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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 the Proposal for a 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. 15348/25)
- comments from BG, CZ, LT, LV, MT, NL, SE, SK, RO, SI, AT, DE, ES, FI, HR, IE, IT, LU, LU, PL, PT, BE, EE, EL, FR

Guidelines to be followed

Please kindly provide your contributions in the table below.

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

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

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

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

Thank you for your cooperation!

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>General Comments</p>	<p>MT (Comments): It was noted that new recitals emphasise the role of AI, high performance computing, quantum technologies, robotics, ect. All of these technologies have a very high energy demand, reinforcing the need for the ECF to prioritise investments in energy (particularly electricity) supply and investments in grids in parallel to digital.</p> <p>SE (Comments): SE maintains a scrutiny reservation as regards the parts of the proposal that relates to Horizon Europe. Comments below concerning the programming of the competitiveness part of pillar II in Horizon in the ECF should be seen in light of this, and the fact that the link between the two programmes are bracketed to be dealt with in the horizontal MFF track.</p>

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	<p>Editorial remark: SE actions/projects are used interchangeably in the text, should be consistent.</p> <p>DE (Comments): Our main interests for improving the ECF proposal are governance and inclusion of the Council / Member States, focus on key strategic areas as well as the principles of impact and competition. To boost competitiveness, funding with public means on an EU level must address a market failure, provide European public goods and provide a European added value.</p> <p>ES (Comments): Spain values the strategic orientation of the ECF, particularly its contribution to strengthening the Union’s technological, industrial, and production capacity. However, to ensure a coherent and inclusive interpretation that aligns with the existing acquis on bioeconomy, coastal areas, and the blue economy, Spain considers it essential that the Regulation explicitly recognize the role of the primary marine sectors (fishing, aquaculture, and activities linked to the blue economy) within the framework of European competitiveness, also in order to coherently reflect what is already established in recital 33.</p> <p>IE (Comments): Overall, IE welcomes the revised text and views the amendments and additional articles as going in the right direction and strengthening the policy aims of the ECF. Ireland would like to thank the PRES for their work to date. Ireland is also very supportive of the revised text to strengthen the focus on SMEs and scale-ups.</p>

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	<p>IE recommend the Commission be asked to provide guidance in on(i) how Horizon Europe rules apply to collaborative R&I - ie when Horizon vs ECF rules apply, (ii) how award criteria will be tailored and (iii) how the EU for Business Network and ECF Project Advisory will avoid duplication and operate referral pathways</p> <p>LU (Comments): LU comment:</p> <p>Luxembourg recalls that, alongside competitiveness and industrial objectives, the ECF should contribute to protecting and improving public health and strengthening health systems, in line with Articles 9 and 168 TFEU. We therefore ask for (i) a stronger focus on prevention, health promotion and reduction of health inequalities; (ii) continuity with the most impactful EU4Health actions, notably successful joint actions and networks between health authorities, and future best-practice exchange and capacity building among public health authorities; and (iii) appropriate sectoral oversight and governance of work programmes, including through the involvement of health authorities in the committees and advisory structures.</p>
<p>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]</p>	<p>AT (Comments):</p> <p>General remark: AT wishes to state again that health must be an important objective of the ECF that should not be undermined by the objective of competitiveness. As pointed out in our comments on the first compromise proposal, the obligation to ensure the health and well-being of the public is encoded in the Treaties of the EU. With the discontinuation of EU4Health as a stand-alone regulation with its own dedicated budget, the regulations that continue to provide funding for health priorities need to have health as a key objective.</p>

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	<p>IE (Drafting suggestions):</p> <p>Art 3(2)(d)(2) For support to the European Defence Technological and Industrial Base (EDTIB), with the specific objectives of:</p> <ul style="list-style-type: none"> (a) Promoting defence industrial readiness of the Union and its Member States through the strengthening of the long-term competitiveness, responsiveness and resilience of the EDTIB, including support to startups, scaleups and SMEs, fostering an innovative EU defence industrial ecosystem; (b) Collaborative research and development of defence and dual use products and technologies, including disruptive technologies for defence; (c) Cooperation throughout the life-cycle of defence equipment, in particular in defence procurement and for the development of European defence projects of common interest; (d) Adjustment of the EDTIB to structural changes, including its ability to ensure the timely availability and supply of defence products <p>Art 67 (2a) activities related to Union’s technological sovereignty, such as research, development, and uptake of critical space technologies, including those directly related to the EU Observatory of Critical Technologies, (OCT) and to the objective referred to in Article 3(1b) for reducing and preventing high-risk strategic dependencies and implementation of OCT roadmaps that reduce Union dependencies and enhance competitiveness of the Union space ecosystem;</p> <p>New 45(a) To ensure focus on reducing and preventing high-risk dependencies, the approach identified by the Commission</p>

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	<p><u>(SWD(2021)352) shall be used as foundation. High risk dependencies then should be understood here as dependencies on external reliances on goods, services, data, capital or technology relevant for the Union’s economy and open international trading system, which are essential for the Union’s security and resilience that pose high vulnerability due to a high degree of market concentration, limited dispensability (substitutability), and exposure to coercive or unstable third countries in particular in a disproportionately unbalanced trade relationship.</u></p> <p>IE (Comments):</p> <p>IE suggested text amendment - Art 3(2)(d)(2) IE seeks the inclusion of a reference to “dual use” to build on previous references in the text including paragraph 40 of the recital and article 3(1)(a). This suggested addition, along with explicit mention of dual use in related articles such as Article 46, would more clearly provide for dual-use projects, or suppliers, in the defence pillar.</p> <p><u>High Risk Dependencies</u></p> <p>IE has concerns about the text relating to addressing strategic dependencies, which we consider is overly broad and requires a strong evidence base to support the identification of such dependencies.</p> <p>IE - t and new 45a IE would like to propose the text across on high risk dependencies, in line with our intervention at WP. See also amendments to article 3(1b) below.</p> <p><u>Other General comments</u></p> <p>IE request clarification about the use of the term [T]rans-Europe digital infrastructure. Is this referring to a TEN instrument or simply to digital infrastructure spanning Europe? In recital (20), on page 15 of the first document (TF), a capital ‘T’ is used which infers the instrument. However,</p>

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	<p>later in the second Word document (TF2) in Chapter III on page 10, a lower case ‘t’ is used. (Art 3(2)(c)(iii))</p> <p>IT (Drafting suggestions):</p> <p>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]</p> <p>IT (Comments):</p> <p>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.</p> <p>It is crucial to avoid – here as well as in Recital (89), in footnote n. 31 and in Article 88(d) of the revised compromise text – referring to “Regulation (EU) 2021/783 of the European Parliament and of the Council of 29 April 2021 establishing a Programme for the Environment and Climate Action (LIFE) and repealing Regulation (EU) No 1293/2013 (OJ L 172, 17.5.2021 (http://data.europa.eu/eli/reg/2021/783/oj))”.</p> <p>At the same time, it is crucial to avoid in Article 33 (1)(a) – as well as in Article 34 (2) of the revised compromise text – referring to “LIFE activities”.</p> <p><u>Rationale:</u></p>

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	<p>The current proposal for the EU Multiannual Financial Framework (MFF) 2028-2034 fails to adequately safeguard the continuation of the LIFE Programme, which has historically supported key environmental and climate objectives.</p> <p>The proposed integration of LIFE actions/activities into National and Regional Partnership Plans (NRPPs), the EU Facility and the European Competitiveness Fund (ECF) is insufficient, as there are no binding financial obligations or a guaranteed "ring-fenced" budget.</p> <p>Thus, Italy advocates for restoring LIFE as a stand-alone programme under Heading 2 of the MFF, proposing:</p> <ul style="list-style-type: none"> • A dedicated financial envelope for 2028-2034, divided into thematic subprogrammes (Circular economy, Zero pollution, Nature & biodiversity, Climate mitigation & adaptation, Clean energy transition). • Ensuring LIFE remains a key instrument for environmental and climate action, complementary to "mainstreamed" policies in other EU funds. • Funding could be sourced by reallocating part of the expanded Horizon Europe budget. <p>Italy has formally requested to keep a LIFE-specific Regulation that maintains its autonomy, direct Commission management, and accessibility for public and private beneficiaries.</p> <p>This approach does not modify the architecture proposed by the Commission and aligns with other EU flagship programmes (e.g., Erasmus+, Horizon Europe), ensuring targeted and coordinated action on environmental protection and climate resilience.</p> <p>The restoration of LIFE would not undermine MFF simplification goals but rather enhance Europe's ability to tackle environmental challenges with dedicated EU funding and a solidarity approach to enhance the management of EU natural resources.</p> <p>Finally, Italy hereby requests again the Danish Presidency to facilitate the establishment of a process that could lead to the formulation of an ad hoc</p>

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	<p>proposal by the Commission for a LIFE-specific Regulation also for the programming period 2028-2034.</p> <p>PT (Comments):</p> <p>We welcome the overall ambition of the ECF to strengthen EU competitiveness and recognise the positive reference to outermost regions in Recital (9). From the specific perspective of an outermost, insular and health-competent region, we would, however, underline the need to ensure:</p> <ul style="list-style-type: none"> -adequate reflection of the specific constraints of the outermost regions under Article 349 TFEU; -explicit safeguarding of regional competences in health and the principle of subsidiarity; -coherence with EU health-security legislation (EU4Health, HERA, NIS2); -a clear and operational articulation between the ECF and future National and Regional Partnership Plans (NRPP); -clarity, legal certainty and enforceability across governance, support instruments and eligibility provisions.
<p>THE EUROPEAN PARLIAMENT AND THE COUNCIL OF THE EUROPEAN UNION,</p>	
<p>Having regard to the Treaty on the Functioning of the European Union, and in particular Article 43(2), Article 168(5), Article 172, first subparagraph, Article 173(3), first subparagraph, Article 175, first subparagraph, Article 182(4), Article 183 in conjunction with Article 188, second paragraph, Article 189(2), Article 192(1), Article 194(2), Article 212(2) and Article 322(1), point (a), thereof,</p>	<p>FR (Drafting suggestions):</p> <p>Having regard to the Treaty on the Functioning of the European Union, and in particular Article 43(2), Article 168(5), Article 172, first subparagraph, Article 173(3), first subparagraph, Article 175, first subparagraph, Article</p>

