accordance with Regulation (EU, Euratom) 2024/2509 and apply to all award procedures under the ECF. FR (Comments): Il est nécessaire de renforcer la position des États membres dans la définition des critères d'éligibilité, conformément à l'ambition de l'article 10 relatif à la préférence européenne. PL (Drafting suggestions): 1. Eligibility criteria shall be set to support achievement of the general and specific objectives referred to in Article 3 of this Regulation, in accordance

Proposal for a Regulation establishing the European Competitiveness Fund (doc. 13413/25)

From: AT, BG, CZ, DE, FI, HR, IE, IT, LT, LU, MT, PT, BE, HU, ES, SE, SI, EL, FR, PL

Deadline: 15 October 2025 COB

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Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	with Regulation (EU, Euratom) 2024/2509 and apply to all award procedures under the ECF.
2. Provided any specific condition laid down within each policy window or component are met, one or more of the following categories of legal entities may be eligible to receive Union support in award procedures under direct and indirect management:	FR (Drafting suggestions): Without prejudice to ~~Provided~~ any specific condition laid down within each policy window or component ~~are met~~, one or more of the following categories of legal entities may be eligible to receive Union support in award procedures under direct and indirect management FR (Comments): Proposition de reformulation afin d'assurer une cohérence de compréhension entre les critères d'éligibilité généraux prévus à l'article 9 et les critères d'éligibilité complémentaires prévus à l'article 51 (industrie de la défense).
(a) entities established in a Member State or in Overseas Countries and Territories;	FR (Drafting suggestions): (a) entities established in a Member State, Outermost regions or in Overseas Countries and Territories; FR (Comments): Au regard des difficultés d'accès des régions ultrapériphériques aux fonds, en particulier en gestion directe, il apparaît nécessaire de les mentionner explicitement.
(b) entities established in an associated ~~third~~ country;	SE

Proposal for a Regulation establishing the European Competitiveness Fund (doc. 13413/25)

From: AT, BG, CZ, DE, FI, HR, IE, IT, LT, LU, MT, PT, BE, HU, ES, SE, SI, EL, FR, PL

Deadline: 15 October 2025 COB

Updated: 27/10/2025 09:02

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Comments): Why is “third” removed?
(c) international organisations;	LU (Drafting suggestions): (c) the EIB Group and international organisations; MT (Drafting suggestions): (c) the EIB Group and international organisations;
(d) other entities established in non-associated third countries where the funding of such entities is essential for implementing the action and contributes to the objectives set out in Article 3.	FR (Comments): Des exemples peuvent-ils être fournis de cas dans lesquels un tel financement serait nécessaire et sur les acteurs visés ici ? Comment la cohérence de cet article avec les enjeux de souveraineté et de préférence européenne sera assurée ?
	DE (Drafting suggestions): (PT (Drafting suggestions): ff
3. In addition to Article 168(2) and (3) of Regulation (EU, Euratom) 2024/2509, associated third countries referred to in Article 11(1) of this Regulation and international organisations may, where relevant, participate in and benefit from any procurement mechanisms set out in Article 168(2) and	LU (Drafting suggestions):

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Deadline: 15 October 2025 COB

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Presidency text (doc. 13413/25)	Drafting suggestions and Comments
(3) of Regulation (EU, Euratom) 2024/2509. Rules applicable to Member States pursuant to Article 168 of Regulation (EU, Euratom) 2024/2509 shall be applied, mutatis mutandis, to participating associated third countries and international organisations.	3. In addition to Article 168(2) and (3) of Regulation (EU, Euratom) 2024/2509, associated third countries referred to in Article 11(1) of this Regulation, the EIB Group and international organisations may, where relevant, participate in and benefit from any procurement mechanisms set Article 168(2) and (3) of Regulation (EU, Euratom) 2024/2509. Rules applicable to Member States pursuant to Article 168 of Regulation (EU, Euratom) 2024/2509 shall be applied, mutatis mutandis, to participating associated third countries, the EIB Group and international organisations. MT (Drafting suggestions): 3. In addition to Article 168(2) and (3) of Regulation (EU, Euratom) 2024/2509, associated third countries referred to in Article 11(1) of this Regulation, the EIB Group and international organisations may, where relevant, participate in and benefit from any procurement mechanisms set out in Article 168(2) and (3) of Regulation (EU, Euratom) 2024/2509. Rules applicable to Member States pursuant to Article 168 of Regulation (EU, Euratom) 2024/2509 shall be applied, mutatis mutandis, to participating associated third countries, the EIB Group and international organisations. FR (Comments): Coherence avec article 9.2(b)
4. In award procedures, the following activities shall not be eligible for support:	
(a) activities that are prohibited by Union law, applicable international law, or by national law in all Member States;	

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
(b) activities that are already fully financed from other public or private sources,	
(c) in accordance with Article 136 of the Financial Regulation, eligibility restrictions shall apply to high-risk suppliers in line with EU law, for security reasons.	IT (Drafting suggestions): ~~in accordance with Article 136 of the Financial Regulation, e~~Eligibility restrictions shall apply to high-risk suppliers ~~in line with EU law~~, for security reasons, <u>in accordance with Article 136 of the Financial Regulation and in line with EU law.</u> IT (Comments): Improves readability by placing the objective (security restrictions) first, while keeping the legal reference secondary SE (Comments): How is high-risk defined in this context?
	DE (Drafting suggestions): <u>4 (a) The fields of research defined in Article 21 (10) of the Horizon Europe Regulation shall not be financed.</u> DE (Comments): The exclusion rules defined in Article 21 (10) of the current Horizon Europe Regulation regarding the eligibility of projects involving human embryos or heS and the supplementary protocol declaration requested by DE must also be applied in the ECF.

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	FR (Drafting suggestions): <u>4.a. Proposals for actions shall be assessed in accordance with excellence-oriented award criteria: (a) The quality and efficiency of the implementation of the action. (b) The objectives, priorities and the expected results set for the relevant action, in particular through the evaluation of one or more of the following criteria as specified in the work programmes: : (i) contribution to excellence, (ii) innovation capacities, (iii) cross-border cooperation, in particular with SMEs and mid-caps that bring substantial added-value to the action, (iv) competitiveness, (v) increase in production capacities and availability, (vi) reduction of lead production time, (v) increase in interoperability, (vii) increase in interchangeability and (viii) security of supply throughout the Union in response to identified risks.</u> FR (Comments): Reprise des dispositions de l'article 53
5. The work programme or the documents related to the award procedure may further specify the eligibility criteria set out in this Regulation or set out additional eligibility criteria for specific actions.	BE (Drafting suggestions): 5. The work programme or the documents related to the award procedure may further specify the eligibility criteria set out in this Regulation or set out additional eligibility criteria for specific actions, <u>provided that such additional eligibility criteria are duly substantiated.</u> BE (Comments): The advantage of a single rulebook is precisely that the rules are the same for every award procedure. There must be room for additional eligibility

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	criteria, but then there must be sufficient justification for why these additional criteria are necessary. FR (Drafting suggestions): <u>Where appropriate and duly justified, and after consultation of Member States</u>, the work programme or the documents related to the award procedure may further specify the eligibility criteria set out in this Regulation or set out additional eligibility criteria for specific actions. FR (Comments): L'intégration de critères d'éligibilité supplémentaires devrait rester exceptionnelle, les porteurs de projets ayant besoin d'une stabilité des règles de participation. Les critères d'éligibilité devraient dès lors être définis dans le règlement et non au niveau des programmes de travail. Il s'agit là d'un élément essentiel pour garantir la prévisibilité des règles pour les candidats et éviter les litiges juridiques. Des critères supplémentaires ne devraient être précisés que dans des cas extrêmement rares, et après consultation des États membres, ce qui n'est pas toujours la procédure habituelle au sein des comités de programme.
6. Representatives of third countries or international organisations shall not be present in deliberations on eligibility/award criteria.	DE (Comments): We do not understand this deletion and ask presidency for more explanation. HU (Drafting suggestions): Delete the point. HU

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Comments): This is a procedural matter that has already been addressed in Article 83.7. The proposed text has very little to do with eligibility rules.
	CZ (Drafting suggestions): Article 9a Award criteria 1. A proposal shall be evaluated on the basis of the award criteria, which are excellence, impact, quality and efficiency of the implementation and, in the case of a consortium, geographical balance. The work programme shall lay down further details concerning the application of these award criteria including any weighting and, thresholds. 2. In case of support of critical technologies, they shall be deemed critical where they meet either of the following conditions a. they bring to the internal market an innovative, emerging and cutting-edge element with significant economic potential; b. they contribute to reducing or preventing strategic dependencies of the Union. CZ (Comments): CZ – given that the ECF builds on the STEP platform, we consider it important to highlight these two conditions
<i>Article 11</i>	

Association of third countries to activities under the ECF	AT (Drafting suggestions):
	~~Association~~ <u>Participation</u> of third countries <u>and international organisations</u> to activities under the ECF
	AT (Comments):
	To be as clear as Article 7 of the current Space Programme Regulation (2021/696).
	DE (Comments): Need more clarification on how association agreements will be negotiated and how Member States will be involved in the process. What was the intention when inserting different categories of countries in para. 1?
	HR (Comments): A clearer text on how this association would be at play having in mind the regulation of the same association in Horizon Europe would be very much welcomed (does one exclude or include the other and/or the inclusion of third countries in the commitmentology will defer depending on the programme). Additionally, will the additional conditions be set for third country participation in defence related policy window.
	ES (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	Third countries associated to Horizon Europe are either linked to the entire programme (e.g. the UK and Switzerland) or only to Pillar II. We would therefore encourage the Presidency to take this into account, as separating the R&I component into a dedicated work programme for each window would help simplify procedures and make participation in R&I actions more predictable. FR (Comments): Cet article devrait être également étudié sous le prisme de la préférence européenne. Il serait pertinent de tenir compte des évolutions qui seront faites sur l'article 10.
1. The ECF may be opened to the participation of the following third countries through full or partial association, in accordance with the objectives laid down in Article 3 and in accordance with the relevant international agreements or any decisions adopted under the framework of those agreements and applicable to:	CZ (Comments): CZ - General comment: When promoting the EU's technological sovereignty, it is necessary to take into account the EU's technological dependence on three countries and not to adopt too restrictive measures for participation in the ECF where this would harm the research and innovation development of the technology concerned and stakeholders in the EU. IE (Drafting suggestions): The Commission shall ensure appropriate Member State representation where appropriate when deciding if the ECF may be opened to the participation of the following third countries through full or partial association, in accordance with the objectives laid down in Article 3 and in accordance with the relevant international agreements or any decisions adopted under the framework of those agreements and applicable to: IE

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Comments): IE notes that MS must remain heavily involved in key decisions. The Digital Europe Programme (DEP) Committee and the Connecting Europe Facility (CEF) Committee are good examples of how this process is tried and trusted. Suggested text amendment. BE (Comments): This opening can enhance the Fund’s attractiveness, but it is important to guarantee the protection of the EU’s strategic interests and reciprocity in access conditions. HU (Comments): The feasibility and reasonableness of full or partial association must be examined separately for each category of countries, taking into account the objectives of the policy proposal in question, i.e., what is the scope of the participation offer, will the scope of the association be determined during the negotiations, will the principle of equal treatment be violated during the negotiations, and what are the consequences for grant management, i.e., implementation? It cannot be ruled out that, for certain policy issues, partial association may be preferable to full association, but the justification for this must be examined on a case-by-case basis. ES (Comments): The Commission should clarify what “full or partial association” means, if third countries need to conclude specific bilateral or multilateral agreements

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	specifying the terms of participation (including eligibility conditions) in the ECF, and what procedure will be followed to adopt such agreements. FR (Drafting suggestions): <u>Without prejudice to</u> ~~Provided~~ <u>any specific condition laid down within each policy window or component</u>, ~~the~~ ECF may be opened to the participation of the following third countries through full or partial association, in accordance with the objectives laid down in Article 3 and in accordance with the relevant international agreements or any decisions adopted under the framework of those agreements and applicable to FR (Comments): Proposition de reformulation afin d'assurer une cohérence de compréhension entre l'association générale des pays tiers prévue à l'article 11 et l'association des pays tiers prévue à l'article 50 (industrie de la défense).
(a) members of the European Free Trade Association which are members of the European Economic Area, as well as Andorra, Monaco and San Marino;	
(b) acceding countries, candidate countries and potential candidates;	
(c) European Neighbourhood Policy countries;	
(d) other third countries.	AT (Drafting suggestions): (d) other third countries <u>or international organisations in accordance with the conditions laid down in a specific agreement concluded in accordance with Article 218 TFEU.</u>

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	AT (Comments): (d) other third countries <u>or international organisations in accordance with the conditions laid down in a specific agreement concluded in accordance with Article 218 TFEU.</u> To be as clear as Article 7 of the current Space Programme Regulation (2021/696). PT (Comments): This also includes developing countries, as it is nowadays within Horizon Europe (2021-2027)? FR (Comments): La Commission pourrait-elle préciser quels critères encadreraient la participation de ces “autres pays tiers” ? PL (Drafting suggestions): „It may be opened to other third countries on a full or partial association basis, subject to specific security, strategic and financial conditions” PL (Comments):

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Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	Poland's new proposed wording for this provision ensures flexibility in engaging global partners while safeguarding the EU's strategic interests.
	DE (Drafting suggestions): <u>1a. The association to the ECF and the association to the Horizon Europe Regulation according to Article 9 of that Regulation may be done in a single association agreement with the third country.</u> DE (Comments): To make association easier for a third country.
2. Provided any possible specific conditions laid down within each policy window or component are met by the interested third country, the Association Agreements for programme participation in the ECF shall:	FR (Comments): La Commission pourrait-elle préciser comment elle entend rendre compte du suivi et du respect des conditions énoncées au paragraphe 2 ?
(a) ensure a fair balance as regards between the contributions and benefits of the third country participating in the ECF;	AT (Drafting suggestions): (a) ensure a fair balance between the contributions and benefits of the third country <u>or international organisation</u> participating in the ECF; AT (Comments): To be as clear as Article 7 of the current Space Programme Regulation (2021/696). SE (Comments):

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	Important that third countries who contribute also are given benefits that ensure they can participate on equal conditions as participating MS. How is this ensured?
(b) lay down the conditions of participation in the programmes, including the calculation of financial contributions, consisting of an operational contribution and a participation fee, to the ECF and its general administrative costs;	
(c) not confer on the third country any decision-making power in the programme;	AT (Drafting suggestions): (c) not confer on the third country or international organisation any decision-making power in the programme; AT (Comments): To be as clear as Article 7 of the current Space Programme Regulation (2021/696).
(d) guarantee the rights of the Union to ensure sound financial management and to protect its financial interests;	
(e) ensure the protection of strategic, security, defence and public order interests of the Union and its Member States.	AT (Drafting suggestions): e) ensure the protection of strategic, security, defence and public order interests of the Union and its Member States, including as regards the protection of classified information under Article 13. AT

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Comments): To ensure the protection of classified information. SI (Drafting suggestions): ensure the protection of strategic, security, defence and ~~public order interests~~ of the Union and its Member States. SI (Comments): How and who defines public order interests? PL (Drafting suggestions): „They shall ensure protection of strategic, security, defence and public order interests of the Union and its Member States, requiring adherence to EU export control and sensitive technology protection rules” PL (Comments): The proposed new provision minimizes the risk of unauthorized transfer of key technologies and protects the EU’s strategic assets
	SI (Drafting suggestions): f) respect of human rights and international law
3. For the purposes of point (d), the third country shall grant the necessary rights and access required under Regulations (EU, Euratom) 2024/2509 and (EU, Euratom) No 883/2013, and guarantee that enforcement decisions imposing a pecuniary obligation on the basis of Article 299 TFEU,	SE (Drafting suggestions):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
as well as judgements and orders of the Court of Justice of the European Union, are enforceable. and ensure that its competent authorities cooperate with the European Public Prosecutor's Office (EPPO) in the investigations and prosecutions of criminal offences affecting the Union's financial interests in accordance with applicable international agreements or other applicable rules.	Add the following: <u>Association or partial association with other third countries shall only be possible if they fulfil all the following criteria: (a) commitment to a rules-based open market economy, including fair and equitable dealing with intellectual property rights, respect of human rights, backed by democratic institutions; (b) active promotion of policies to improve the economic and social well-being of citizens</u> SE (Comments): Rules similar to the ones proposed for the Horizon regulation are also needed here, for the sake of protecting IPR rights and European values of involved European actors. PL (Drafting suggestions): „Third countries shall grant the necessary rights and access under Regulations (EU, Euratom) 2024/2509 and 883/2013, guarantee enforceability of Court of Justice judgments, and cooperate with OLAF and the EPPO in investigations and prosecutions affecting the Union's financial interests” PL (Comments): The proposed provision ensures effective enforcement of EU law and coordinated action against financial abuse
4. Separate specific agreements may be concluded in accordance with Article 218 TFEU for activities under the ECF related to security, the provision of secured services and critical assets to the EU.	DE (Drafting suggestions):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	4. ~~Separate specific agreements may be concluded in accordance with Article 218 TFEU for activities under the ECF related to security, the provision of secured services and critical assets to the EU.~~ DE (Comments): We see no need for additional rules in this area. HU (Comments): The questions arises whether the COM will respect the procedural steps set out in Article 218 TFEU for all categories of third countries, or whether, in the case of third countries of Article 11 point 1 (b) and (c), the COM will continue to apply the standard authorizations used in FP9 (COM negotiating and concluding association agreements under a simplified procedure, without involving the Council)
	DE (Drafting suggestions): <u>5. The association to the collaborative research and innovation activities of the policy windows, with the exception of the specific programme for defence research and innovation, is possible either through association to the ECF or to Horizon Europe.</u>
Article 12	IT (Comments): With regard to the implementation, the principle of technological neutrality should be duly emphasized.
	CZ (Comments): CZ -The Czech Republic also proposes that the ECF includes measures to facilitate the participation of first-time applicants. Specifically, it calls for the

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	introduction of more favorable and simpler conditions for entities participating in the program for the first time, for example through simplified administrative requirements, appropriate financial guarantees, and targeted support tools, including training and a clear definition of the minimum scope of consulting services for first-time applicants. Such an adjustment would reduce barriers to entry, increase the diversity of participants, and contribute to expanding the fund's impact across the EU.
Implementation and forms of Union support	BG (Comments): With a view to ensuring balanced development across the Union, an appropriate share of the resources under the ECF should be allocated for entities established in a Member State or a region where GDP per capita is below the EU average.
1. The ECF ~~is to~~ shall be implemented through work programmes in accordance with Article 110 of Regulation (EU, Euratom) 2024/2509.	DE (Comments): . LU (Drafting suggestions): 1. The ECF shall be implemented ~~through work programmes~~ in accordance with Article 110 of Regulation (EU, Euratom) 2024/2509. MT (Drafting suggestions): The ECF shall be implemented ~~through work programmes~~ in accordance with Article 110 of Regulation (EU, Euratom) 2024/2509. PT

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Comments): There is a need for clarification regarding work programmes. Is it envisaged one work programme per policy window? Will they be multiannual or annual? Which role is reserved for Member States in the design and adoption of the work programmes? How is this engagement of MS envisaged? BE (Comments): It is necessary to guarantee simplicity and predictability of procedures for beneficiaries, especially SMEs and regional actors. Harmonisation of rules across policy windows and clarity of award criteria are essential.
	MT (Drafting suggestions): <u>2a. The conditions of the ECF InvestEU Instrument implementation will be specified through investment guidelines, as described in Chapter II, Section 2.</u>
2. The ECF shall be implemented in accordance with Regulation (EU, Euratom) 2024/2509, under direct management or under indirect management with entities referred to in Article 62(1), point (c) of that Regulation.	MT (Drafting suggestions): <u>2b. The EIB Group shall implement the ECF InvestEU Instrument on an enhanced reliance basis in line with the objectives of simplification, flexibility and predictability.</u> MT (Comments): Recital 69 should ideally be aligned accordingly to ensure consistency: “.... the implementation of the ECF InvestEU Instrument should build on existing agreements, templates for legal and contractual arrangements, as well as established monitoring and reporting tools, together with enhanced reliance

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	<u>on the EIB's rules, policies and procedures reflecting their unique governance and role as EU treaty bodies</u>. This improves the impact of Union support.....”
	CZ (Drafting suggestions): <u>3. In order to ensure a balanced development across the Union, at least 35 % of the resources under the ECF shall be directed to entities from Members States whose GNI per capita remains below the EU average.</u> CZ (Comments): CZ recognizes the importance of supporting excellence within the European Competitiveness Fund (ECF), we believe that no Member State can be left behind. Moreover, further widening of disparities between Member States must be avoided. Ensuring geographically balanced participation and fostering integration of stakeholders from all Member States into wider European industrial and innovation value chains, whilst ensuring fair and effective access to support mechanisms within the ECF is therefore a fundamental prerequisite for strengthening the overall competitiveness and resilience of the EU. To make European projects truly European there is a need for more balanced distribution of funding across the Member States. Otherwise, we risk that many entities from certain Member States – especially those with relatively limited experience with Union-level instruments - will not be able to participate in collaborative efforts. We therefore advocate for the introduction of measures that would better safeguard such balance within ECF, in particular through adding the new provisions.
3. Award procedures implemented under the ECF, shall comply with the general provisions of the ECF as set out in Chapters I and II of this	CZ

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
Regulation, which, in case of conflict, shall prevail over any other rules pertaining to the activities or subsequent implementing acts.	(Drafting suggestions): 34. ... DE (Drafting suggestions): 3. <u>All granting of Union funding under the ECF must be excellence-oriented and based on competitive and merit-based award procedures.</u> Award procedures implemented under the ECF, shall comply with the general provisions of the ECF as set out in Chapters I and II of this Regulation, which, in case of conflict, shall prevail over any other rules <u>within the ECF</u> pertaining to the activities or subsequent implementing acts. HR (Drafting suggestions): HR: HR suggest insertion of new paragraph 3.: <i>In order to ensure a balanced development across the Union, at least 40 % of the resources under the ECF shall be directed to entities from Member States whose GNI per capita (in 2023) remains below the EU27 average, including additional safeguards for Member States with shorter EU membership status.</i> HR (Comments): HR considers that pre-defined allocation should be focused on MS's whose GNI per capita remains below the EU 27 average (data from 2023). Further safeguards for MS with lower GNI per capita and a shorter EU membership status in this group are need. PT

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Comments): In full knowledge that this theme is to be discussed in the Ad hoc MFF Group, without excluding the excellence criteria, we defend that the text should include an explicit reference to the need to ensure the participation of all Member States. We must include mechanisms that allow more peripheral Member States and those at lower levels of development to participate in the dynamics of strengthening European competitiveness. SI (Drafting suggestions): 3. Award procedures implemented under the ECF, <u>shall be primarily based on open, competitive calls for proposals</u> and shall comply with the general provisions of the ECF as set out in Chapters I and II of this Regulation, which, in case of conflict, shall prevail over any other rules pertaining to the activities or subsequent implementing acts. <u>For research and innovation actions the rules of the Horizon Europe regulation apply.</u> SI (Comments): In line with paragraph 5. PL (Drafting suggestions): 3. Award procedures implemented under the ECF, shall comply with the general provisions of the ECF as set out in Chapters I and II of this Regulation, which, in case of conflict, shall prevail over any other rules pertaining to the activities or subsequent implementing acts <u>The award procedures shall be designed to ensure a broad and inclusive participation and distribution of funds across all Member States. Particular priority shall be given to Member States with lower innovation, investment and absorption</u>

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	<u>capacity, measured as a Gross National Income (GNI) per capita below the Union average.</u> PL (Comments): Justification in General comments
	DE (Drafting suggestions): <u>3a. All award procedures and proposals for actions shall be assessed in excellence- and merit-based award procedures based on transparent assessment criteria, including:</u> (a) <u>The quality and efficiency of the implementation of the action.</u> (b) <u>The expected results of the action against measureable targets specified in the work programmes, addressing, where relevant :</u> (i) <u>contribution to the Union's competitiveness and innovation capacity, (ii) contribution to excellence, , (iii) cross-border cooperation, (iv) security of supply throughout the Union in response to identified risks, (v) contribution to the Union's strategic technological capabilities.</u> (c) <u>Participation of SMEs and mid-caps through substantial added-value to the action.</u> <u>3b. Award procedures and proposals actions shall for the specific windows also be assessed in particular through the evaluation of one or more of the following additional criteria:</u> (a) <u>For the 'Clean Transition and Industrial Decarbonisation' window (implemented through the activities set out in Chapter II and Chapter IV, and contributing to the specific objectives set out in Article 3(2), point (a)): GHG emissions avoided and removals in tCO₂ e.</u> (b) <u>For the 'Defence Industry' section of the 'Resilience and Security, Defence Industry, and Space' window (implemented through</u>

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	<u>activities set out in Chapter II and Chapter VII, including the specific programme for defence research and innovation referred to in paragraph 1, and contributing to the specific objectives set out in Article 3(2), point (d(2))): (i) reduction of lead production time, (ii) increase in interoperability or interchangeability (iii) security of supply throughout the Union in response to identified risks, including in particular high exposure to the risk of materialisation of conventional military threats, (iv) increase in production capacities and availability.</u> DE (Comments): Key policy elements of the Fund, such as the selection/award criteria must be fundamentally and consistently regulated in the Regulation itself. (3a) includes the fundamental and overarching principles and criteria for all decisions taken under the ECF. Criteria in (3b) complement those in (3a) for specific actions under specific policy windows. <u>The criteria in (3a) and (3b) are not yet complete and will be further developed.</u> SI (Drafting suggestions): <u>3a) In order to ensure a balanced development across the Union, at least 35 % of the resources under the ECF shall be directed to entities from Members States whose GNI per capita remains below the EU average.</u> SI (Comments): To make European projects truly European there is a need for more balanced distribution of funding across the Member States. Otherwise, we risk that many entities from certain Member States – especially those with relatively

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	limited experience with Union-level instruments - will not be able to participate in collaborative efforts. We therefore advocate for the introduction of measures that would better safeguard such balance within ECF.
4. Where award procedures concern more than one specific objective laid down in Article 3(2), the work programme may specify that the award procedure is implemented under a single set of rules by applying directly Regulation (EU, Euratom) 2024/2509, complemented by the general rules set out in Chapter I and II, or by applying the rules of one of the concerned specific objectives.	CZ (Drafting suggestions): 45. ... FI (Comments): <u>FI: connection with the Competitiveness Coordination Tool is still unclear. The mechanisms and processes by which the tool will operate are not defined yet. More details are needed, e.g. composition, decision making, responsibilities, etc., to understand how the ECF and HE are linked and complementary.</u> HR (Drafting suggestions): HR: HR suggest adding a new paragraph 4 to Art. 12 with a wording: <i>4. In order to promote a balanced distribution of resources within the ECF, the Commission shall implement it on basis of a regular analysis of participation trends and access barriers. To that effect, the Commission shall take specific measures, in particular:</i> <i>(a) establishing minimum indicative thresholds for the allocation of funding to Member States referred to in paragraph 3 of Article 12 under certain calls or instruments of the ECF, on the basis of objective and transparent criteria;</i> <i>(b) supporting the integration of entities from different Member States into Single Market value chains as referred in Article 16, notably through</i>

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	<i>ensuring geographic balance in the composition of consortia or in the value chain.</i> <i>The Commission shall regularly involve Member States in the design and monitoring of such measures.</i> IT (Drafting suggestions): Where award procedures concern more than one specific objective laid down in Article 3(2), the work programme may specify that the award procedure is implemented under a single set of rules through, alternatively: a) ~~by applying~~ directly application of the Regulation (EU, Euratom) 2024/2509, complemented by the general rules set out in Chapter I and II; b) ~~or by applying~~ application of the rules of one of the concerned specific objectives IT (Comments): make the alternative choice clearer FR (Drafting suggestions): Where award procedures concern more than one specific objective laid down in Article 3(2), the work programme shall specify that the award procedure is implemented under a single set of rules by applying directly Regulation (EU, Euratom) 2024/2509, complemented by the general rules set out in Chapter I and II, and by applying the rules of one of the concerned specific objectives. <u>When the specific objective laid down in Article 3(2)d(2) is concerned, the awarded action shall fulfil conditions provided under articles 50 and 51 of the ECF regulation.</u> FR (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	Les règles spécifiques à la défense et au spatial devraient toujours être appliquées quand bien même la procédure d'attribution réponds à plusieurs objectifs. La Commission peut-elle clarifier ce qu'elle entend par "rules of one of the concerned specific objectives" ? Cela signifie-t-il que chaque fenêtre pourra développer ses propre procédures de sélection de projets ? Ce paragraphe s'appliquera-t-il aussi au volet compétitivité du pilier 2 de recherche collaborative du PCRI ? Toute contribution de l'Union accordée au titre de plusieurs objectifs spécifiques, y compris des objectifs spécifiques liés à l'industrie de défense, devra remplir des conditions spécifiques liées aux activités de l'industrie de défense (prévues aux articles 50 et 51 du FEC). PL (Drafting suggestions): 4. Where award procedures concern more than one specific objective laid down in Article 3(2), the work programme may specify that the award procedure is implemented under a single set of rules by applying directly Regulation (EU, Euratom) 2024/2509, complemented by the general rules set out in Chapter I and II, or by applying the rules of one of the concerned specific objectives.
	CZ (Drafting suggestions): <u>6. In order to promote a geographically balanced distribution of resources within the ECF, the Commission shall implement it on basis of a regular analysis of participation trends and access barriers. To that effect, the Commission shall take specific measures, in particular:</u> <u>(a) establishing minimum indicative thresholds for the allocation of funding to Member States referred to in paragraph 3 of Article 12 under</u>

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	<u>certain calls or instruments of the ECF, on the basis of objective and transparent criteria;</u> <u>(b) supporting the integration of entities from different Member States into Single Market value chains as referred in Article 16, notably through ensuring geographic balance in the composition of consortia or in the value chain.</u> <u>The Commission shall regularly involve Member States in the design and monitoring of such measures</u> CZ (Comments): CZ recognizes the importance of supporting excellence within the European Competitiveness Fund (ECF), we believe that no Member State can be left behind. Moreover, further widening of disparities between Member States must be avoided. Ensuring geographically balanced participation and fostering integration of stakeholders from all Member States into wider European industrial and innovation value chains, whilst ensuring fair and effective access to support mechanisms within the ECF is therefore a fundamental prerequisite for strengthening the overall competitiveness and resilience of the EU. To make European projects truly European there is a need for more balanced distribution of funding across the Member States. Otherwise, we risk that many entities from certain Member States – especially those with relatively limited experience with Union-level instruments - will not be able to participate in collaborative efforts. We therefore advocate for the introduction of measures that would better safeguard such balance within ECF, in particular through adding the new provisions. SI (Drafting suggestions): <u>4.a) In order to promote a balanced distribution of resources within the ECF, the Commission shall implement it on basis of a regular analysis of</u>

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	<u>participation trends and access barriers. To that effect, the Commission shall take specific measures, in particular:</u> <u>(a) establishing minimum indicative thresholds for the allocation of funding to Member States referred to in paragraph 3 of Article 12 under certain calls or instruments of the ECF, on the basis of objective and transparent criteria;</u> <u>(b) supporting the integration of entities from different Member States into Single Market value chains as referred in Article 16, notably through ensuring geographic balance in the composition of consortia or in the value chain.</u> <u>c) the Commission shall regularly involve Member States in the design and monitoring of such measures.</u> SI (Comments): To make European projects truly European there is a need for more balanced distribution of funding across the Member States. Otherwise, we risk that many entities from certain Member States – especially those with relatively limited experience with Union-level instruments - will not be able to participate in collaborative efforts. We therefore advocate for the introduction of measures that would better safeguard such balance within ECF.
5. In certain duly substantiated circumstances, Union funding may be granted without a call for proposals in accordance with Article 198 of Regulation (EU, Euratom) 2024/2509, including with point (e).	CZ (Drafting suggestions): <u>57. In certain duly substantiated circumstances, in particular with regard to strategic projects pursuant to the NZIA and the CRMA, after consultation with Member States,</u> Union funding may be granted without a call for proposals in accordance with Article 198 of Regulation (EU, Euratom) 2024/2509, including with point (e). DE

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Drafting suggestions): 5. In certain duly substantiated exceptional circumstances, such as the need to respond to a public emergency, Union funding may be granted without a call for proposals in accordance with Article 198 of Regulation (EU, Euratom) 2024/2509, including with point DE (Comments): The exceptional circumstances should be interpreted carefully and strictly. Further rules for this exceptions should be included in the regulation, additionally Member states should be able to set rules for this exception in the work programmes and / or should be involved in this decision. FI (Drafting suggestions): In certain duly substantiated <u>and exceptional</u> circumstances, Union funding may be granted without a call for proposals in accordance with Article 198 of Regulation (EU, Euratom) 2024/2509, including with point (e). FI (Comments): <u>FI: It is particularly important that financial instruments (loans, guarantees, equity) carry the greatest weight in the ECF, as their multiplier effect is significantly higher than that of grants—making them a more efficient use of taxpayers’ money. Moreover, the nature of repayable financing is in itself the most reliable way to enable economically competitive investments, as financiers always assess the cash flow generated by projects and their economic viability.</u> IT

Proposal for a Regulation establishing the European Competitiveness Fund (doc. 13413/25)

From: AT, BG, CZ, DE, FI, HR, IE, IT, LT, LU, MT, PT, BE, HU, ES, SE, SI, EL, FR, PL

Deadline: 15 October 2025 COB

Updated: 27/10/2025 09:02

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Drafting suggestions): In certain duly substantiated circumstances, Union funding may be granted without a call for proposals in accordance with Article 198 of Regulation (EU, Euratom) 2024/2509, ~~including with point (e).~~ IT (Comments): unnecessary specification BE (Comments): What does ‘substantiated circumstances’ mean? How will this be defined and who will decided that circumstances are duly substantiated? SE (Drafting suggestions): In certain duly substantiated exceptional circumstances, Union funding may be granted without a call for proposals in accordance with Article 198 of Regulation (EU, Euratom) 2024/2509, including with point (e). FR (Comments): Quels secteurs sont concernés ici et sur la base de quels critères ?
6. Union support may be provided in any form in accordance with Regulation (EU, Euratom) 2024/2509, in particular grants, prizes, procurement, non-financial donations, budgetary guarantees, and financial instruments.	AT (Drafting suggestions): 6. Union support may be provided in any form in accordance with Regulation (EU, Euratom) 2024/2509, in particular grants, prizes, procurement, non-financial donations, budgetary guarantees, and financial instruments. Collaborative research and innovation activities under

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	<u>Chapters IV to VII shall be implemented in accordance with Article 15(1)-(3) of the Regulation (EU) XXX [Horizon Europe].</u> SE (Drafting suggestions): Union support may be provided in any form in accordance with Regulation (EU, Euratom) 2024/2509, in particular grants, prizes, procurement, non-financial donations, budgetary guarantees, and financial instruments. <u>Priority should be given to budgetary guarantees and financial instruments.</u> FR (Comments): À quel article du règlement (UE, Euratom) 2024/2509 cet article fait-il référence ?
7. Where Union support is provided in the form of a budgetary guarantee and financial instruments, including when combined with other forms of non-repayable support in blending operations, it shall be implemented in accordance with Title X of Regulation (EU, Euratom) 2024/2509 .	
8. Where Union funding is provided in the form of a grant, including when combined in blending operations with other forms of repayable support not supported by the Union budget, funding shall be provided in accordance with Title VIII of Regulation (EU, Euratom) 2024/2509 and in the form of financing not linked to costs in accordance with Article 125(1), point (a), of that Regulation (EU, Euratom) 2024/2509, or, where necessary, simplified cost options. Funding may be also provided in the form of actual eligible cost reimbursement where the objectives of an action cannot be achieved otherwise or where this form is necessary to enable other sources of funding, including financing from Member States.	IT (Drafting suggestions): Where Union funding is provided in the form of a grant, including when combined in blending operations with other forms of repayable support not supported by the Union budget, funding shall be provided in accordance with Title VIII of Regulation (EU, Euratom) 2024/2509 and in the form of financing not linked to costs in accordance with Article 125(1), point (a), of that Regulation (EU, Euratom) 2024/2509, or, where necessary, <u>and in accordance with the same regulation,</u> simplified cost options <u>(lump sums,</u>

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	<u>unit costs or flat-rate financing</u>). Funding may be also provided in the form of actual eligible cost reimbursement where the objectives of an action cannot be achieved otherwise or where this form is necessary to enable other sources of funding, including financing from Member States. IT (Comments): bring the simplified procedures back to the regulatory framework
	CZ (Drafting suggestions): <u>9a. National experts will be included in the evaluation committee with regard to their expertise in a given topic of Union competitiveness.</u> CZ (Comments): CZ considers it important that national experts are nominated to the evaluation committee with regard to their expertise.
9. In accordance with Article 153(3) of Regulation (EU, Euratom) 2024/2509, for actions implementing research and innovation activities, the evaluation committee may be composed partially or fully of independent external experts.	AT (Drafting suggestions): 9. In accordance with Article 153(3) of Regulation (EU, Euratom) 2024/2509, for actions implementing research and innovation activities, the evaluation committee may be composed partially or fully of independent external experts, <u>with award procedures ensuring that the principle of excellence is maintained as the primary criterion.</u> AT (Comments): Austria underlines that the principle of excellence must be maintained for all R&I activities, and that SSH dimensions should be included to increase the effectiveness of research.

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	LT (Drafting suggestions): In accordance with Article 153(3) of Regulation (EU, Euratom) 2024/2509, for actions implementing research and innovation activities, the evaluation committee ~~may shall~~ be composed ~~partially or~~ fully of independent external experts. In duly justified cases set out in the work programme, the evaluation committee may be composed partially of independent external experts. LT (Comments): We consider that for actions implementing research and innovation activities the evaluation committee composed of independent experts should remain a default option. MT (Drafting suggestions): In accordance with Article 153(3) of Regulation (EU, Euratom) 2024/2509, for actions implementing research and innovation activities, the evaluation committee ~~may shall~~ be composed ~~partially or fully~~ of independent external experts. MT (Comments): Malta calls for all members of the evaluation committee to be independent and external. This is in line with current practice under Horizon Europe 2021-2027. We see no need for a change. BE (Drafting suggestions):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	In accordance with Article 153(3) of Regulation (EU, Euratom) 2024/2509, for actions implementing research and innovation activities, the evaluation committee ~~may~~ must be composed partially or fully of independent external experts <u>of different disciplines where relevant</u> BE (Comments): Especially for R&I activities, evaluation should rely on scientific excellence and take an interdisciplinary perspective. SI (Drafting suggestions): 9. In accordance with Article 153(3) of Regulation (EU, Euratom) 2024/2509, for actions implementing research and innovation activities, the evaluation committee ~~may~~ shall be composed ~~partially or fully~~ of independent external experts. <u>Except in duly justified cases as set out in the work programme, when the evaluation committee may be composed partially or fully of representatives of Union institutions or bodies as referred to in Article 153 of the Financial Regulation.</u> SI (Comments): The article is not clear - the new provision is not in accordance with the article (but in regardless of the provisions of the Article 153(3) the third paragraph of Regulation (EU, Euratom) 2024/2509, the provision provides “Members of the evaluation committee may be external experts where that possibility is provided for in the basic act”). Are the other parts (provisions) of the Article 153(3) of Regulation (EU, Euratom) 2024/2509 not taken into consideration? RIA activities must be evaluated by external experts.

Proposal for a Regulation establishing the European Competitiveness Fund (doc. 13413/25)

From: AT, BG, CZ, DE, FI, HR, IE, IT, LT, LU, MT, PT, BE, HU, ES, SE, SI, EL, FR, PL

Deadline: 15 October 2025 COB

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Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	FR (Comments): La France souhaiterait disposer d'éléments de clarifications concernant la composition du comité d'évaluation : dans quelle mesure celui-ci serait-il "partiellement" ou "totalement" composé d'experts externes indépendants, comment les Etats membres seraient impliqués dans ou associés à ces organes, et sur leur articulation avec Horizon Europe.? PL (Drafting suggestions): „9. In accordance with Article 153(3) of Regulation (EU, Euratom) 2024/2509, for actions implementing research and innovation activities, the evaluation committee may be composed partially or fully of independent external experts and should ensure representation from all Member States PL (Comments): Representation from all Member States in evaluation committees ensures that assessments reflect the diversity of national priorities and conditions, leading to more balanced and context-aware evaluations across the Union
10. Contributions to a mutual insurance mechanism set out in Article 30 of the Framework Programme for Research and Innovation may cover the risk associated with the recovery of sums due by recipients and shall be considered as a sufficient guarantee under Article 155 of Regulation (EU, Euratom) 2024/2509. No additional guarantee or security shall be accepted from beneficiaries or imposed upon them.	
11. Where necessary to achieve the objectives set out in Article 3, parts of the ECF may be implemented through Public-Private or Public-public Partnerships established under the Framework Programme for Research and	AT (Drafting suggestions):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
Innovation, in particular by entrusting budget implementation tasks, in accordance with Article 62(1), point (c) of Regulation (EU, Euratom) 2024/2509, to joint undertakings established pursuant to 187 TFEU. Support from the ECF shall be conditional upon efficient use of Union financing, a proportionate financial contribution from other partners at least matching the Union contribution and voting rights for the Union in the governing bodies ensuring protection of the interests of the Union in the partnership. For that purpose, joint undertakings shall be established through a single establishing act ensuring centralised administrative functions.	11. Where necessary to achieve the objectives set out in Article 3, parts of the ECF may be implemented through Public-Private or Public-public Partnerships established under the Framework Programme for Research and Innovation, in particular by entrusting budget implementation tasks, in accordance with Article 62(1), point (c) of Regulation (EU, Euratom) 2024/2509, to joint undertakings established pursuant to 187 TFEU. Support, <u>including financial resources</u>, from the ECF shall be conditional upon efficient use of Union financing, a proportionate financial contribution from <u>the Union</u> ~~other partners~~ at least matching the <u>other partners</u> ~~Union~~ <u>in-cash or in-kind</u> contribution and voting rights for the Union <u>and other partners</u> in the governing bodies ~~ensuring protection of the interests of the Union in the partnership~~. For that purpose, joint undertakings shall be established through a single establishing act ensuring centralised administrative functions. CZ (Drafting suggestions): Where necessary to achieve the objectives set out in Article 3, parts of the ECF may be implemented through Public-Private or Public-public Partnerships established under the Framework Programme for Research and Innovation, in particular by entrusting budget implementation tasks, in accordance with Article 62(1), point (c) of Regulation (EU, Euratom) 2024/2509, to joint undertakings established pursuant to 187 TFEU. Support from the ECF shall be conditional upon efficient use of Union financing, a proportionate financial contribution from other partners ~~at least matching the Union contribution~~ and voting rights for the Union in the governing bodies ensuring protection of the interests of the Union in the partnership. For that purpose, joint undertakings shall be established through a single establishing act ensuring centralised administrative functions. CZ (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	CZ is strongly in favour of making the implementation of European partnerships, with regards to the contributions of other partners than the EU, more flexible and suggests to keep only “proportionate funding” in the text, which is sufficient. The previous wording would cause serious issues for financing excellent projects in tripartite partnerships such as the Chips JU, where achieving a same or higher contribution to a project by Participating States that by the Commission is, in some cases, difficult to achieve (from practical reasons, such as many partners from many Participating States with a limited budget, different eligibility rules in each country, different funding rates, etc.). This point is fundamental for CZ. Furthermore, CZ suggests to discuss and set the rules for voting rights in the legislative act establishing the joint undertakings and not here, which would enable better to reflect specificities of each partnership. MT (Drafting suggestions): Where necessary to achieve the objectives set out in Article 3, parts of the ECF may be implemented through Public-Private or Public-public Partnerships established under the Framework Programme for Research and Innovation, in particular by entrusting budget implementation tasks, in accordance with Article 62(1), point (c) of Regulation (EU, Euratom) 2024/2509, to joint undertakings established pursuant to 187 TFEU. <u>The establishment of such Partnerships should be limited to cases of strict necessity, and only when collaborative calls are insufficient to achieve the foreseen objectives.</u> Support from the ECF shall be conditional upon efficient use of Union financing, a proportionate financial contribution from other partners at least matching the Union contribution and voting rights for the Union in the governing bodies ensuring protection of the interests of the Union in the

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	partnership. For that purpose, joint undertakings shall be established through a single establishing act ensuring centralised administrative functions. MT (Comments): Malta argues that due to high administrative and financial burdens, it is important to avoid having too many partnerships unless proven absolutely necessary. PT (Comments): It is fundamental to guarantee that the large majority of the FP for R&I is open and accessible to all European stakeholders. European Partnerships, public-private or public-public, should only be launched in specific cases where the open Calls of the FP Work Programmes cannot fulfill the aimed objectives and impact for a specific sector or area. BE (Comments): It is important that Member States are sufficiently involved and duly consulted in the design and implementation of the partnerships. ES (Drafting suggestions): 11. Where necessary to achieve the objectives set out in Article 3, parts of the ECF may be implemented through Public-Private or Public-public Partnerships established under the Framework Programme for Research and Innovation, in particular by entrusting budget implementation tasks, in accordance with Article 62(1), point (c) of Regulation (EU, Euratom) 2024/2509, to joint undertakings established pursuant to 187 TFEU. Support

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	from the ECF shall be conditional upon efficient use of Union financing, a proportionate financial contribution from other partners at least matching the Union contribution and voting rights for the Union in the governing bodies ensuring protection of the interests of the Union in the partnership. For that purpose, joint undertakings shall be established through a single establishing act ensuring centralised administrative functions. SI (Drafting suggestions): 11. Where ~~necessary to achieve~~ the objectives set out in Article 3 ~~cannot be achieved by other means~~, parts of the ECF may be implemented through Public-Private or ~~Public-public~~ Partnerships established ~~under the Framework Programme for Research and Innovation~~, in particular by entrusting budget implementation tasks, in accordance with Article 62(1), point (c) of Regulation (EU, Euratom) 2024/2509, to joint undertakings established pursuant to 187 TFEU. Support from the ECF shall be conditional upon efficient use of Union financing, a proportionate financial contribution from other partners at least matching the Union contribution and voting rights for the Union in the governing bodies ensuring protection of the interests of the Union in the partnership. For that purpose, joint undertakings shall be established through a single establishing act ensuring centralised administrative functions. SI (Comments): A more strict wording needs to be put in place. This text also needs to be consolidated with the proposal for the Horizon Europe Regulation, where public-public partnerships are not mentioned.

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	Which Framework is that? Is establishment meant from curent HEU and partnerships that are continuing into new Horizon Europe? Or this refers to newly established P2Ps & PPPs? FR (Drafting suggestions): Where necessary to achieve the objectives set out in Article 3, parts of the ECF may be implemented through-Public-Private or Public-public Partnerships including Joint Undertakings established under the Framework Programme for Research and Innovation pursuant to article 187 TFEU, in particular by entrusting budget implementation tasks, in accordance with Article 62(1), point (c) of Regulation (EU, Euratom) 2024/2509, ~~to joint undertakings established pursuant to 187 TFEU~~. Support from the ECF shall be conditional upon efficient use of Union financing, a proportionate financial or in-kind contribution from other partners at least matching the Union contribution and voting rights for the Union in the governing bodies ensuring protection of the interests of the Union in the partnership. For that purpose, joint undertakings shall be established through a single establishing act ensuring centralised administrative functions. FR (Comments): La contribution des autres partenaires ne devrait pas être uniquement financière, afin de tenir compte des contributions en nature (par exemple, EuroHPC). Dans quelle mesure cet article, y compris la “proportionate financial contribution from other partners” s’applique-t-elle à la participation d’acteurs privés aux partenariats et activités de recherche dans le cadre d’Horizon Europe ? PL

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Drafting suggestions): „Where necessary to achieve Article 3 objectives, parts of the ECF may be implemented through public-private or public-public partnerships under the Framework Programme, entrusting tasks to joint undertakings in accordance with Article 62(1)(c). Participation shall require efficient use of Union funds, matching contributions from national/regional partners and Union voting rights in governance. PL (Comments): It supports public–private partnerships (PPPs) and public–public partnerships (PPPs) with Polish and macro-regional partners, while safeguarding the EU’s interests.
12. In addition to the grounds set out in Article 132 of Regulation (EU, Euratom) 2024/2509, award procedures and resulting legal commitments shall allow for termination where the objectives of the action are unlikely to be achieved at all or within the set timelines, or the action has lost its policy relevance	CZ (Comments): CZ - If an action loses its policy relevance, is it necessary to reimburse the entirety of the funds, or only a part thereof? DE (Comments): . Could COM give examples for situations in which a termination following this paragraph would be implemented? IT (Comments): Suggestion: provide a mechanism to protect the economic operator, otherwise it will discourage participation or risk legal actions. Before termination, we recommend attempting to renegotiate the terms of the contract, based on emerging needs

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	BE (Drafting suggestions): 12. In addition to the grounds set out in Article 132 of Regulation (EU, Euratom) 2024/2509, award procedures and resulting legal commitments shall allow for termination where the objectives of the action are unlikely to be achieved at all or within the set timelines, ~~or the action has lost its policy relevance~~ BE (Comments): Who will decide that the action is no longer relevant to policy? It is important to provide certainty to stakeholders (industry, but also R&I). This provision would significantly reduce that certainty and considerably diminish the attractiveness of the programme. SI (Drafting suggestions): 12. In addition to the grounds set out in Article 132 of Regulation (EU, Euratom) 2024/2509, award procedures and resulting legal commitments shall allow for <u>a duly justified</u> termination where the objectives of the action <u>as established in the supporting agreement</u> are unlikely to be achieved at all or within the set timelines, or the action has lost its policy relevance SI (Comments): It is unclear in which cases exactly the provision will apply. This should be further clarified.
Article 14	

Governance and Advisory Boards	AT (Comments): The tasks mentioned below constitute an advisory role for the mentioned board/committee. Providing advice should not be mixed up with a governing role. Governance mechanisms and the role of Member States need to be further elaborated. See below. DE (Comments): How does the Commission envisage the role and composition of the Strategic Stakeholders Board? How can duplications or overlaps with other, existing governance formats be avoided? How is it ensured that R&I needs are taken into account in expert committees, advisory boards and comitology committees? HR (Comments): It is of utmost importance to properly include the MS in both of this boards, be that as their members or oversight bodies, esp. in relation to the comitology procedures. This is also much relevant when it comes to ensuring inclusiveness and realization of potential across the Union. Additionally, any duplication and further fragmentation of coordination of interlinked programmes such as ECF and Horizon Europe would not be appreciated and could, in case of Horizon Europe, endanger the basic principles of its implementation, global attractiveness and recognition that FP is. IT (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	Italy keeps a general reservation on this article and each of its sections. Increased flexibility should be underpinned by robust governance and involvement of the Council in relevant configurations, in the planning of activities, the adjustment of priorities as well as the implementation of the budget. In this section, it is also necessary to provide a link with the Competitiveness Coordination Tool (from Competitiveness Compass, COM(2025) 30 final) PT (Comments): What governance structures will be implemented to guarantee a streamlined approach between ECF policy windows and the thematic areas under the competitiveness pillar of Horizon Europe? How will Member States be involved in the strategic orientation and prioritization of each ECF policy window? Will there also be a governance board? BE (Comments): The ECF governance should be closely linked to NZIA/CRMA governance, also in order to avoid duplication of efforts. To this end, please include in recital 35: ‘Even if the Critical Raw Materials Board has no formal role in the establishment of the work programmes, their views on addressing challenges related to the supply and sustainability of critical raw materials should be taken into account.’ and in recital 10: ‘Furthermore, the opinion of the advisory boards of representatives of all Member States, such as the Critical Raw Material Board, the Net Zero Europe Platform or the European

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	Semiconductor Board shall be taken into account when drafting the work programmes.'
	FR (Drafting suggestions): <u>The Commission acts in accordance with a pluriannual strategic guidance elaborated by the Council in coordination with the Commission.</u> <u>The pluriannual guidance is annexed to the present regulation.</u> <u>The investment guidelines for the InvestEU instrument shall also be defined in coherence with the overall guidelines of the fund.</u> FR (Comments): Il pourrait être envisagé l'établissement de lignes directrices stratégique pour l'entiereté de la période de programmation par les Etats membres. Ce lignes directrices devraient fixer les priorités sectorielles au sein de chaque volet thématiques du FEC. Elles pourraient notamment définir les secteurs que les Etats membres souhaitent voir adjoints de critères stricts. Ces lignes directrices devraient être défini en Annexe de la présente régulation. Les lignes directrices d'investissement devraient être définies par la Commission, les Etats Membres et les partenaires de mis en œuvre au même moment que les priorités sectorielles du fond et pour l'entièrete de la période de programmation. Quel est l'objectif exact du "Conseil des parties prenantes stratégiques" ? Comment pourrait-il être envisagé de représenter tous les intérêts stratégiques et d'éviter tout conflit d'intérêts, tant en termes de compétitivité industrielle que de représentation nationale ? Combien de membres ce Conseil devra-t-il compter ? Comment garantir la prise en compte des intérêts de défense et de sécurité de l'Union ?

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
1. A Strategic Stakeholders Board is established.	AT (Comments): The representation of SMEs in the ECF Strategic Stakeholder Board (composed of high-level experts reflecting multistakeholder consultations, including those of industry, SMEs, social partners, researchers, investors, etc.) does not seem sufficient to ensure a strong focus on SMEs. It remains unclear how call-topics and actions for the horizontal window “Project advisory, SME collaboration and skills” will be developed and decided on. A dedicated SME-Programme Committee for the horizontal window “Project advisory, SME collaboration and skills” should be foreseen to involve Member States in this process, including decision mechanism for the development of SME-related Business Support actions and also for the interaction with the 4 vertical policy windows. FI (Comments): <u>FI: We support the idea of discussing with stakeholders in an organised and transparent manner. The Strategic Stakeholder Board must provide its advice and inputs at an early strategic phase and should under no circumstances introduce an additional layer of decision-making or bureaucracy. The role of the Strategic Stakeholders Board needs to be designed so that its input is proportional to the actual shareholders of the programme and that it cannot manipulate the award criteria in case of open calls.</u> IT (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	It would be useful to have more information on the role, powers and common participation rules of the Strategic Stakeholders Board (especially for the collaborative research component). PT (Comments): The role and competences of this strategic stakeholders board is still very unclear. SI (Drafting suggestions): 1. — A Strategic Stakeholders Board is established. SI (Comments): Scrutiny reservation on entire Article. FR (Comments): Il serait utile que la Commission fournisse plus de précisions sur la coordination entre ce comité et ceux qui existent dans d'autres programmes (comités d'Horizon europe par exemple).
	EL (Drafting suggestions): <u>Member States shall have an institutional role within the Strategic Stakeholders Board, ensuring balanced geographical and thematic representation</u> EL (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
2. The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, following an open call for nominations or for expressions of interest, or both, whichever the Commission finds more appropriate, and taking into account the need for balance in sector, organisation type, including private investors, and size, expertise, gender, age and geographical distribution. The term of members the Board shall be limited to four years, renewable once. Members of the Board should act with integrity and probity.	Member States' participation is essential for ownership, coordination with national strategies, and legitimacy of the Fund's governance model. AT (Comments): Open issues: 1. Decision-Making and Structure: Key questions revolve around who prioritizes research topics, the development of Integrated Work Programmes, decision-making structures, budget allocation, and the involvement of Member States. This requires a clear understanding of the roles and composition of the Strategic Stakeholder Board and the Observatory of Emerging Technologies and how National Contact Points (NCPs) are integrated within the ECF. 2. Coordination and Support: There is a need for a well-coordinated support structure at both national and European levels to facilitate research and innovation, involving investment support, business services, and networks. Ensuring effective synergies between various funding programmes and the ECF through tools [like the Competitiveness Coordination Tool] is crucial for optimizing these processes. 3. Partnerships and Contributions: A strategic portfolio of European partnerships is essential, with the ECF playing a supportive role. Decisions are needed on the continuation of partnership types and joint undertakings into FP10, while national interests such as budget sovereignty and SME proximity need to be preserved to maintain a favourable legal and operational environment. 4. National autonomy: maintaining national participation and ensuring that partnerships align with national interests and funding flexibility is vital. 5. Financial Commitments and Locations: Clarification is needed on the financial commitments required from countries and the consequences of non-compliance. Additionally, the structural location of partnerships and their interface with the ECF, as well as the contribution to policy windows, require

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	greater clarity to ensure coherence and functionality within the funding framework. CZ (Drafting suggestions): 2. The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, following an open call for nominations or for expressions of interest, or both, whichever the Commission finds more appropriate, and taking into account the need for balance in sector, organisation type, including private investors, and size, expertise, gender, age and geographical distribution, <u>including the nominee designated by each Member State</u>. The term of members the Board shall be limited to four years, renewable once. Members of the Board should act with integrity and probity. DE (Drafting suggestions): 2. The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, following an open call for nominations or for expressions of interest, or both, whichever the Commission finds more appropriate, and taking into account the need for balance in sector, organisation type, including private investors, and size, expertise, gender, age and geographical distribution. The term of members the Board shall be limited to four years, renewable once <u>by three years</u>. Members of the Board should act with integrity and probity. DE (Comments): The term of the board members should be limited to the duration of the MFF. As concerns different organisation types, will R&I experts / academia as well as civil society be included?

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	FI (Comments): <u>FI: To ensure the link between the ECF and Horizon Europe Competitiveness part, the ECF committee configurations for each policy window must be composed of technical experts from relevant DGs.</u> IE (Drafting suggestions): The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, following an open call for nominations or for expressions of interest, or both, whichever the Commission finds more appropriate, and taking into account the need for balance in sector, organisation type, including private investors, and size, expertise, gender, age and geographical distribution. ~~The term of members the Board shall be limited to four years, renewable once. Members of the Board should act with integrity and probity.~~ <u>The Commission shall ensure an appropriate representation from across the Member States.</u> IE (Comments): IE notes the decision making process should be a fair and shared process between the Commission and represented MS's. It is important that MS's can engage in the decision process DEP and CEF Committees are examples of how this has been successful to date. Suggested text amendment IT (Drafting suggestions): . LU (Drafting suggestions):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	2.. <u>The EIB Group shall have [two] permanent representatives.</u> The other members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, following an open call for nominations or for expressions of interest, or both, whichever the Commission finds more appropriate, and taking into account the need for balance in sector, organisation type, including private investors, and size, expertise, gender, age and geographical distribution. The term of members the Board shall be limited to four years, renewable once. Members of the Board should act with integrity and probity. LU (Comments): Important to have the EIB duly represented in any startegic board. Member States' representation/involvement in the Strategic Stakeholder Board needs to be discussed, to ensure that the expertise shared within the Board is available to all parties involved in the oversight of the Fund. MT (Drafting suggestions): 2. The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, following an open call for nominations or for expressions of interest, or both, whichever the Commission finds more appropriate, and taking into account the need for balance in sector, organisation type, including private investors, and size, expertise, gender, age and geographical distribution. The term of members the Board shall be limited to four years, renewable once. Members of the Board should act with integrity and probity. <u>The EIB Group shall have a permanent representative.</u> PT (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	Stability and rotativity are crucial aspects of these type of structures. Therefore, it would be important to ensure that at least 50% of the composition of the Board is renewed after the limited period. There should be input from the Member States regarding the nomination of the members of this board. The composition of the Strategic stakeholders Board is not clear neither is the selection process. FR (Drafting suggestions): The members of the ECF Strategic Stakeholders Board shall be appointed by the ~~Commission~~ Council based on a recommendation from the Commission following an open call for nominations or for expressions of interest, or both, whichever the Commission, jointly with the Council, finds more appropriate, and taking into account the need for balance in sector, organisation type, including private investors, and size, expertise, gender, age and geographical distribution and with due balance between the specific objectives listed in article 3.2. The term of members the Board shall be limited to four years, renewable once. Members of the Board may act with integrity and probity. FR (Comments): La Commission devrait associer le Conseil à la définition de la composition du Conseil stratégique des parties prenantes, afin de garantir la participation des États membres aux instances de gouvernance du fonds.

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	Il est essentiel que les structures de pilotage stratégique des composantes de défense du FEC tiennent compte des structures existantes et de la représentation des États membres de l'Union européenne. Comment l'équilibre entre les secteurs sera-t-il assuré afin que tous les acteurs stratégiques des domaines couverts par le FEC soient correctement représentés ?
3. The Commission shall establish the detailed rules on selection and composition, remuneration, rules of procedure, conflicts of interest and confidentiality for the ECF Stakeholder Board. Members of the Board shall be bound by these terms.	AT (Drafting suggestions): The Commission shall establish the detailed rules on selection and composition, remuneration, ~~rules of procedure~~, conflicts of interest and confidentiality for the ECF Stakeholder Board. Members of the Board shall be bound by these terms. <u>3 (bis) On proposal by the Commission, the ECF Stakeholder Board shall adopt its rules of procedure upon constitution</u> AT (Comments): Instead of prescribing the working methods to the respective bodies, the body itself should adopt its RoP. PT (Comments): The composition of the Board should include one representative of each Member State.

Proposal for a Regulation establishing the European Competitiveness Fund (doc. 13413/25)

From: AT, BG, CZ, DE, FI, HR, IE, IT, LT, LU, MT, PT, BE, HU, ES, SE, SI, EL, FR, PL

Deadline: 15 October 2025 COB

Updated: 27/10/2025 09:02

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	FR (Drafting suggestions): The Commission shall ~~establish~~ <u>propose for adoption by the Council</u> the detailed rules on selection and composition, remuneration, rules of procedure, conflicts of interest and confidentiality for the ECF Stakeholder Board. Members of the Board shall be bound by these terms. FR (Comments): Les règles applicables à ces importants organes du fonds devraient être adoptées par le Conseil.
4. The ECF Strategic Stakeholder Board, informed by an observatory on emerging technologies, shall advise on the overall direction for the ECF, advise on long-term competitiveness trends, advise on areas of market failures and suboptimal investment situations that could be addressed in the implementation of the ECF, and advise on the identification of strategic portfolios of projects within and across activities of the ECF for which it may be composed in different policy-oriented configurations.	FI (Comments): <u>FI: The ECF has clear targets to improve the EU's technological capabilities; accordingly, knowledge on the latest technology trends should be brought back into the ECF Stakeholder Board and the work to be done by this board.</u> IT (Drafting suggestions): The ECF Strategic Stakeholder Board, informed by an observatory on emerging technologies, shall advise on the overall direction for the ECF, advise on long-term competitiveness trends, advise on areas of market failures and suboptimal investment situations that could be addressed in the implementation of the ECF, <u>advise on shortages of skills contributing to the availability of skills in investment in strategic sectors for EU competitiveness</u>, and advise on the identification of strategic portfolios of

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	projects within and across activities of the ECF, for which it may be composed in different policy-oriented configurations. PT (Comments): Important to guarantee the role of the Member States in the different policy-oriented configurations. We see no reference on the alignment with the future Competitiveness Coordination Tool. More information on this observatory on emerging technologies is needed as well. BE (Drafting suggestions): The ECF Strategic Stakeholder Board, informed by an observatory on emerging technologies, shall advise on the overall direction for the ECF, advise on long-term competitiveness trends, and advise on areas of market failures and suboptimal investment situations that could be addressed in the implementation of the ECF, ~~and advise on the identification of strategic portfolios of projects within and across activities of the ECF for which it.~~ The Board may be composed in different policy-oriented configurations. BE (Comments): The fund's governance is a key issue for ensuring coherence, transparency, and effectiveness of the instruments. The roles, composition, and operational means of the various bodies must be clarified, ensuring balanced representation of stakeholders, including regions (for example through the Committee of the Regions).