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	<p>182(1), Article 183 in conjunction with Article 188, second paragraph, Article 189(2), Article 192(1), Article 194(2), Article 212(2) and Article 322(1), point (a), thereof,</p> <p>FR (Comments): Cette base juridique prévoit une procédure législative spéciale, incompatible avec les autres bases juridiques prévoyant la PLO (au titre de la <i>jurisprudence dioxyde de titane</i>). L'article 182-1 TFUE prévoit bien la PLO.</p>
Having regard to the proposal from the European Commission,	
After transmission of the draft legislative act to the national parliaments,	
<p>Having regard to the opinion of the European Economic and Social Committee,¹</p> <p>_____</p> <p>1 OJ C , , p. .</p>	
<p>Having regard to the opinion of the Committee of the Regions,²</p> <p>_____</p> <p>2 OJ C , , p. .</p>	
Having regard to the opinion of the Court of Auditors,	
Acting in accordance with the ordinary legislative procedure,	
Whereas:	

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<p>(2) The Union is facing a defining period for its future, from a political, economic, social, environmental, climate and security perspective, including increased risks of conventional military threats. The Draghi report on the future of European Competitiveness³ presented a new vision to reignite sustainable growth in Europe. The Letta report⁴ outlined that Europe must leverage its Single Market to achieve a leadership position in the global competition. The Commission communication on the Competitiveness Compass⁵ provided a joint roadmap for boosting decarbonisation and competitiveness, building on the recommendations of these reports. The Commission communication on the Clean Industrial Deal⁶ outlined the need to accelerate decarbonisation, reindustrialisation and innovation, bringing together climate action and competitiveness under one overarching growth. Sectorial Industrial Action Plans, such as Automotive, Steel and Metals and Chemicals aim to ensure the long-term competitiveness, sustainability, and resilience of the European industry. The State of the Digital decade 2025⁷ highlights the urgent need to foster cooperation and increase public and private investments for strengthening Union’s digital leadership, sovereignty and inclusiveness. The Joint White Paper on European Defence Readiness⁸ underlines the need to massively and rapidly reinvest in defence in support of Europe’s freedom of action. Moreover, the priorities of the Economic Security Strategy further underline the crucial need to secure the Union’s technological edge and de-risk economic relations including by enhancing the resilience of supply chains and thereby reducing dependencies on others. The European Ocean Pact outlines the need to enhance competitiveness and accelerate the strategic transition across the blue economy sectors, focussing especially on decarbonisation and scaling up innovation. As outlined in the Commission Communication on the Road to the next MFF,⁹ the next Union long-term budget needs to be more focused, simpler, more flexible, and predictable and better deliver on the Union priorities, including bolstering the Union competitiveness.</p>	<p>LT (Drafting suggestions): (2) The Union is facing a defining period for its future, from a political, economic, social, environmental, climate and security perspective, including increased risks of conventional military threats. The Draghi report on the future of European Competitiveness³ presented a new vision to reignite sustainable growth in Europe. The Letta report⁴ outlined that Europe must leverage its Single Market to achieve a leadership position in the global competition. The Commission communication on the Competitiveness Compass⁵ provided a joint roadmap for boosting decarbonisation and competitiveness, building on the recommendations of these reports. The Commission communication on the Clean Industrial Deal⁶ outlined the need to accelerate decarbonisation, reindustrialisation and innovation, bringing together climate action and competitiveness under one overarching growth. Sectorial Industrial Action Plans, such as Automotive, Steel and Metals and Chemicals aim to ensure the long-term competitiveness, sustainability, and resilience of the European industry. The State of the Digital decade 2025⁷ highlights the urgent need to foster cooperation and increase public and private investments for strengthening Union’s digital leadership, sovereignty autonomy and inclusiveness. The Joint White Paper on European Defence Readiness⁸ underlines the need to massively and rapidly reinvest in defence in support of Europe’s freedom of action. Moreover, the priorities of the Economic Security Strategy further underline the crucial need to secure the Union’s technological edge and de-risk economic relations including by enhancing the resilience of supply chains and thereby reducing dependencies on others. The European Ocean Pact outlines the need to enhance competitiveness and accelerate the strategic transition across the blue economy sectors, focussing especially on decarbonisation and scaling up innovation. As outlined in the Commission Communication on the Road to the next MFF,⁹ the next Union long-term budget needs to be more focused,</p>

<p>3 The future of European competitiveness: Report by Mario Draghi, September 2024, https://commission.europa.eu/topics/eu-competitiveness/draghi-report_en</p> <p>4 Enrico Letta’s Report on the Future of the Single Market, April 2024, https://www.consilium.europa.eu/media/ny3j24sm/much-more-than-a-market-report-by-enrico-letta.pdf.</p> <p>5 Competitiveness compass - European Commission</p> <p>6 Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, The Clean Industrial Deal: A joint roadmap for competitiveness and decarbonisation, COM(2025) 85 final, 26.2.2025.</p> <p>7 COM(2025) 290 final State of the Digital Decade 2025: Keep building the EU’s sovereignty and digital future.</p> <p>8 Joint Communication to the European Parliament, the European Council and the Council on ‘European Economic Security Strategy’, JOIN(2023) 20 final, 20.6.2023.</p> <p>9 Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, The road to the next multiannual financial framework, COM(2025) 46 final, 11.2.2025.</p>	<p>simpler, more flexible, and predictable and better deliver on the Union priorities, including bolstering the Union competitiveness.</p> <hr/> <p>3 The future of European competitiveness: Report by Mario Draghi, September 2024, https://commission.europa.eu/topics/eu-competitiveness/draghi-report_en</p> <p>4 Enrico Letta’s Report on the Future of the Single Market, April 2024, https://www.consilium.europa.eu/media/ny3j24sm/much-more-than-a-market-report-by-enrico-letta.pdf.</p> <p>5 Competitiveness compass - European Commission</p> <p>6 Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, The Clean Industrial Deal: A joint roadmap for competitiveness and decarbonisation, COM(2025) 85 final, 26.2.2025.</p> <p>7 COM(2025) 290 final State of the Digital Decade 2025: Keep building the EU’s sovereignty and digital future.</p> <p>8 Joint Communication to the European Parliament, the European Council and the Council on ‘European Economic Security Strategy’, JOIN(2023) 20 final, 20.6.2023.</p> <p>9 Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, The road to the next multiannual financial framework, COM(2025) 46 final, 11.2.2025.</p> <p>LT (Comments): Please sovereignty replace by autonomy LV</p>
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	<p>(Drafting suggestions):</p> <p>The Union is facing a defining period for its future, from a political, economic, social, environmental, climate and security perspective, including increased risks of conventional military threats. The Draghi report on the future of European Competitiveness³ presented a new vision to reignite sustainable growth in Europe. The Letta report⁴ outlined that Europe must leverage its Single Market to achieve a leadership position in the global competition. The Commission communication on the Competitiveness Compass⁵ provided a joint roadmap for boosting decarbonisation and competitiveness, building on the recommendations of these reports. The Commission communication on the Clean Industrial Deal⁶ outlined the need to accelerate decarbonisation, reindustrialisation and innovation, bringing together climate action and competitiveness under one overarching growth. In addition, preserving and restoring Europe’s natural capital and biodiversity, and strengthening environmental governance, remain essential preconditions for long-term competitiveness and societal resilience. Sectorial Industrial Action Plans, such as Automotive, Steel and Metals and Chemicals aim to ensure the long-term competitiveness, sustainability, and resilience of the European industry. The State of the Digital decade 2025⁷ highlights the urgent need to foster cooperation and increase public and private investments for strengthening Union’s digital leadership, sovereignty and inclusiveness. The Joint White Paper on European Defence Readiness⁸ underlines the need to massively and rapidly reinvest in defence in support of Europe’s freedom of action. Moreover, the priorities of the Economic Security Strategy further underline the crucial need to secure the Union’s technological edge and de-risk economic relations including by enhancing the resilience of supply chains and thereby reducing dependencies on others. The European Ocean Pact outlines the need to enhance competitiveness and accelerate the strategic transition across the blue economy sectors, focussing especially on decarbonisation and scaling up innovation. As outlined in the Commission Communication on the Road to the next MFF,⁹ the next Union long-term budget needs to be more focused,</p>

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	<p>simpler, more flexible, and predictable and better deliver on the Union priorities, including bolstering the Union competitiveness.</p> <p>LV (Comments): Adds explicit recognition that environmental and nature policy is a fundamental competitiveness factor. The added wording reflects core LIFE Programme topics, which are not currently visible or explicitly represented in the next MFF.</p> <p>NL (Drafting suggestions): (2) The Union is facing a defining period for its future, from a political, economic, social, environmental, climate and security perspective, including increased risks of conventional military threats. The Draghi report on the future of European Competitiveness³ presented a new vision to reignite sustainable growth in Europe, <u>which put productivity growth at the core of the competitiveness agenda, as the most important driver of long-term growth and leading to rising standards of living over time.</u> The Letta report⁴ outlined that Europe must leverage its Single Market to achieve a leadership position in the global competition. The Commission communication on the Competitiveness Compass⁵ provided a joint roadmap for boosting decarbonisation and competitiveness, building on the recommendations of these reports. The Commission communication on the Clean Industrial Deal⁶ outlined the need to accelerate decarbonisation, reindustrialisation and innovation, bringing together climate action and competitiveness under one overarching growth. Sectorial Industrial Action Plans, such as Automotive, Steel and Metals and Chemicals aim to ensure the long-term competitiveness, sustainability, and resilience of the European industry. The State of the Digital decade 2025⁷ highlights the urgent need to foster cooperation and increase public and private investments for</p>

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	<p>strengthening Union’s digital leadership, sovereignty and inclusiveness. The Joint White Paper on European Defence Readiness⁸ underlines the need to massively and rapidly reinvest in defence in support of Europe’s freedom of action. Moreover, the priorities of the Economic Security Strategy further underline the crucial need to secure the Union’s technological edge and de-risk economic relations including by enhancing the resilience of supply chains and thereby reducing dependencies on others. The European Ocean Pact outlines the need to enhance competitiveness and accelerate the strategic transition across the blue economy sectors, focussing especially on decarbonisation and scaling up innovation. As outlined in the Commission Communication on the Road to the next MFF,⁹ the next Union long-term budget needs to be more focused, simpler, more flexible, and predictable and better deliver on the Union priorities, including bolstering the Union competitiveness.</p> <hr/> <p>3 The future of European competitiveness: Report by Mario Draghi, September 2024, https://commission.europa.eu/topics/eu-competitiveness/draghi-report_en</p> <p>4 Enrico Letta’s Report on the Future of the Single Market, April 2024, https://www.consilium.europa.eu/media/ny3j24sm/much-more-than-a-market-report-by-enrico-letta.pdf.</p> <p>5 Competitiveness compass - European Commission</p> <p>6 Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, The Clean Industrial Deal: A joint roadmap for competitiveness and decarbonisation, COM(2025) 85 final, 26.2.2025.</p> <p>7 COM(2025) 290 final State of the Digital Decade 2025: Keep building the EU’s sovereignty and digital future.</p>

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	<p>8 Joint Communication to the European Parliament, the European Council and the Council on ‘European Economic Security Strategy’, JOIN(2023) 20 final, 20.6.2023.</p> <p>9 Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, The road to the next multiannual financial framework, COM(2025) 46 final, 11.2.2025.</p> <p>NL (Comments): To reflect this key message of Draghi, with high relevance for this Fund.</p> <p>SE (Drafting suggestions): The Union is facing a defining period for its future, from a political, economic, social, environmental, climate and security perspective, including increased risks of conventional military threats. The Draghi report on the future of European Competitiveness³ presented a new vision to reignite sustainable growth in Europe. The Letta report^A outlined that Europe must leverage its Single Market to achieve a leadership position in the global competition. The Commission communication on the Competitiveness Compass⁵ provided a joint roadmap for boosting decarbonisation and competitiveness, building on the recommendations of these reports. The Commission communication on the Clean Industrial Deal⁶ outlined the need to accelerate decarbonisation, reindustrialisation and innovation, bringing together climate action and competitiveness under one overarching growth. Sectorial Industrial Action Plans, such as Automotive, Steel and Metals and Chemicals aim to ensure the</p>

^A Enrico Letta's Report on the Future of the Single Market, April 2024, <https://www.consilium.europa.eu/media/ny3j24sm/much-more-than-a-market-report-by-enrico-letta.pdf>.

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	<p>long-term competitiveness, sustainability, and resilience of the European industry. The State of the Digital decade 2025⁷ highlights the urgent need to foster cooperation and increase public and private investments for strengthening Union’s digital leadership, sovereignty and inclusiveness. The Joint White Paper on European Defence Readiness⁸ underlines the need to massively and rapidly reinvest in defence in support of Europe’s freedom of action. Moreover, the priorities of the Economic Security Strategy further underline the crucial need to secure the Union’s technological edge and de-risk economic relations including by enhancing the resilience of supply chains and thereby reducing dependencies on others. <u>The Commission communication EU Action Plan on Cable Security emphasized the need for security and resilience of submarine cable. The European Water Resilience Strategy highlights importance of enhancing EU water resilience across all sectors to strengthen the competitiveness of the EU economy, guaranteeing food and energy security and crisis preparedness for the EU.</u> The European Ocean Pact outlines the need to enhance competitiveness and accelerate the strategic transition across the blue economy sectors, focussing especially on decarbonisation and scaling up innovation. As outlined in the Commission Communication on the Road to the next MFF,⁹ the next Union long-term budget needs to be more focused, simpler, more flexible, and predictable and better deliver on the Union priorities, including bolstering the Union competitiveness.</p> <p>SE (Comments):</p> <p>The EU Action Plan on Cable Security is another strategic communication from the commission. Submarine cables is a part of the ECF and the action plan on cable security should be emphasized in this context.</p>

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	<p>SE proposes that the European Water Resilience Strategy is addressed in this context as all sectors are directly or indirectly dependent water.</p> <p>Unsustainable water management undermines overall security of supply and competitiveness, as recognised in the Competitiveness Compass and the Clean Industrial Deal. Also, the strategy has a direct link to the Ocean Pact.</p> <p>IE</p> <p>(Drafting suggestions):</p> <p>2) The Union is facing a defining period for its future, from a political, economic, social, environmental, climate and security perspective, including increased risks of conventional military threats. The Draghi report on the future of European Competitiveness³ presented a new vision to reignite sustainable growth in Europe, <u>which put productivity growth at the core of the competitiveness agenda, as the most important driver of long-term growth and leading to rising standards of living over time.</u> The Letta report⁴ outlined that Europe must leverage its Single Market to achieve a leadership position in the global competition. The Commission communication on the Competitiveness Compass⁵ provided a joint roadmap for boosting decarbonisation and competitiveness, building on the recommendations of these reports. The Commission communication on the Clean Industrial Deal⁶ outlined the need to accelerate decarbonisation, reindustrialisation and innovation, bringing together climate action and competitiveness under one overarching growth. Sectorial Industrial Action Plans, such as Automotive, Steel and Metals and Chemicals aim to ensure the long-term competitiveness, sustainability, and resilience of the European industry. The State of the Digital decade 2025⁷ highlights the urgent need to foster cooperation and increase public and private investments for strengthening Union's digital leadership, sovereignty and inclusiveness. The Joint White Paper on European Defence Readiness⁸ underlines the need to massively and rapidly reinvest in defence in support of Europe's freedom of action. Moreover, the priorities of the Economic Security Strategy further</p>

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	<p>underline the crucial need to secure the Union’s technological edge and de-risk economic relations including by enhancing the resilience of supply chains and thereby reducing dependencies on others. The European Ocean Pact outlines the need to enhance competitiveness and accelerate the strategic transition across the blue economy sectors, focussing especially on decarbonisation and scaling up innovation. As outlined in the Commission Communication on the Road to the next MFF,⁹ the next Union long-term budget needs to be more focused, simpler, more flexible, and predictable and better deliver on the Union priorities, including bolstering the Union competitiveness.</p> <p>IE (Comments): IE welcome the inclusion of decarbonisation.</p> <p>IE suggested text amendment - to reflect the key role of productivity in the competitiveness agenda, as acknowledged in the Draghi Report.</p> <p>PT (Comments): PT welcomes the inclusion of decarbonisation.</p> <p>BE (Comments): Important that we keep the notion of both decarbonisation and competitiveness.</p>
<p>(2a) The ECF as a whole will pursue the general objectives as indicated in this Regulation while taking into account the specificities of the activities supported under the Fund.</p>	<p>SE (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	SE can accept the revised text but calls for a clearer hierarchy among the general objectives, in order to clarify the overall orientation of the ECF in accordance with the suggestion in Article 3(1).
	<p>LV (Drafting suggestions):</p> <p>2b supporting the protection and restoration of ecosystems, and measures to halt and reverse biodiversity loss, in line with the Union’s biodiversity and climate objectives;</p> <p>LV (Comments):</p> <p>This addition reflects essential areas traditionally supported under the LIFE Programme, which are currently not represented in the ECF objectives or policy windows. As these domains contribute directly to long-term competitiveness, climate resilience and environmental sustainability, their explicit inclusion is necessary to ensure continuity within the MFF 2028–2034 architecture and avoid an implementation gap once LIFE is repealed.</p>
<p>(3) To regain and reinforce its competitive edge, it is essential that the Union revives the innovation cycle by developing its disruptive innovation capacity and investing in emerging, cutting-edge and strategic technologies with significant economic potential including by raising productivity. To ensure its autonomy in the global economy, the Union should guarantee its technological and industrial leadership in strategic sectors, starting with critical raw materials supply chains and its circular economy, to develop and manufacture strategic technologies in Europe, as well as mitigate risks affecting its security and resilience emanating from critical external dependencies. This can be done by addressing market failures and suboptimal investment situations, in a proportionate manner and without crowding out private funding, considering the high investment needs for delivering on Union priorities, including for decarbonisation and the digital transition. Greater emphasis should be put on leveraging private sector</p>	<p>NL (Drafting suggestions):</p> <p>This can be done by addressing market failures (including transition failures) and suboptimal investment situations, in a proportionate manner and without crowding out private funding, considering the high investment needs for delivering on Union priorities, including for decarbonisation and the digital transition.</p> <p>SE (Comments):</p> <p>SE welcomes the proposed revisions.</p> <p>DE (Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>participation by improving the use of risk-sharing mechanisms between Union funds and private investors, to ensure an efficient use of public funding. This will build upon and further amplify the impact of the progress achieved on the Savings and Investment Union, which will provide the necessary regulatory landscape for private investments to thrive. The use of any additional national resources is without prejudice to the application of Articles 107 and 108 TFEU.</p>	<p>(3) To regain and reinforce its competitive edge, it is essential that the Union revives the innovation cycle by developing its disruptive innovation capacity and investing in emerging, cutting-edge and strategic technologies with significant economic potential including by raising order to raise its productivity. To ensure its autonomy in the global economy, the Union should guarantee its technological and industrial leadership in strategic sectors, starting with critical raw materials supply chains and its circular economy, to develop and manufacture strategic technologies in Europe, as well as mitigate risks affecting its security and resilience emanating from critical external dependencies.</p> <p>(3a) Actions supported under this programme should address This can be done by addressing market failures and suboptimal investment situations, in a proportionate manner and without crowding out private funding, considering the high investment needs for delivering on Union priorities, including for decarbonisation and the digital transition. Greater emphasis should be put on leveraging private sector participation by improving the use of risk-sharing mechanisms between Union funds and private investors, to ensure an efficient use of public funding. This will build upon and further amplify the impact of the progress achieved on the Savings and Investment Union, which will provide the necessary regulatory landscape for private investments to thrive. The use of any additional national resources is without prejudice to the application of Articles 107 and 108 TFEU.</p> <p>DE (Comments): Raising productivity is primarily an end, not a mean.</p> <p>This should be put in a separate recital, because it should be a general principle with regard to all the actions supported by the programme.</p> <p>ES</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>(3) To regain and reinforce its competitive edge, it is essential that the Union revives the innovation cycle by developing its disruptive innovation capacity and investing in emerging, cutting-edge and strategic technologies with significant economic potential including by raising productivity. To ensure its autonomy in the global economy, the Union should guarantee its R&I, technological and industrial leadership in strategic sectors, starting with critical raw materials supply chains and its circular economy, to develop and manufacture strategic technologies in Europe, as well as mitigate risks affecting its security and resilience emanating from critical external dependencies. This can be done by addressing market failures and suboptimal investment situations, in a proportionate manner and without crowding out private funding, considering the high investment needs for delivering on Union priorities, including for decarbonisation and the digital transition. Greater emphasis should be put on leveraging private sector participation by improving the use of risk-sharing mechanisms between Union funds and private investors, to ensure an efficient use of public funding. This will build upon and further amplify the impact of the progress achieved on the Savings and Investment Union, which will provide the necessary regulatory landscape for private investments to thrive. The use of any additional national resources is without prejudice to the application of Articles 107 and 108 TFEU.</p> <p>ES</p> <p>(Comments):</p> <p>The wording excludes part of the collaborative R&I activities of Horizon Europe not directly linked to technology or competitiveness, that are also needed.</p> <p>IE</p> <p>(Comments):</p> <p>IE welcomes the inclusion of reference to raising productivity and the inclusion of the text on the circular economy</p>