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	It is not up to the Board to identify a portfolio of projects. This Board will include various organisations that have their own interests. ES (Drafting suggestions): 4. The ECF Strategic Stakeholder Board, informed by an observatory on emerging technologies, shall advise on the overall direction for the ECF, advise on long-term competitiveness trends, advise on areas of market failures and suboptimal investment situations that could be addressed in the implementation of the ECF, and advise on the identification of strategic portfolios of projects within and across activities of the ECF for which it may be composed in different policy-oriented configurations, <u>including a specific configuration on industrial competitiveness.</u> SE (Drafting suggestions): The ECF Strategic Stakeholder Board, informed by an observatory on emerging technologies, shall advise on the overall direction for the ECF, advise on long-term competitiveness trends, advise on areas of market failures and suboptimal investment situations that could be addressed in the implementation of the ECF, and advise on the identification of strategic portfolios of projects within and across activities of the ECF, for which it may be composed in different policy-oriented configurations. SI (Drafting suggestions): 4. The ECF Strategic Stakeholder Board, informed by an observatory on emerging technologies, shall advise on the overall direction for the ECF, advise on long-term <u>research and</u> competitiveness trends, advise on areas of market failures and suboptimal investment situations that could be addressed in the implementation of the ECF, and advise on the identification of

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	strategic portfolios of projects within and across activities of the ECF, for which it may be composed in different policy-oriented configurations. SI (Comments): If these are technologies not yet developed, research trends should also be monitored and advised on. PL (Drafting suggestions): „Informed by an emerging-technologies observatory, the Board shall advise the Commission on ECF strategic direction, long-term competitiveness trends, market failures and suboptimal investment gaps, and on strategic project portfolios, meeting in policy-oriented configurations as needed” PL (Comments): It strengthens strategic, evidence-based guidelines that are flexible and tailored to identified market and technological needs. Proposed new wording
	BE (Drafting suggestions): <u>The Strategic Board shall consult regularly with the ERC Scientific Council and the EIC Board.</u> BE (Comments): It is important that there is sufficient consultation between the ERC Scientific Council and the EIC Board, which also sets out strategic guidelines for the ERC and the EIC respectively, which are important programmes for ensuring this seamless investment journey.

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	ES (Drafting suggestions): <u>4bis. The President of the ECF Strategic Stakeholder Board will inform the Council regularly about the activities of the Board and the conclusions taken therein.</u> ES (Comments): The Regulation should foresee a reporting procedure so the Council is duly informed about the discussions of the ECF Strategic Stakeholder Board. FR (Drafting suggestions): <u>5. A Strategic Steering Board is established.</u> <u>It shall be composed of Member states representatives and four representatives of the Commission and one expert appointed as a non-voting member by the European Parliament. That expert shall perform his or her duties impartially and in the interest of the ECF fund.</u> <u>The Strategic Steering Board shall select a Chairperson from among the Commission representatives for a term of four years, renewable once. The Chairperson shall report biannually to the representatives of the Advisory Board on the implementation and operation of the ECF fund.</u> <u>The Steering Board shall:</u> <u>(a) oversee the implementation of the ECF, monitoring the achievement of both general and specific objectives for each policy window under proposal of programme committees, based on the scoreboard of indicators provided by the Commission;</u> <u>(b) adopt strategic guidance for the implementing partners in relation to each policy window, including guidance on the design of operating</u>

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	<u>policies and procedures necessary for the Fund's operation;</u> <u>(c) decide on any strategic reorientation in both policy and budget wise, under proposal of programme committees;</u> <u>(d) control an effective coordination between ECF and Horizon Europe ensuring innovation technologies continuum investment journey</u> <u>(d) oversee the implementation of the ECF-InvestEU instrument in line with the overarching objective of ensuring a seamless investment continuum..</u> <u>(e) Oversee and arbitrate on the management and reallocation of all revenues, repayments, released guarantees, recoveries or surplus provisions generated under this Regulation, its predecessors Regulations (EU) 2015/1017 and (EU) 2021/523, as well as those referred to in Annex IV of Regulation (EU) 2021/523.</u> FR (Comments): Proposition d'introduire une instance de pilotage du fonds – dispositions inspirées du règlement InvestEU
5. An independent Investment Committee shall be established under the ECF InvestEU Instrument (the 'Investment Committee').	FR (Drafting suggestions): <u>An independent Investment Committee shall be established under the ECF InvestEU Instrument (the 'Investment Committee'). It shall be constituted in 4 different configurations replicating the windows of the EFC.</u> FR (Comments): Disposition inspirée du règlement actuel. L'instrument InvestEU ne devrait pas être implémenté par des programmes de travail. La délégation soutiendra

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	4 configurations du comité d'investissement InvestEU, répliquant les fenêtres thématiques. PL (Drafting suggestions): „An independent Investment Committee shall be established under the ECF InvestEU instrument to examine financing and investment operations proposed by implementing partners for coverage under the Union guarantee” PL (Comments): It clarifies the role of the Commission in reviewing and approving operations backed by a guarantee.
	FR (Drafting suggestions): <u>Each configuration of the Investment Committee shall be composed of six remunerated external experts. The experts shall be selected and shall be appointed by the Commission, after the approval of the Strategic Steering Board. The experts shall be appointed for a term of up to four years, renewable once. They shall be remunerated by the Union. The Commission, at the recommendation of the Strategic Steering Board, may decide to renew the term of office of an incumbent member of the Investment Committee without following the procedure laid down in this paragraph</u> <u>The experts shall have a high level of relevant market experience in project structuring and financing or financing of SMEs or corporates.</u>

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	<u>When participating in the activities of the Investment Committee, its members shall perform their duties impartially and in the sole interest of the ECF Fund. They shall not seek or take instructions from the implementing partners, the institutions of the Union, the Member States, or any other public or private body.</u> FR (Comments): Proposition sur la composition des comités d'investissement, organe majeur dans l'attribution des financements dont il faudrait cadrer dès le règlement les qualités requises des experts amenés à siéger.
6. The composition of the Investment Committee shall ensure that it has a wide knowledge of the sectors covered by the ECF and a wide knowledge of the geographic markets in the Union, and shall ensure that the Investment Committee as a whole is gender-balanced.	AT (Drafting suggestions): 6. The composition of the Investment Committee shall ensure that it has a wide knowledge of the sectors covered by the ECF and a wide knowledge of the geographic markets in the Union, and shall ensure that the Investment Committee <u>is acting independently and</u> as a whole is gender-balanced. AT (Comments): Instead of prescribing the working methods to the respective bodies, the body itself should adopt its RoP. IT (Drafting suggestions): The composition of the Investment Committee shall ensure that it has a wide knowledge of the sectors covered by the ECF and a wide knowledge of the geographic markets in the Union, skills gap and shall ensure that the Investment Committee as a whole is gender-balanced PT

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Comments): Who will nominate this Committee? Where will this be specified? FR (Drafting suggestions): The composition of the Investment Committee shall <u>depend on its thematic configuration</u> and ensure that it has a wide knowledge of the sectors covered by the thematic window of the ECF-and a wide knowledge of the geographic markets in the Union, and shall ensure that the Investment Committee as a whole is gender-balanced. FR (Comments): Disposition inspiré du règlement actuel. L'instrument InvestEU ne devrait pas être implémenté par des programmes de travail. La délégation soutiendra 4 configurations du comité d'investissement InvestEU, répliquant les fenêtres thématiques. PL (Drafting suggestions): „The composition of the Investment Committee shall ensure that it has a wide knowledge of the sectors covered by the ECF and a wide knowledge of the geographic markets in the Union, and shall ensure that the Investment Committee ~~as a whole is geographically and gender balanced~~” <u>Committee includes representation from all Member States and reflects gender diversity.</u> PL (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	Ensuring geographical balance in the composition of the Investment Committee is consistent with the principles concerning the EFC Strategic Stakeholder Board and constitutes a prerequisite for possessing “broad knowledge of geographic markets within the Union.”
7. The Investment Committee shall examine the proposals for financing and investment operations submitted by implementing partners for coverage under the Union guarantee and verify the compliance with the applicable rules of the proposals for financing under the ECF InvestEU Instrument.	DE (Drafting suggestions): 7. The Investment Committee shall examine the proposals for financing and investment operations submitted by implementing partners for coverage under the Union guarantee and verify the compliance with the applicable rules of the proposals for financing under the ECF InvestEU Instrument. <u>The Investment Committee shall report regularly on the outcomes of its meetings</u> DE (Comments): The current InvestEU Investment Committee reports regularly on the results of its meetings (on the EU guarantee approvals): https://investeu.europa.eu/investeu-governance/investment-committee_en This procedure should be maintained under the ECF. MT (Drafting suggestions): The Investment Committee shall examine the proposals for financing and investment operations, <u>including framework operations</u>, submitted by implementing partners for coverage under the Union guarantee and verify the compliance with the applicable rules of the proposals for financing under the ECF InvestEU Instrument. SE

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Drafting suggestions): The Investment Committee shall examine the proposals for financing and investment operations submitted by implementing partners for coverage under the Union guarantee and verify the compliance with the applicable rules of the proposals for financing under the ECF InvestEU Instrument. <u>The Investment Committee should inform the Advisory Board on ECF InvestEU on its decisions and main deliberations</u> FR (Drafting suggestions): The Investment Committee shall (a) examine the proposals for financing and investment operations submitted by implementing partners for coverage under the Union guarantee and verify the compliance with the applicable rules of the proposals for financing under the ECF InvestEU Instrument. <u>(b) verify the compliance of the proposals with this Regulation and the relevant investment guidelines; (c) control any potential overlapping with the ECI accelerator or any other funds implemented and (d) check whether the financing and investment operations that would benefit from the support under the EU guarantee comply with all relevant requirements.</u>
	FR (Drafting suggestions): <u>7.a.A scoreboard of indicators (the ‘Scoreboard’) shall be established to ensure that the Investment Committee is able to carry out an independent, transparent and harmonised assessment of requests for the use of the EU guarantee for financing and investment operations proposed by implementing partners</u> <u>Implementing partners shall fill out the Scoreboard for their proposals for financing and investment operations</u>

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	<u>The Scoreboard shall cover the following elements: (a) a description of the proposed financing or investment operation; (b) how the proposed financing or investment operation contributes to EU policy objectives; (c) a description of additionality; (d) a description of the market failure or suboptimal investment situation; e) the financial and technical contribution by the implementing partner; (f) the impact of the investment; (g) the financial profile of the financing or investment operation; (h) complementary indicators.</u> <u>The Investment Committee shall use the Scoreboard in its assessment and verification of the proposed financial and investment operations.</u> <u>Conclusions of the Investment Committee shall be adopted by simple majority of all members. Conclusions of the Investment Committee approving the coverage of the EU guarantee for a financing or investment operation shall be publicly accessible and shall include the rationale for the approval and information on the operation, in particular its description, the identity of the promoters or financial intermediaries, and the objectives of the operation. The conclusions shall also refer to the global assessment stemming from the Scoreboard</u> FR (Comments): Outil de monitoring présent dans le règlement InvestEU qui serait important de reprendre.
8. The Advisory Board on ECF InvestEU Instrument shall be composed of one representative of each implementing partner and one representative of each Member State. ~~€~~The Advisory Board on ECF InvestEU Instrument shall, provide advice on the design of financial products and on the strategic and operational direction in its area of competence. It shall also provide advice on the coordination with the EIC to ensure complementarity with other Union	CZ (Drafting suggestions): 8. The Advisory Board on ECF InvestEU Instrument shall be composed of one representative of each implementing partner and one representative nominated by each Member State. The Advisory Board on ECF InvestEU Instrument shall, provide advice on the design of financial products and on

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
funding or private investments. The Advisory Board shall be chaired by a representative of the Commission.	the strategic and operational direction in its area of competence. It shall also provide advice on the coordination with the EIC to ensure complementarity with other Union funding or private investments. The Advisory Board shall be chaired by a representative of the Commission. LU (Drafting suggestions): 8. The Advisory Board on ECF InvestEU Instrument shall be composed of one representative of each implementing partner and one representative of each Member State. the Advisory Board on ECF InvestEU Instrument shall, provide advice on the design of financial products and on the strategic and operational direction in its area of competence. It shall also provide advice on the coordination with the EIC to ensure complementarity with other Union funding or private investments. The Advisory Board shall be chaired by a representative of the Commission. <u>The EIB Group shall be duly represented in the Advisory Board.</u> MT (Drafting suggestions): 8. The Advisory Board on ECF InvestEU Instrument shall be composed of one representative of each implementing partner and one representative of each Member State. the Advisory Board on ECF InvestEU Instrument shall, provide advice on the design of financial products and on the strategic and operational direction in its area of competence. It shall also provide advice on the coordination with the EIC to ensure complementarity with other Union funding or private investments. The Advisory Board shall be chaired by a representative of the Commission. <u>The EIB Group shall be duly represented in the Advisory Board.</u> PT (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	The structure to be set with the representatives from each Member State is similar to the current Horizon Europe (2021-2027) Programme Committee configuration? ES (Drafting suggestions): 8. The Advisory Board on ECF InvestEU Instrument shall be composed of one representative of each implementing partner and one representative of each Member State. the Advisory Board on ECF InvestEU Instrument shall, provide advice on the design of financial products and on the strategic and operational direction in its area of competence. It shall also provide advice on the coordination with the EIC to ensure complementarity with other Union funding or private investments. The Advisory Board shall be chaired by a representative of the Commission. <u>Meetings of representatives of the Member States in a separate format shall also be organised at least twice a year.</u> ES (Comments): The Regulation should establish a minimum number of annual meetings to be held. Currently, the InvestEU Advisory Board meets twice per year. FR (Drafting suggestions): The ~~Advisory~~ <u>Steering</u> Board on ECF InvestEU Instrument shall be composed of one representative of each implementing partner and one representative of each Member State. ~~‡The Advisory~~ <u>Steering</u> Board on ECF InvestEU Instrument shall, <u>annually review and complete the investment guidelines</u>, provide advice on the design of financial products and on the strategic and operational direction in its area of competence. It shall also provide advice on the coordination with the EIC to ensure complementarity

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	with other Union funding or private investments <u>and guarantee a continuity of the investment journey.</u> The <u>Advisory Steering</u> shall be chaired by a representative of the Commission. <u>Based on Commission analysis, the steering board shall assess and control market conditions, market failures and suboptimal investment situations, exchange views on market developments, share best practices particularly in mobilizing private capital and decide on markets orientations.</u> FR (Comments): Les lignes directrices d'investissement devraient être définies par la Commission, les Etats Membres et les partenaires de mise en œuvre au même moment que les priorités sectorielles du fond et pour l'entièreté de la période de programmation. Ces lignes directrices devraient pouvoir être complétées par le comité d'investissement, sur recommandation du Strategic Steering Board et en lien avec l'Advisory Board. La délégation soutiendra des prérogatives accrues pour l'Advisory Board de InvestEU qui devrait être un réel organe de pilotage de l'instrument bénéficiant d'un reporting par instrument et par thématiques lui permettant de conseiller efficacement sur la mise en œuvre d'InvestEU. La délégation pourra à ce titre orienter la Commission vers les prérogatives de l'actuel Steering Board d'InvestEU. De façon à garantir une continuité du financement de la recherche fondamentale au déploiement industriel entre Horizon Europe et le FEC, la délégation pourra souhaiter que l'Advisory Board (et notamment la BEI qui y siège) joue un rôle pivot en garantissant que (i) les startups soutenues par l'EIC Accelerator puissent bénéficier de solutions de financement InvestEU

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	en cas de tour de table plus important (seuil à définir) ; (ii) que les startups n'ayant pas obtenu de financements par l'EIC dans le cadre d'Horizon Europe puissent en obtenir dans le cadre du FEC via l'instrument InvestEU. Le steering board d'InvestEU doit pouvoir se doter d'éléments d'analyse des failles de marché nécessitant des investissements financiers ciblés et arbitrer sur les modalités de mise en œuvre de stratégies de développement de marchés et de mobilisation des financements privés.
9. The Commission shall establish the detailed rules on selection and composition, remuneration, rules of procedure, conflicts of interest and confidentiality for the Investment Committee and the Advisory Board on ECF InvestEU Instrument.	AT (Drafting suggestions): 9. The Commission shall establish the detailed rules on selection and composition, remuneration, ~~rules of procedure~~, conflicts of interest and confidentiality for the Investment Committee and the Advisory Board on ECF InvestEU Instrument. <u>9 (bis). On proposal by the Commission, the Investment Committee and the Advisory Board shall adopt their respective rules of procedure upon consitution.</u> AT (Comments): Instead of prescribing the working methods to the respective bodies, the body itself should adopt its RoP. PT (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	Clarification about the role of National Promotional Banks needed. It is important to ensure that these institutions are able to act quickly to promote economic growth and employment. ES (Drafting suggestions): 9.1 The Commission shall establish the detailed rules on selection and composition, remuneration, rules of procedure, conflicts of interest and confidentiality for the Investment Committee and the Advisory Board on ECF InvestEU Instrument. ES (Comments): The MS and the implementing partners should be able to chose their representatives in the Advisory Board independently. SE (Drafting suggestions): The Commission shall, <u>after consulting the Member States,</u> establish the detailed rules on selection and composition, remuneration, rules of procedure, conflicts of interest and confidentiality for the Investment Committee and the Advisory Board on ECF InvestEU Instrument FR (Drafting suggestions): The Commission shall, <u>by means of implementing acts,</u> establish the detailed rules on selection and composition and remuneration for the Investment Committee and the Advisory Board on ECF InvestEU Instrument. The Commission shall jointly establish the detailed rules of procedure, conflicts of interest and confidentiality for the Investment Committee and the Advisory Board on ECF InvestEU Instrument. <u>Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 83(3).</u>

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	FR (Comments): Le Conseil devrait être associé à la définition de la composition du Comité et du Conseil d'administration ainsi qu'aux dispositions y afférentes, notamment en garantissant une procédure de réexamen pour l'adoption de l'ensemble de ces dispositions.
	ES (Drafting suggestions): <u>9.2 . The Commission shall suggest the operating rules and procedures for the Advisory Board, that should be adopted in the first meeting and shall manage the secretariat of the Advisory Board. All relevant documentation and information shall be made available to the Advisory Board to enable it to exercise its tasks.</u> ES (Comments): This is based on the current InvestEU Regulation, except that the operating rules are proposed by the Commission and adopted by the Advisory Board.
10. The Commission and Implementing partners shall establish regular Policy Review Dialogues to discuss progress with the implementation of the financial products and engage on relevant policy developments.	CZ (Drafting suggestions): 10. The Commission, Member States and Implementing partners shall establish regular Policy Review Dialogues to discuss progress with the implementation of the financial products and engage on relevant policy developments. IE (Comments): IE suggest to add a provision for mid-term policy review within the governance framework to ensure adaptability

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	LU (Drafting suggestions): 10. The Commission and Implementing partners shall establish regular Policy Review Dialogues to discuss progress with the implementation of the financial products and engage on relevant policy developments. MT (Drafting suggestions): 10. The Commission and Implementing partners shall establish regular Policy Review Dialogues to discuss progress with the implementation of the financial products and engage on relevant policy developments. <u>Regular Policy Review Dialogues between the Commission and advisory partners shall take place to facilitate exchange on areas of market failure and suboptimal investment situations where Project advisory and business support is particularly needed.</u> PT (Comments): What will the Policy Review Dialogues consist of?
11. The Commission shall ensure that stakeholders are consulted in the development of the work programmes, with the creation of one or several thematic platforms per window.	CZ (Drafting suggestions): 11. The Commission shall ensure that stakeholders, <u>including academic sector, and Member States</u> are consulted in the development of the work programmes, with the creation of one or several thematic platforms per window. FI (Drafting suggestions):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	11. The Commission shall ensure that stakeholders are consulted <u>in the course of/prior to</u> the development of the work programmes, with the creation of one or several thematic platforms per window. FI (Comments): <u>FI: The stakeholders are potential beneficiaries of the programme and cannot be directly involved in designing the final work programme and the award criteria.</u> LT (Comments): Could you please elaborate on the thematic platforms? Will they be based on MS representation? PT (Comments): Work programmes duration should be defined. What will the thematic platforms consist of? FR (Drafting suggestions): 11. The Commission shall ensure that stakeholders and Member States are associated to ~~consulted in~~ the development of the work programmes, with the creation of one or several thematic platforms per window, and per specific objectives as listed in article 3.2., except for work programmes implementing actions referred to in Articles 44(1). FR (Comments): Les parties prenantes sont représentées dans le Stakeholder Board. Pour ce qui est des programmes de travail, il est important que les Etats membres

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	soient associés à leur développement, et que de tels comités soient mis en place et consultés pour chaque secteur, et non seulement par fenêtre thématique. Dans la fenêtre ‘Health, bio-technologies, bio-economy and agriculture’ par exemple, compte tenu des spécificités importantes des secteurs agricoles et de santé, une représentation équilibrée ou des sous-comités devraient être introduits. Concernant le paragraphe 11, la France demande à ce que l'adoption des programmes de travail en soutien à la BITDE suive une gouvernance et une comitologie spécifiques, qui doivent respecter le rôle central des États membres en matière de défense. Que signifie et impliquerait les “plateformes thématiques” (mentionnées au paragraphe 11) ?
	SE (Drafting suggestions): <u>12. The Commission shall establish one or several Evaluation Committees to decide on the award of grant funding. The Evaluation Committee shall assess the proposals compliance with the regulation. The Evaluation Committee should consist of both Commission staff and independent experts. The Evaluation Committees should inform Member States about its decisions and deliberations</u>

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
Chapter II	PT (Comments): Chapter II – General Comments: • Flexible instruments (grants, blending, guarantees) Request that priority be given to mechanisms adapted to SMEs and local authorities (smaller ticket sizes, simplified blending). • Real cumulativeness Insist on the operationalization of single rules, single legal commitment, and coordinated auditing to avoid duplication when there are multiple sources (FEC + HE + InvestEU + national funds). • SLA/KPIs (Article 20) Strongly support the inclusion of accelerated calls (30 days for preliminary results, 60 days for final decision), especially for SMEs/scale-ups. Public KPIs (Digital): publish, for each call/semester, simple process performance indicators. Ensure that the different support modalities are SME friendly and proportional (simplified or dedicated calls)
ECF TOOLBOX	
SECTION 1	

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
GRANTS, PROCUREMENT AND INDUSTRIAL POLICY COORDINATION TOOLS	FI (Drafting suggestions): <u>Award criteria and selection</u> <u>1. A proposal shall be evaluated on the basis of the following award criteria:</u> <u>(a) excellence;</u> <u>(b) impact;</u> <u>(c) quality and efficiency of the implementation.</u> <u>The work programme shall specify details on how these award criteria are to be applied.</u> FI (Comments): <u>FI: There needs to be a separate article on the award criteria and selection</u> IT (Comments): The nature and functioning of the coordination tools must be better laid out. We ask the Commission to further explain the relationship between the governance of the ECF, as governed by the ECF Regulation [COM(2025) 555 final] (Stategic Stakeholders Board, Advisory Board on ECF InvestEU Instrument and Investment Committee) and the Competitiveness Coordination Tool envisaged by the Competitiveness Compass [COM(2025) 30 final], but not yet defined in its functioning (Coordination procedure? Representative body? Which council branches will be involved?)

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<i>Article 15</i>	
	ES (Comments): We insist on the need of introducing a political level in the governance of the ECF, with a key role for MS and the Council. In the current proposal, every aspect (both political and technical) in the implementation of the ECF is left to the Work Programmes. However, political key decisions (on sectoral priorities, types of actions, etc.) should be differentiated from purely technical details. The steering mechanism foreseen in the context of the annual budgetary procedure may not be specialized enough. It would be useful to have more information on what the Work Programmes will look like, the level of detail they will entail and the level of aggregation. How many work programmes are expected? What is the average size? What will they look like for InvestEU? Will they be separate from other instruments or a part of an WP can be implemented through InvestEU and another part through another instrument? More information would be welcomed and necessary to have further discussions on governance.

Work Programmes	AT (Comments): AT requests additional information on the budget allocation within the Work Programmes for the specific Policy Windows. Specifically, it should be transparent whether there will be a dedicated percentage of each work programme budget for a specific thematic priority (for example health within the policy window Health, Biotechnology, Agriculture and Bioeconomy). While flexibility is important it needs to be ensured that health priorities will receive a sufficient dedicated budget in the respective policy window. In addition, AT asks whether the type and design of Joint Actions and Direct Grants that are currently funded under EU4Health will be continued in the work programmes of the ECF. PT (Comments): How will integrated work programmes between the ECF policy windows and Horizon Europe be designed and implemented? Who will be involved in their development, what will be the role of Member States? ES (Comments): It would be useful to confirm the envisaged duration of the work programmes, for instance whether they are to be established on an annual (our assumption) or multiannual basis. FR (Drafting suggestions): The work programmes may set out <u>for the entire budget period with a year breakdown:</u> PL (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	Ensuring in this article a stronger role for Member States in shaping work programmes and evaluation criteria increases transparency and aligns the Fund with the Union's objectives regarding cohesion and employment.
1. The work programmes may set out:	DE (Drafting suggestions): 1. The work programmes ~~may~~ shall set out <u>actions and associated budget from ECF as well as actions set out in the specific dedicated part of the work programmes indicated in paragraph 2. The work programmes shall set clear priorities on which areas contribute most effectively to the Union's competitiveness as well as security and resilience and shall strive for maximum coherence among each other. A particular focus shall be put on strategic technologies and activities contributing to the Union's open strategic autonomy.</u> DE (Comments): Work programmes should be coherent with other EU priorities and policy. To implement this in the ECF regulation, we need more information about the planned steering and coordination mechanism as well as the Competitiveness Coordination Tool. IT (Drafting suggestions): 1. The work programmes ~~may~~ shall set out: IT (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	It is crucial to ensure that the work programmes actually establish everything provided for in letters from a) to h) of Article 15(1). MT (Drafting suggestions): The work programmes ~~may~~ shall set out: MT (Comments): Malta highlights the need for greater certainty on what to expect in a Work Programme. PT (Comments): There is a need for clarification regarding work programmes. - It is envisage one work programme per policy window? - They will be multiannual or annual? - Which role is reserved for Member States in the design and adoption of the work programmes? How is this engagement of MS envisaged? BE (Drafting suggestions): The work programmes shall ~~may~~ set out: SI (Drafting suggestions): The work programmes shall ~~may~~ set out
	DE (Drafting suggestions): 1a. The work programme may set out:
(a) actions and associated budget from ECF as well as actions set out in the specific dedicated part of the work programmes indicated in paragraph 2;	DE

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Drafting suggestions): (a) ~~actions and associated budget from ECF as well as actions set out in the specific dedicated part of the work programmes indicated in paragraph 2;~~ HR (Drafting suggestions): HR: HR suggest additional amendment: <i>a) actions and associated budget from ECF as well as actions set out in the specific dedicated part of the work programmes indicated in paragraph 2, taking into account the need for balanced participation of SMEs across all Member States.</i> HR (Comments): HR proposes adding a reference to SMEs' balanced participation to avoid concentration of resources in more advanced regions. SE (Comments): If these activities are stipulated by Article 34.4, i.e. Competitiveness and Society activities supported under the Horizon Regulation, SE maintains a scrutiny reservation on this paragraph and seeks clarification regarding how these activities will be developed, and how MS and stakeholders will be involved. FR (Drafting suggestions): actions and associated budget from ECF as well as actions set out in the specific dedicated part of the work programmes indicated in paragraph 2; PL

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Drafting suggestions): (a) actions and associated budget from ECF as well as actions set out in the specific dedicated part of the work programmes indicated in paragraph 2, <u>reflecting the shared ambition to strengthen the Union's long-term resilience and to draw on the diverse innovative and industrial strengths across all Member States;</u> PL (Comments): <u>Justification in General comments</u>
(b) instruments and form of funding;	FR (Drafting suggestions): instruments and form of funding; when it comes to financial instruments it shall be decided by the investment committee of the instrument FR (Comments): Le comité d'investissement InvestEU devrait participer à cette décision et décider de sa mobilisation. L'instrument InvestEU ne devrait pas être implémenté par des programmes de travail.
(c) eligibility and award criteria;	AT (Drafting suggestions): (c) eligibility and award criteria <u>based on the principle of excellence</u> AT (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	Austria underlines that the principle of excellence must be maintained for all R&I activities, and that SSH dimensions should be included to increase the effectiveness of research. DE (Drafting suggestions): (c) eligibility and criteria <u>in accordance with Article 9, Article 11 and Article 12;</u> FI (Drafting suggestions): <u>Additional</u> eligibility and award criteria; FI (Comments): FI These should be complementary to criteria set in main articles on eligibility and <u>general</u> award criteria. The criteria should not excessively vary between the work programmes. SE (Drafting suggestions): eligibility and award criteria <u>to foster excellence in line with this regulation</u> SE (Comments): The criteria for support should be set out in the regulation rather than be left to the work programme. FR (Drafting suggestions):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(e) — eligibility and award criteria; FR (Comments): La France souligne que les critères d'éligibilité établis dans ce Règlement (articles 9 et 51 pour l'industrie de la défense) représentent des exigences minimales qui ne peuvent être modifiées par les programmes de travail. Ces critères devraient être définis dans le règlement. PL (Drafting suggestions): eligibility and award criteria;
(d) a single co-financing rate per action for actual cost grants;	ES (Drafting suggestions): (d) a single ~~co-financing~~ funding rate per action for actual cost grants; ES (Comments): Terminology (funding, co-financing, co-funding, etc.) should be unified across the Regulation (even if that will be eventually ensured by the lawyer-linguists). SE (Drafting suggestions): a single co-financing rate per action for actual cost grants; SE (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	The key criteria for support should be set out in the regulation rather than left to the work programme SI (Drafting suggestions): d) a single co-financing rate per action ~~for actual cost grants~~; SI (Comments): A single co-financing rate should be the norm.
	CZ (Comments): Without offering specific text proposals, we offer the following idea for further consideration. The implementation of the EDF, for example, has shown that securing co-financing is often a lengthy and demanding process. The situation can be further complicated by national legislation, and it could take years to provide the finances to consortia. Therefore, CZ proposes to add an article, which would allow the provision of finances directly to the European Commission, which would then distribute it to the respective consortia, according to the work packages and provisions, as defined in the grant agreement. The process would be as follows: 1. Before the project proposal is submitted, the EU MS usually know the amount of co-financing from their entities and sometimes provide the so-called <i>Co-financing declaration</i>. 2. After the project is evaluated and awarded, the EU MS usually receive, by the European Commission, information containing total eligible cost of participant, requested EU contribution for participant, and need for co-financing for entities established in the respective EU MS.

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	3. The EU MS could provide the co-funding directly to the European Commission, which would further distribute it to consortia, together with a contribution from the EU. The main added value of this proposal is that it would further streamline the process and reduce the bureaucratic burden. Moreover, the finances would not be connected with the MoU preparation and its signature and could be, theoretically, provided faster.
(e) actions to which the Mutual Insurance Mechanism under Regulation (EU) [XXX] [Horizon Europe] applies;	
(f) rules applicable to actions concerning more than one specific objective;	FR (Drafting suggestions): rules applicable to actions concerning more than one specific objective, <u>in the case space and defence objectives are included, specific rules relatde to these objectives shall apply;</u> FR (Comments): La délégation pourra soutenir un encadrement de ce point pour les activités de défense et du spatial.
(g) actions to which specific rules apply, in particular on ownership, exploitation and dissemination, transfer and licensing as well as access rights to results;	FR (Drafting suggestions): actions to which specific rules apply, in particular on ownership, exploitation and dissemination, transfer and licensing as well as access rights to results <u>in the case space and defence objectives are included, specific rules relatde to these objectives shall apply;</u> FR

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Comments): La délégation pourra soutenir un encadrement de ce point pour les activités de défense et du spatial.
(h) actions which benefit from the mechanisms set out in Article 20;	DE (Comments): We carry substantial reservations with regards to the mechanisms in Art 20 and need more guardrails in the regulation. Then a deletion of paragraph 1 (h) might be necessary.
	IT (Drafting suggestions): <u>i) Skills gap analyses</u> BE (Drafting suggestions): <u>Within each policy window of the ECF, multiple work programmes may be established</u> BE (Comments): Because the policy windows are broad in terms of scope, it should be possible to draw up multiple work programmes within a single policy window PL (Drafting suggestions): To add: (i) Work programmes shall include dedicated funding envelopes for water and wastewater infrastructure projects, including monitoring of PFAS and microplastics, and support for energy-neutral technologies in wastewater treatment.