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	<p>IT (Drafting suggestions):</p> <p>(3) To regain and reinforce its competitive edge, it is essential that the Union revives the innovation cycle by developing its disruptive innovation capacity and investing in emerging, cutting-edge and strategic technologies with significant economic potential including by raising productivity. To ensure its autonomy in the global economy, the Union should guarantee its technological and industrial leadership in among strategic sectors, starting with critical raw materials, automotive, energy intensive industries supply chains, and its circular economy, to develop and manufacture strategic technologies in Europe, as well as mitigate risks affecting its security and resilience emanating from critical external dependencies. This can be done by addressing market failures and suboptimal investment situations, in a proportionate manner and without crowding out private funding, considering the high investment needs for delivering on Union priorities, including for decarbonisation and the digital transition. Greater emphasis should be put on leveraging private sector participation by improving the use of risk-sharing mechanisms between Union funds and private investors, to ensure an efficient use of public funding. This will build upon and further amplify the impact of the progress achieved on the Savings and Investment Union, which will provide the necessary regulatory landscape for private investments to thrive. The use of any additional national resources is without prejudice to the application of Articles 107 and 108 TFEU.</p> <p>PT (Comments):</p> <p>PT welcomes the reference to circular economy, particularly in what concerns critical raw materials.</p> <p>BE (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>We support the inclusion of circular economy</p> <p>EE</p> <p>(Drafting suggestions):</p> <p>(3) To regain and reinforce its competitive edge, it is essential that the Union revives the innovation cycle by developing its disruptive innovation capacity and investing in emerging, cutting-edge and strategic technologies and relevant skills with significant economic potential including by raising productivity. To ensure its autonomy in the global economy, the Union should guarantee its technological and industrial leadership in strategic sectors, starting with critical raw materials supply chains and its circular economy, to develop and manufacture strategic technologies in Europe, as well as mitigate risks affecting its security and resilience emanating from critical external dependencies. This can be done by addressing market failures and suboptimal investment situations, in a proportionate manner and without crowding out private funding, considering the high investment needs for delivering on Union priorities, including for decarbonisation and the digital transition. Greater emphasis should be put on leveraging private sector participation by improving the use of risk-sharing mechanisms between Union funds and private investors, to ensure an efficient use of public funding. This will build upon and further amplify the impact of the progress achieved on the Savings and Investment Union, which will provide the necessary regulatory landscape for private investments to thrive. The use of any additional national resources is without prejudice to the application of Articles 107 and 108 TFEU.</p> <p>EE</p> <p>(Comments):</p> <p>EE supports the amendments regarding raising productivity and circular economy. In addition we want to highlight that technologies without skills to use them, will not raise productivity on their own.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>FR (Drafting suggestions):</p> <p>To regain and reinforce its competitive edge, it is essential that the Union revives the innovation cycle by developing its disruptive innovation capacity and investing in emerging, cutting-edge and/or strategic technologies, as well as all types of innovations, with significant economic potential including by raising productivity. To ensure its autonomy in the global economy, the Union should guarantee its technological and industrial leadership in strategic sectors, starting with critical raw materials supply chains and its circular economy, to develop and manufacture strategic technologies in Europe, as well as mitigate risks affecting its security and resilience emanating from critical external dependencies. This can be done by addressing market failures and suboptimal investment situations, in a proportionate manner and without crowding out private funding, considering the high investment needs for delivering on Union priorities, including for decarbonisation and the digital transition. Greater emphasis should be put on leveraging private sector participation by improving the use of risk-sharing mechanisms between Union funds and private investors, to ensure an efficient use of public funding. This will build upon and further amplify the impact of the progress achieved on the Savings and Investment Union, which will provide the necessary regulatory landscape for private investments to thrive. The use of any additional national resources is without prejudice to the application of Articles 107 and 108 TFEU.</p> <p>FR (Comments):</p> <p>Il convient de prendre en compte tous les types de technologies et d'innovations, qui ne sont pas toujours à visée industrielle ou de pointe, mais qui contribuent malgré tout activement à la compétitivité de l'UE et aux objectifs du présent règlement</p>

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<p>(4) This requires that Union funding offers support to businesses and projects along the entire investment journey. This journey encompasses all stages of developing and manufacturing strategic technologies, products and services in Europe, from applied research, through all forms of innovation, scale-upscaleup, industrial deployment, to manufacturing and market deployment, including the necessary investment and operational costs support, infrastructure and skills. The investment journey is not linear as all stages feed each other, and ideas for new products or services might arise at any stage. European funding needs to cater for this non-linear reality with increased flexibility of providing support preserving predictability for funding.</p>	<p>FR (Drafting suggestions):</p> <p>(4) This requires that Union funding offers support to businesses and other stakeholders along the entire investment journey. This journey encompasses all stages of designing, developing and manufacturing strategic technologies, products and services in Europe, from fundamental research, through all forms of research and innovation, scale-upscaleup, industrial deployment, to manufacturing and market deployment, including the necessary investment and operational costs support, infrastructure and skills. The investment journey is not linear as all stages feed each other, and ideas for new products or services might arise at any stage. European funding needs to cater for this non-linear reality with increased flexibility of providing support preserving predictability for funding.</p> <p>FR (Comments):</p> <p>Le parcours d’investissement ne doit pas seulement concerner que les entreprises, dans la mesure où elles ne seront pas les seules bénéficiaires des activités du FEC. En revanche, le soutien aux projets ne relève pas véritablement d’une logique de « parcours d’investissement », puisque justement les projets évoluent au fur et à mesure de ce parcours. Par ailleurs, le développement des technologies, produits et services débute par la recherche fondamentale et non la recherche appliquée.</p>
<p>(5) This also requires that Union funding facilitates the creation and expansion of innovative and industrial ecosystems, where different actors interact in a synergetic way. Successful ecosystems feature intensive and agile interactions and collaboration between small and large companies, universities research institutions, infrastructure providers, investors as well as public authorities. Without such collaborations within and between</p>	<p>CZ (Comments):</p> <p>CZ: We suggest to highlight here: Academic and research organizations, including universities, are key to the entire innovation chain (including basic research, technology transfer, proof of concept, and market introduction).</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>individual innovation and industrial ecosystems, innovation potential stays unexploited.</p>	<p>LT (Drafting suggestions):</p> <p>(5) This also requires that Union funding facilitates the creation and expansion of innovative and industrial ecosystems, where different actors interact in a synergetic way. In particular, the ECF should support the development of emerging innovation ecosystems in less developed regions, strengthen cross-border ecosystem integration and facilitate knowledge diffusion, ensuring that competitiveness benefits reach all Member States equally. Successful ecosystems feature intensive and agile interactions and collaboration between small and large companies, universities research institutions, infrastructure providers, investors as well as public authorities. Without such collaborations within and between individual innovation and industrial ecosystems, innovation potential stays unexploited.</p> <p>LT (Comments):</p> <p>We would like to emphasize the need of ECF be structured in a way that enables all Member States, including smaller ones, to fully benefit from the opportunities it offers, thereby contributing to cohesive and balanced development across the European Union.</p> <p>ES (Drafting suggestions):</p> <p>(5) This also requires that activities supported by Union funding facilitates the creation and expansion of innovative and industrial ecosystems, where different actors collaborate and interact in a synergetic way. Successful ecosystems feature intensive and agile interactions and collaboration between small and large companies, universities research organisations institutions, infrastructure providers, investors as well as public authorities. Without such</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>collaborations within and between individual innovation and industrial ecosystems, innovation potential stays unexploited.</p> <p>ES (Comments): The creation of the ecosystems is a consequence of the activities funded by the Programme.</p> <p>BE (Drafting suggestions): (5) This also requires that Union funding facilitates the creation and expansion of innovative and industrial EU ecosystems based on the connection between regional ecosystems, where different actors interact in a synergetic way. Successful ecosystems feature intensive and agile interactions and collaboration between small and large companies, universities research institutions, infrastructure providers, investors as well as public authorities. Without such collaborations within and between individual innovation and industrial ecosystems, innovation potential stays unexploited</p> <p>FR (Drafting suggestions): 5) This also requires that Union funding facilitates the creation and expansion of innovative and industrial ecosystems, where different actors interact in a synergetic way. Successful ecosystems feature intensive and agile interactions and collaboration between small and large companies, universities, research performing organisations, infrastructure providers, investors as well as public authorities. Without such collaborations, innovation potential stays unexploited</p> <p>FR (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>Concernant la notion d'institutions de recherche, ce dernier ne relève pas du langage agréé, et peut désigner à la fois les organisations finançant la recherche et celles qui "font" de la recherche.</p>
	<p>DE (Drafting suggestions): <u>(5a) Promoting skills development under the ECF should primarily be done as part of actions with European added value that also address other additional objectives of this programme.</u></p> <p>DE (Comments): Skills development should not be an own standing goal of itself but rather support other objectives of this programmes.</p>
<p>(6) Digital connectivity is crucial to foster collaboration within the ecosystem, accelerating innovation, enabling seamless and secure access to critical digital capacities and solutions across the Union, facilitating cross-border public-private partnerships, and fostering interoperability and cost-effectiveness.</p>	<p>SE (Drafting suggestions): Digital connectivity <u>that is robust, resilient and redundant</u> is crucial to foster collaboration within the ecosystem, (...).</p> <p>SE (Comments): The robustness, resilience and redundancy of digital infrastructure is crucial, and should be emphasized in this context. SE do not see these perspectives at the moment in the proposal.</p> <p>BE (Drafting suggestions): (6) Digital connectivity is crucial to foster collaboration within the ecosystem, <u>strengthening cybersecurity</u>, accelerating innovation, and enabling seamless and secure access to critical digital capacities and</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>solutions across the Union. It facilitates cross-border public-private partnerships and fosters interoperability and cost-effectiveness.</p> <p>BE (Comments):</p> <p>As connectivity expands across sectors and borders, systems, services, and actors become more interdependent. This interdependence creates additional attack surfaces that can only be managed through embedded cybersecurity measures. Including cybersecurity acknowledges that secure connectivity is a precondition for the collaboration and innovation the recital aims to promote.</p>
	<p>IT (Drafting suggestions):</p> <p><u>(6a) In delivering Union support through the Fund, a principle of technological neutrality should apply. The Fund should refrain from prescribing or favouring specific technologies, thereby enabling a competitive environment in which diverse technological solutions can contribute to the Union’s objectives of competitiveness, sustainability, resilience and security on the basis of their performance, maturity and scalability.</u></p> <p>IT (Comments):</p> <p>Introducing an explicit recital on technological neutrality ensures that Union funding under the European Competitiveness Fund supports innovation based on performance and results, not on predetermined technological choices. This principle strengthens legal certainty, avoids market distortions, and provides a level playing field for public and private investment. <u>It also guarantees coherence with the Leaders’ guidance, as affirmed in the Oct. 2025 European Council Conclusions.</u></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>(7) Therefore, the purpose of the ECF is to establish an investment capacity to support European competitiveness in strategic technologies, infrastructures, products and services and sectors, providing for a more seamless investment journey. It will promote the creation, collaboration, and expansion of innovation, private finance and industrial ecosystems.</p>	<p>LV (Drafting suggestions): Therefore, the purpose of the ECF is to establish an investment capacity to support European competitiveness in strategic technologies, infrastructures, products and services and sectors, providing for a more seamless investment journey. It will promote the creation, collaboration, and expansion of innovation, private finance and industrial ecosystems, including those supporting environmental resilience, biodiversity enhancement, and nature-based solutions, which are essential for Europe’s long-term competitiveness.</p> <p>PT (Comments): The recognition of industrial ecosystems is positive, but the health ecosystem must explicitly include public healthcare providers, as these are essential actors in innovation cycles, data generation and crisis-response capability. We recommend clarifying that “healthcare providers, including regional public health systems, form integral actors within the Health & Biotech ecosystem.</p>
<p>(8) In the EU, persistent disparities in competitiveness and innovation performance across regions continue to exist. After sustained efforts at both EU and national level to close the innovation gap, it is time to unlock the full potential of every region. By ensuring that less-developed regions are effectively connected to EU value chains, the Union as a whole will be better positioned to compete globally.</p>	<p>LT (Drafting suggestions): In the EU, persistent disparities in competitiveness and innovation performance across regions continue to exist. After sustained efforts at both EU and national level to close the innovation gap, it is time to unlock the full potential of every region. To achieve this, the ECF should provide targeted measures to strengthen emerging innovation ecosystems in less-developed regions, support capacity building, and ensure proportionate access to competitiveness instruments across all Member States. By</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>ensuring that less-developed regions are effectively connected to EU value chains, the Union as a whole will be better positioned to compete globally.</p> <p>LT (Comments):</p> <p>The proposal reinforces the concern already identified in the recital while introducing a concrete operational principle. It is in Lithuania’s interest to establish legally that the European Competitiveness Fund should not only recognise existing disparities but also actively contribute to their reduction, thereby ensuring a more equitable distribution of competitiveness benefits across the Union.</p> <p>NL (Drafting suggestions):</p> <p>(8) In the EU, persistent disparities in competitiveness and innovation performance across regions continue to exist. After sustained efforts at both EU and national EU and national level to close the innovation gap, it is time to unlock the full potential of every region through national level efforts. By ensuring that less-developed regions are effectively connected to EU value chains, the Union as a whole will be better positioned to compete globally.</p> <p>NL (Comments):</p> <p>Lagging national investments need to be addressed.</p> <p>RO (Drafting suggestions):</p> <p>In the EU, persistent disparities in competitiveness and innovation performance across regions continue to exist. After sustained efforts at both EU and national level to close the innovation gap, it is time to unlock the full potential of every region. By ensuring that less-developed regions are effectively connected to EU value chains, the Union as a whole will be better positioned to compete globally, including, through tailored mechanisms,</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>the effective integration of all regions and Member States into innovation ecosystems, skills development frameworks, technology transfer pathways, industrial deployment and scale-up mechanisms, and strategic value chains across the Union.</p> <p>RO (Comments): RO appreciates this recital. We kindly ask for examples of measures/ articles in ECF Regulation meant to ensure that <i>less-developed regions</i> will be effectively connected to EU value chains?</p> <p>DE (Drafting suggestions): (8) In the EU, persistent disparities in competitiveness and innovation performance across regions continue to exist. After sustained efforts at both EU and national level to close the innovation gap, it is time to unlock the full potential of every region. The support activities in articles 27 and 28 shall ensure By ensuring that less-developed regions are effectively connected to EU value chains, the Union as a whole will be better positioned to compete globally.</p> <p>DE (Comments): The aspect of addressing disparities is dealt with in the NRPP and should not be a general goal for the ECF.</p> <p>FI (Drafting suggestions): (8) — In the EU, persistent disparities in competitiveness and innovation performance across regions continue to exist. After sustained efforts at both EU and national level to close the innovation gap, it is time to unlock the full potential of every region. By ensuring that less-developed regions are</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>effectively connected to EU value chains, the Union as a whole will be better positioned to compete globally.</p> <p>FI (Comments): Competitiveness fund is not a regional fund.</p> <p>PT (Drafting suggestions): In the EU, persistent disparities in competitiveness and innovation performance across regions continue to exist. After sustained efforts at both EU and national level to close the innovation gap, it is time to unlock the full potential of every region. By ensuring that less-developed regions and the Union's outermost regions are effectively connected to EU value chains through positive differentiation measures, including higher co-financing rates and simplified procedures, the Union as a whole will be better positioned to compete globally.</p> <p>BE (Drafting suggestions): (8) In the EU, persistent disparities in competitiveness and innovation performance across regions continue to exist <u>and global challenges generate more assymmetric impact on EU regions</u>. After sustained efforts at both EU and national level to close the innovation gap, it is time to unlock the full potential of every region. By ensuring that <u>different categories of less-developed</u> regions are effectively connected to EU value chains <u>and by explicitly supporting the interconnexion of regional innovation ecosystems and territorial anchoring of policies</u>, the Union as a whole will be better positioned to compete globally. <u>The ECF promote the integration of regional strategies, foster interconnexion of regional innovation and industrial ecosystems, and ensure that territorial specificities are taken into account in the design and implementation of its actions.</u></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>BE (Comments):</p> <p>The focus should be on interconnexion of regions, not only on LD regions if the objective is to unlock the potential of the different categories of regions. Strong industrial capacities lays in transition regions, that also face important industrial challenges – that should be covered. S3 can be a strong lever to foster complementarities and collaboration</p>
<p>(9) The EU outermost regions and overseas countries and territories represent unique and strategic assets that benefit the Union as a whole – including proximity to third countries, exceptional conditions for space and astrophysics research, abundant renewable energy potential, rich biodiversity, and extensive maritime zones. The ECF should leverage their potential as geostrategic outposts, particularly in support of the Union’s objectives on security, preparedness, regional value chains, and competitiveness.</p>	<p>PT (Drafting suggestions):</p> <p>(...)The ECF should leverage their potential as geostrategic outposts, particularly in support of the Union’s objectives on security, preparedness, regional value chains, essential public services, notably healthcare and civil protection, and competitiveness, by introducing specific measures to address structural constraints and ensure positive differentiation in funding and implementation.</p> <p>PT (Comments):</p> <p>This clarification makes explicit that the role of the outermost regions (ORs) is not only geostrategic and economic, but also directly linked to the continuity and resilience of essential public services, notably health systems, which are structurally more exposed in insular and remote territories.</p>
<p>(10) The Commission should ensure tight coordination and synergies between all Union founding sources in the MFF. For this purpose, the Framework Programme for Research and Innovation will be tightly linked to the ECF: to ensure that the European industry leverages research results funded by the Union to further innovate and produce in Europe. In order to</p>	<p>NL (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>foster synergies, the work programmes adopted under this Regulation should integrate in a specific and dedicated part and ensure coherence with the ‘Competitiveness’ component, Part II ‘Competitiveness and Society’ of the Regulation (EU) [XXX]¹⁰ of the European Parliament and of the Council [Horizon Europe Framework programme for Research and Innovation]¹¹ in accordance with the committee procedure set out in this Regulation.</p> <p>Horizon Europe rules (including, where relevant and unless otherwise specified, any cross-referred ECF provisions) should apply to the collaborative research and Besides, the ECF shall ensure coherence with the types of actions planned to be implemented under the innovation Fund, notably when developing activities funded under Horizon Europe Pillar II ‘Competitiveness’ part that should be integrated in a specific dedicated part in the ECF Work Programmes. (Placeholder - This also should apply to rules on evaluation committees.) (Placeholder - In order to be able to apply as entities from associated countries to the collaborative part funded under Horizon Europe, the entities need to be established in countries that are associated to Horizon Europe.) In accordance with Horizon Europe and ECF rules (Article 4(3) of the Horizon Europe Specific Programme proposal) the ECF Work Programmes, including collaborative research parts under the policy windows of Chapters IV to VII of the ECF, should be adopted under the work programme rules of the ECF, including its comitology procedures to maintain a seamless support to the investment journey. The specific programme for defence research and development has its own set of rules consolidated in the ECF, with the ECF rules applicable to the Support for Defence Industry Policy component, including the Collaborative Defence Research & Development, Innovation and Technological Superiority.</p> <p>_____</p> <p>10 OJ L., p</p> <p>11 COM(2025) 543</p>	<p>We welcome the additions in this recital, explaining the interlinkage with Horizon Europe. The corresponding articles should also be amended to adequately reflect this recital, see suggestions.</p> <p>What this recital (and the regulation) does not yet cover is the interlinkage between R&I/Horizon Europe and the ECF in terms of strategic priority setting and programming for R&I, and how this should best be reflected in the governance of both programmes.</p> <p>SE (Comments):</p> <p>SE welcomes the clarification of the relationship between the ECF and Horizon Europe in the recitals, and requests that the text be supplemented to specifically point out that the excellence criteria in Horizon Europe will be applicable to the competitiveness part of pillar II in the Horizon Europe regulation (in addition to other relevant aspect that are already advised to be mentioned in the placeholder).</p> <p>SE reminds about its scrutiny reservation under general comments above and calls for further clarifications regarding the proposed governance structure and possible consequences thereof. It is still not clear how the ECF comitology procedure and work programme rules will apply on and impact research and innovation.</p> <p>SK (Drafting suggestions):</p> <p>(10) The Commission should ensure tight coordination and synergies between all Union founding sources in the MFF. For this purpose, the Framework Programme for Research and Innovation will be tightly linked to the ECF: to ensure that the European industry leverages research results funded by the Union to further innovate and produce in Europe. In order to foster synergies, the work programmes adopted under this Regulation should</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>integrate in a specific and dedicated part and ensure coherence with the ‘Competitiveness’ component, Part II ‘Competitiveness and Society’ of the Regulation (EU) [XXX]¹⁰ of the European Parliament and of the Council [Horizon Europe Framework programme for Research and Innovation]¹¹ in accordance with the committee procedure set out in this Regulation.</p> <p>Horizon Europe rules (including, where relevant and unless otherwise specified, any cross-referred ECF provisions) should apply to the collaborative research and Besides, the ECF shall ensure coherence with the types of actions planned to be implemented under the innovation Fund, notably when developing activities funded under Horizon Europe Pillar II ‘Competitiveness’ part that should be integrated <u>in a specific Work Programme dedicated to Research and Innovation for each of the policy windows in a specific dedicated part</u> in the ECF Work Programmes. <i>(Placeholder - This also should apply to rules on evaluation committees.) (Placeholder - In order to be able to apply as entities from associated countries to the collaborative part funded under Horizon Europe, the entities need to be established in countries that are associated to Horizon Europe.)</i> In accordance with Horizon Europe and ECF rules (Article 4(3) of the Horizon Europe Specific Programme proposal) the ECF <u>and HE Work Programmes, including collaborative research</u> parts under the policy windows of Chapters IV to VII of the ECF, should be adopted under the work programme rules of the ECF, including its comitology procedures <u>will follow the strategic orientation of the ECF general committee</u> to maintain a seamless support to the investment <u>journey in accordance with the committee procedure set out in this Regulation.</u> The specific programme for defence research and development has its own set of rules consolidated in the ECF, with the ECF rules applicable to the Support for Defence Industry Policy component, including the Collaborative Defence Research & Development, Innovation and Technological Superiority.</p>