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	PL (Comments): Ensures that ECF work programmes address critical infrastructure needs related to water and wastewater, in line with environmental and climate goals, and supports Member States in meeting legal obligations.
2. The work programmes under this Regulation shall integrate in a specific dedicated part collaborative research and innovation activities and their dedicated budget.	AT (Drafting suggestions): 2. The work programmes under this Regulation shall integrate in a specific dedicated part collaborative research and innovation activities and their dedicated budget, <u>in line with the Horizon Europe Regulation.</u> DE (Drafting suggestions): 2. The work programmes under this Regulation shall integrate in a specific dedicated part collaborative research and innovation activities and their dedicated budget. <u>The ECF work programmes shall also set out policy priorities that will steer EIC challenges.</u> DE (Comments): To ensure synergies between the EIC and the ECF and avoid duplications, the connection between these two should be mentioned not only in the recitals (text based on recital 53). Separate configurations are required for decisions on R&I parts of the policy windows' work programmes. The ministries responsible for R&I (if necessary with the involvement of other experts), who can assess the research needs and the current state of research, must be involved in the decision-making process. This requires at least sub-configurations of the thematic programme committees on R&I. In addition, at the technical level it should

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	be ensured that real experts for the specific areas can provide input to the decision-making. Also, a clear link between the Horizon Europe programme committees and those of the ECF policy windows must be established so that for the entirety of R&I policy, as bundled in the independent Horizon Europe, MS involvement is ensured. We will provide drafting suggestions on this in future three-column documents on Chapter VIII, Article 83. IE (Drafting suggestions): The work programmes under this Regulation shall integrate in a specific dedicated part collaborative research and innovation activities and their dedicated budget. The Commission shall ensure that Member States are consulted before the work programmes are finalised as appropriate. IE (Comments): IE notes it is important that MS share the decision making with the Commission and continue to have an input in the successful DEP and CEF committees. Suggested text amendment. PT (Comments): What does this mean in practice? Will the COM launch a single Work Programme also including the R&I topics to be funded under Horizon Europe (2028-2034) Pillar II? How the coordination between the ECF policy windows and HE Pillar II collaborative research ambition will be aligned?

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	What governance structures and committees will be set to guarantee the role of the Member-States within the priorities discussion? BE (Drafting suggestions): 2. The work programmes under this Regulation shall integrate in a specific dedicated part collaborative research and innovation activities and their dedicated budget. <u>This specific part of the work programmes will be consistent with principles and objectives established under the Framework Programme for Research and Innovation. Activities carried out under this part of the work programme shall be grounded in the principle of excellence.</u> BE (Comments): It will be important that work programmes for collaborative research and innovation activities are in line with principles and general/specific objectives of the Framework Programme for R&I, including ethics and integrity, freedom of scientific research, open science, integration of social sciences, humanities, etc. It is not the whole work programme that has to be subject to the R&I framework programme principles. R&I collaborative projects within the ECF policy windows must be based on the principle of excellence, as is the case in the framework programme . ES (Drafting suggestions): 2. There <u>shall be</u> work programmes under this Regulation ~~shall integrate in a specific dedicated~~ <u>to part</u> collaborative research and innovation

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	activities <u>referred to under the policy windows described in Chapters IV to VII</u> and their dedicated budget. ES (Comments): A separate collaborative research and innovation work programme for each window will be suggested in Art 83 and subsequent amendments will be necessary in Art 33,37, 39, 42 and 80. SI (Drafting suggestions): 2. The work programmes under this Regulation shall include integrate in a specific dedicated section for part collaborative research and innovation activities, along with an earmarked and their dedicated budget. FR (Drafting suggestions): The work programmes under this Regulation shall integrate in a specific dedicated part and window by window collaborative research and innovation activities and their dedicated budget. <u>Calls for collaborative research projects should take into account R&I specificities. The rules established by the Framework Programme for Research and Innovation, including selection and eligibility criteria, shall apply to these calls.</u> FR (Comments): Il est important de disposer d'une vue claire de l'allocation des activités et budgets par fenêtre, pour assurer qu'ils répondent aux objectifs spécifiques qui leur sont assignés par l'article 3.2.

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	En lien avec l'article 15(2), la Commission pourrait-elle préciser le champ d'application du programme de travail, notamment au vu des implications pour les activités de recherche et d'innovation collaboratives ? Les spécificités de la R&I doivent être prises en compte lors de la rédaction des appels à projets de recherche collaborative. Il est également important de préciser les règles et critères applicables à ces appels. PL (Drafting suggestions): 2. The work programmes under this Regulation shall integrate in a specific dedicated part collaborative research and innovation activities and their dedicated budget. <u>with the purpose of linking excellence with emerging innovation potential across the Union and supporting projects that contribute to Europe's technological and production sovereignty</u> PL (Comments): <u>Justification of proposal is in General comments</u>
	DE (Drafting suggestions): <u>2a. Duration of the work programmes should be limited. With regard to space, each (sub-)component is to have a separate work programme not exceeding two years' duration.</u> DE (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	Work programmes should be limited in time, at a maximum to the duration of the MFF; as concerning space activities, the work programmes should have a maximum duration of two years.
3. The Commission shall, by means of implementing acts, adopt the work programmes implementing the ~~specific objectives referred to in Article 3(2), points (a), (b), (c) and (d) and for the horizontal activities~~ actions provided for in Chapter III. Those implementing acts shall be adopted in accordance with the advisory procedure referred to in Article 83(2).	AT (Drafting suggestions): 3. The Commission shall, by means of implementing acts, adopt the work programmes implementing the ~~specific objectives referred to in Article 3(2), points (a), (b), (c) and (d) and for the horizontal activities~~ actions provided for in Chapter III. Those implementing acts shall be adopted in accordance with the examination ~~advisory~~ procedure referred to in Article 83(~~3~~2). AT (Comments): AT requests additional information on the governance of the policy window. Specifically, more information needs to be provided regarding the formation and work processes of the Policy Window's Steering Groups. In addition, more information needs to be provided on the process of adopting the annual work programmes. It remains unclear how call-topics and actions for the horizontal window "Project advisory, SME collaboration and skills" will be developed and decided on. A dedicated SME-Programme Committee for the horizontal window "Project advisory, SME collaboration and skills" should be foreseen to involve Member States in this process, including decision mechanism for the development of SME-related Business Support actions and also for the interaction with the 4 vertical policy windows. CZ (Drafting suggestions):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	3. — The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2), points (a), (b), (c) and (d) and for the horizontal activities actions provided for in Chapter III. Those implementing acts shall be adopted in accordance with the advisory procedure referred to in Article 83(2). CZ (Comments): CZ - We call for the use of examination procedure in chapter III; accordingly, this para should be deleted. DE (Drafting suggestions): 3. — The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2), points (a), (b), (c) and (d) and for the horizontal activities actions provided for in Chapter III. Those implementing acts shall be adopted in accordance with the advisory procedure referred to in Article 83(2). DE (Comments): We request using the examination procedure for all work programmes. HR (Drafting suggestions): HR: HR suggest additional amendment. <i>The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2), points (a), (b), (c) and (d) and for the horizontal activities actions provided for in Chapter III. Those implementing acts shall be adopted in accordance with the ~~advisory~~ examination procedure referred to in Article 83(2).</i>

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	HR (Comments): Ensure a stronger role of the MS in the management of the ECF through greater use of the examination procedure. IE (Comments): IE suggest to maintain high-level principles in the act while delegating operational details to the implementing acts IT (Drafting suggestions): The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2), points (a), (b), (c) and (d) and for the horizontal activities <u>actions provided for</u> in Chapter III. Those implementing acts shall be adopted in accordance with the advisory procedure referred to in Article 83(2). IT (Comments): Wherever comitology is foreseen, the examination procedure should apply. LT (Drafting suggestions): The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2), points (a), (b), (c) and (d) and for the horizontal activities <u>actions provided for</u> in Chapter III. Those implementing acts shall be adopted in accordance with the advisory examination procedure referred to in Article 83(<u>23</u>). LT (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	Lithuania considers that examination procedure should be followed as it provides for higher engagement of MSs. MT (Comments): Malta strongly supports the extension of the examination committee procedure to all work programmes of the policy windows. BE (Drafting suggestions): 3. The Commission shall, by means of implementing acts, adopt the work programmes implementing the ~~specific objectives referred to in Article 3(2), points (a), (b), (c) and (d) and for the horizontal activities~~ actions provided for in Chapter III. Those implementing acts shall be adopted in accordance with the ~~advisory~~ examination procedure referred to in Article 83(~~23~~). BE (Comments): This should also be the examination procedure. Member State should be actively involved in the drafting of the work programmes and the prioritisation of actions. In areas where national co-financing will be significant and which require full support from and synergies with regional and national programmes, Member States must be actively involved. We are not convinced by the COM proposal that changing the procedure used by current programmes will drastically speed up the adoption of the WP. Already for the current SME part of the Single Market Programme, there is examination procedure. ES

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Drafting suggestions): 3. The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2), points (a), (b), (c) and (d) and for the horizontal activities actions provided for in Chapter III. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 83(3) ~~advisory procedure referred to in Article 83(2)~~. SE (Drafting suggestions): The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2), points (a), (b), (c) and (d) and for the horizontal activities in Chapter III. Those implementing acts shall be adopted in accordance with the examination ~~advisory~~ procedure referred to in Article 83(~~3~~2). SE (Comments): A stronger involvement of MS is required, i.a. in order to support good linking of priorities on EU, national and regional level (which is a stated objective under the current Horizon Europe proposal). SI (Drafting suggestions): 3. — The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2), points (a), (b), (c) and (d) and for the horizontal activities actions provided for in Chapter III. Those implementing acts shall be adopted in accordance with the ~~advisory~~ procedure referred to in Article 83(2). SI (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	Scrutiny reservation We advocate for all work programmes to be adopted in examination comitology procedure. We trust that the partnership between the EC and MSs and the early co-design of priorities through the Steering Mechanism and Competitiveness Coordination Tool will ensure a swift and smooth examination and adoption of the Work programme. FR (Drafting suggestions): The Commission shall, by means of implementing acts, adopt the work programmes implementing the ~~specific objectives referred to in Article 3(2), points (a), (b), (c) and (d) and for the horizontal activities~~ actions provided for in Chapter III. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 83(3). FR (Comments): La procédure d'examen doit être préférée à la procédure consultative afin de mieux impliquer les Etats membres dans la gouvernance du Fonds européen de compétitivité. PL (Drafting suggestions): „The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives ~~referred to in Article 3(2), points (a), (b), (c) and (d) and for the horizontal activities~~ in Chapter III at least for the period of two years. Those implementing acts shall be adopted in accordance with the ~~advisory procedure referred to in Article 83(2)~~ examination procedure referred to in Article 83(3)”

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	PL (Comments): Work programmes should define many key aspects of the implementation and management of the EFC at the level of the work programmes, rather than at the level of the regulation. This is the main reason why the current provisions regarding their multiannual perspective should be maintained. Annual work programmes make it more difficult for Member States and applicants to prepare for participation in the programmes and to carry out related planning activities. Moreover, since many decisions are to be taken at the stage of the work programmes, we see no reason to limit the role of Member States in their development and reiterate our proposal to change the current advisory procedure to a examination
4. The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2), ~~point (d) (2), (3) and (4)~~. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 83(3).	AT (Comments): see comment for Art 15 (3) above CZ (Drafting suggestions): 4 3. The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2) and actions provided for in Chapter III, ~~point (d) (2), (3) and (4)~~. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 83(3). CZ (Comments): CZ - We call for the use of examination procedure in chapter III.

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	DE (Drafting suggestions): 4. The Commission shall adopt all work programmes, by means of implementing acts~~adopt the work programmes implementing the specific objectives referred to in Article 3(2), point (d) (2), (3) and (4). Those~~ implementing acts shall be adopted in accordance with the examination procedure referred to in Article 83(3). [Placeholder for mechanism going beyond comitology. To be filled after horizontal discussion on MFF governance.] DE (Comments): Governance is a horizontal issue that is also discussed in the AHWP MFF with regard to the negotiating box. We need to follow these horizontal guidelines always be followed. The following position on the ECF governance therefore is subject to this reservation. We are in favor of using the examination procedure for all work programmes. However, the comitology procedure alone is not sufficient. It is necessary to ensure greater involvement of the MS in the design of the work programmes, in particular with regard to horizontal prioritization across the ECF (e.g. through a mandatory consultation prior to the submission of the final draft work programmes by COM). The role of MS must go beyond a mere take it or leave it decision at the end. In addition to the technical dimension and in view of the fundamental prioritization decisions within the policy windows, it is also necessary to address overarching strategic issues at a higher level. For example, a strategic discussion in the Council would be conceivable. We still have questions as to

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	whether and how the proposed Defence Industrial Advisory Board and the Space and Defence Advisory Board could fit into this idea of dealing with strategic issues at higher level. COM should give member states enough time to evaluate and comment the draft work programmes prior to the comitology procedure. Nevertheless a timely adoption of the work programmes should be assured. Reasonable timing of the proposals and discussion should be further discussed and added to this provision. What procedure would apply if the work programme were to be changed? IT (Drafting suggestions): 4. The Commission shall, by means of implementing acts, adopt the work programmes implementing the ~~specific~~ objectives referred to in Article 3(2), point (d) (2), (3) and (4). Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 83(3). MT (Comments): Malta strongly supports the extension of the examination procedure to all work programmes of the policy windows. PT (Comments): Which role is reserved for Member States in the design and adoption of the work programmes? How is this engagement of MS envisaged? We support examination procedure for all objectives/committees. ES (Drafting suggestions):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	4. The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2), ~~point (d) (2), (3) and (4)~~ <u>and the actions provided for in Chapter III.</u> Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 83(3). ES (Comments): The work programmes should be approved by a specific configuration of the Programme Committee in accordance with the examination procedure. Given the multiplicity of areas included in each “policy window”, different sub configurations of the Programme Committee should be arranged (sub-windows). SE (Drafting suggestions): The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2), point (d) (2), (3) and (4). Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 83(3). <u>Where the committee delivers no opinion, the Commission shall not adopt the draft implementing act and Article 5(4), third subparagraph, of Regulation (EU) No 182/2011 shall apply.</u> FR (Drafting suggestions): The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2) <u>and for actions provided for in Chapter III excluded from the InvestEU instrument which shall be implemented separately.</u> Those implementing

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	acts shall be adopted in accordance with the examination procedure referred to in Article 83(3). A second sentence must be added to this article 83(3): “Where the committee delivers no opinion, the Commission shall not adopt the draft implementing act and the third subparagraph of Article 5(4) of Regulation (EU) No 182/2011 shall apply”. FR (Comments): L’instrument InvestEU ne devrait pas être implémenté par des programmes de travail.
5. On duly justified imperative grounds of urgency relating to the fact that a work programme has not been adopted by October 1 of the year preceding the year of budget implementation, the Commission shall adopt the work programme by means of immediately applicable implementing acts in accordance with the procedure referred to in Article 83(4) and not later than October 15 of the year preceding the year of budget implementation. Those implementing acts shall remain in force for the period of budget implementation.	CZ (Drafting suggestions): § 4. On duly justified imperative grounds of urgency relating to the fact that a work programme has not been adopted by October 1 of the year preceding the year of budget implementation, the Commission shall adopt the work programme by means of immediately applicable implementing acts in accordance with the procedure referred to in Article 83(4) and not later than October 15 of the year preceding the year of budget implementation. Those implementing acts shall remain in force for the period of budget implementation. DE (Drafting suggestions): 5. On duly justified imperative grounds of urgency relating to the fact that a work programme has not been adopted by October 1 of the year preceding the year of budget implementation, the Commission shall adopt the work programme by means of immediately applicable implementing acts in accordance with the procedure referred to in Article 83(4) and not later than

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	October 15 of the year preceding the year of budget implementation. Those implementing acts shall remain in force for the period of budget implementation. DE (Comments): . IT (Comments): As a minimum, the Commission should describe the reasons for urgency in order to justify its action, providing elements of transparency to the Member States. This seems to entail that a Work Plan must be adopted by October 2027. Consequently, the Advisory Board must already be established and operational, and the ECF regulations must be adopted even earlier. What happens if the Regulation is not adopted within this timeframe? Moreover, we would appreciate clarification on how this provision can be reconciled with the timeline of the annual EU budgetary procedure, which is normally concluded in November. Allowing the Commission to adopt work programmes by 15 October — before the budget for the following year is formally adopted — raises questions about the legal and budgetary consistency of programming decisions taken prior to the finalisation of the budget. MT (Drafting suggestions): On duly justified imperative grounds of urgency ~~relating to the fact that a work programme has not been adopted by October 1 of the year~~

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	~~preceding the year of budget implementation~~, the Commission shall adopt the work programme by means of immediately applicable implementing acts in accordance with the procedure referred to in Article 83(4) ~~and not later than October 15 of the year preceding the year of budget implementation~~. Those implementing acts shall remain in force for the period of budget implementation. MT (Comments): Malta argues that the urgency clause should only be triggered in cases much more serious than a missed deadline. PT (Comments): What is the meaning of “On duly justified imperative grounds of urgency”. We welcome clarification. BE (Drafting suggestions): <i>Suggestion to delete this provision if no further explanation is provided.</i> ~~5. — On duly justified imperative grounds of urgency relating to the fact that a work programme has not been adopted by October 1 of the year preceding the year of budget implementation, the Commission shall adopt the work programme by means of immediately applicable implementing acts in accordance with the procedure referred to in Article 83(4) and not later than October 15 of the year preceding the year of budget implementation. Those implementing acts shall remain in force for the period of budget implementation.~~ BE

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Comments): Even if for budget planification at national level and for future applicants, it is preferable to have the work programme adopted well ahead of the year to come it applies to, the date of October 1st in itself cannot be considered as an imperative grounds of urgency. The COM has to make an effective planification to allow the adoption on time (comments from MS based on the reception of a draft WP 15 days before a meeting of the committee and additional time for comments if changes have been added to the text cannot be considered as an explanation for delays and be the grounds for an “urgent” adoption under this provision). HU (Drafting suggestions): With the exemption of work programmes implementing the specific objectives referred to in Article 3(2), point (d) (2), (3) and (4)., on ~~On~~ duly justified imperative grounds of urgency relating to the fact that a work programme has not been adopted by October 1 of the year preceding the year of budget implementation, the Commission shall adopt the work programme by means of immediately applicable implementing acts in accordance with the procedure referred to in Article 83(4) and not later than October 15 of the year preceding the year of budget implementation. Those implementing acts shall remain in force for the period of budget implementation. HU (Comments): Defence related decisions shall only be adopted in accordance with the examination procedure referred to in Article 83(3). ES (Drafting suggestions): ~~5. — On duly justified imperative grounds of urgency relating to the fact that a work programme has not been adopted by October 1 of the year~~

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	preceding the year of budget implementation, the Commission shall adopt the work programme by means of immediately applicable implementing acts in accordance with the procedure referred to in Article 83(4) and not later than October 15 of the year preceding the year of budget implementation. Those implementing acts shall remain in force for the period of budget implementation. ES (Comments): The Commission should give a more detailed explanation of why Work Programmes should be approved by the end of the year. It is unclear how the calendar related to the work programmes interacts with the annual budgetary procedure (including the steering mechanism). Clarification would be welcome on who will determine the grounds for urgency. In our view, urgency in relation to actions under the Programme should be decided by the relevant programme committee. While the article refers to Article 8 of Regulation (EU) No 182/2011 on immediately applicable implementing acts, it would be important to ensure that the Commission does not adopt the work programme without prior submission to the programme committee, which should be duly informed in advance. SI (Drafting suggestions): 5. — On duly justified imperative grounds of urgency relating to the fact that a work programme has not been adopted by October 1 of the year preceding the year of budget implementation, the Commission shall adopt the work programme by means of immediately applicable implementing acts in accordance with the procedure referred to in Article 83(4) and not later than October 15 of the year preceding the year of budget implementation. Those implementing acts shall remain in force for the period of budget implementation.

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	SI (Comments): How was this cut-off date defined? In Horizon Europe it is rare to have a work programme adopted ahead of October 1 of a given year. Need to improve transparency - <i>why</i> this exception exists or <i>what justification is acceptable</i> Scrutiny reservation. This would enable the Commission to adopt the work programme in absence of the opinion (or consensus) of the Member States, which would significantly erode the role of Member States in programming and governance of ECF. FR (Drafting suggestions): ~~5. — On duly justified imperative grounds of urgency relating to the fact that a work programme has not been adopted by October 1 of the year preceding the year of budget implementation, the Commission shall adopt the work programme by means of immediately applicable implementing acts in accordance with the procedure referred to in Article 83(4) and not later than October 15 of the year preceding the year of budget implementation. Those implementing acts shall remain in force for the period of budget implementation.~~ FR (Comments): La Commission peut-elle définir « duly justified imperative grounds » et le besoin de prévoir de telles dispositions ?
	DE

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Drafting suggestions): <u>4. (a) The Commission shall adopt by means of implementing acts the decision on the approval of the funding of actions involving the use of human embryos and human embryonic stem cells.</u> DE (Comments): The Member States must be involved in the review process for research with human embryonic stem cells (heS) in a co-responsible manner; the implementing provisions should correspond to the current regulations in Horizon Europe 2021-2027. The exclusion rules defined in Article 21 (10) of the current Horizon Europe Regulation regarding the eligibility of projects involving human embryos or heS and the supplementary protocol declaration requested by DE must also be applied in the ECF.
6. On duly justified imperative grounds of urgency relating to the need for an immediate reaction to a crisis or other similar exceptional and duly substantiated emergencies, the Commission may adopt a work programme by means of immediately applicable implementing acts in accordance with the procedure referred to in Article 83(4).	CZ (Drafting suggestions): ~~6-5.~~ On duly justified imperative grounds of urgency relating to the need for an immediate reaction to a crisis or other similar exceptional and duly substantiated emergencies, the Commission may adopt a work programme by means of immediately applicable implementing acts in accordance with the procedure referred to in Article 83(4). DE (Drafting suggestions): 6. On duly justified imperative grounds of urgency relating to the need for an immediate reaction to a crisis or other similar exceptional and duly substantiated emergencies, the Commission may adopt a work programme by means of immediately applicable implementing acts in accordance with the procedure referred to in Article 83(4). <u>The work programmes may set out further conditions and rules for this exception</u>

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	DE (Comments): The exceptional circumstances should be interpreted carefully and strictly. Member states should be able to set rules for this exception in the work programmes and / or should be involved in this decision. IT (Comments): As a minimum, the Commission should describe the reasons for urgency in order to justify its action, providing elements of transparency to the Member States HU (Drafting suggestions): With the exemption of work programmes implementing the specific objectives referred to in Article 3(2), point (d) (2), (3) and (4)., on On duly justified imperative grounds of urgency relating to the need for an immediate reaction to a crisis or other similar exceptional and duly substantiated emergencies, the Commission may adopt a work programme by means of immediately applicable implementing acts in accordance with the procedure referred to in Article 83(4). HU (Comments): Defence related decisions shall only be adopted in accordance with the examination procedure referred to in Article 83(3). ES (Drafting suggestions): 6. On duly justified imperative grounds of urgency relating to the need for an immediate reaction to a crisis or other similar exceptional and duly

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	substantiated emergencies, the Commission may adopt a work programme by means of immediately applicable implementing acts in accordance with the procedure referred to in Article 83(4). <u>Budgetary commitments made on this basis should not exceed the [X] % of the amount referred to in Article 4(1).</u> ES (Comments): The Regulation should give a more detailed indication of what a crisis may mean (e.g. linking these situations to the crisis that warrant the activation of the new crisis mechanism in the recitals). The amount of resources that could be mobilized under this paragraph should be capped. SI (Drafting suggestions): ~~6. — On duly justified imperative grounds of urgency relating to the need for an immediate reaction to a crisis or other similar exceptional and duly substantiated emergencies, the Commission may adopt a work programme by means of immediately applicable implementing acts in accordance with the procedure referred to in Article 83(4).~~ SI (Comments): Not sure if the crisis and other emergencies are duly defined and justified. Scrutiny reservation. This would enable the Commission to adopt the work programme in absence of the opinion (or consensus) of the Member States, which would significantly erode the role of Member States in programming and governance of ECF. FR (Drafting suggestions):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	On duly justified imperative grounds of urgency relating to the need for an immediate reaction to a crisis or other similar exceptional and duly substantiated emergencies, the Commission may adopt a work programme by means of immediately applicable implementing acts in accordance with the procedure referred to in Article 83(4). FR (Comments): La Commission peut-elle justifier le besoin de prévoir de telles dispositions ? Quel serait un exemple de nécessité de réaction immédiate à une crise ou situation d'urgence, pour laquelle une procédure d'examen classique ne serait pas adaptée?
	FR (Drafting suggestions): <u>Article 15a</u> <u>Committee procedure</u> <u>1. The Commission shall be assisted by a committee. That committee shall be a committee within the meaning of Regulation (EU) No 182/2011.</u> <u>2. The committee may convene in configurations reflecting the different policy windows of the ECF.</u> <u>3. Each configuration should have a sub-group in charge of collaborative research to take into account R&I specificities, including one or two representatives of the general configuration. Reversely, one of the representative of the sub-group should take part to the general configuration.</u>

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	<u>5. Where the opinion of the committee is to be obtained by written procedure, that procedure shall be terminated without result when, within the time-limit for delivery of the opinion, the chair of the committee so decides or a simple majority of committee members so request.</u> <u>6. In accordance with international agreements concluded by the Union, representatives of third countries or international organisations may be invited as observers in the meetings of the Specific Programme committee under the conditions laid down in its rules of procedure, taking into account security and public order of the Union or its Member States.</u> FR (Comments): Étant donné que les comités de programme ne sont pas mentionnés dans le règlement, nous suggérons de reproduire cet article de la proposition Horizon Europe (article 18 du programme spécifique) et de l'adapter aux fenêtres politiques. Il est essentiel que les États membres discutent et adoptent des programmes de travail dans le cadre des configurations les plus appropriées, en particulier par le biais de sous-groupes ou de configurations dédiés à la recherche collaborative. PL (Drafting suggestions): <u>„7. When adopting the work programmes referred to in paragraphs 3 to 6, the Commission shall ensure the effective participation of the Member States in the decision-making process. The Commission shall conduct prior consultations with the Member States and take due account of their</u>

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	<u>positions so as to guarantee that the Fund's actions reflect the diverse needs and potential of the Union's national economies".</u> <u>"8.The ECF shall maintain sufficient flexibility to support projects and work programmes based on smart specialisations relevant to all countries and regions. Specific mechanisms, including thematic reserves, simplified procedures, application support, and widening measures, shall be established to enable participation of entities from less developed countries and regions"</u> PL (Comments): Many key issues to be addressed by the European Commission within the programmes should be discussed with the participation of Member States. Ensuring greater influence of Member States in the decision-making process is essential both for transparency and to guarantee that the Fund's activities reflect the diverse needs and potential of individual national economies. Therefore, it is important to maintain adequate flexibility in the ECF to enable the implementation of projects and work programmes based on smart specialisations, relevant to all countries and regions, with particular emphasis on capacity building in sectors with high, long-term growth potential, making full use of local resources and absorptive capacities. Similar to the Horizon Europe programme, the ECF should also incorporate a "widening" approach among its objectives and mechanisms, allowing entities from low-performing countries to participate in projects and develop their potential. In this context, consideration should be given to introducing corrective mechanisms or thematic reserves aimed at less developed countries, procedural simplifications, application support, and monitoring of territorial and sectoral balance in the Fund's implementation. For Poland, it is crucial to ensure that Member States have the possibility to supervise work programmes

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	through an appropriate procedure, enabling them to effectively monitor and influence their content, rather than merely serving in an advisory capacity.
<i>Article 16</i>	
Single Market value chains builder	CZ (Comments): CZ - Member States should be more formally consulted on the implementation of the article and have opportunity to effectively supervise the implementation of Commissions measures. DE (Comments): What is the funding approach behind “value chain builders”? Where is this term defined legally? Who should be supported for which projects and when? Why are those calls explicitly mentioned here and not part of the usual actions contributing to the objectives of each window? FI (Comments): <u>We see this as a coordination and support action.</u> IT (Comments): The provisions on Single Market value chains builder are welcomed, however further clarifications is needed.
	EL (Comments): We have a scrutiny reservation. We have taken note of the relevant clarifications. There is a need to specify the provisions in the article itself.

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
4. — In order to foster resilient Union value chains, the work programmes may include dedicated value-chains scale up calls which shall support both project preparation and crowding in of additional public and private capital to integrate suppliers, manufacturers, and innovators from different Member States and diversify sources of supply.	AT (Drafting suggestions): In order to foster resilient Union value chains, the work programmes may include dedicated value-chains scale up calls which shall support both project preparation and crowding in of additional public and private and (in some cases) public capital to integrate suppliers, manufacturers, and innovators from different Member States and diversify sources of supply. AT (Comments): Private and public capital should not be treated equally. FI (Drafting suggestions): In order to foster resilient Union value chains, the work programmes may include dedicated value-chains scale up calls which shall support both project preparation and crowding in of additional public and private capital to integrate suppliers, manufacturers, and innovators from different Member States and diversify sources of supply while not distorting the single market FI (Comments): <u>FI: This is absolutely fundamental. The single market is the guarantee and guardian of level-playing field, fair competition, true EU added value, global competitiveness and resilience in all value chains.</u> PT (Comments): This needs clarification and to be densified. SE

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Drafting suggestions): In order to foster resilient Union value chains, the work programmes may include dedicated value-chains scale up calls which shall support both project preparation and crowding in of additional public and private capital to integrate suppliers, manufacturers, and innovators from different Member States and diversify sources of supply <u>while not distorting the Single market and safeguarding openness through rules based trade.</u> SE (Comments): Measures should be taken to avoid market distortion. It is important that the ECF safeguards openness towards the rest of the world, and a well functioning Single Market, and does not foster inhouse production where open, rules-based trade is more efficient. FR (Drafting suggestions): In order to foster resilient Union value chains, the work programmes may include dedicated value-chains scale up calls which shall support both project preparation and crowding in of additional public and private capital to integrate suppliers, manufacturers, and innovators from different Member States and diversify sources of supply. FR (Comments): La délégation pourra soutenir une inscription dans le règlement des critères d’attribution décrits dans la fiche technique

Proposal for a Regulation establishing the European Competitiveness Fund (doc. 13413/25)
From: AT, BG, CZ, DE, FI, HR, IE, IT, LT, LU, MT, PT, BE, HU, ES, SE, SI, EL, FR, PL

Deadline: 15 October 2025 COB
Updated: 27/10/2025 09:02

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
<i>Article 17</i>	PT (Comments): Support that calls for tech frontrunners adopt a two-stage format and be designed in a SME-friendly manner. This reduces application costs and efforts for smaller companies in the first phase, increasing the likelihood of participation by SMEs and peripheral regions.