10 OJ L., p

11 COM(2025) 543

SK

(Comments):

Collaborative R&I activities should be included in an independent work programme

SI

(Drafting suggestions):

(10) The Commission should ensure tight coordination and synergies between all Union founding sources in the MFF. For this purpose, the Framework Programme for Research and Innovation will be tightly linked to the ECF: to ensure that the European industry leverages research results funded by the Union to further innovate and produce in Europe. In order to foster synergies, the work programmes adopted under this Regulation should integrate in a specific and dedicated part and ensure coherence with the ‘Competitiveness’ component, Part II ‘Competitiveness and Society’ of the Regulation (EU) [XXX]¹⁰ of the European Parliament and of the Council [Horizon Europe Framework programme for Research and Innovation]¹¹ in accordance with the committee procedure set out in this Regulation. **Horizon Europe rules (including, where relevant and unless otherwise specified, any cross-referred ECF provisions) should apply to the collaborative research and** ~~Besides, the ECF shall ensure coherence with the types of actions planned to be implemented under the innovation Fund, notably when developing activities funded under Horizon Europe Pillar II ‘Competitiveness’ part that should be integrated in a specific dedicated part in the ECF Work Programmes. (Placeholder – This also should apply to rules on evaluation committees.) (Placeholder – In order to be able to apply as entities from associated countries to the collaborative part funded under Horizon Europe, the entities need to be~~

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>established in countries that are associated to Horizon Europe.) In accordance with Horizon Europe and ECF rules (Article 4(3) of the Horizon Europe Specific Programme proposal) the ECF Work Programmes, including collaborative research parts under the policy windows of Chapters IV to VII of the ECF, should be adopted under the work programme rules of the ECF, including its comitology procedures to maintain a seamless support to the investment journey. The specific programme for defence research and development has its own set of rules consolidated in the ECF, with the ECF</p> <p>rules applicable to the Support for Defence Industry Policy component, including the Collaborative Defence Research & Development, Innovation and Technological Superiority.</p> <p>SI (Comments): Slovenia believes that all R&I activities should be defined under the work programmes of Horizon Europe.</p> <p>AT (Comments): AT requests a stronger wording: Horizon Europe rules “shall” apply to the collaborative research and innovation activities funded under Horizon Europe pillar II (Competitiveness).</p> <p>Therefore, the respective text should be moved back to article 9a.</p> <p>DE (Comments): We consider this a very relevant clarification also for the users of the respective programmes. The application of the Horizon Europe rules within</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>the ECF must be legally binding. In our view, it remains unclear whether a mention of the Horizon Europe rules in the recitals is sufficient and legally binding for their application within the ECF. Therefore, we strongly suggest to remove it from the non-binding recitals to article 7 (1)(a). It should also be clear that this applies to rules on evaluation committees. As regards association, we have suggested additions to Article 11.</p> <p>As regards comitology, it should be made clear in the regulation that there are subconfigurations of the configurations of the programme committees for the dedicated parts for collaborative research and innovation actions in the ECF Work Programmes.</p> <p>ES (Drafting suggestions):</p> <p>(10) The Commission should ensure tight coordination and synergies between all Union funding sources in the MFF. For this purpose, the Framework Programme for Research and Innovation will be tightly linked coordinated with to the ECF—to ensure that the European industry leverages research results funded by the Union to further innovate and produce in Europe. In order to foster synergies, the work programmes adopted under this Regulation should include integrate in an independent one specific and dedicated part and ensure coherence with for the ‘Competitiveness’ component, Part Pillar II ‘Competitiveness and Society’ of the Regulation (EU) [XXX]¹⁰ of the European Parliament and of the Council [Horizon Europe Framework programme for Research and Innovation]¹¹ in accordance with the committee procedure set out in this Regulation. Horizon Europe rules (including, where relevant and unless otherwise specified, any cross-referred ECF provisions) should apply to the collaborative research and innovation Besides, the ECF shall ensure coherence with the types of actions planned to be implemented under the innovation Fund, notably when developing activities funded under Horizon Europe Pillar II</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>‘Competitiveness’ part that should be integrated in a specific dedicated part in the ECF Work Programmes. (Placeholder - This also should apply to rules on evaluation committees.) (Placeholder - In order to be able to apply as entities from associated countries to the collaborative part funded under Horizon Europe, the entities need to be established in countries that are associated to Horizon Europe.) In accordance with Horizon Europe and ECF rules (Article 4(3) of the Horizon Europe Specific Programme proposal) the ECF Work Programmes, including collaborative research parts under the policy windows of Chapters IV to VII of the ECF, should be adopted under the work programme rules of the ECF, including its comitology procedures to maintain a seamless support to the investment journey. The specific programme for defence research and development has its own set of rules consolidated in the ECF, with the ECF rules applicable to the Support for Defence Industry Policy component, including the Collaborative Defence Research & Development, Innovation and Technological Superiority.</p> <hr/> <p>10 OJ L., p</p> <p>11 COM(2025) 543</p> <p>ES (Comments): This recital should be revisited. The wording is too long, complex and confusing.</p> <p>The new text is a bit confusing and too long and there seem to be some duplicated parts, for instance that Pillar II WPs should be integrated in a specific and dedicated part and ensure coherence with the ECF.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>Collaborative R&I activities shall be included in an independent work programme within each policy window that shall be approved by the specific R&I committee, under the examination procedure.</p> <p>FI (Comments):</p> <p>This seems to be very much work in progress and we would appreciate immediate clarity on it.</p> <p>IE (Comments):</p> <p>IE welcome what appears to be the increased clarity regarding separate and distinct rules applying to the ECF and Horizon Europe; however, the text is confusing.</p> <p>IE would therefore welcome more clarity on when Horizon vs ECF rules apply, and on the interlinkage between R&I/Horizon Europe and the ECF in terms of strategic priority setting and programming for R&I, and how this should best be reflected in the governance of both programmes.</p> <p>PT (Comments):</p> <p>While PT welcomes the clarification introduced in this recital, in what concerns the rules of HE to be applied to collaborative research and innovation under the competitiveness part, we would be in favour of having this reference clearly specified in the regulation,</p> <p>In what concerns art.9 specifically, we took note of the PRES DK remarks on this topic, and its effort to guarantee a good regulation. Nonetheless, it should still be possible to legally clarify this aspect on art. 9, without compromising the quality of the regulation.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>PT presents a drafting suggestion in an effort to contribute to this alternative.</p> <p>BE</p> <p>(Drafting suggestions):</p> <p>(10) The Commission should ensure tight coordination and synergies between all Union founding sources in the MFF. For this purpose, the Framework Programme for Research and Innovation will be tightly linked to the ECF: to ensure that the European industry leverages research results funded by the Union to further innovate and produce in Europe.</p> <p><u>Collaborative research and innovation activities, to be supported by the Pillar on Competitiveness under Horizon Europe, should be key for translating research into the creation of products and solutions to support the industrial strength of the Union on global markets. Societal uptake should also be considered an integral part of the scope of the policy windows, ensuring that research and innovation outcomes are not only translated into industrial competitiveness but also deliver tangible benefits for citizens and society at large.</u> In order to foster synergies, the work programmes adopted under this Regulation should integrate in a specific and dedicated part and ensure coherence with the ‘Competitiveness’ component, Part II ‘Competitiveness and Society’ of the Regulation (EU) [XXX]¹⁰ of the European Parliament and of the Council [Horizon Europe Framework programme for Research and Innovation]¹¹ in accordance with the committee procedure set out in this Regulation. Horizon Europe rules (including, where relevant and unless otherwise specified, any cross-referred ECF provisions) should apply to the collaborative research and innovation Besides, the ECF shall ensure coherence with the types of actions planned to be implemented under the innovation Fund, notably when developing activities funded under Horizon Europe Pillar II ‘Competitiveness’ part that should be integrated in a specific dedicated part in the ECF Work Programmes.<i>(Placeholder - This also should apply to rules on evaluation committees.) (Placeholder - In order to be able to</i></p>

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	<p><i>apply as entities from associated countries to the collaborative part funded under Horizon Europe, the entities need to be established in countries that are associated to Horizon Europe.)</i> In accordance with Horizon Europe and ECF rules (Article 4(3) of the Horizon Europe Specific Programme proposal) the ECF Work Programmes, including collaborative research <u>and innovation</u> parts under the policy windows of Chapters IV to VII of the ECF, should be adopted under the work programme rules of the ECF, including its comitology procedures to maintain a seamless support to the investment journey. The specific programme for defence research and development has its own set of rules consolidated in the ECF, with the ECF rules applicable to the Support for Defence Industry Policy component, including the Collaborative Defence Research & Development, Innovation and Technological Superiority.</p> <p>BE (Comments):</p> <p>How does the Commission intend to ensure, in practice that R&I and industrial deployment Benefit from an integrated vision and real synergies in the WP, while respecting the specificities, temporalities and requirements specific to each field ?</p> <p>Under art. 83, we still support the committees per windows but still would like to ensure that the R&I and the deployment sides are well represented (both expertise covered which could be well reflected in the actions covered by the work program under each policy window, as well as a balance among TRL).</p> <p>Emphasise the importance of applied research of the specific objectives of the programme.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>Societal impact is included in the objectives (Article 3.1 (a)), but is not mentioned further in the recitals. Hence this addition.</p> <p>FR (Drafting suggestions):</p> <p>(10) The Commission should ensure tight coordination and synergies between all Union founding sources in the MFF, <u>in particular for programmes of the Heading 2. This would ensure that the European industry leverages research results funded by the Union to further innovate and produce in Europe. Since research and innovation contributes significantly to stimulating Union’s competitiveness,</u> the Framework Programme for Research and Innovation and the ECF should collaborate closely around common strategic priorities. In order to cover whole value chains, the work programmes adopted under this Regulation should integrate in a specific and dedicated part with <u>calls for proposals under</u> the ‘Competitiveness’ component, Part II ‘Competitiveness and Society’ of the Regulation (EU) [XXX]¹⁰ of the European Parliament and of the Council [Horizon Europe Framework programme for Research and Innovation]¹¹ in accordance with the committee procedure set out in this Regulation. Horizon Europe rules, including eligibility and award criteria, should apply to the collaborative research activities funded under Horizon Europe Pillar II ‘Competitiveness’ part. Besides, the ECF shall ensure coherence with the types of actions planned to be implemented under the Innovation Fund, notably when developing work programmes, as well as with the Connecting Europe Facility and Single Market and Customs programme.</p> <p><i>(Placeholder - This also should apply to rules on evaluation committees.)</i> <i>(Placeholder - In order to be able to apply as entities from associated countries to the collaborative part funded under Horizon Europe, the entities need to be established in countries that are associated to Horizon Europe.)</i> In accordance with Horizon Europe and ECF rules (Article 4(3) of the Horizon Europe Specific Programme proposal), the ECF</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>work programmes, including the dedicated collaborative R&I parts under the policy windows of Chapters IV to VII of the ECF, should be adopted under the work programme rules of the ECF, including its comitology procedures, while taking into account R&I specificities. The specific programme for defence research and development has its own set of rules consolidated in the ECF, with the ECF rules applicable to the Support for Defence Industry Policy component, including the Collaborative Defence Research & Development, Innovation and Technological Superiority.</p> <p>FR (Comments):</p> <p>La formulation de ce considérant manque de clarté, et plusieurs passages se répètent (règles de comitologie, intégration des appels à projets dans les programmes de travail du FEC ...). Par ailleurs, le narratif justifiant de l’articulation entre Horizon Europe et le FEC n’est pas pertinent, puisqu’il évoque le besoin de synergies entre l’ensemble des programmes du CFP (déjà mentionné au considérant 12a). Nous proposons ainsi de supprimer les redondances et de préciser le lien entre politiques de R&I et politique industrielle, en lien avec les objectifs formulés à l’article 3. Par ailleurs, les règles d’Horizon Europe précisent déjà que certaines dispositions du règlement FEC s’appliquent à l’ensemble des appels, à l’instar de l’article 10 sur la préférence européenne.</p> <p>Les autres programmes de la rubrique 2 ayant trait à la compétitivité devraient être mentionnés.</p>
<p>(11) In order to foster synergies between actions under the ECF and the Innovation Fund, the work programmes of the ECF should ensure coherence</p>	