EU Tech frontrunners	CZ (Comments): CZ - Member States should be more formally consulted on the implementation of the article and have opportunity to effectively supervise the implementation of Commissions measures. DE (Comments): What is the funding approach behind "EU Tech Frontrunner"? Where is this term legally defined? Who should be supported for which projects and when? The funding purpose and award criteria must be regulated in sufficient detail in the Regulation (see comments on Art. 16). FI (Comments): <u>FI: In our view this is a very important instrument and as a prerequisite it needs to be implemented with open calls and through transparent and excellence-driven award criteria (see above in the comments). This instrument would continue the legacy of Horizon Europe second pillar higher TRL and industry-driven projects including the once in PPPs or JUs, being at the same time more bottom-up, openly designed, smaller, more agile and extending towards commercialisation through crowding in private capital. This instrument also needs to be implemented seamlessly with Horizon Europe as the instrument operates at the interface and the project could include also research and innovation activities. Unlike Single Market value chains builder we see this as including also RDI activities and thus manifesting the seamless investment journey from HE to ECF and private funding. There is thus a need to substantiate this instrument further.</u> <u>Clarity needed on this article on:</u>

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	• <u>What type of entities qualify as “EU Tech Frontrunners”? Does this term apply only to companies/industry-driven consortia only, or what role is foreseen for RTOs as tech providers?</u> • <u>An indication of potential funding mechanisms and amounts should be given to encourage participation.</u> • <u>Identify and support EU Tech Frontrunners along with their suppliers to invest in new innovative solutions.</u> IT (Comments): In general terms, the provisions on EU Tech frontrunners is positive, but further clarification on the procedures is needed.
	CZ (Comments): CZ understands the need to ensure maximum flexibility of the Fund, particularly in view of the specific purposes and features of the actions under Article 17. Nevertheless, we consider that overarching rules should be defined. We thus kindly request clarification in written response on comments below.
1. The work programmes may include dedicated two-stage bottom-up award procedures to identify and support EU Tech frontrunners through industry-driven consortia leveraging on their role as innovation and export drivers to strengthen their global competitive position along with their European SME suppliers through investments in new solutions and identification of relevant partners. Project preparation as well as crowding in of additional public and private capital may be supported.	AT (Drafting suggestions): The work programmes may include dedicated two-stage bottom-up award procedures to identify and support EU Tech frontrunners through industry-driven consortia leveraging on their role as innovation and export drivers to strengthen their global competitive position along with their European SME suppliers through investments in new solutions and identification of relevant partners. Project preparation as well as crowding in of additional public and private and (in some cases) public capital may be supported. AT

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Comments): Private and public capital should not be treated equally. CZ (Comments): CZ - Clarification is needed on the overarching principles or rules that would apply with regard to project size and expected impact, as well as on the role foreseen for different types of enterprises. In this context, we would also appreciate explanation on what the criteria that will define a “Tech frontrunner” and determine the eligibility of projects for support would be. Further details are needed on the organisation of the two-stage process. In particular, it should be specified whether the provision that “project preparation may be supported” implies that applicants would be eligible for financial support already during the first stage. DE (Comments): What does “through industry-driven consortia” mean? Why can these objectives not be achieved through other existing types of procedures? PT (Comments): This needs clarification. SE (Comments): There is a risk that a this supports established companies in favour of upcoming competitors. How do we ensure promotion of effective competition with this set up? SI (Drafting suggestions):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	1. The work programmes may include dedicated two-stage bottom-up award procedures to identify and support EU Tech frontrunners through industry-driven consortia leveraging on their role as innovation and export drivers to strengthen their global competitive position along with their European SME suppliers and academic R&I partners through investments in new solutions and identification of relevant partners. Project preparation as well as crowding in of additional public and private capital may be supported. FR (Comments): La délégation pourra soutenir une inscription dans le règlement des critères d'attribution décrits dans la fiche technique
2. At the first stage, an open call for expression of interest for goods, works or services that might contribute to Union competitiveness in general, or in a specified sector, may be published without specification of the kind of activities or the instrument of budget implementation to be used.	FR (Comments): Comment ce nouveau mécanisme serait-il structuré ?
3. At the second stage, analysis and crowding in of additional public and private capital shall be supported.	AT (Drafting suggestions): 3. At the second stage, analysis and crowding in of additional ~~public and private~~ and (in some cases) public capital shall be supported. AT (Comments): Private and public capital should not be treated equally. FI (Drafting suggestions):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	<u>At the second stage, Horizon Europe funding can be used for further research and innovation activities and analysis and crowding in of additional public and private capital shall be supported</u>
4. Proposals and offers shall be evaluated and ranked based on common award criteria such as their comparative contribution to Union competitiveness.	AT (Drafting suggestions): 4. Proposals and offers shall be evaluated and ranked based on common award criteria such as <u>excellence, innovation, addressing a market failure and</u> their comparative contribution to Union <u>long-term</u> competitiveness. DE (Drafting suggestions): 4. Proposals and offers shall be evaluated and ranked based on common award criteria <u>as laid down in Art. 12 3a as well</u> ~~such~~ as their comparative contribution to Union competitiveness DE (Comments): Excellence and competition need to be the sole criteria. FI (Drafting suggestions): <u>4. Proposals and offers shall be evaluated and ranked based on ~~common~~ the award criteria referred to in the Article xx.</u> FI (Comments): <u>FI: Therefore this should refer to a separate new article on general award criteria (look above).</u> IE (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	IE would welcome clear guidance on the evaluation process especially on transparency and accountability which are key to maintaining public trust SE (Drafting suggestions): Proposals and offers shall be evaluated and ranked based on common award criteria such as excellence, innovation, addressing a market failure and their comparative contribution to Union long-term competitiveness SE (Comments): Long term competitiveness and innovation should be prioritized over short term industry support PL (Drafting suggestions): „Proposals and offers shall be evaluated and ranked based on common award criteria, including their comparative contribution to Union competitiveness. <u>The evaluation process shall explicitly include a criterion to identify and reward technological frontrunners from across the entire Union, ensuring a balanced geographical participation and distribution. To this end, additional points shall be awarded to projects that are led by or include key partners from Member States or regions with lower innovation, investemnt and absorptive potential performance.</u>” PL (Comments): Poland’s proposal establishes clear, strategic criteria aligned with the EU’s competitiveness objectives; it encourages consortia to deliver scalable, high-impact projects and to build strong partnership structures

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Presidency text (doc. 13413/25)	Drafting suggestions and Comments
5. The evaluation committee shall determine the most appropriate instrument of budget implementation, as well as propose the maximum amount and form of the Union contribution.	FI (Drafting suggestions): <u>The evaluation committee referred to in the Article xxx shall determine the most appropriate instrument of budget implementation, as well as propose the maximum amount and form of the Union contribution.</u> SI (Drafting suggestions): 5. The evaluation committee, <u>composed partially or fully of independent external experts with in-depth knowledge of EU technology landscape</u>, shall determine the most appropriate instrument of budget implementation, as well as propose the maximum amount and form of the Union contribution. EL (Comments): We have a scrutiny reservation. We need to clarify the authority and procedures of the evaluation committee. FR (Comments): Quelle est la relation du comité d'évaluation mentionné avec les programmes de travail ? PL (Drafting suggestions): „The evaluation committee shall recommend the most appropriate financing instrument under Regulation (EU, Euratom) 2024/2509 and propose the maximum Union contribution and its form—such as grants, equity-like instruments or budgetary guarantees—tailored to each project’s risk profile and scale-up needs.

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	PL (Comments): The proposed clarification ensures that each flagship project receives a financing structure individually tailored to its development stage and risk level, optimizes the use of the EU budget, and complies with the legal framework governing financial instruments.
	DE (Drafting suggestions): <u>6. The work programmes shall also include the possibility for the support of tech frontrunners to run tech challenges on specific questions.</u> DE (Comments): We would propose to foresee also a possibility to deviate from the two stage procedure and include so-called tech challenges. In Germany, the SPRIND has gained very good experience with those kind of challenges.
Article 18	PT (Comments): Recognize the importance of ramp-up actions for net-zero technologies (e.g. battery manufacturing, hydrogen, sustainable aviation fuels (SAF)). However, overlap with other existing instruments, such as the Innovation Fund, should be avoided, ensuring that the ECF fills specific funding gaps.
	FI (Comments): There is clarity needed in this article on various points:

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	• <u>EU contribution maximum? Rules of the game? + EU top off on projects coming from IPCEIs Art. 19.1(b) = no more RD&I budget?</u> • <u>When is this commitment requested? In the proposal phase, through the call eligibility criteria and evaluation criteria?</u> • <u>How much budget from ECF is reserved for Top Ups? Depending on available funding? What is the procedure to apply for it, or can Member States expect the Top Up for a certain call?</u> • <u>Additional R&I component conditionality would be interesting, e. g. via national plans connected to the IPCEIs.</u>
Production Ramp up actions	CZ (Comments): CZ - Member States should be more formally consulted on the implementation of the article and have opportunity to effectively supervise the implementation of Commissions measures. IT (Comments): More information on Ramp up actions are required SE (Drafting suggestions): <u>Actions to ramp up innovative production</u> SE (Comments): Production and manufacturing seems to be used interchangeably. Is there a distinction? If not, production is preferred as this includes intangible products such as software.
	CZ (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	CZ - Czechia considers it important that the relevant work programme duly defines the conditions under which such support may be granted. We therefore kindly request clarification in written on the following points.
1. By way of derogation from Article 196(2) of the Financial Regulation, financial contributions may, where necessary for the implementation of manufacturing projects essential to support the ~~general~~ Union's resilience objective as indicated on ~~referred to in~~ Article 3(1)(b), or activities required to ensure the security, resilience or service continuity to support the objectives referred to in Article 3(2), point (d), cover actions that started prior to the date of the submission of the proposal for those actions .	AT (Drafting suggestions): 1. By way of derogation from Article 196(2) of the Financial Regulation, financial contributions may, where necessary for the implementation of manufacturing projects essential to support the Union's resilience as referred to in Article 3(1)(b), or activities required to ensure the security, resilience or service continuity to support the objectives referred to in Article 3(2), point (d), cover actions that started up to [X] months prior to the date of the submission of the proposal for those actions . AT (Comments): For the production ramp-up actions, we are hesitant to allow for an open-ended grandfathering of covering projects that started prior to the submission of the proposal for such action. As compromise, we could support a maximum allowed timespan, e.g. 3 months. CZ (Comments): Clarification is needed on how the need to launch Production Ramp-up actions will be determined, and who will be responsible for deciding and approving their urgency. It should also be specified whether and how <u>all</u> Member States will be involved in such decisions, and whether a comitology procedure is envisaged. Further clarification is required on the general principles to be applied when determining the eligible period and level of support for costs incurred prior to the submission of the project proposal.

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	DE (Drafting suggestions): 1. ~~By way of derogation from Article 196(2) of the Financial Regulation, financial contributions may, where necessary for the implementation of manufacturing projects essential to support the general Union's resilience objective as indicated on referred to in Article 3(1)(b), or activities required to ensure the security, resilience or service continuity to support the objectives referred to in Article 3(2), point (d), cover actions that started prior to the date of the submission of the proposal for those actions.~~ DE (Comments): We are critical of the possibility of opening up the ECF to retroactive financing of projects. The Regulation must comprehensively prevent windfall effects and ensure additionality financing effects. What is the reason why this should be done? And if necessary, why only for production ramp up actions? Other projects can similarly be of huge importance for strengthening resilience. In any case, the justification of the deviation from the Budget Regulation in case of urgency should be legally certain, unambiguous and appropriate. The reference to general resilience objectives is not sufficient. FI (Drafting suggestions): 1. By way of derogation from Article 196(2) of the Financial Regulation, financial contributions may, <u>in exceptional and duly justified cases addressing market failures</u>, where necessary for the implementation of manufacturing projects essential to support the general resilience objective

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	as indicated on Article 3(1), or activities required to ensure the security, resilience or service continuity to support the objective referred to in Article 3(2), point (d), cover actions that started prior to the date of the submission of the proposal for those actions, <u>when there is duly justified value-added to do that.</u> SE (Drafting suggestions): By way of derogation from Article 196(2) of the Financial Regulation, financial contributions may, <u>in exceptional cases</u> where necessary for the implementation of <u>innovative</u> manufacturing projects essential to support the ~~general Union's~~ resilience ~~objective~~ as ~~indicated~~ on Article 3(1)(b), or activities required to ensure the security, resilience or service continuity to support the objective referred to in Article 3(2), point (d) <u>and that address market failures</u>, cover actions that started <u>up to six months</u> prior to the date of the submission of the proposal for those actions. SE (Comments): In the WP on 11 Sep, Cion referred to “special cases” here. Need clarification on that. We question the need to connect ramp-up actions with retroactive support. How will support for actions previously started before submission ramp up production? FR (Drafting suggestions): By way of derogation from Article 196(2) of the Financial Regulation, financial contributions may, where necessary for the implementation of ~~manufacturing~~ <u>production</u> projects essential to support the ~~general~~ <u>Union's</u>

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	resilience objective as indicated on <u>referred to in</u> Article 3(1) ~~(b)~~, or activities required to ensure the security, resilience or service continuity to support the objectives referred to in Article 3(2), point (c), cover actions that started prior to the date of the submission of the proposal for those actions . FR (Comments): La délégation pourra soutenir une inscription dans le règlement des critères d’attribution décrits dans la fiche technique. La résilience étant aussi un élément important des articles 3(1) et 3(2), nous proposons de supprimer les références restrictives aux sous-paragraphe des articles 3(1) et 3(2), et de remplacer “manufacturing” par “production”, mieux adapté à l’ensemble du champ de cet article 3.
2. The work programme or the documents related to the award procedure shall set out additional conditions to ensure that the support is necessary and proportionate, excluding overcompensation and double funding, is temporary and decreases over time.	DE (Drafting suggestions): ~~2. The work programme or the documents related to the award procedure shall set out additional conditions to ensure that the support is necessary and proportionate, excluding overcompensation and double funding, is temporary and decreases over time.~~ SI (Drafting suggestions): 2. The work programme or the documents related to the award procedure shall set out additional conditions to ensure that the support <u>ensures European added value</u>, is necessary and proportionate, excluding overcompensation and double funding, is temporary and decreases over time. FR

Proposal for a Regulation establishing the European Competitiveness Fund (doc. 13413/25)
From: AT, BG, CZ, DE, FI, HR, IE, IT, LT, LU, MT, PT, BE, HU, ES, SE, SI, EL, FR, PL

Deadline: 15 October 2025 COB
Updated: 27/10/2025 09:02

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Comments): La Commission peut-elle préciser quelles sont les “conditions supplémentaires” mentionnées ?
<i>Article 20</i>	
	PT (Comments): Advocate for the concrete implementation of the accelerated procedure (SLA 30/60 – 30 days to report results, 60 days for final decision) in appropriate tenders. It is also proposed that the Commission publish performance KPIs per call as a way to monitor and provide transparency on the efficiency of the process.

Accelerated and Targeted Actions for Competitiveness	CZ (Comments): CZ - Member States should be more formally consulted on the implementation of the article and have opportunity to effectively supervise the implementation of Commissions measures. DE (Comments): We should keep in mind that this Article is part of the negotiating box and that we therefore need to incorporate the decisions made in that context. We have many questions on this article. COM is granted a very far-reaching deviation from ordinary procurement procedures, the justification for which is usually very broadly interpretable. We are extremely critical of awards without award procedure (paragraph 2a), awards based on the applicants' self-evaluation (paragraph 2b) or awards without a specific funding reason (paragraph 2d). We ask the COM for further information on this article. The accelerated support shall be limited to exceptional circumstances and be guided by the principles of additionality of funding, transparency, competition- and excellence-based award decisions as well as the need to address market failure. FI (Comments): <u>FI: This article does not specify clear criteria for activating these shortened procedures. There is a risk of a lack of transparency if minimum rules for publicity and ex post control are not established.</u> IT (Comments):

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	More insights on Accelerated and Targeted Actions for Competitiveness are demanded. In particular, it would be helpful to understand how it would function in practice, but it could potentially enhance both the flexibility and speed of funding delivery. BE (Comments): The exceptional circumstances put forward in this article to justify accelerated or targeted actions should be more precisely defined in advance, preferably already in this regulation to avoid any confusion and have legal certainty. SI (Drafting suggestions): ~~Accelerated and Targeted Actions for Competitiveness~~ SI (Comments): Scrutiny reservation on entire Article. EL (Comments): We have a general scrutiny reservation. We need to add safeguards in order to ensure fair competition. FR (Comments): La délégation pourra soutenir une inscription dans le règlement des critères d'attribution décrits dans la fiche technique
2. In accordance with paragraph 1, one or more of the following measures may be applied to an award procedure:	AT

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	(Drafting suggestions): 2. In accordance with paragraph 1, one or more of the following measures may be applied to an award procedure <u>in cases corresponding to a maximum of [X] % of total funding</u>: AT (Comments): : AT asks whether the current design of action grants, procurement and direct grants to Member States in the EU4Health Work Programmes will be continued under the ECF. AT would urge to introduce budgetary caps for accelerated and targeted actions, to ensure they apply only for truly exceptional cases.
(a) For grants, without prejudice to the use of competitive procedures wherever appropriate in line with Article 192(1) and in addition to Article 198 of Regulation (EU, Euratom) 2024/2509, the work programme may specify that an award procedure takes the form of a targeted intervention to:	ES (Comments): Specifically for grants, we were wondering if the Programme Committee will be directly involved in the approval of any such acitons. SE (Drafting suggestions): For grants, without prejudice to the use of competitive procedures wherever appropriate in line with Article 192(1) and in addition to Article 198 of Regulation (EU, Euratom) 2024/2509, the work programme may <u>in exceptional cases</u> specify that an award procedure takes the form of a targeted intervention to:
(1) identify an action of imperative public interests of the Union and the beneficiaries or categories of beneficiaries which may be invited to submit a proposal without a call; or,	PT (Comments):

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	It is important to set the criteria to define “imperative public interest”. SE (Drafting suggestions): identify an action of imperative public interests of the Union and the beneficiaries or categories of beneficiaries ~~which may be invited to submit a proposal without a call~~; or, SE (Comments): Well-functioning markets with effective competition are what make companies competitive; it is important that support or support criteria does not distort the market and competition between sectors or companies. To have effective competition to support the most productive actions the calls needs to be transparent. FR (Comments): La Commission peut-elle préciser ce qu’il faut entendre par “intérêts publics impératifs de l’Union” ?
(2) set out an amount up to which proposals may be identified and invited that have been awarded a seal referred to in Article 8 of this Regulation but have not received Union funding due to lack of budget. The applicants may be invited to resubmit their proposal without a call; where the proposal is resubmitted without substantial change, the granting authority may decide to fully rely on the prior positive evaluation and any previously conducted controls and submitted supporting documents; the reasons for the award of the individual action shall be duly substantiated in the award decision and the	LT (Comments): Could the European Commission explain the rationale of this para? It is not clear why a proposal that has not been selected for funding due to lack of budget, later is funded not by selecting project from the reserve list but by inviting to resubmit proposal awarded a seal. MT

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
list of actions shall be published in the Annual Activity Report referred to in Article 74(9) of Regulation (EU, Euratom) 2024/2509; or,	(Drafting suggestions): (2) set out an amount up to which proposals may be identified and invited that have been awarded a seal referred to in Article 8 of this Regulation but have not received Union funding due to lack of budget. The applicants may be invited to resubmit their proposal without a call; where the proposal is resubmitted without substantial change, the granting authority may decide to fully rely on the prior positive evaluation and any previously conducted controls and submitted supporting documents; <u>the criteria for the award shall be made known beforehand</u>, and the reasons for the award of the individual action shall be duly substantiated in the award decision and the list of actions shall be published in the Annual Activity Report referred to in Article 74(9) of Regulation (EU, Euratom) 2024/2509; or, MT (Comments): Malta argues that the criteria on which the awards will be decided need to be made clear beforehand for the sake of transparency. SE (Drafting suggestions): set out an amount up to which proposals may be identified and invited that have been awarded a seal referred to in Article 8 of this Regulation but have not received Union funding due to lack of budget. The applicants may be invited to resubmit their proposal ~~without a call~~; where the proposal is resubmitted without substantial change, the granting authority may <u>consider</u> ~~decide to fully rely on~~ the prior positive evaluation and any previously conducted controls and submitted supporting documents, <u>when considering granting Union funding</u>; the reasons for the award of the individual action shall be duly substantiated in the award decision and the list of actions shall be published in the Annual Activity Report referred to in Article 74(9) of Regulation (EU, Euratom) 2024/2509; or,

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	SE (Comments): Well-functioning markets with effective competition are what make companies competitive; it is important that support or support criteria does not distort the market and competition between sectors or companies. To have effective competition to support the most productive actions the calls needs to be transparent.
(3) specify an action and beneficiaries, or a policy area and categories of beneficiaries, and set out an amount up to which proposals may be invited for extension of actions under the ECF or other Union programmes, in order to continue or add additional activities or entities, and/or to further develop results; where actions and beneficiaries are not individually identified in the work programme, the reasons for the award of the individual action shall be duly substantiated in the award decision and the list of actions shall be published in the Annual Activity Report referred to in Article 74(9) of Regulation (EU, Euratom) 2024/2509. The award may take the form of an amendment to the original action by adding new activities and increasing the maximum Union contribution.	LT (Comments): We advocate for MSs' representatives involvement in this process. SI (Drafting suggestions): 3) specify an action and beneficiaries, or a policy area and categories of beneficiaries, and set out an amount up to which proposals may be invited for extension of actions under the ECF or other Union programmes, in order to continue or add additional activities or entities, and/or to further develop results; where actions and beneficiaries are not individually identified in the work programme, the reasons for the award of the individual action shall be duly substantiated in the award decision and the list of actions shall be published in the Annual Activity Report referred to in Article 74(9) of Regulation (EU, Euratom) 2024/2509. The award may take the form of an amendment to the original action by adding new activities <u>and/or partners, or both</u>, and increasing the maximum Union contribution FR (Comments):

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	La Commission pourrait-elle préciser — y compris en donnant un exemple — ce que l’on entend par “catégories de bénéficiaires” ? Pourrait-elle confirmer que ce paragraphe renvoie au secteur de l’ensemble et de la formation professionnels et de l’enseignement supérieur du programme Erasmus+ ?
(b) By way of derogation from Articles 199, 201, 203 regarding grants or from Article 170(1), points (b) and (c), and (2) regarding procurement, of Regulation (EU, Euratom) 2024/2509, the work programme may specify that an award procedure takes the form of an accelerated intervention to:	SE (Drafting suggestions): By way of derogation from Articles 199, 201, 203 regarding grants or from Article 170(1), points (b) and (c), and (2) regarding procurement, of Regulation (EU, Euratom) 2024/2509, the work programme may in exceptional cases specify that an award procedure takes the form of an accelerated intervention to:
(1) limit the requirements for the award decision and signature of legal commitments to a preliminary evaluation of award and exclusion criteria; the award decision shall be taken based solely on a self-declaration of applicants and tenderers on selection and eligibility criteria without request for corresponding supporting documents during pre-evaluation; the final evaluation, including for selection and eligibility criteria, and the requests for any relevant supporting documents shall be conducted within three months of the signature of the legal commitment; and,	MT (Comments): The text implies that projects will be allowed to start without a Grant Agreement in place. Malta would like to inquire if this is the case and the way forward in case of non-compliance
(2) require the notification of the results of the preliminary evaluation to the applicants or tenderers within 30 calendar days of the deadline for submission of proposals or tenders; the award decision shall be taken within 60 calendar days of the deadline for submission of proposals or tenders and shall be exempted, where applicable, from the procedures set out in Article 83; until the completion of the final evaluation no pre-financing shall be paid.	MT (Comments): Malta would like to know if this means that the time to grant will be 3 months and whether the projects will be able to start without pre-financing

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(c) By way of derogation from Article 9 of this Regulation, the work programme may specify that an award procedure takes the form of an inducement intervention to allow for a temporary and conditional waiver of compliance with a specified part of the eligibility criteria during the award procedure and parts of the implementation of the action, in particular regarding the place of establishment; compliance with the temporarily waived eligibility criteria shall instead be achieved and evaluated during the implementation of the action within a timeframe specified in the legal commitment. If the temporarily waived eligibility criteria are not complied with at the specified date, the action shall be considered ineligible in its entirety and any Union funding shall be fully recovered; for inducement interventions no pre-financing shall be paid.	DE (Comments): We welcome the idea to only assess the eligibility criteria at a later stage as it can give an incentive to companies to relocate to the EU. LT (Comments): Could the European Commission explain the rationale of this para? PT (Comments): Protect supply chains and critical technologies from high-risk third-country interference. Foresee automatic exclusions in critical domains (cyber, communications, space, munitions).
(d) The work programme may set up special two-stage bottom-up award procedures in accordance with the following rules:	
(1) during the first stage, a call for expression of interest may be launched without specification of the kind of activities or the instrument of budget implementation to be used, to enable applicants, tenderers and pillar-assessed entities to submit project proposals or offers for goods, works or services that might contribute to Union competitiveness in general or in a specified sector.	
(2) proposals and offers shall be evaluated and ranked based on common award criteria such as their comparative contribution to Union competitiveness. The evaluation committee shall determine the most appropriate instrument of budget implementation under direct or indirect management, in particular grant, procurement, non-financial donations,	AT (Comments): The article should not only refer to competitiveness as an award criteria but to the objectives set out for each policy window for which a work

Proposal for a Regulation establishing the European Competitiveness Fund (doc. 13413/25)

From: AT, BG, CZ, DE, FI, HR, IE, IT, LT, LU, MT, PT, BE, HU, ES, SE, SI, EL, FR, PL

Deadline: 15 October 2025 COB

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Presidency text (doc. 13413/25)	Drafting suggestions and Comments
contribution agreements or other support, as well as propose the maximum amount and form of the Union contribution.	programme is tabled. AT asks whether the key for Union contribution to award procedures will remain 60:40 and 80:20. ES (Drafting suggestions): (2) proposals and offers shall be evaluated and ranked based on common award criteria such as their comparative contribution to Union competitiveness. The evaluation committee shall ~~determine~~ propose the most appropriate instrument of budget implementation under direct or indirect management, in particular grant, procurement, non-financial donations, contribution agreements or other support, as well as propose the maximum amount and form of the Union contribution. SE (Drafting suggestions): proposals and offers shall be evaluated and ranked based on common award criteria such as excellence, innovation, addressing a market failure and their comparative contribution to Union long-term competitiveness. FR (Comments): Que signifie l'expression "dons non financiers" ? Des contributions en nature ? Ce n'est pas la formulation convenue dans les règlements précédents. Quelle est la relation du comité d'évaluation mentionné avec les programmes de travail ?
(3) during the second stage, within the available budget, successfully evaluated projects or offers shall be invited to adjust and complete their proposal or offer in accordance with the conclusions of the evaluation committee. The award procedure shall otherwise proceed in accordance with the rules set out in Article 12, as applicable to the respective instrument of budget implementation.	

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3. In accordance with paragraph 1, for actions which require the planning, construction and operation of facilities funded under award procedures the work programme may determine that, depending on the nature of the action, it is of public interest and may be of imperative reason of overriding public interest within the meaning of Article 6(4) and Article 16(1), point (c), of Council Directive 92/43/EEC and Article 4(7) of Directive 2000/60/EC of the European Parliament and of the Council , in the interest of defence within the meaning of Article 2(3) of Regulation (EC) No 1907/2006 of the European Parliament and of the Council , and in the interests of public health and safety within the meaning of Article 9(1), point (a) of Directive 2009/147/EC of the European Parliament and of the Council, in accordance with and under the conditions set out in applicable legislation such as the Net Zero Industry Act Regulation 2024/1735, RED III (Directive 2023/2413), or the Defence Readiness Omnibus (COM(2022)349) provided that the remaining other conditions set out in these provisions are fulfilled.	PL (Comments): This deviation from open call procedures is very general and insufficiently justified. It reduces the transparency of the European Commission's decisions regarding the use of the EU budget, creates a risk of decisions being influenced by lobbying, and poses the risk that projects and beneficiaries will be treated according to different rules
	AT (Comments): .
SECTION 2	

ECF INVESTEU INSTRUMENT	DE (Comments): Aiming for continuity with the InvestEU instrument is generally welcome. InvestEU has proven its worth in the past. However, many aspects are still unclear and need to be examined in detail. The COM's responses to the member states' written questions is essential. We ask the Commission to clearly state why several technical provisions seem to have been waved. Until such such explanation has been provided, we think that essential technical provisions should be carried over from the current InvestEU Regulation. We are wondering in particular why (parts of the) following provisions have not been taken from the current InvestEU regulation: - Article 7 InvestEU: Combination of Portfolios: Will it still be possible for the EIB Group to combine portfolios? - Article 11 InvestEU: Scope of Partnership - Article 15 InvestEU: Selection of implementing partners other than the EIB Group; particularly paragraph 2 of Article 15 - Article 17 (Guarantee agreements) - Article 18 (Requirements for the use of the EU guarantee) - Article 19 (Coverage and terms of the EU guarantee) IT (Comments): In general, the common objective of support provided through financial instruments is to mitigate the consequences of market failures, which typically take the form of credit rationing, by facilitating access to credit for deserving enterprises that private financiers would not otherwise be willing to support. In order to ensure the effectiveness of financial instruments, however, it is essential to adopt appropriate criteria for designing and implementing

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	measures that are consistent with the characteristics of the entrepreneurial system concerned. Therefore, it is necessary to avoid an exclusive or excessive centralisation at EU level in the management of financial instruments for SMEs, so as to allow, at national level, the definition of instruments with the required flexibility to take into account the entrepreneurial fabric of the relevant territories/regions. More specifically, with regard to access to credit, it should be noted that the use of European instruments and platforms, while offering limited advantages in terms of leverage effect and ability to address the actual financial needs of enterprises, involves the adoption of “rigid” intervention models, which are administratively burdensome and, unless laboriously adjusted through corrective measures, cannot be operationally implemented in a flexible manner that meets the consolidation and/or development needs of territorially rooted enterprises. This is particularly relevant, in the case of Italy, for enterprises located in less developed areas, or characterised by sectoral or dimensional diversity
<i>Article 21</i>	
General Framework	
	ES (Comments): The section on the InvestEU Instrument is much less detailed than the InvestEU Regulation (Regulation (EU) 2021/523), which includes many more technical aspects. Is the InvestEU Regulation continue to apply? If not, where are those technical details going to be defined?
1. As a horizontal delivery tool for Union internal policies, the ECF InvestEU Instrument shall contain the budgetary guarantee and financial instruments, including when combined with non-repayable support in a blending operation, for the purpose of contributing to the general and specific	DE (Drafting suggestions):

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objectives set out in Article 3, and may be implemented in synergy with other Union or national activities, including through compartments for Member States.	1. As a horizontal delivery tool for Union internal policies, the ECF InvestEU Instrument shall contain the budgetary guarantee and other financial instruments, including when combined with non-repayable support in a blending operation, for the purpose of contributing to the general and specific objectives set out in Article 3, and may be implemented in synergy with other Union or national activities, including through compartments for Member States. DE (Comments): The term “financial instrument” is unclear and circular. Financial instruments within the meaning of Art. 2 (30) of the Financial Regulation are “equity or equity based instruments, loans or guarantees, or other risk-sharing arrangements [...]”. This should be clarified. Otherwise a specific definition of “financial instrument” should be added to the ECF Regulation. IT (Comments): The Commission should clarify whether and how continuity is ensured with regard to the possibilities, currently provided for in the InvestEU Regulation (Articles 9(2) and 10(3) of Regulation (EU) 2021/523), to combine the two compartments in a single operation with selective risk allocation between different levels (tranches). SI (Drafting suggestions): As a horizontal delivery tool for Union internal policies, the ECF InvestEU Instrument shall contain the budgetary guarantee and financial instruments, <u>as stated in the point 2 of this article</u> including when combined with non-repayable support in a blending operation, for the purpose of contributing to the general and specific objectives set out in Article 3, and may be

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	implemented in synergy with other Union or national activities, including through compartments for Member States. SI (Comments): We believe that it should be added which are financial instrumenta under this Regulation: loans, guarantees, counter-guarantees, capital market instruments, any other form of funding or credit enhancement, including subordinated debt, or equity or quasi-equity investments. Blending instruments are already stated in the following text. FR (Drafting suggestions): 1. As a horizontal delivery tool for Union internal policies, the ECF InvestEU Instrument shall contain the budgetary guarantee and financial instruments, including when combined with non-repayable support in a blending operation, for the purpose of contributing to the general and specific objectives set out in Article 3, and may be implemented <u>by its dedicated structures</u> in synergy with other Union or national activities, including through compartments for Member States. FR (Comments): L'instrument InvestEU ne devrait pas être implémenté par des programmes de travail. La délégation soutiendra 4 configurations du comité d'investissement InvestEU, répliquant les fenêtres thématiques. La France salue l'ambition du FEC de mobiliser les investissements privés par le biais de l'instrument InvestEU du FEC.

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	Le financement devrait être conditionné à des critères de préférence européenne et reposer exclusivement sur les ressources existantes de l'Union, sans charge supplémentaire pour les budgets nationaux. PL (Drafting suggestions): „The ECF InvestEU Instrument shall serve as a horizontal delivery tool for Union internal policies, providing a budgetary guarantee and financial instruments—including when blended with non-repayable support—to contribute to the general and specific objectives of Article 3. It may be deployed in synergy with other Union or national initiatives, including through dedicated compartments for Member States. PL (Comments): We would like the European Commission to provide more details on these possibilities and clarify how such actions will stimulate equal participation of Member States in calls. In our view, combined with another provision regarding the need to ensure additional funding for project implementation, this could only increase the inequality of Member States' participation in the programme, where award beneficiaries would be those entities and countries able to secure the missing financing. The European Investment Bank Group (EIBG) is currently treated as one of several implementing partners under the InvestEU guarantee instrument (ECF). This status does not reflect the key role and substantial experience of the EIBG. To date, the EIB's partnership with the European Commission under InvestEU has been strategic and collaborative, particularly in risk assessment and the design of financial instruments. Limiting this role could weaken implementation effectiveness and hinder the rapid market deployment of the instrument. The Commission's rationale for this approach

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	is unclear, especially since the implementation of InvestEU by the EIB/EIF—and previously EFSI—was positively evaluated. Regarding specific questions: • Dedicated allocation for EIBG: Why has no dedicated pool been foreseen for the EIBG? This could pose a serious issue for the bank's participation in the instrument, particularly regarding portfolio building, which requires long-term capital planning and maintaining relationships with financial institutions and clients. What would be the role of other EU national promotional banks? • Risk assessment: Under InvestEU, the EIB played a key role in risk assessment and co-designing instruments with the Commission, leveraging its long-standing experience and capacity to manage investment project risks. It is unclear who will be responsible for risk assessment in the new system and on what basis, particularly given the planned “open architecture” and the resulting increase in implementing partners. In light of the above, the issue of EIB's management role in running the instrument is also crucial. While the document generally refers to the roles of various partners, it does not clearly define the EIB's role in fund management, including participation in investment committees, consultations on investment guidelines, and monitoring activities.
2. The ECF InvestEU Instrument shall address market failures or suboptimal investment situations. The ECF InvestEU Instrument may in particular provide loans, guarantees, counter-guarantees, capital market instruments, any other form of funding or credit enhancement, including subordinated debt, or equity or quasi-equity investments, provided directly or indirectly through financial intermediaries, funds, investment platforms or other vehicles to be channelled to final recipients.	AT (Drafting suggestions): 2. The ECF InvestEU Instrument shall address market failures or suboptimal investment situations. The ECF InvestEU Instrument may in particular provide loans, guarantees, counter-guarantees, capital market instruments, any other form of funding or credit enhancement, including subordinated debt, ~~or equity~~ or quasi-equity investments, provided directly

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	or indirectly through financial intermediaries, funds, investment platforms or other vehicles to be channelled to final recipients. AT (Comments): AT urges the deletion of any reference to direct equity. IT (Comments): Not clear what kind of instrument the ECF InvestEU Instrument may provide: if all those listed “loans, guarantees, counter-guarantees, capital market instruments, any other form of funding or credit enhancement, including subordinated debt, or equity or quasi-equity investments, funds, investment platforms or other vehicles to be channelled to final recipients”, is there a share for each instrument OR How will the (3). Budgetary guarantee of EUR 70b be used toward such instrument? A guarantee to finance a loan? It appears that a pillar-assessed private bank could also act as a direct implementing partner. If large European banks act as implementing partners, they may end up managing significant portfolios. Has the Commission considered any measures to mitigate such risks? How could it ensure that the investment themes are so clearly defined for commercial actors that there is no risk of guaranteeing banks’ regular loan portfolios with taxpayers’ money? PT (Comments): What will be the breakdown between debt and equity?

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	Regarding the “financial intermediaries”, can the COM detail the target for this fund? It will be financial intermediaries or SME, Mid Caps and large companies? Will it be single beneficiary or multi-beneficiary? SE (Drafting suggestions): The ECF InvestEU Instrument shall address market failures that cannot be mitigated in a more efficient manner, or suboptimal investment situations. The ECF InvestEU Instrument may in particular provide loans, guarantees, counter-guarantees, capital market instruments, any other form of funding or credit enhancement, including subordinated debt, or equity or quasi-equity investments, provided directly or indirectly through financial intermediaries, funds, investment platforms or other vehicles to be channelled to final recipients. SE (Comments): Support can be justified if it deals with a clear market failure that cannot be addressed in a more efficient manner.
3. [The maximum amount of the budgetary guarantee under the EU Compartment of the ECF InvestEU Instrument shall be EUR 70 000 000 000 in current prices.] It shall be provisioned at the rate of 50 %.	CZ (Drafting suggestions): The maximum amount of the budgetary guarantee under the EU Compartment of the ECF InvestEU Instrument shall be EUR 70 000 000 000 in current prices.] It shall be provisioned at the rate of ~~50~~40 % CZ (Comments): CZ – For now, we would like to keep the current rate of 40%. We will further adjust our position based on the technical seminar on 29/10.

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	DE (Comments): According to the EU Commission, there is “no legal limitation on the contribution to financing the ECF InvestEU financial instruments”. What is meant by this and how does that relate to the 70 bn EUR? ES (Drafting suggestions): 3. [The maximum amount of the budgetary guarantee under the EU Compartment of the ECF InvestEU Instrument shall be EUR 70 000 000 000 in current prices.] It shall be provisioned at the rate of <u>450</u> %. ES (Comments): We support the use of the guarantees for higher risk projects, but in the current programme the provisioning rate is set so that it covers the VaR with a 95% confidence interval, and we believe this confidence interval can be reduced (and thus the provisioning rate also be reduced), given the track record with previous programmes. FR (Drafting suggestions): [The maximum amount of the budgetary guarantee under the EU Compartment of the ECF InvestEU Instrument shall be EUR 70 000 000 000 in current prices.] It shall be provisioned at the rate of 50 %. <u>An additional amount of the EU guarantee may be provided for the purposes of the Member State compartment referred to in Article 24 of this Regulation, subject to the allocation by Member States and in accordance with the contribution agreement signed with the Commission detailing obligations and reporting.</u>

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	FR (Comments): La Commission peut-elle donner des précisions sur la fixation de ce taux à 50% ? Au vu de la diversité des actions envisagées et des risques associés pour l'utilisation de cet instrument, la Commission envisage-t-elle des flexibilités à ce taux ?
<u>3a. [X] % of the EU guarantee under the EU compartment shall be granted to the EIB Group.</u>	AT (Drafting suggestions): 3a. — [X] % of the EU guarantee under the EU compartment shall be granted to the EIB Group. AT (Comments): We are still of the view that we should aim for a pure open architecture approach. Further, given the guarantee range from EUR 17-70bn Euro, an ex-ante allocation of a specified share seems difficult. If we would like to e.g. keep guarantees for the EIB stable (at around EUR 20bn) that would imply a share of around 30% - 120%, depending on the actual guarantee volume. Most importantly, any allocation to the EIB must not endanger its capital sustainability. Respective confirmation has to be provided before approval of any share or volume allocated to the EIB. CZ

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Drafting suggestions): <u>65 % of the EU guarantee under the EU compartment shall be granted to the EIB Group.</u> CZ (Comments): The 65/35 proposal provides the EIB with allocation certainty for a quick start, while at the same time leaving one third of the allocation available for national development banks and other institutions. We believe this will lead to a better diversification of allocation and risk distribution, and potentially also improve access to finance for small businesses, as national development banks, and possibly other institutions that, have better access to the regions. DE (Drafting suggestions): 3a. [X] % of the EU guarantee under the EU compartment, <u>amounting to [X], shall be granted to the EIB Group. The EIB Group shall provide an aggregate financial contribution amounting to [X].</u> DE (Comments): We can support the introduction of such a provision. But it is to early to discuss concrete numbers, as this also depends on the overall allocation for the ECF InvestEU Instrument. Furthermore and as is the case today, the EIB (and other Implementing Partners) should have skin in the game. FI (Drafting suggestions): Add new text to replace X in brackets: <u>A minimum of 75</u> FI

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Comments): Experience so far has shown that the leading role of the EIB Group as InvestEU implementing partner should be maintained to ensure effective implementation. Allocating a large share of the EU guarantee to the EIB Group is necessary to guarantee predictability and foreseeability of its operations. IT (Comments): The new formulation is an improvement. The quota reserved to EIB shall represent 75% of the total amount, as successfully implemented in the past. All MS have been represented/financed/guaranteed with EIB (the Bank of the Union) support. Italy, in particular, highly benefitted from it. PT (Comments): We support this insertion. In this context, we request additional clarification on the EIB Group's role in implementing the ECF, particularly in risk assessment and other tasks currently assigned to the EIB within InvestEU. Finally, we suggested that a more flexible provisioning rate could be a good way to overcome time constraints and different implementation modes/instruments, through a lower provisioning rate for guarantee or debt instruments, while still allowing considerable flexibility in risk-taking, and a higher provisioning rate for equity instruments, allowing for possible write-offs in these types of investments. BE (Comments): Further analysis is needed to assess the impact of this proposal.

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	ES (Drafting suggestions): <u>3a. At least [X] % of the EU guarantee under the EU compartment shall be granted to the EIB Group. Independently to the size of the EU compartment, the pre-allocation to the EIB Group should at least amount to EUR [X].</u> ES (Comments): We believe that there should be an explicit allocation of the EU compartment to the EIB because it the EIB has proved a reliable implementing partner of InvestEU and the guarantees have helped the EIBG to support more innovative and additional investments across the EU. Reserving part of the allocation for the EIBG beforehand gives certainty to the institution and helps to ensure a swift implementation. For those reasons, our preliminary view is that the EIB share of the total InvestEU instrument should be established as a minimum percentage of the total amount of the EU Compartment. This should be combined with a minimum absolute amount of financial instruments delivered through ECF InvestEU Instruments via the EIB Group of [X] €. SE (Drafting suggestions): <u>~~3a. — [X] % of the EU guarantee under the EU compartment shall be granted to the EIB Group.~~</u> SE (Comments): Do not see need for earmarking of the guarantee, should rather have open competition between implementing partners.

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	FR (Drafting suggestions): <u>[X] % of the EU guarantee under the EU compartment shall be granted to the EIB Group. The EIB Group shall provide an aggregate financial contribution amounting to EUR XXX. That contribution shall be provided in a manner and form that facilitates the implementation of the European Competitiveness Fund and the achievement of the objectives set out in Article 3. The remaining [XX]% of the EU guarantee under the EU compartment shall be granted to other implementing partners, which shall also provide a financial contribution to be determined in the guarantee agreements.</u>
4. [The minimum amount of the Union support from ECF delivered through ECF InvestEU Instrument shall be EUR 17 000 000 000, to be used in support of the general and specific objectives set out in Article 3.] This minimum amount shall be increased by the contributions from the work programmes set out in Article 15. The contributions shall be a favoured means of implementation under the ECF and used for provisioning of the budgetary guarantee or financing of the financial instruments.	DE (Comments): For Implementing Partners this could be challenging with a view on predictability. In that regard, different options should be discussed (incl. a minimum quota for funding implemented through the InvestEU instrument from the policy windows), also taking into account the view of the EIB. IT (Drafting suggestions): 4. The minimum amount of the Union support from ECF delivered through ECF InvestEU Instrument shall be EUR 17 000 000 000 bn, to be used in support of the general and specific objectives set out in Article 3. This minimum amount shall be increased by the contributions from the work programmes, set out in Article 15. The work programmes shall be multi-annual, and [t]he contributions shall be a favoured means of implementation under the ECF and used for provisioning of the budgetary guarantee or financing of the financial instruments.

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	IT (Comments): As also provided for in Recital 50 of the Proposal, work programmes in the multi-annual format would provide greater predictability for implementing partners in relation to budgetary guarantees and financial instruments. Accordingly we propose the following drafting: (50) The ECF should be implemented through work programmes as set out in this Regulation. Work programmes could be adopted under an annual or multi-annual format. The latter could in particular be considered for the purposes of Union support provided for budgetary guarantees and financial instruments, with a view to provide predictability to implementing partners, as is the case of the ECF InvestEU Instrument. The designated mode of implementation reflects the identified needs for directionality, flexibility, predictability and efficiency, required to meet the objectives of the Regulation. In accordance with Regulation (EU Euratom) 2024/2059, the work programmes and the call documents will set out more technical implementation details for the budget across the set of policies supported by the ECF, including specific eligibility and award criteria depending on the instrument of budget implementation, be it grant, or procurement, and the specific policy objectives pursued. Work programmes are also the appropriate place to allocate budget in accordance with evolving policy priorities, and they should set out contributions, specific conditions and expected results. FR (Drafting suggestions): [The minimum amount of the Union support from ECF delivered through ECF InvestEU Instrument shall be EUR 17 000 000 000, to be used in support of the general and specific objectives set out in Article 3.] This

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	minimum amount shall be increased by the contributions from the work programmes set out in Article 15 <u>and confirmed by the Steering Board of the instrument.</u> The contributions shall be a favoured means of implementation under the ECF and used for provisioning of the budgetary guarantee or financing of the financial instruments. FR (Comments): La délégation pourra indiquer souhaiter que la gouvernance de l'instrument soit associée dans le cas de contributions additionnelles provenant des fenêtres thématiques du FEC.
5. The investment guidelines set out by the Commission shall define in more detail the scope of intervention in support of the general and specific objectives set out in Article 3. The investment guidelines shall be prepared in close dialogue with the potential implementing partners.	DE (Drafting suggestions): 5. The <u>Commission is empowered to adopt delegated acts in accordance with Article 84 in order to supplement this Regulation by investment guidelines set out by the Commission shall define</u> defining in more detail the scope of intervention in support of the general and specific objectives set out in Article 3. The investment guidelines shall be prepared in close dialogue with the <u>EIB Group and other</u> potential implementing partners. DE (Comments): As the Investment Guidelines may potentially set out essential aspects of the ECF InvestEU Instrument, we don't see why this will not be in the form of a Delegated Act, as it is the case today. LU (Drafting suggestions):

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	The investment guidelines set out by the Commission shall define in more detail the scope of intervention in support of the general and specific objectives set out in Article 3. The investment guidelines shall be prepared in close dialogue with the EIB Group and other ~~the potential~~ implementing partners. PT (Comments): The investment guidelines will be set out by the Commission? Will there be no input from Member States? Clarification is needed. SE (Drafting suggestions): The investment guidelines set out by the Commission <u>after consultation with the Member States</u> shall define in more detail the scope of intervention in support of the general and specific objectives set out in Article 3. The investment guidelines shall be prepared in close dialogue with the potential implementing partners. FR (Drafting suggestions): The investment guidelines set out by the Commission, <u>the Member States and the potential implementing partners, including the EIB group,</u> shall define in more detail the scope of intervention in support of the general and specific objectives set out in Article 3. ~~The investment guidelines shall be prepared in close dialogue with the potential implementing partners.~~ <u>The investment guidelines should be reviewed annually by the Steering Board.</u> FR (Comments): Les lignes directrices d'investissement devraient être définies par la Commission, les Etats Membres et les partenaires de mis en œuvre au même

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	moment que les priorités sectorielles du fond et pour l'entièreté de la période de programmation.
6. The following rules shall apply to the provisioning referred to in paragraph 3:	PT (Comments): We support a more flexible provisioning rate as a means to overcome different implementation modes and schedule. A lower provisioning rate for guarantee or debt instruments, while still allowing considerable flexibility in risk-taking; a higher provisioning rate for equity instruments, allowing for possible write-offs in these types of investments.
(a) the provisioning rate shall be assessed every year in accordance with the assessment referred to in Article 41(5) of Regulation (EU, Euratom) 2024/2509;	DE (Drafting suggestions): (a) the provisioning rate shall be assessed every year, to reflect the portfolio risk, and in accordance with the assessment referred to in Article 41(5) of Regulation (EU, Euratom) 2024/2509; IT (Comments): provisioning rate (50% vs 40%): defining ex-ante the risk to be taken is too hard: agree on revising the provisioning rate every year. (40% or 50% expected loss is already a very high rate. It shows a high appetite for risk, or a strong commitment to innovation). SE (Drafting suggestions):

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	the provisioning rate shall be assessed every year, <u>to reflect the portfolio risk, and</u> in accordance with the assessment referred to in Article 41(5) of Regulation (EU, Euratom) 2024/2509; SE (Comments): In order to maintain sound budgeting principles, the provisioning rate needs to reflect the portfolio risk. FR (Drafting suggestions): the provisioning rate shall be assessed every year in accordance with the assessment referred to in Article 41(5) of Regulation (EU, Euratom) 2024/2509 <u>with a specific review of the adequacy of the provisioning rate laid down in Article 21(3) of this Regulation with respect to the actual risk profile of the financing and investment operations covered by the ECF InvestEU</u>
(b) for the purpose of support under other Union programmes referred to in Article 23(2) the provisioning shall be made from that other Union programme;	
(c) the provisioning shall be committed until 31 December 2034 and shall take into account the progress in granting the budgetary guarantee under the ECF InvestEU Instrument.	
(d) in accordance with Article 214(2) of Regulation (EU, Euratom) 2024/2509, the provisioning shall be constituted until 31 December 2037 and shall take into account the progress in the approval and signature of the financing and investment operations.	FR (Comments): La Commission peut-elle justifier la nécessité de fixer ce délai et préciser les critères utilisés pour le déterminer ? Pourquoi cette disposition n'est pas existante dans le règlement actuel ?

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7. The Commission is empowered to adopt delegated acts in accordance with Article 84 to amend paragraph 3 to adjust the provisioning rate and to adjust the maximum amount of the budgetary guarantee with up to 20% of that amount.	AT (Drafting suggestions): 7. The Commission is empowered to adopt delegated acts in accordance with Article 84 to amend paragraph 3 to adjust the provisioning rate and to adjust the maximum amount of the budgetary guarantee with up to ~~20~~ 15% of that amount. AT (Comments): AT opposes increasing the maximum amount by which the Commission can adjust the budgetary guarantee from 15% (as in the current InvestEU) to 20% - the volumes are likely to be higher than under the current InvestEU anyhow, so 15% will mean a higher absolute amount than is currently the case. DE (Drafting suggestions): 7. The Commission is empowered to adopt delegated acts in accordance with Article 84 to amend paragraph 3 to adjust the provisioning rate and to adjust the maximum amount of the budgetary guarantee with up to ~~15~~ 20% of that amount. DE (Comments): Where will the funds for the provisioning rate for such a guarantee increase of 20 % come from? Furthermore, we have reservations with regards to deviating from the current provision, which allows for an adjustment of 15 %. ES

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	(Drafting suggestions): 7. The Commission is empowered to adopt delegated acts in accordance with Article 84 to amend paragraph 3 to adjust the provisioning rate ~~and~~ or to adjust the maximum amount of the budgetary guarantee with up to 20% of that amount. ES (Comments): This provision is confusing. Does this mean that the Commission can only increase the maximum amount of the budgetary guarantee if it reduces the provisioning rate? If the decisions to adjust the provisioning rate and the maximum amount of the budgetary guarantee are independent of each other, the wording should be clearer. SE (Drafting suggestions): The Commission is empowered to adopt ~~delegated~~ implementing acts in accordance with Article 84 to amend paragraph 3 to adjust the provisioning rate and to adjust the maximum amount of the budgetary guarantee with up to 20% of that amount. SE (Comments): Important with appropriate influence for MS. FR (Comments): La Commission peut-elle expliquer l'augmentation du seuil d'ajustement de 15 % à 20 % ?
	LU (Drafting suggestions):

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	<u>8. Support from a budgetary guarantee or a financial instrument under this Regulation and Union support provided through financial instruments or budgetary guarantees established by programmes in other programming periods may be combined to support financial products or portfolios implemented or to be implemented under this Regulation or any Regulation replacing this Regulation under future programming periods. 9. The financial products established under InvestEU Regulation and new products under this Regulation are state aid consistent within the meaning of the Financial Regulation Article 212(2).</u> LU (Comments): Suggest to introduce additional paragraph in order to align with the recently adopted Investment Simplification Omnibus. MT (Drafting suggestions): <u>8. Support from a budgetary guarantee or a financial instrument under this Regulation and support provided through financial instruments or budgetary guarantees established by programmes in other programming periods may be combined to support financial products or portfolios implemented or to be implemented under this Regulation.</u> MT (Comments): If paragraph 8 is introduced in the compromise, additional drafting including implementation modalities should be introduced in order to fully enable combinations as currently offered under InvestEU and further simplified through the Investment Simplification Omnibus expected to be adopted shortly.

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	FR (Drafting suggestions): Article 21(a) : Monitoring and reporting <u>1. Indicators to report on the progress of the ECF InvestEU instruments and the ECF funds towards the achievement of the general and specific objectives laid down in Article 3 shall be set out in Annex XXX</u> <u>2. The Commission shall provide anual financial and operational reporting of the ECF fund and reporting of the financing and investment operations under the ECF investment instrument to the Strategiic steering board including reporting on the relevant indicators related to the policy objectives covered.</u> <u>3. Every six months, the Commission shall provide to the Startegic steering board a uptodate reporting on the management and proposed reallocation of all revenues, repayments, released guarantees, recoveries or surplus provisions generated under this Regulation, its predecessors Regulations (EU) 2015/1017 and (EU) 2021/523, as well as those referred to in Annex IV of Regulation (EU) 2021/523.</u> Article 21(b) : Evaluation. <u>1. Evaluations of the ECF program including specifically the ECF InvestEU instrument shall be carried out so that they feed into the decision-making process in a timely manner.</u> <u>2. By 30 September 2031, the Commission shall submit to the European Parliament and to the Council an independent interim evaluation report</u>

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	<u>on the ECF program assessing its effectiveness, efficiency, impact, relevance, and results in relation to the general and specific objectives of each policy window as well as its coordination with Horizon Europe.</u> <u>3.By 30 September 2031, the Commission shall submit to the European Parliament and to the Council an independent interim evaluation report of the ECF InvestEU instrument, in particular on the use of the EU guarantee, on the fulfilment of the implementing partners' obligations, on the allocation of the EU guarantee, on the implementation MS compartments as well as the Project advisory activities, and on the</u> <u>The evaluation shall in particular demonstrate how the ECF InvestEU instrument has contributed to the reaching of ECF Programme targets as well as EU policy goals, especially with regard to added value and the geographical and sectoral balance of the supported financing and investment operations. The evaluation shall also assess the application of the focus on SMEs, as well as the development of skills and the support to scaleups and startups.</u> FR (Comments): La délégation pourra indiquer souhaiter bénéficier d'un reporting dédié pour l'instrument au service du Steering Board.
Article 22	

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

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	companies to the detriment of SMEs. Moreover, the relationship between these provisions and support to scale up under Horizon Europe is unclear / it is not clear the relation to scale up under Horizon Europe.
1. The ECF InvestEU Instrument shall serve as the Union's integrated platform for delivering targeted financial support to companies across all development phases start-ups, scale-ups, including those actively pursuing manufacturing, industrial and market deployment. It shall ensure that high-potential European companies developing or deploying innovative solutions can access the capital and resources to grow in the Union, thus strengthening the integration of the Single market and the Savings and Investment Union.	AT (Drafting suggestions): The ECF InvestEU Instrument shall serve as the Union's integrated platform for delivering targeted financial support to companies across all development phases start-ups, scale-ups, including those actively pursuing manufacturing, industrial and market deployment. It shall ensure that high-potential European companies developing or deploying innovative solutions can access the capital and resources to grow in the Union, <u>bridging the gap between research and market deployment</u>, thus strengthening the integration of the Single market and the Savings and Investment Union DE (Comments): What is meant by "the Union's integrated platform"? What is the relation of the ECF InvestEU Instrument to the Scale-up facility ? The interaction between Invest-EU, the Scale-up Facility, the Scaleup Europe fund and the ECF and its governance structures is not entirely clear, the structure seems complex. A diagram could be helpful for a better understanding. FI (Drafting suggestions): The ECF InvestEU Instrument shall serve as the Union's integrated platform for delivering targeted financial support to companies across all development phases start-ups, scale-ups, including those actively pursuing manufacturing,

Proposal for a Regulation establishing the European Competitiveness Fund (doc. 13413/25)

From: AT, BG, CZ, DE, FI, HR, IE, IT, LT, LU, MT, PT, BE, HU, ES, SE, SI, EL, FR, PL

Deadline: 15 October 2025 COB

Updated: 27/10/2025 09:02

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	industrial and market deployment <u>of innovative solutions</u>. It shall ensure that high-potential European companies developing or deploying <u>these</u> innovative solutions can access the capital and resources to grow in the Union, thus strengthening the integration of the Single market and the Savings and Investment Union. IT (Comments): Could the Commission clarify the process through which these instruments are proposed, evaluated and approved? In particular, the following should be better defined: the criteria by which the Commission approves new instruments proposed by the EIB, which has operational autonomy with regard to its own resources; the degree of autonomy of the EIB in the technical design of the instruments; the way in which other financial partners are involved; and the mechanisms for transparency and accountability in the selection and implementation. Furthermore, it is not specified whether there are quantitative or qualitative limits to the facility's intervention, nor whether evaluation tools are envisaged. PT (Comments): What will be the connection of this facility with EIC Fund that is included under Horizon Europe Pillar III concerning the EIC Accelerator instrument? SE (Drafting suggestions): The ECF InvestEU Instrument shall serve as the Union's integrated platform for delivering targeted financial support to companies across all development phases-start-ups, scale-ups, ~~including those~~ actively pursuing <u>innovative</u> manufacturing, industrial and market deployment. It shall <u>promote ensure</u> ~~that~~ [high-potential] European companies <u>with potential to be productive</u>, developing or deploying innovative solutions can access the capital and

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	resources to grow in the Union, thus strengthening the integration of the Single market and the Savings and Investment Union. SE (Comments): Financial support should not be given to established manufacturing processes, as it risks counteracting the necessary structural adjustment of the economy. Need further discussions on what “high potential” means. See brackets. FR (Drafting suggestions): The ECF InvestEU Instrument shall serve as the Union’s integrated platform for delivering targeted financial support to companies across all development phases start-ups, scale-ups, including those actively pursuing manufacturing, industrial and market deployment. It shall ensure that high-potential European companies developing or deploying innovative solutions can access the capital and resources to grow in the Union, thus strengthening the integration of the Single market and the Savings and Investment Union. <u>The InvestEU instrument and its governance should exercise this mission in coordination with the EIC Accelerator and ensure continuation of the funding journey for startup funded by the EIC Accelerator.</u> FR (Comments): La délégation pourra souhaiter que le Steering Board (et notamment la BEI qui y siège) joue un rôle pivot en garantissant que les startups soutenues par l’EIC Accelerator puissent bénéficier de solution de financement InvestEU en cas de tour de table plus important (seuil à définir).

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2. The Commission shall in particular develop a Scale-up facility in cooperation with the EIB Group, other international financial institutions and National Promotional Banks. The facility shall provide in a coordinated and consistent manner, a comprehensive set of financing tools tailored to the unique needs of scale-ups, including indirect and direct equity and quasi-equity, venture debt, loans, guarantees and blended finance, with a view to attract private investors in supporting scale up financing and facilitate exit options. The facility shall target SMEs and small mid-cap companies and Mid-cap companies.	AT (Drafting suggestions): 2. The Commission shall in particular develop a Scale-up facility in cooperation with the EIB Group, other international financial institutions and National Promotional Banks. The facility shall provide in a coordinated and consistent manner, a comprehensive set of financing tools tailored to the unique needs of scale-ups, including indirect ~~and direct~~ equity and quasi-equity, venture debt, loans, guarantees and blended finance, with a view to attract private investors in supporting scale up financing and facilitate exit options. The facility shall target SMEs and small mid-cap companies and Mid-cap companies. AT (Comments): AT urges the deletion of any reference to direct equity. BG (Drafting suggestions): The facility shall target SMEs and small mid-cap companies. ~~and Mid-cap companies~~ BG (Comments): Mid-cap companies are large enterprises by definition and do not need financial support or state aid for their growth. The newly invented type of enterprises by the European Commission at European level, called small mid-caps, are not regulated by the national legislation of the Member states. These enterprises will take from the budget for small and medium-sized enterprises on one hand, and on the other hand will violate the rules for granting state aid and free competition in entire sectors, since by their nature they represent large enterprises with thousands of

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	employees in them. This raises the question to what extent the state aid rules apply to the European Commission while providing funding to mid-caps? DE (Drafting suggestions): The Commission shall in particular develop a Scale-up facility in cooperation with the EIB Group, other international financial institutions and National Promotional Banks. The facility shall provide in a coordinated and consistent manner, <u>also with existing national, regional and supranational initiatives</u>, a comprehensive set of financing tools tailored to the unique needs of scale-ups, including indirect and direct equity and quasi-equity, venture debt, loans, guarantees and blended finance, with a view to attract private investors in supporting scale up financing and facilitate exit options. The facility shall target SMEs and small mid-cap companies and Mid-cap companies“ DE (Comments): With regard to direct equity, we see a need for discussion. Does the Commission see a risk of crowding out private VC funds? How will this be prevented? Existing instruments such as the European Tech Champions Initiative as well as instruments of the EIF put great effort to foster private fund structures so that private VC funds can get up to speed and scale in the EU. Would the facility be counterproductive to that? We underline the importance of consistency with existing tools and the option of co-investing with the Scaleup Facility. An inefficient duplication of structures and instruments has to be avoided, as well as fundraising or pipeline competition between national, regional and EU-instruments (also from a state-aid-law perspective). A mechanism for a close and transparent exchange with the member states should be implemented by the Commission, possibly under the ECF Investment EU Instrument.

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	PT (Comments): We request more details on what is encompassed by the concept of "international financial institutions". FR (Drafting suggestions): The Commission with the Steering Board of the Instrument shall in particular develop a Scale-up facility in cooperation with the EIB Group, other international financial institutions and National Promotional Banks. The facility shall provide in a coordinated and consistent manner, a comprehensive set of financing tools tailored to the unique needs of scale-ups detailed in the investment guidelines, including indirect and direct equity and quasi-equity, venture debt, loans, guarantees and blended finance, with a view to attract private investors in supporting scale up financing and facilitate exit options. The facility shall target SMEs and small mid-cap companies and Mid-cap companies.
3. The facility shall intervene where market investors cannot provide sufficient financing for European high-growth, innovative and strategic companies, including if needed to protect the Union's strategic assets, interests, autonomy or economic security.	DE (Drafting suggestions): 3. The facility shall intervene where market investors cannot provide sufficient financing for European high-growth, innovative and strategic companies start-ups and scale-ups, including if needed to protect the Union's strategic assets, interests, autonomy or economic security. DE (Comments): It is also clear that funds under Art. 22 shall benefit only start-ups and scale-ups; paragraph 3 must be specified accordingly. SE

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Drafting suggestions): The facility shall intervene where market investors cannot provide sufficient financing for European high-growth, innovative and strategic companies, including if needed to protect the Union's strategic assets, interests, autonomy or economic security <u>due to a clear market failure that cannot be addressed in a more efficient manner and intervening not risk crowding out private investments.</u> SE (Comments): Well-functioning markets with effective competition are what make companies competitive; it is important that support does not distort the market and competition between sectors or companies. Support can be justified if it deals with a clear market failure that cannot be addressed in a more efficient manner. It is important that the ECF safeguards openness towards the rest of the world and does not foster inhouse production where open, rules-based trade is more efficient. SI (Drafting suggestions): 3. The facility shall intervene where market investors cannot provide sufficient financing for European high-growth, innovative and strategic companies, including if needed to protect the Union's strategic assets, interests, autonomy or economic security. SI (Comments): It is not clear where strategic companies are defined and who defines them.

Proposal for a Regulation establishing the European Competitiveness Fund (doc. 13413/25)

From: AT, BG, CZ, DE, FI, HR, IE, IT, LT, LU, MT, PT, BE, HU, ES, SE, SI, EL, FR, PL

Deadline: 15 October 2025 COB

Updated: 27/10/2025 09:02

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
4. It will leverage public investment to catalyse substantial private and institutional capital flows, such as from private equity funds, corporates, pension funds, insurance companies, and other long-term investors, thus deepening Europe's capital markets and fostering sustainable growth of scale-up companies.	DE (Drafting suggestions): It will leverage <u>coordinated</u> public investment to catalyse substantial private and institutional capital flows, such as from private equity funds, corporates, pension funds, insurance companies, and other long-term investors, thus deepening Europe's capital markets and fostering sustainable growth of scale-up companies.” DE (Comments): Please see above comment to Art. 22 (2). FR (Drafting suggestions): It will leverage public investment to catalyse substantial private and institutional capital flows, such as from private equity funds, corporates, pension funds, insurance companies, and other long-term investors, thus deepening <u>the Union's</u> capital markets and fostering sustainable growth of scale-up companies.
<i>Article 23</i>	
Exclusivity clause	
1. During the period of the MFF 2028-2034, budgetary guarantees, financial instruments, or financial instruments directly implemented by the Commission in accordance with Article 219 of Regulation (EU, Euratom) 2024/2509 to support policy objectives on the territory of the Union shall solely be established under this Section.	IT (Comments): Will it be possible for the Member State to implement financial instruments under the NRPP?

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
<i>Article 24</i>	IT (Comments): It seems appropriate that the regulatory provisions concerning InvestEU should duly take into account, possibly under Articles 24 and/or 25, the opportunity, for the European instrument, to support and complement guarantee funds/instruments provided at national level, whose functioning may rely on a consolidated regulatory framework and on well-established mechanisms familiar to potential beneficiaries.
EU Compartment and Member States Compartment	ES (Comments): The Regulation should include an article on the MS compartment. The provisions in art. 10 of the current InvestEU Regulation should be discussed.
1. The ECF InvestEU Instrument shall consist of an EU Compartment and a Member State Compartment.	PT (Comments): On what conditions the Member State should participate? Private financial intermediaries can also participate?
	FR (Drafting suggestions): <u>The Member State compartment shall address specific market failures or suboptimal investment situations in one or several regions or Member States to deliver the policy objectives of the contributing funds</u>
2. Specific contributions to the ECF InvestEU Instrument under Article 5(1) may be made in accordance with Articles 211(2) and 221(2) of Regulation (EU, Euratom) 2024/2509. Specific contributions to the	PT (Drafting suggestions):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
budgetary guarantee under the ECF InvestEU Instrument shall result in an additional amount of the budgetary guarantee referred to in Article 21(3).	Add: 'Member State contributions for Defence actions may take the form of classified national funds and be managed under enhanced security rules. PT (Comments): For Defence: Ensure possibility of co-financing with classified national resources and reinforced confidentiality.
	ES (Drafting suggestions): <u>Article 24.2bis. Member State Compartments</u> <u>1. The establishment of the part of the EU guarantee under the Member State compartment according to Article 5 shall be subject to the conclusion of a contribution agreement between a Member State and the Commission.</u> <u>Two or more Member States may conclude a joint contribution agreement with the Commission.</u> <u>By way of derogation from Article 211(1) of the Financial Regulation, the provisioning rate of the EU guarantee under the Member State compartment shall be set in each contribution agreement to take account of the risks attached to the financial products intended to be used.</u> <u>2.The contribution agreement shall at least contain the following elements:</u> <u>(a) the overall amount of the part of the EU guarantee under the Member State compartment pertaining to the Member State concerned, its provisioning rate, the amount of the contribution from funds under shared management;</u> <u>(b) the Member State strategy, consisting of the financial products and their minimum leverage, the geographical coverage, including regional</u>

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	<u>coverage if necessary, types of projects, the investment period and, where applicable, the categories of final recipients and of eligible intermediaries;</u> <u>(c) the selected implementing partner or partners; (d) any contribution from funds under shared management;</u> <u>(e) the obligations to provide annual reports to the Member State, including reporting on the relevant indicators;</u> <u>(f) provisions on the remuneration for the part of the EU guarantee under the Member State compartment;</u> <u>(g) any combination with resources under the EU compartment, including in a layered structure to achieve better risk coverage.</u> <u>The contribution agreements shall be implemented by the Commission through guarantee agreements concluded with the implementing partners selected by the Member State. Where no guarantee agreement has been concluded within nine months from the conclusion of the contribution agreement, the contribution agreement shall be terminated or prolonged by mutual agreement. Where the amount of a contribution agreement has not been fully committed under one or more guarantee agreements within nine months from the conclusion of the contribution agreement, that amount shall be amended accordingly. The unused amount of provisioning attributable to amounts allocated by a Member State shall be paid back to the Member State.</u> ES (Comments): We suggest to take the main elements of art.10 of Regulation (EU) 2021/523, with the following adjustments: • The provisioning rate should be agreed between the Commission and the Member State

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	The guarantee agreement should be signed by the Commission and the Implementing Partner/Implementing Partners selected by the contributing MS. The Commission shall not be allowed to implement the MS Compartment through an IP different from the one/the ones selected by the contributing MS. FR (Drafting suggestions): <u>The establishment of the part of the EU guarantee under the Member State compartment shall be subject to the conclusion of a contribution agreement between a Member State and the Commission.</u> <u>By way of derogation from Article 211(1) of the Financial Regulation, the provisioning rate of the EU guarantee under the Member State compartment shall be set at 40 % and may be adjusted downwards or upwards in each contribution agreement to take account of the risks attached to the financial products intended to be used.</u> <u>The contribution agreement shall at least contain the following elements:</u> <u>(a) the overall amount of the part of the EU guarantee under the Member State compartment pertaining to the Member State concerned, its provisioning rate, the amount of the contribution from other funds, the constitution phase of the provisioning and the amount of the resulting contingent liability to be covered by a back-to-back guarantee provided by the Member State concerned;</u> <u>(b) the Member State strategy, consisting of the financial products and their minimum leverage, the geographical coverage, including regional coverage if necessary, types of projects, the investment period and, where applicable, the categories of final recipients and of eligible intermediaries;</u>

Proposal for a Regulation establishing the European Competitiveness Fund (doc. 13413/25)
 From: AT, BG, CZ, DE, FI, HR, IE, IT, LT, LU, MT, PT, BE, HU, ES, SE, SI, EL, FR, PL

Deadline: 15 October 2025 COB
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Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	<u>(c) the potential implementing partner or partners proposed and the obligation of the Commission to inform the Member State concerned of the implementing partner or partners selected;</u> <u>(d) any contribution from funds to the ECF InvestEU Advisory activities; (e) the obligations to provide annual reports to the Commission, including reporting on the relevant indicators related to the policy objectives covered in the funds programmes (f) provisions on the remuneration for the part of the EU guarantee under the Member State compartment;</u>
<i>Article 25</i>	

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
Community of implementing partners	DE (Comments): See above: Some provisions with regards to the scope of the partnership with the EIB and other Implementing Partners might warrant a closer look and reinstruction in the text. Overall, under the current InvestEU Regulation, the European Investment Bank is the central implementation partner of the EU guarantee. In our view, this partnership should continue given that the EIB is the bank of the EU and its Member States. EL (Comments): We have a scrutiny reservation. Taking into account recitals 69 and 70, we consider that the community of implementing partners should remain open to new partners, and don't rely only to existing implementing partners. FR (Comments): Cet article devrait mentionner les défis liés à la consolidation des rapports des différents partenaires afin d'assurer une gestion efficace de cet instrument.
1. The ECF InvestEU Instrument will be implemented by partners in an open architecture model, including the European Investment Bank (EIB) Group, international financial institutions, the national promotional banks and institutions.	IT (Drafting suggestions): The ECF InvestEU Instrument will be implemented by partners in an open architecture model, including with 75% of the EU guarantee granted to the

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	European Investment Bank (EIB) Group, <u>while the remaining 25% is granted to other implementing partners, including</u> international financial institutions, the national promotional banks and institutions. IT (Comments): A direct allocation of a share of InvestEU to EIB Group, as in the past (currently at least 75%) will pursue EU objectives, as the EIB Group applies and delivers EU policies. In addition, a stable and predictable allocation, ensures efficient programming foresight. In the past 10 years, including with EFSI, it boosted investment not otherwise financed in the market. The EIB Group finances large and transnational infrastructures, multicountry projects, not otherwise financed. Keeping the current access ensures operational continuity, efficiency in implementation and a stable institutional oversight for the achievement of the Union's objectives of competitiveness and strategic autonomy. Ex-ante known allocation allows the EU Bank to finance riskier operations, addressing market failure and suboptimal investment, in the whole EU membership. LU

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Drafting suggestions): 1. The ECF InvestEU Instrument will be implemented by <u>the European Investment Bank Group, in accordance with article 21, paragraph 3, point a, and other</u> ~~partners in an open architecture model, including the European Investment Bank (EIB) Group~~ international financial institutions <u>and</u> the national promotional banks and institutions. LU (Comments): Given its role under the Treaties as well as its capacity to operate in all Member States and the existing experience, based on the partnership established under Article 11 of the InvestEU Regulation, the EIB Group should remain a privileged implementing partner for the ECF InvestEU Instrument. MT (Comments): Malta believes that 75% of the financial resources of ECF InvestEU need to be earmarked to the EIB Group and that an interim evaluation should take place mid-way through the programming period. PT (Comments): Clarification about the role of National Promotional Banks. It is important to ensure that these institutions are able to act quickly to promote economic growth and employment. HU (Drafting suggestions):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	The ECF InvestEU Instrument will be implemented by partners in an open architecture model, including the European Investment Bank (EIB) Group, international financial institutions, the national promotional banks and institutions <u>with accepting the validity of the pillar assessments carried out by the Commission in accordance with Article 157 of Regulation (EU, Euratom) 2024/2059.</u> HU (Comments): Point 69 of the preamble to the draft regulation refers to the fact that guarantee agreements and pillar-based assessments concluded under the current InvestEU Regulation will also apply to the implementation of the ECF InvestEU. For the sake of clarity, it is proposed that this - in particular the continuation of the pillar-based evaluation - should also be reflected here, in the text of the regulation. SI (Drafting suggestions): 1. The ECF InvestEU Instrument will be implemented by partners in an open architecture model, including the European Investment Bank (EIB) Group, international financial institutions, the national promotional banks <u>and other national financial</u> institutions. SI (Comments): We suggest to add reference to other nacional financial institution since the financial instruments are implemented also through other financial institutions such as public funds.
	FR (Drafting suggestions):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	<u>National promotional banks and institutions that have successfully undergone a pillar assessment under the predecessor Regulations (EU) 2015/1017 and (EU) 2021/523, and that comply with all requirements and obligations stemming from previous agreements, shall be considered eligible for the ECF investment instrument</u> FR (Comments): Dispositions permettant aux partenaires de mise en œuvre d'InvestEU de soumettre de nouveaux accords de garantie sans avoir à subir une nouvelle évaluation du pilier.
2. By way of derogation from Article 211(5) of Regulation (EU, Euratom) 2024/2509, and subject to Article 12 of this Regulation, the implementation of a budgetary guarantee or financial instrument, including when combined with non-repayable support in a blending operation, may be entrusted to any entity referred to in Article 62(1), first subparagraph, point (c), of Regulation (EU, Euratom) 2024/2509.	
3. In addition to entities referred to in Article 62(1), first subparagraph, point (c), and Article 211(5) of Regulation (EU Euratom) 2024/2029, bodies established in a Member State, governed by the private law of a Member State or Union law may also be exceptionally entrusted, following a positive pillar assessment, with the implementation of a budgetary guarantee or financial instrument, including when combined with non-repayable support in a blending operation, to the extent that such bodies are provided with adequate financial guarantees which may be, for each action, limited to the maximum amount of the Union support. Those bodies governed by private law shall be selected with due account to the nature of the financial instrument or budgetary guarantee to be implemented, the experience and the financial and operational capacity, and their rules and procedures for verifying the economic viability of projects of final recipients. The selection	DE (Comments): We have some reservations with regards to bodies governed by private law as implementing partners: What is the reason for the addition, and does the Commission already have specific companies in mind? Please provide a concrete example. Could SEAPs qualify as possible implementing partners under Article 25(3)?

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
shall be transparent, justified on objective grounds and shall not give rise to a conflict of interests.	
Chapter III	PT (Comments): <u>Chapter III – General Comments</u> • SME-friendly by design Highlight the need for: two-stage applications, simplified payments (lump sums), an active service desk, and calls tailored to smaller ticket sizes. A specific KPI could also be envisaged. • Connection to skills and training Advocate that supported projects always include an upskilling/reskilling component, especially in digital, green transition, and mobility.
Project Advisory, SME Collaboration, skills development and Access to Funding	PT (Comments): NGOs, Civil society organizations could be considered as partners in several sectors.
SECTION 1	

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
PROJECT ADVISORY	PT (Comments): It is important to avoid duplication of efforts and to take advantage of structures already in place that work very closely with the EU companies and are boosters of this services like the Enterprise Europe Network. The work of the Enterprise Europe Network (EEN) with SMEs and startups in preparing for and accessing financial instruments is key and should be highlighted under this Article.
<i>Article 26</i>	PT (Comments): Ensure that the ECF's technical assistance and project advisory mechanism (Project Advisory) has direct access to local/regional entities and SMEs, including outermost regions (ORs). It is important that this advisory service be coordinated with specific clusters/sectors (e.g. maritime transportation, clean tech, renewables, digital), leveraging sectoral knowledge to improve the quality of supported projects.

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
Project Advisory	DE (Comments): In principle, we welcome the fact that companies and institutions have a central point of contact where they receive advice. Important for simplifying funding. The rationale and criteria for making public funds available to private applicants for business or investment advice (paragraphs 2a and 2b) must be significantly tightened, otherwise significant windfall effects could be expected. Shall the advice services also be valid for FP10 including the research part of the policy windows?
1. The Project Advisory shall be made available for repayable and non-repayable instruments. Actions and activities supported under this chapter shall contribute to the general objectives set out in Article 3(1) and shall support and complement, where relevant, activities under the other chapters.	IT (Drafting suggestions): The Project Advisory shall be made available for repayable and non-repayable instruments. Actions and activities supported under this chapter shall contribute to the general objectives set out in Article 3(1) and shall ~~support and~~ strategically complement and leverage, where relevant, activities under the other chapters. IT (Comments): Emphasises added value and alignment with other chapters. FR (Drafting suggestions): The Project Advisory shall be made available for repayable and non-repayable instruments. Actions and activities supported under this chapter shall contribute to the general objectives set out in Article 3(1) and shall support and complement, where relevant, activities under the other chapters.

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
2. A centralised access to advisory and business acceleration services shall be provided which may include:	SE (Drafting suggestions): A centralised access to advisory and business acceleration services shall be provided and shall be part financed by the recipients, which may include: PL (Drafting suggestions): <u>„2. A centralised access to advisory and business acceleration services shall be provided, ensuring accessibility and fair opportunities for companies and project promoters across all Member States, which may include”.</u> PL (Comments): Ensuring accessibility and equal treatment across all Member States in the provision of project advisory services is crucial to prevent geographical imbalances and to guarantee that enterprises in less developed innovation ecosystems are not disadvantaged. While efficiency and synergies are important, the absence of explicit safeguards creates a risk that advisory support and business acceleration services will be concentrated in Member States and regions with already well-developed innovation and financing environments. By explicitly incorporating accessibility and equal treatment into the rules for project advisory services, the Fund enhances inclusiveness, supports the integrity of the Single Market, and maximises its impact by unlocking untapped potential across all Member States, particularly in regions at risk of brain drain or structural disadvantage

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
(a) investment advisory services, including market development activities and advisory support for the identification, preparation, development, structuring, procuring and implementation of investment projects, and for enhancing the capacity of project promoters and financial intermediaries to implement financing and investment operations and improve the understanding and use of financial instruments to exploit their full potential. Such support may cover any stage of the life cycle of a project or financing of a supported entity;	IT (Drafting suggestions): investment advisory services, including market development activities and advisory support for the full life-cycle of investment projects, from identification, preparation, development, structuring, procuring and implementation of investment projects, and for enhancing the capacity of project promoters and financial intermediaries to implement financing and investment operations and improve the understanding and use of financial instruments to exploit their full potential. Such support may cover any stage of the life cycle of a project or financing of a supported entity; IT (Comments): The addition clarifies that advisory support covers the entire project life-cycle and strengthens the capacity of promoters and intermediaries to fully utilise financial instruments. Maintains consistency with previous proposals emphasizing clarity and alignment with EU terminology.
(b) business coaching and acceleration services targeting potential ECF beneficiaries and other project promoters, including SMEs and mid-cap companies, start-ups and scale-ups, supporting and facilitating their access to ECF funding and financing, and facilitating matchmaking with private investors and promoting financial literacy of entrepreneurs, including understanding of the opportunities offered by capital market based financing;	HR (Drafting suggestions): HR: HR suggest additional amendment. <i>b) business coaching and acceleration services targeting potential ECF beneficiaries and other project promoters, including SMEs and mid-cap companies, start-ups and scale-ups, supporting and facilitating their access to ECF funding and financing, and facilitating matchmaking with private investors and promoting financial literacy of entrepreneurs, including understanding of the opportunities offered by capital market based financing; as well as support for improving managerial and governance capacities of SMEs.</i>

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	HR (Comments): HR suggests including a reference to strengthening managerial and governance capacities to reflect the needs of smaller companies IT (Drafting suggestions): business coaching and acceleration services targeting potential ECF beneficiaries and other project promoters, including SMEs and mid-cap companies, start-ups and scale-ups, aimed at supporting and facilitating ~~their~~ access to ECF funding and financing, ~~and~~ facilitating matchmaking with private investors, and promoting financial literacy of entrepreneurs, including understanding of the opportunities offered by capital market based financing; IT (Comments): Condenses repetitive phrasing PL (Drafting suggestions): „business coaching and acceleration services targeting potential ECF beneficiaries and other project promoters, ~~including~~ especially SMEs and mid-cap companies, start-ups and scale-ups, supporting and facilitating their access to ECF funding and financing, and facilitating matchmaking with private investors and promoting financial literacy of entrepreneurs, including especially understanding of the opportunities offered by capital market based financing” PL (Comments):

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	Strengthening small and medium-sized enterprises (SMEs), mid-caps, start-ups, and scale-ups is of particular importance for the EU's strategic objectives, as well as for the goals of the ECF. Therefore, placing greater emphasis on these entities in project advisory services will help achieve these objectives more effectively.
	CZ (Drafting suggestions): <u>(d) specific advisory services for first-time applicants and Member States referred to in paragraph 3 of Article 12;</u> CZ (Comments): CZ - Although CZ recognize the importance of supporting excellence within the ECF, we believe that no Member State can be left behind. Moreover, further widening of disparities between Member States must be avoided. Ensuring geographically balanced participation and fostering integration of stakeholders from all Member States into wider European industrial and innovation value chains, whilst ensuring fair and effective access to support mechanisms within the ECF is therefore a fundamental prerequisite for strengthening the overall competitiveness and resilience of the EU. Thus, we propose to add new par. (d). HR (Drafting suggestions): HR: HR suggest adding a new letter d) to Art. 26 paragraph 2 with a wording: <i>(d) specific advisory services for first-time applicants and Member States referred to in paragraph 3 of Article 12;</i> PT

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Drafting suggestions): adding a new letter: (c) specific advisory services for first-time applicants and Member States referred to in paragraph 3 of Article 12; PT (Comments): We believe that ensuring a geographical balanced participation and fostering integration of stakeholders from all Member States into European industrial and innovation value chains is critical for strengthening the overall competitiveness and resilience of the EU. Therefore, we need to ensure fair and effective access to support mechanisms within the ECF, mitigating the risk that many entities from certain Member States - especially those with relatively limited experience with Union-level instruments - will not be able to participate in collaborative efforts. BE (Drafting suggestions): <u>(c) providing ex ante knowledge about existing funding opportunities for SMEs, providing business with the opportunity to participate in the services specified in points (a) and (b) of this paragraph.</u> BE (Comments): Providing services such as coaching and advise is much needed for many SMEs. However, before they can benefit from these services they must be aware of their existence, which is often not the case when it comes to European funding. SI

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Drafting suggestions): <u>(c) specific advisory services for first-time applicants and Member States referred to in paragraph 3 of Article 12;</u> SI (Comments): To make European projects truly European there is a need for more balanced distribution of funding across the Member States. Otherwise, we risk that many entities from certain Member States – especially those with relatively limited experience with Union-level instruments - will not be able to participate in collaborative efforts. We therefore advocate for the introduction of measures that would better safeguard such balance within ECF.
3. Project advisory shall, among others, support the generation of project pipelines and the development of potential investment projects under the ECF InvestEU Instrument and contribute to their further development. Project advisory shall also cooperate with industrial alliances and European clusters <u>or other relevant European groupings</u>. ~~Project advisory~~ <u>It</u> shall be available under each policy window ~~referred~~, covering <u>all relevant</u> sectors ~~under that window~~. ~~In addition, advisory, and may also provide~~ support ~~may cover general objectives and~~ <u>for</u> cross-cutting actions <u>and general objectives</u>.	CZ (Drafting suggestions): Project advisory shall, among others, support the generation of project pipelines and the development of potential investment projects under the ECF InvestEU Instrument and contribute to their further development. Project advisory shall also cooperate with industrial alliances and European clusters or other relevant European groupings. It shall be available <u>in each Member State</u> under each policy window, covering all relevant sectors, and may also provide support for cross-cutting actions and general objectives. IE (Drafting suggestions): Project advisory shall also cooperate with industrial alliances and European clusters <u>including regional business networks and/or nascent, sector-specific clusters, or other relevant European groupings</u>. IE

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Comments): IE notes the draft assumes existing clusters are sufficient. The EU, and the Fund, should encourage new cluster formation and support SMEs to organise and access funding collaboratively, to address the need for knowledge and capacity-building. Suggested text amendment SE (Comments): Welcome the suggested broadening.
4. The Commission may conclude advisory agreements with advisory partners and service providers in line with the needs of each policy windows. The Commission and the advisory partners, including the EIB Group, shall cooperate closely with a view to ensuring efficiency, synergies and effective geographic coverage across the Union, while taking account of existing structures and work.	BG (Comments): We suggest the EC to use the currently developed national Governing Bodies providing european funding for SMEs and their experienced experts in the process of evaluation of projects. CZ (Comments): CZ - We consider it necessary to include National Contact Points of previous programmes as Member States can built on their knowledge and linkages as well as advisory services. IT (Drafting suggestions): The Commission may conclude advisory agreements with advisory partners and service providers in line with the needs of each policy windows. The Commission and the advisory partners, including the EIB Group, shall cooperate closely with a view to ensuring efficiency, synergies and effective geographic coverage across the Union, while taking into account of existing structures and work. IT

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Comments): This revision corrects minor wording issues LU (Drafting suggestions): 4. The Commission may conclude advisory agreements with the EIB Group and other advisory partners and service providers in line with the needs of each policy windows. The Commission and the advisory partners, including the EIB Group, shall cooperate closely with a view to ensuring efficiency, synergies and effective geographic coverage across the Union, while taking account of existing structures and work. PT (Comments): Investment in project advisory services and skills development support is very positive, and it is important to ensure that these services are made available in a decentralized manner and are accessible to SMEs in the Member States. BE (Comments): Advisory services must ensure broad geographical and sectoral coverage of these services and their articulation with existing regional schemes. FR (Drafting suggestions): The Commission may conclude advisory agreements with advisory partners and service providers in line with the needs of each policy windows. The Commission and the advisory partners, including the EIB Group, shall cooperate closely with a view to ensuring efficiency, synergies and effective geographic coverage across the Union, while taking account of existing structures and work.

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	FR (Comments): La Commission peut-elle garantir que les principes d'excellence, de préférence européenne et de renforcement de notre autonomie stratégique resteront les seuls principes directeurs des actions de ce fonds ? PL (Drafting suggestions): <u>„The Commission may conclude advisory agreements with advisory partners and service providers in line with the needs of each policy windows. The Commission and the advisory partners, including the EIB Group, shall cooperate closely with a view to ensuring efficiency, synergies and effective geographic coverage across the Union, as well as the cohesion of the Single Market, while taking account of existing structures and work and guaranteeing fair and non-discriminatory access for companies and project promoters in all Member States, with particular attention to regions with lower innovation and advisory capacity”</u> PL (Comments): A clear reference to the “coherence of the Single Market” ensures that the advisory activities under the Fund are not limited solely to efficiency and synergies, but also actively contribute to sustainable development across the Union. The Single Market is the foundation of the EU; however, inequalities between Member States and regions in access to advisory services, financial instruments, and innovation ecosystems create a risk of fragmentation.

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	This addition ensures that the advisory dimension of the Fund supports inclusiveness and accessibility in all Member States, including those with less developed advisory ecosystems. It also guarantees that the Fund's support contributes to strengthening the integrity and unity of the Single Market, avoiding the risk of uneven access to services or deepening existing inequalities. In this way, the reference to coherence ensures both fairness and efficiency in the implementation of advisory support. It enables the creation of tailored partnerships that maximize outreach, avoid duplication of activities, and leverage the knowledge of existing advisory networks, ensuring cost-effective and well-coordinated services.
	CZ (Drafting suggestions): <u>4a The Commission shall support the establishment of an advisory structure at national level, including technical assistance, to be managed by the Member States, which may, at their discretion, further extend such advisory services to the regional level.</u> CZ (Comments): CZ - We consider it necessary to ensure the provision of advisory services at the level of the Member State. In order to incentivise applicants to submit projects, they need a reliable point of support. Member States already have established structures which may serve as a basis for this purpose. Moreover, these actors are familiar with the environment in which the project will be implemented. For these reasons, it is essential to involve the Member States directly in the advisory process. LU

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Drafting suggestions): 4a. <u>The EIB Group shall be allocated an amount corresponding to at least [XX]% of the budget earmarked for the advisory support mechanism under Article 4.2(a) for advisory initiatives implemented under the ECF.</u>
5. Irrespective of the instrument of budget implementation for the acquisition or provision of advisory services, providers and recipients of the services shall be selected in accordance with the principles of transparency and equal treatment, avoidance of conflict of interest, including conflicting professional interests.	
6. When implementing the Project Advisory, the Commission, its advisory partners and other service providers shall, when appropriate, collaborate with other Union or national public or private advisory and support service providers, including the EU for Business Network.	SE (Drafting suggestions): When implementing the Project Advisory, the Commission, its advisory partners and other service providers shall, when appropriate, collaborate with other Union or national public or private advisory and support service providers, including the EU for Business Network. <u>National advisory and support service providers can be sub-contracted as advisory partners for the ECF, in order not to duplicate national structures on EU level.</u>
SECTION 2	PT (Comments): Effectively make the ECF SME-friendly, as provided for in Articles 27-29, by adopting two-stage applications, broader use of lump sums (fixed-amount financing), and administrative simplification in procedures. It is also suggested that a dedicated support service (helpdesk) be created and indicative targets for SME participation in funded projects be defined.

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
SME COLLABORATION	DE (Comments): The ECF replaces the SME-specific funding and support landscape (in the current MFF). We therefore welcome this SME-specific Section as it is imperative to guarantee a visible EU SME funding and strong supporting system for SMEs in the ECF. We recall the consistent application of the COM's "SME first" principle. Which parts of the SME pillar of the Single Market Programme will be included in the ECF? Which will go beyond that?
<i>Article 27</i>	
EU for Business Network	
4. —“EU for Business” Network shall be established to help Union businesses become more competitive and innovate, grow and scale in the Single Market and beyond, with a particular emphasis on SMEs, startups, scaleups and small mid-cap companies. The network shall have a Union-wide and geographically balanced coverage, taking into account the specificities of all types of regions in the Union, including the less developed regions, <u>transition regions</u> , and the Union outermost regions.	DE (Comments): We highly welcome the fact that the demonstrably successful Enterprise Europe Network (EEN) is to be continued with an extended mandate within the framework of the EU for Business Network. However, this mandate can only be successful if the network is <u>adequately resourced</u> and relieved of internal network bureaucracy HR (Comments): It is necessary to further clarify whether the new network will fully replace the existing initiatives in the long term (for example, the Enterprise Europe Network (EEN)) or whether it will act as an overarching framework that brings them together and coordinates them IE

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	(Drafting suggestions): The network shall have a Union-wide and geographically balanced coverage, taking into account the specificities of all types of regions in the Union, including the less developed regions, transition regions, and the Union outermost regions. The network shall also include tailored outreach, and support communications campaigns, aimed at SMEs. IE (Comments): IE recommended to include clear performance indicators for SME engagement and outcomes IE notes that SMEs need more targeted outreach and practical support mechanisms to boost uptake. A ‘marketing campaign’ approach would speak to SMEs in their own business language (plain and straightforward) and recognise their limited capacity for engaging with EU programmes. It would link as seamlessly as possible with activities under Article 26 Project Advisory MT (Comments): The network shall be composed of the competence centres selected by the Commission, with a minimum of one such centre per Member State. SE (Drafting suggestions): “EU for Business” Network shall be established to help Union businesses become more competitive and innovate, grow and scale in the Single Market and beyond, with a particular emphasis on SMEs, startups, scaleups and

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	small mid-cap companies. The network shall have a Union-wide and geographically balanced coverage, taking into account the specificities of all types of regions in the Union, including the less developed regions, ~~transition regions~~, and the Union outermost regions. SE (Comments): Transition regions should be removed because there is no definition. What is the difference between the less developed regions and transition regions? EL (Drafting suggestions): 1. “EU for Business” Network shall be established to help Union businesses become more competitive and innovate, grow and scale in the Single Market and beyond, with a particular emphasis on SMEs, startups, scaleups and small mid-cap companies. The network shall have a Union-wide and geographically balanced coverage, taking into account the specificities of all types of regions in the Union, including the less developed regions, <u>transition regions, insular areas</u> and the Union outermost regions. EL (Comments): Insular areas are also areas with specificities where businesses face greater challenges and deserve specific attention. FR (Drafting suggestions):

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	“EU for Business” Network shall be established to help Union businesses become more competitive and innovate, grow and scale in the Single Market and beyond, with a particular emphasis on SMEs, startups, scaleups and small mid-cap companies. The network shall have a Union-wide and geographically balanced coverage, taking into account the specificities of all types of regions in the Union, ~~including the less developed regions, transition regions, and the Union outermost regions.~~ FR (Comments): La Commission peut-elle garantir que les principes d'excellence, de préférence européenne et de renforcement de notre autonomie stratégique resteront les seuls principes directeurs des actions de ce fonds ? Que signifie concrètement une “couverture équilibrée” ? Cela impliquera-t-il une approche préférentielle en faveur des pays moins représentés, ou une approche alignée sur le niveau des contributions financières de chaque pays ? PL (Drafting suggestions): “EU for Business” Network shall be established to help Union businesses become more competitive and innovate, grow and scale in the Single Market and beyond, with a particular emphasis on SMEs as a priority and also including startups, scaleups and small mid-cap companies. The network shall have a Union-wide and geographically balanced coverage, taking into account the specificities of all types of regions in the Union, including the less developed regions, transition regions, and the Union outermost regions. PL (Comments):

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	Given that SMEs account for 99% of the enterprise population, support under the ECF should primarily target them. The extension of proposed measures to SMCs should not take place automatically or without thorough assessment. It is worth highlighting that, in accordance with the “Think Small First” principle set out in the SBA, the specific needs of SMEs should be duly taken into account. Given the specific characteristics of SMEs, in particular the structural limitations in terms of human and financial resources, which may impede their access to funds from the ECF, it would be advisable to grant SMEs clear priority or to clearly single them out as a priority group among the intended beneficiaries – including, where appropriate, small mid-cap companies (SMCs). We underline the strong need to reinforce the focus on SMEs in the relevant provisions of the ECF proposal.
	MT (Drafting suggestions): <u>2. Centres for competitive excellence shall perform all or some of the following activities to the benefit of and in close cooperation with the Union industry, in particular SMEs and mid-caps, as well as research and technology organisations, universities, and the public sector and other relevant stakeholders across the value chains referred to in paragraph 2 of article 3:</u> <u>(a) raising awareness and providing the necessary know-how, expertise and skills to the stakeholders to help them accelerate the development of new technologies, scale-up manufacturing, design options and concepts as well as the integration of new technologies, by effectively using the infrastructure and other available resources of the network;</u> <u>(b) raising awareness and providing or ensuring access to expertise, know-how and services, including system design readiness, building minimum viable products and prototypes, new and existing pilot lines and supporting actions necessary to build skills and competences supported by the Instrument;</u>

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	<u>(c) facilitating access to testing facilities, knowledge and good practices and encouraging joint programmes and collaboration by effectively using the infrastructure and other available resources of the network;</u> <u>(d) developing and managing specific training actions on technologies and their applications to support the development of the talent pool, by skilling and reskilling, and to increase the number of students as well as the quality of education in relevant fields of studies up to PhD level at schools and universities located in the Union by facilitating connections between students and industry across the Union, while paying particular attention to women's participation.</u> <u>(e) in collaboration with the network of National Contact Points, the centre will promote the use of the European Competitiveness Fund, Horizon Europe as well as other relevant instruments for the purpose of meeting the objectives of this instrument.</u> <u>3. Member States shall designate at least one candidate centres of competitive excellence in accordance with their national procedures, administrative and institutional structures through an open and competitive process.</u> <u>Commission is empowered to adopt delegated acts in accordance with Article 84 to specify the selection criteria as well as further details on the implementation of the tasks and functions referred to in this Article.</u> <u>4. The centres for competitive excellence shall have substantial overall autonomy to lay down their organisation, composition and working methods. The organisation, composition and working methods of the centres shall comply with and contribute to the objectives of this Regulation.</u> MT <u>(Comments):</u>

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	Based on the lessons learnt from initiatives under the current MFF period, we believe that building a network of specialised competence centres with the objective of making available resources found throughout the network to reinforce excellence and competitiveness.
<i>Article 28</i>	
Business support	IE (Comments): IE would welcome prioritisation of outlined supports here PT (Comments): The work of the Enterprise Europe Network (EEN) with SMEs and startups in preparing for and accessing financial instruments is key and should be highlighted under this Article. EEN provides precisely the services foreseen—advice, internationalization, access to financing, and partnerships—making it the natural channel to achieve the business support objectives of the ECF.
1. The ECF shall conduct cross-cutting activities focused on strengthening the competitiveness of the SMEs and achieve additionality at Union level, including through the following measures:	BG (Comments): It is important to ensure that the ECF complements the Horizon Europe programme without unnecessary overlaps, while providing equal access and broad availability for small and medium-sized enterprises (SMEs) and supporting economic convergence between Member States. Advisory support should be directed towards business associations, specialised associations and organisations, as well as the authorities of the Member States. SE (Drafting suggestions):

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	The ECF shall, <u>including by using national advisory and support service providers</u>, conduct cross-cutting activities focused on strengthening the competitiveness of the SMEs and achieve additionality at Union level, including through the following measures: SE (Comments): There should be opportunity for sub-contracting national business advice services, to avoid market distortion and overlapping structures. PL (Drafting suggestions): „The ECF shall conduct cross-cutting activities focused on strengthening the competitiveness of the SMEs, while ensuring accessibility and fair opportunities for these entities across all Member States, including through the following measure” PL (Comments): Ensuring accessibility and equal treatment in the cross-cutting ECF actions for SMEs is essential to prevent the concentration of support in regions with already well-developed innovation ecosystems. Without explicit consideration of inclusiveness, SMEs and small mid-caps in less developed Member States or peripheral regions may lack the resources, networks, or expertise to fully benefit from EU-level support.
(a) provision of integrated business advice and support to companies, including through financial support to third parties;	PL (Drafting suggestions): „a) provision of integrated business advice and support to companies, with particular attention to companies in regions with lower innovation.

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	investment and absorption capacity, including through financial support to third parties” PL (Comments): As above
(b) provision of partnering opportunities and capacity building;	IE (Comments): IE recommend introducing capacity-building an advisory support for smaller Member States to aid geographical balance
	IE (Comments): IE recommend including clear performance indicators for SME enagement and outcomes
(c) support and assistance for access to technologies, technology infrastructure and facilities, support market uptake of innovation and support business organisations, SMEs and small mid-cap companies, including startups and scaleups, to participate in collaborative platforms and sectors;	FI (Drafting suggestions): <u>support and assistance for access to technologies, technology infrastructure and facilities (including investments) and services of research performing organisations, such as legal knowledge, support market uptake of innovation and support business organisations, SMEs and small mid-cap companies, including startups and scaleups, to participate in collaborative platforms and sectors;</u> EL (Drafting suggestions): (c) support and assistance for ensuring equal access to technologies, technology infrastructure and facilities, support market uptake of innovation

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	and support business organisations, SMEs and small mid-cap companies, including startups and scaleups, to participate in collaborative platforms and sectors; EL (Comments): We should ensure equal access to technologies, infrastructures, digital services for all businesses, especially SMEs, across all regions of EU. FR (Drafting suggestions): support and assistance for access to technologies, technology infrastructure and facilities, support market uptake of innovation and support business organisations, SMEs and small mid-cap companies, including startups and scaleups, to participate in collaborative platforms and sectors; PL (Drafting suggestions): “support and assistance for access to technologies, technology infrastructure and facilities, support market uptake of innovation and support business organisations especially for SMEs and also small mid-cap companies, including startups and scaleups and business organisations, to participate in collaborative platforms and sectors”; PL (Comments): Given that SMEs account for 99% of the enterprise population, support under the ECF should primarily target them. The extension of proposed measures to SMCs should not take place automatically or without thorough assessment. It is worth highlighting that, in accordance with the “Think Small First” principle set out in the SBA, the specific needs of SMEs should be duly taken into

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	account. Given the specific characteristics of SMEs, in particular the structural limitations in terms of human and financial resources, which may impede their access to funds from the ECF, it would be advisable to grant SMEs clear priority or to clearly single them out as a priority group among the intended beneficiaries – including, where appropriate, small mid-cap companies (SMCs). We underline the strong need to reinforce the focus on SMEs in the relevant provisions of the ECF proposal.
(d) promoting business understanding of Union policies, obtaining feedback on their effectiveness;	PL (Drafting suggestions): „The ECF shall engage businesses to enhance understanding of Union policies, collect feedback on their effectiveness, and inform policy refinement” PL (Comments): The new proposed wording aims to create a feedback loop between SMEs and policymakers, enhancing policy relevance and business engagement.
(e) increasing the access and the availability of finance for SMEs including micro-finance and support to social enterprises, and for small mid-cap companies;	AT (Comments): Financing or funding measures for small mid-caps must not be at the expense of SMEs. SMEs (especially micro and small enterprises) cannot be compared to SMCs, not even in terms of their financing needs. At the same time, SMEs form the broad base of the European economy. AUT's concern is that SMCs will compete with SMEs for funding and financing, as access to and availability of financing for SMEs and SMCs are mentioned in one sentence. This has to be avoided.

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	DE (Drafting suggestions): (e)increasing the access and the availability of finance for SMEs including micro-finance and support to social enterprises, ~~and for small mid-cap companies;~~ DE (Comments): Budgetary measures intended for SMEs should be granted exclusively to them and not reallocated to other categories of companies. PL (Drafting suggestions): „increasing the access and the availability of finance for SMEs as a priority, including micro-finance and support to social enterprises, and for small mid-cap companies” PL (Comments): It is worth emphasising that, in accordance with the “Think Small First” principle set out in the SBA, the specific needs of SMEs should be duly taken into account. Considering the particular characteristics of SMEs—especially structural limitations in human and financial resources, which may hinder their access to ECF funds—it is proposed that the relevant provisions be amended to explicitly reflect the need to grant SMEs preferential treatment compared to other categories of enterprises, such as small mid-caps (SMCs).
(f) facilitation access to markets including through support to the internationalisation of SMEs and provision of market intelligence, including in less developed regions, transition regions , and outermost regions;	DE (Comments):

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	The addition of “transition regions” is fine for us. In our view, this addresses the call of some member states to ensure a level-playing field in the access to funding. However, we oppose further additions to this paragraph. BE (Drafting suggestions): (f) facilitation access to markets including through support to the internationalisation of SMEs and provision of market intelligence, including in less developed regions, <u>transition regions</u>, and outermost regions; BE (Comments): It should include all regions and not single out a few and leave out others. Alternatively it could end with ‘in all regions’ if we want to stress that. SE (Drafting suggestions): facilitation access to markets including through support to the internationalisation of SMEs and provision of market intelligence, including in less developed regions, <u>transition regions</u>, and outermost regions; SE (Comments): Transition regions should be removed because there is no definition. What is the difference between the less developed regions and transition regions? EL (Drafting suggestions): (f) facilitation access to markets including through support to the internationalisation of SMEs and provision of market intelligence, including in less developed regions, <u>transition regions</u>, <u>insular areas</u> and outermost regions;

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	EL (Comments): See similar comment in article 27 FR (Drafting suggestions): facilitation access to markets including through support to the internationalisation of SMEs and provision of market intelligence, ~~including in less developed regions, transition regions, and outermost regions;~~ FR (Comments): La Commission peut-elle garantir que les principes d'excellence, de préférence européenne et de renforcement de notre autonomie stratégique resteront les seuls principes directeurs des actions de ce fonds ?
(g) improving the business environment for SMEs and promote new business opportunities for SMEs by supporting among others intellectual property valorisation, standard setting and public procurement;	BE (Drafting suggestions): (g) improving the business environment for SMEs and promote new business opportunities for SMEs by supporting among others <u>their transition to more sustainable business models</u>, intellectual property valorisation, standard setting and public procurement; BE (Comments): The Sustainability advisory services already developed by the Enterprise Europe Network since 2021 should be anchored in this regulation to ensure their perenity as the green transition of SMEs will be crucial for the green transition of our economy, as shown inter alia in the latest State of Europe's environment 2025 with a positive note for Belgium :'' SMEs are increasingly

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	seeing sustainability as a strategic advantage. In Belgium, 65 % of SMEs rated reducing their ecological footprint as mediumtohigh importance in 2023, up from 59 % in 2022, and most view green activities as a way to gain competitive edge.”.
(h) promoting entrepreneurship, including women and youth entrepreneurship and the acquisition of entrepreneurial and business skills.	BG (Comments): Support for women and youth entrepreneurship should include support for small family businesses, creative industries and crafts, which should be considered as a key factor for sustainable growth. HR (Drafting suggestions): HR: HR suggest additional amendment. <i>h) promoting entrepreneurship, including women and youth entrepreneurship and the acquisition of entrepreneurial and business skills, particularly towards fostering entrepreneurship in less developed regions.</i> HR (Comments): HR proposes reinforcing the reference to regional balance by highlighting the importance of entrepreneurship support in less developed areas SI (Drafting suggestions): (h) promoting entrepreneurship, including women and youth entrepreneurship and the acquisition of <u>design thinking, design management</u>, entrepreneurial and business skills. SI (Comments):

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	Promoting design thinking and design management skills in SMEs is of utmost importance, since these skills and knowledge strongly contribute to innovation performance of SMEs. PL (Drafting suggestions): „The ECF shall promote entrepreneurship—with particular emphasis on women and youth—through dedicated training, mentoring and skills-development programmes.” PL (Comments): The proposal strengthens the diversity and renewal of the entrepreneurial ecosystem by supporting underrepresented groups and equipping them with key business and innovation skills.
	CZ (Drafting suggestions): <u>2. The Actions within the ECF should allow SMEs participation and be designed accordingly.</u> CZ (Comments): CZ welcomes dedicated SME actions. However, this should not limit the participation of SMEs in non-dedicated actions. It is imperative that all actions allow SMEs to participate. BE (Drafting suggestions): <u>(i) providing SMEs with ex ante guidance for which European funding they might be eligible, including this Regulation;</u>

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	BE (Comments): The risk of this European Competitiveness Fund is that funding will not reach SMEs. This due to a lack of administrative power in SMEs but also because of a lack of knowledge of which European funding might be applicable to them.
<i>Article 29</i>	
Dedicated SME Actions to increase SME participation	BG (Comments): It is necessary to provide a more detailed specification of the resources allocated for SMEs
1. — Each window shall support dedicated, sector-specific actions targeting start-ups, SMEs and small mid-cap companies or calls for SMEs in strategic sectors with a view to fostering innovation, business acceleration, commercialisation and scaling-up.	AT (Comments): Will the budget for these actions come from the horizontal window “Project advisory, SME collaboration and skills” or from the 4 policy windows? BG (Comments): The draft regulation must include a separate programme with a separate budget to promote the development of European small and medium-sized enterprises. The lack of such Programme puts at risk the main objective of the European Competitiveness Fund. The inclusion of large enterprises under the cover of mid-cap enterprises means less funding, less opportunities and worse participation in value chains and innovations for SMEs. DE (Drafting suggestions):

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	Each window shall support dedicated, sector-specific actions targeting ~~start-ups, SMEs and small mid-cap companies~~ or calls for SMEs in strategic sectors with a view to fostering innovation, business acceleration, commercialisation and scaling-up. DE (Comments): We very much welcome this Article calling for specific, dedicated SME provisions. It is duly important, that whilst foreseeing these dedicated measures for SMEs their general participatory capabilities shouldn't be harmed. Support measures for SMEs or budgetary measures intended for SMEs should be granted exclusively to them and not reallocated to other categories of companies. Whilst start-ups are covered within the current SME-definition, SMCs are specifically not. FI (Drafting suggestions): <u>Each window shall support dedicated, sector-specific actions targeting start-ups, SMEs and small mid-cap companies or calls for SMEs in strategic sectors with a view to fostering business acceleration as well as technology creation, maturation, and adoption innovation, for the commercialisation and scaling-up of innovative products and services by SMEs. This includes actions to improve access of SMEs to technology capabilities and infrastructures.</u> PT (Comments): Is this foreseen under the Horizon Europe part of the policy windows? What type of actions can be expected?

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	Again, support must be made available in a decentralized manner and accessible to SMEs in all Member States. ES (Drafting suggestions): Each window shall support dedicated, sector-specific actions targeting start-ups and SMEs. ~~and small mid-cap companies or calls for SMEs in strategic sectors with a view to fostering innovation, business acceleration, commercialisation and scaling-up.~~ ES (Comments): The current wording seems to restrict support to SMEs to only certain sectors, deemed innovative. Although small midcaps needs could also be addressed specifically, those should be addressed separately from SMEs', since financial restrictions are different for each group of companies. SE (Drafting suggestions): Each window shall support dedicated, sector-specific actions targeting innovative start-ups, SMEs and small mid-cap companies or calls for SMEs ~~in strategic sectors~~ with a view to fostering innovation, business acceleration, commercialisation and scaling-up and without crowding out private investments. FR (Drafting suggestions): Each window shall support dedicated, sector-specific actions targeting start-ups, SMEs and small mid-cap companies, groupings of such actors, or calls for SMEs in strategic sectors with a view to fostering innovation, business acceleration, commercialisation and scaling-up.

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	PL (Drafting suggestions): Each window shall support dedicated, sector-specific actions targeting start-ups, SMEs and small mid-cap companies or calls for ~~SMEs the above group of enterprises~~ in strategic sectors with a view to fostering innovation, business acceleration, commercialisation and scaling-up. PL (Comments): Given that SMEs account for 99% of the enterprise population, support under the ECF should primarily target them. The extension of proposed measures to SMCs should not take place automatically or without thorough assessment. It is worth highlighting that, in accordance with the “Think Small First” principle set out in the SBA, the specific needs of SMEs should be duly taken into account. Given the specific characteristics of SMEs, in particular the structural limitations in terms of human and financial resources, which may impede their access to funds from the ECF, it would be advisable to grant SMEs clear priority or to clearly single them out as a priority group among the intended beneficiaries – including, where appropriate, small mid-cap companies (SMCs). We underline the strong need to reinforce the focus on SMEs in the relevant provisions of the ECF proposal.
	CZ (Drafting suggestions): <u>2. At least 30 % of the financial envelope for each window shall be allocated to sector-specific actions or calls for start-ups and SMEs.</u> CZ (Comments):

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	CZ - EU documents have stated that SMEs play an ever more important role as agile providers of disruptive technologies and innovation. However, access to finance remains a major concern for more than 40 % of SMEs. They also have fewer opportunities than in the US or in the UK. It is, for example, estimated that the SMEs received only approx. 16 % allocated budget of the EDF. There also remain a significant grant request oversubscription for various SMEs calls, which prevents us from financing high-quality projects. The EU should provide SMEs with further opportunities to contribute to various ECF targets / objectives. Unlike European “primes” that can raise finances from other sources, the SMEs need out dedicated support, which will not only lead to new innovative products, but also to a more competitive EDTIB. HR (Drafting suggestions): HR: HR suggest additional paragraph. <i>To ensure effective participation of SMEs across sectors, the ECF will also provide for dedicated instruments or simplified calls specifically tailored to the needs of smaller enterprises, including those that are not primarily technology-intensive but contribute to strategic objectives through process, product or service innovation. These mechanisms should ensure proportionate administrative requirements, streamlined application procedures and digital access to relevant support tools.</i> HR (Comments): HR suggest dedicated action regarding smaller enterprises that are not primarily technology-intensive. ES

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	(Drafting suggestions): <u>An amount of EUR [X] of the amount referred to in the paragraph 1 of Article 4 shall be allocated for SMEs.</u> ES (Comments): The Regulation should be more clear and specific on the support granted to SMEs, including by ringfencing a specific amount for this purpose (ideally, differentiated for each window).
Article 30	PT (Comments): Strengthen the link between funded projects and national qualification policies. Specifically, ensure that projects in the digital, infrastructure or green transition areas always incorporate a training and upskilling/reskilling component.
Support for skills development	DE (Comments): It is important that national competences on education laid down in Article 165 and 166 TFEU are not touched upon by the activities foreseen in this article. In principle, supporting skills development strengthens competitiveness and competences and supports the creation of high-quality jobs. In this context, it is unclear why Art. 30 and the accompanying recital 21 does not touch upon complementarity and synergies with the Union of Skills as well as the ESF and its existing structures (especially with regard to life-long learning as well as up- and reskilling of employees). We should not duplicate ESF funding.

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4.——The ECF shall finance activities in support of skills development, in particular in the strategic sectors, building strong links between higher education, vocational education and training providers, applied research and businesses for an agile, innovative and competitive economy. This shall include support for a European Skills Guarantee to support value chain transitions in favour of strategic growth sectors or occupations across the labour market through upskilling and reskilling of the workforce and Vocational Education and Training (VET) partnerships to strengthen cooperation between VET providers and businesses, especially SMEs and connecting them with regional industrial ecosystems.	AT (Drafting suggestions): The ECF shall finance activities in support of skills development, in particular in the strategic sectors, building strong links between higher education, research and technology organisations, vocational education and training providers, applied research and businesses for an agile, innovative and competitive economy. This shall include support for a European Skills Guarantee to support value chain transitions in favour of strategic growth sectors or occupations across the labour market through upskilling and reskilling of the workforce and Vocational Education and Training (VET) partnerships to strengthen cooperation between VET providers and businesses, especially SMEs and connecting them with regional industrial ecosystems. DE (Drafting suggestions): 4.——The ECF shall finance activities in support of skills development, in particular in the strategic sectors, building strong links between higher education, vocational education and training providers, applied research and businesses for an agile, innovative and competitive economy. This shall include support for a European Skills Guarantee to support value chain transitions in favour of strategic growth sectors or occupations across the labour market through upskilling and reskilling of the workforce and Vocational Education and Training (VET) partnerships to strengthen cooperation between VET providers and businesses, especially SMEs and connecting them with regional industrial ecosystems. <u>These actions shall ensure complementarity to those of the ESF.</u> DE (Comments):

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	There is a need further specify the activities foreseen in this article. We would be happy to receive examples of possible implementation IE (Comments): IE would like to expand scope to include public sector digital skills and innovation training, ensuring Member State readiness for implementing ECF-funded projects IT (Comments): Define more clearly the complementarity between ECF financial support for skills in strategic sectors (<i>clean transition and industrial decarbonisation; digital leadership; health, biotechnology and bioeconomy; resilience, defence and space</i>) and the Erasmus+ programme in the field of lifelong learning, skills and talent development, and attracting human capital in terms of mobility (consider, for example, the opportunity for scholarships in strategic sectors such as green tech, AI, cyber, etc. under the <i>first strategic axis “learning opportunities for all”</i>). Further elements of synergy/complementarity can be seen between the Erasmus+ <i>strategic axis 2 “capacity building”</i> and Articles 27-30 of the proposed ECF Regulation with regard to “<i>support for skills development</i>” and the establishment of “<i>strong links between higher education, VET providers and businesses</i>”. LT (Drafting suggestions): The ECF shall finance activities in support of skills development, in particular in the strategic sectors, building strong links between higher education, vocational education and training providers, applied research and businesses for an agile, innovative and competitive economy. This shall include support for a European Skills Guarantee to support value chain

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

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	upskilling and reskilling of the workforce and Vocational Education and Training (VET) partnerships to strengthen cooperation between VET providers and businesses, especially SMEs and connecting them with regional industrial ecosystems. PT (Comments): Re-skilling is a key element of lifelong learning, allowing people to adapt to fast technological and societal changes. It strengthens employability, supports innovation, and ensures inclusion in a constantly evolving labour market. In the same page, entrepreneurship education is crucial to equip individuals with the mindset and skills to identify opportunities, take initiative, and create value. It is important to further clarify the types of actions funded under the scope of skills enhancement and reskilling. Are we referring to skills enhancement or reskilling only when part of an applied project within the transitions' value chain? Are we talking about specific skills enhancement projects <i>tout court</i> and outside the applied sectoral projects but benefiting the strategic sectors within ECF? Both? Also, following the COM presentation to the Social Questions Working Party on 23 September 2025, it would be important to clarify even further: a) to what extent there will exist a mechanism to assess complementarity with Erasmus+ actions, particularly those related to circulation of skills and support to VET business partnerships, which seem to overlap with what is being presented for ECF; b) It is referred that the European Skills Guarantee will be the main (loan) mechanism, also supporting social infrastructure, microfinance and social enterprises, but it is not clear how that connects with the ECF framework and mostly within the established strategic sectors.

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	BE (Comments): Complementarity with existing programmes (Erasmus+, regional programmes...) must be ensured SE (Comments): Regarding “building strong links between higher education, vocational education and training providers” it needs to be clarified how this is meant to be. Cooperation between education institutions needs to build on a voluntary basis. Higher education institutions are autonomous. Regarding “European Skills Guarantee“ it needs to be clarified what organisation or institution that is responsible for providing this guarantee. Need clarification on the cooperation between education institutions. The cooperation needs to be voluntary as higher education institutions are autonomous. It needs to be clarified which organisation or institution that is responsible for providing this guarantee. SI (Drafting suggestions): 4. —The ECF shall finance activities in support of skills development, in particular in the strategic sectors, <u>as well as in areas of future technologies</u>, building strong links between higher education, vocational education and training providers, applied research and businesses for an agile, innovative and competitive economy. This shall include support ~~for a European Skills Guarantee~~ <u>for existing Erasmus+ and other mechanisms aimed at skills</u>

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	<u>development</u> to support value chain transitions in favour of strategic growth sectors or occupations across the labour market through upskilling and reskilling of the workforce and Vocational Education and Training (VET) partnerships, <u>such as Centres of Vocational Excellence</u> to strengthen cooperation between VET providers and businesses, especially SMEs and connecting them with regional industrial ecosystems. SI (Comments): EU needs to be future-oriented also when supporting skills development. We suggest deleting the reference of the European Skills Guarantee since it does not yet exist as a full action. Until it is not properly established, we cannot give it a legal force within another legal act. Instead, if needed, we suggest to mention the existing initiatives, for instance Pact for Skills, Centres of Vocational Excellence, also European University Alliances etc Furthermore, given that the proposed EU programmes increasingly address and mention skills, it would be appropriate to include a definition of “skills”. Please find our proposal based on Council Recommendation on key competences for lifelong learning: <u>“skills are defined as the ability and capacity to carry out processes and use the existing knowledge to achieve results” and, therefore, form one of the integral parts of key competences alongside knowledge and attitudes, based on the Council Recommendation on key competences for lifelong learning.”</u> EL (Drafting suggestions): The ECF shall finance activities ~~in support~~ supporting skills development, ~~in particular~~ particularly in strategic sectors, ~~building strong links between~~ by

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	fostering strong links between higher education, vocational education and training providers, applied research <u>institutions</u>, and businesses, for an agile, innovative and competitive economy. This shall include support for a European Skills Guarantee ~~to support~~ <u>aimed at facilitating</u> value chain transitions towards strategic growth sectors or occupations through upskilling and reskilling of the workforce, and <u>for</u> Vocational Education and Training (VET) partnerships to strengthen cooperation between VET providers and businesses, especially SMEs, and ~~connecting~~ <u>to better connect them</u> with regional industrial ecosystems. EL (Comments): To ensure alignment with EU wording and provide clearer articulation of the links between skills, SMEs and regional industrial ecosystems. FR (Drafting suggestions): The ECF shall finance activities in support of skills development, in particular in the strategic <u>economic</u> sectors <u>for EU competitiveness and sovereignty</u>, building strong links between higher education, vocational education and training providers, ~~applied~~-research and businesses for an agile, innovative, <u>sustainable, resilient</u> and competitive economy. This shall include support for a European Skills Guarantee to support value chain transitions in favour of strategic growth sectors or occupations across the labour market through upskilling and reskilling of the workforce and Vocational Education and Training (VET) partnerships to strengthen cooperation between VET providers and businesses, especially SMEs and connecting them with regional industrial ecosystems. <u>Where relevant and appropriate, the ECF should also finance activities of the European Universities Alliances, as they constitute a lever for intergated European ecosystems across Europe.</u> PL

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	(Drafting suggestions): „The ECF shall finance activities in support of skills development, ~~in particular~~ in the strategic sectors, building strong links between higher education, vocational education and training providers, applied research and businesses for an agile, innovative and competitive economy. This shall only include support for a European Skills Guarantee to support value chain transitions in favour of strategic growth sectors or occupations across the labour market through upskilling and reskilling of the workforce and Vocational Education and Training (VET) partnerships to strengthen cooperation between VET providers and businesses, especially SMEs and connecting them with regional industrial ecosystems. PL (Comments): It is necessary to establish a clear distinction between the ECF and activities supported by the Erasmus+, ESF, and other EU programmes/funds. The ECF, particularly in the area of skills development, should focus on strategic sectors through targeted initiatives, such as the European Skills Guarantee or partnerships in vocational education and training. Without a clearly defined scope at the level of overarching legislation, there is a significant risk of duplication—where similar activities are funded by multiple instruments—leading to inefficiency and fragmentation of efforts. A well-defined division of responsibilities ensures rational allocation of resources, avoids overlapping actions, and increases transparency in planning and implementation processes. Moreover, such clarity supports coherent policymaking and facilitates monitoring and evaluation, enabling stakeholders to better assess the impact of each programme. It also strengthens strategic coordination among EU

Proposal for a Regulation establishing the European Competitiveness Fund (doc. 13413/25)
From: AT, BG, CZ, DE, FI, HR, IE, IT, LT, LU, MT, PT, BE, HU, ES, SE, SI, EL, FR, PL

Deadline: 15 October 2025 COB
Updated: 27/10/2025 09:02

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	funding instruments, ensuring that each effectively contributes to the broader EU skills agenda.
SECTION 3	
BENEFICIARY SERVICE DESK	

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
<i>Article 31</i>	PT (Comments): Improve accessibility and capacity of project promoters in the Outermost Regions to submit competitive proposals. Accelerate and simplify complementary financial support mechanisms for proof-of-concept and deployment grants, which can be particularly useful for public infrastructure management entities. Such mechanisms should be easily accessible and publicized, so that local authorities or public companies can benefit from them to implement pilot projects and scale up innovative solutions. This complements national concerns about including public authorities in the range of beneficiaries. PL (Drafting suggestions): „In accordance with Article 150 of Regulation (EU, Euratom) 2024/2509, the ECF shall finance and support the maintenance, extension and user-centric designed enhancement of the single electronic data interchange area and related digital grant management infrastructure. This shall apply irrespective of the mode or instrument of budget implementation and shall integrate advisory and business-acceleration services as well as the single gateway for access to Union support under the Performance Regulation” PL (Comments): It provides a simplified and consistent digital access point for all ECF participants, reduces administrative burdens within the financing instruments, and integrates advisory and acceleration support directly into the online access platform.

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
Access to Union funding	DE (Comments): What is the difference to the Project Advisory in Article 26? EL (Comments): We need to specify the provisions.
2. The ECF may support any additional activities to facilitate and accelerate access to Union funding, and other funding, financing and investments, as well as to ensure valorisation and uptake of results through tools and instruments such as proof of concept, deployment grants, advisory and business support services, and any dedicated platform.	CZ (Comments): It should be clarified how this portal will be linked to the <i>Single Gateway</i> referred to in Art. 12 of the draft 'Regulation establishing the framework for monitoring budgetary expenditure, performance and other horizontal rules for Union programmes and activities' (COM(2025) 545 final), as well as to other Commission web portals for applicants and the public. Could it be confirmed/explained whether an online tool enabling the identification of consortia seeking new partners will continue to be available (may facilitate access to funding for entities of different sizes and levels of experience in ECF-like programmes). We kindly request the issue being clarified in written response. BE (Comments): Genuine simplification and an effective single entry point are needed, ensuring the clarity and accessibility of funding instruments for all types of beneficiaries. Which actors does COM have in mind for this? Would these activities also be included in a work programme? Could national or regional business

Presidency text (doc. 13413/25)	Drafting suggestions and Comments
	advisory agencies receive funding for such activities? What is meant with any dedicated platform? EL (Drafting suggestions): The ECF may support any additional activities to facilitate and accelerate access to Union funding, and other funding, financing and investments, as well as to ensure valorisation and uptake of results through tools and instruments such as proof of concept, deployment grants, advisory and business support services, and any dedicated platform <u>consistent with Cohesion Policy objectives and complementary to the STEP Platform</u>. EL (Comments): To clarify the link with Cohesion Policy and enhance synergy between ECF-supported financial tools, STEP platform and national/regional investment programmes PL (Comments): The regulation does not mention the existing structures of the National Contact Points network, which in recent years have invested in capacity building, professional advisory services, and network development. We believe that the experience and value of these structures should be recognised and reflected in the regulation. It expands the scope of ECF activities to remove remaining access barriers, promotes rapid proof-of-concept testing and project implementation, and utilises both digital and on-site tools to maximise the use and impact of funded outcomes.