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>with the priorities and types of actions that could be funded under the Innovation Fund. Together, the ECF, Horizon Europe, and the Innovation Fund will provide coherent support to the Union competitiveness.</p>	
<p>(12) Moreover, to foresee a strong connection with the Competitiveness Coordination Tool, the work programme of the ECF should ensure coherence with the selected projects and competitiveness priorities identified under the Tool.</p>	<p>AT (Drafting suggestions): (12) Moreover, to foresee a strong connection with the Competitiveness Coordination Tool, the work programme of the ECF should ensure coherence with the selected projects and competitiveness priorities identified under the Tool.</p> <p>AT (Comments): As long as we have no information on the CCT, it should not be part of a regulation.</p> <p>ES (Comments): Reserve. There is no information on the Competitiveness Coordination Tool.</p> <p>FI (Drafting suggestions): Moreover, to foresee a strong connection with the Competitiveness Coordination Tool, the work programme of the ECF should ensure coherence with the selected projects and competitiveness priorities identified under the Tool.</p> <p>FI (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>As long as there is no tool, we prefer to delete this and come back to it in a revised format when more is known. Reference to selected projects and competitiveness priorities needs explanation: what projects and selected how? what priorities and selected how?</p> <p>FR (Comments): Les autorités françaises ont besoin de davantage d'information sur cet outil avant de se prononcer.</p>
<p>(12a) To ensure an efficient use of Union resources in achieving the objectives of the ECF, the ECF shall be implemented in synergy with other Union Funds including the Global Europe Fund, the Single Market and Customs Program, Erasmus+ and AgoraEU.</p>	<p>SE (Comments): SE welcomes the added recital.</p> <p>ES (Drafting suggestions): (12a) To ensure an efficient use of Union resources in achieving the objectives of the ECF, the ECF shall be implemented in synergy with other Union Funds including the Global Europe Fund, the Union Civil Protection Mechanism and Union support for health emergency preparedness and response, the Single Market and Customs Program, Erasmus+ and AgoraEU. <u>Complementarity of Union Funds will be also ensured.</u></p> <p>ES (Comments): Complementarity of Funds is also needed.</p> <p>The Union Civil Protection Mechanism and Union support for health emergency preparedness and response proposal legislative statement includes</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>a specific mention to synergies with the ECF: “The European Competitiveness Fund will enhance the EU’s preparedness and strategic autonomy in key sectors and technologies (e.g. health innovation and manufacturing).” If we are going to name specific funds or instruments, this one should also be included.</p> <p>IE (Comments):</p> <p>IE agree with this new addition.</p> <p>PL (Drafting suggestions):</p> <p>(12a) To ensure an efficient use of Union resources in achieving the objectives of the ECF, the ECF shall be implemented in synergy with other Union Funds including the Global Europe Fund, the Connecting Europe Facility the Single Market and Customs Program, Erasmus+ and AgoraEU.</p> <p>PL (Comments):</p> <p>PL (Drafting suggestions):</p> <p>According to PCY’s Explanatory Note, this new recital is supposed to reflect contents of Article 7(3). Article 7(3) mentions CEF as well, yet it was omitted in the recital (by mistake, we assume – as there is no explanation for the omittance provided).</p> <p>FR (Drafting suggestions):</p> <p>(12a) To ensure an efficient use of Union resources in achieving the objectives of the ECF, the ECF shall be implemented in synergy with other Union Funds including the Global Europe Fund, the Single Market and Customs Program, Erasmus+ and AgoraEU.</p> <p>FR (Comments):</p> <p>La France soutient ce nouveau considérant 12a.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>NL (Drafting suggestions): <u>(12b) Synergies with the Global Europe Instrument offer opportunities to increase coherence between internal and external policies, aligning, inter alia, with the challenges and opportunities identified in the Draghi-report. EU-competitiveness is strengthened by openness, economic relations and mutually beneficial partnerships with third countries, but also as a crucial source of resilience through diversification, in particular in the area of critical raw materials. Competitiveness actions under the ECF with an external dimension should, where relevant, be supported by and implemented in synergy with actions under the Competitiveness pillar in the Global Europe Instrument. In particular in access to diversified sources of critical raw materials and other crucial inputs, the ECF and Global Europe Instrument work programmes shall actively seek and describe synergies and co-investment opportunities, where relevant.</u></p> <p>DE (Drafting suggestions): <u>12b Synergies with the Global Europe Fund offer opportunities to increase coherence between internal and external competitiveness policy, aligning, inter alia, with the challenges and opportunities identified in the Draghi-report. EU-competitiveness is strengthened by economic relations and partnerships with third countries, through competitive pressure, export market opportunities and knowledge spillovers, but also as a crucial source of resilience through diversification, in particular in the area of critical raw materials. Competitiveness actions under the ECF with an external dimension should, where relevant, be supported by and implemented in synergy with the Global Europe Fund. In particular in access to diversified sources of critical raw materials and other crucial inputs, the ECF and Global Europe Fund work</u></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p><u>programmes shall actively seek and describe synergies and co-investment opportunities, where relevant.</u></p> <p><u>12c Work programmes should be limited in time with a two-year cycle as a benchmark. They should in any case not exceed the duration of the MFF (2028-2034). With regard to space, each (sub-)component shall have a separate work programme not exceeding two years' duration.</u></p> <p>DE (Comments): We should actively aim for coherence with Global Europe, also in the implementation of the MFF 2028-34 This complements our proposal on Art 15 (2a)</p> <p>IE (Drafting suggestions): <u>12b) Synergies with the Global Europe Fund offer opportunities to increase coherence between internal and external competitiveness policy. EU-competitiveness is strengthened by economic relations and partnerships with third countries, through competitive pressure, export market opportunities and innovation and knowledge spillovers, but also as a crucial source of resilience through diversification, in particular in the area of critical raw materials. Competitiveness actions under the ECF with an external dimension should, where relevant, be supported by and implemented in synergy with the Global Europe Fund.</u></p> <p>IE (Comments): IE suggested text amendment to emphasise the role of partnerships and economic relationships in building resilience.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>(13) Cooperation between public and private sectors can benefit European competitiveness and leveraging private investments is necessary to complete the objectives of the ECF. Therefore, it should be possible to implement parts of the ECF budget through public-private partnerships together with other public and private entities, where this is the most effective implementation form to achieve the policy objectives established for research and technological development, while ensuring additionality and avoiding the crowding-out of private investments. Public-private partnerships in the form of Joint Undertakings should be established where a close involvement of the Union is required and should ensure appropriate voting rights for the Union as well as sufficient co-investment by other partners to leverage Union support. In view of fostering synergies and efficiencies, it is necessary, based on the assessed needs, to ensure a centralised establishment and administrative functions for joint undertakings. Therefore, the number of joint undertakings should be as limited as possible.</p>	<p>NL (Drafting suggestions):</p> <p>(13) Cooperation between public and private sectors can benefit European competitiveness and leveraging private investments is necessary to complete the objectives of the ECF. Therefore, it should be possible to implement parts of the ECF budget through public-private partnerships together with other public and private entities, where this is the most effective implementation form to achieve the policy objectives established for research and technological development, while ensuring additionality and avoiding the crowding-out of private investments. Public-private partnerships in the form of Joint Undertakings should be established where a close involvement of the Union is required and should ensure appropriate voting rights for the Union as well as sufficient co-investment by other partners to leverage Union support. Horizon Europe rules on public-private partnerships apply. In view of fostering synergies and efficiencies, it is necessary, based on the assessed needs, to ensure a centralised establishment and administrative functions for joint undertakings. Therefore, the number of joint undertakings should be as limited as possible.</p> <p>NL (Comments):</p> <p>Reference is needed to applicable Horizon Europe rules. It goes too far to at this moment say that the number of joint undertakings should be as limited as possible. The statement on centralised establishment is also not suitable nor needed here.</p> <p>ES (Drafting suggestions):</p> <p>(13) Cooperation between public and private sectors can benefit European competitiveness and leveraging private investments is necessary to complete the objectives of the ECF. Therefore, in duly justified cases, it should be</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>possible to implement parts of the ECF budget through public-private partnerships together with other public and private entities, where this is the most effective implementation form to achieve the policy objectives established for research and technological development, while ensuring additionality and avoiding the crowding-out of private investments. Public-private partnerships in the form of Joint Undertakings should be established <u>in agreement with Member States when needed to fulfill the objectives of the ECF or Horizon Europe and</u> where a close involvement of the Union is required and should ensure appropriate voting rights for the Union as well as sufficient co-investment by other partners to leverage Union support. In view of fostering synergies and efficiencies, it is necessary, based on the assessed needs, to ensure a centralised establishment and administrative functions for joint undertakings. Therefore, the number of joint undertakings should be as limited <u>and similar between them</u> as much as possible. <u>The use of the Horizon Europe budget exclusively for research and innovation activities must be ensured and therefore its use shall be monitored.</u></p> <p>ES (Comments):</p> <p>Partnerships in general, and in particular public-private partnerships, may implement parts of the ECF or HE budgets in duly justified cases, when they are needed to fulfil the objectives of the ECF and/or Horizon Europe collaborative R&I activities.</p> <p>Member States shall participate in the definition of all types of partnerships and decide on the ones to be established as well as the conditions and criteria to be applied.</p> <p>Central management should be further discussed with Member States.</p> <p>As a general rule the Horizon Europe budget shall be solely used for research and innovation activities and should be accounted for separately regardless of how it is managed (whether it is through partnerships or not).</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>FI (Drafting suggestions): Cooperation between public and private sectors can benefit European competitiveness and leveraging private investments is necessary to complete the objectives of the ECF. Therefore, it should be possible to implement parts of the ECF budget through public-private partnerships together with other public and private entities, where this is the most effective implementation form to achieve the policy objectives established for research and technological development, while ensuring additionality and avoiding the crowding-out of private investments. Public-private partnerships in the form of Joint Undertakings should be established where a close involvement of the Union is required and should ensure appropriate voting rights for the Union as well as sufficient co-investment by other partners to leverage Union support. In view of fostering synergies and efficiencies, it is necessary, based on the assessed needs, to ensure a centralised establishment and administrative functions for joint undertakings. Therefore, the number of joint undertakings should be as limited as possible.</p> <p>FI (Comments): Are PPPs here referring only to JUs? why they should be “as limited as possible”? We don’t have the proposal yet at table, this is pre-emptying the negotiations.</p> <p>FR (Drafting suggestions): (13) Cooperation between public and private sectors can benefit European competitiveness and leveraging private investments is necessary to complete the objectives of the ECF. This public-private collaboration should cover all stages of R&I development, from the lab to the market. The European Partnerships, including in the form of Joint Undertakings, are</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>essential tools to deliver on industrial involvement and investment in collaborative research and innovation, and should contribute, where relevant, to the specific policy objectives of the ECF policy Windows. Therefore, such Partnerships should be supported by the ECF to complete these objectives.</p> <p>FR (Comments): Les Entreprises Communes (Joint Undertakings) sont établies par le programme-cadre de recherche et d'innovation, au titre de l'article 187 du TFUE (chapitre Recherche, développement technologique et espace). Ce règlement n'a donc pas vocation à définir leurs règles de fonctionnement, et encore moins à préciser leur nombre. En revanche, il nous semble cohérent que le FEC puisse contribuer financièrement aux activités de certaines Entreprises Communes qui visent à développer des projets technologiques et à visée industrielle (ex : SESAR JU). Nous proposons d'utiliser la même terminologie que dans le considérant d'Horizon Europe, qui met en exergue le rôle des Partenariats comme outils de politique industrielle.</p>
<p>(14) The ECF should use the whole toolbox of Union budget to unlock additional public and private investments, in particular from institutional investors throughout the whole investment journey. It should contribute to creating an “investment culture” by better leveraging public funds and the de-risking potential of the Union budget. It will maximise the added value of Union action and crowd-in private capital to secure a competitive innovation and industrial base, also by using innovative funding instruments including public-private co-investment with asymmetric risk returns. In this regard, the use of financial instruments that crowd in private investors should be the privileged option wherever possible.</p>	<p>SE (Comments): SE considers that the legal text should state more clearly that priority is to be given to financial support through the ECF InvestEU instrument over grants, in accordance with the last sentence of this recital. See proposal in Article 12 and Article 21.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>(15) The Draghi report calls for more investment support to close the investment gap and recognises InvestEU as the key risk-sharing instrument to use. [The ECF InvestEU Instrument should set up a single budgetary guarantee and deliver financial instruments to support EU competitiveness.]</p>	
<p>(16) In a fast-changing economic, social, security and geopolitical environment, recent experience has shown the need for a more flexible multiannual financial framework and its programmes. [To that effect, and in line with the objectives of the ECF, the funding should take due account, in the budgetary procedure, of the evolving policy needs and Union’s priorities as identified in relevant documents published by the Commission while ensuring the necessary predictability for the implementation of investments.]</p>	<p>NL (Drafting suggestions): 16) In a fast-changing economic, social, security and geopolitical environment, recent experience has shown the need for a more flexible multiannual financial framework and its programmes, <u>while ensuring long-term investment certainty</u>. [To that effect, and in line with the objectives of the ECF, the funding should take due account, in the budgetary procedure, of the evolving policy needs and Union’s priorities as identified in relevant documents published by the Commission while ensuring the necessary predictability for the implementation of investments.]</p> <p>IE (Drafting suggestions): 16) In a fast-changing economic, social, security and geopolitical environment, recent experience has shown the need for a more flexible multiannual financial framework and its programmes, <u>while ensuring long-term investment certainty</u>. [To that effect, and in line with the objectives of the ECF, the funding should take due account, in the budgetary procedure, of the evolving policy needs and Union’s priorities as identified in relevant documents published by the Commission while ensuring the necessary predictability for the implementation of investments.]</p> <p>IE (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>IE Suggested text amendment - in view of the need for long term investment certainty to enable businesses to make investment decisions.</p> <p>EE (Drafting suggestions):</p> <p>(16) In a fast-changing economic, social, security-; technological and geopolitical environment, recent experience has shown the need for a more flexible multiannual financial framework and its programmes. [To that effect, and in line with the objectives of the ECF, the funding should take due account, in the budgetary procedure, of the evolving policy needs and Union’s priorities as identified in relevant documents published by the Commission while ensuring the necessary predictability for the implementation of investments.]</p> <p>EE (Comments):</p> <p>As the technological environment is also contantly and rapidly changing it is worth adding it here.</p>
<p>(17) The ECF should facilitate access to funding from Union programmes through user-centric, fast, simpler and harmonised procedures and improve coherence among Union instruments and with Member States investments. The ECF should put beneficiaries of Union funding, and notably industry, SMEs, start-ups and scale-ups startups and scaleups, including those established under the upcoming 28th regime, at the centre of the design of Union funding instruments.</p>	<p>FI (Drafting suggestions):</p> <p>(17) The ECF should facilitate access to funding from Union programmes through user-centric, fast, simpler and harmonised procedures and improve coherence among Union instruments and with Member States investments. The ECF should put beneficiaries of Union funding, and notably industry, SMEs, start-ups and scale-ups startups and scaleups, including those established under the upcoming 28th regime, at the centre of the design of Union funding instruments.</p> <p>FI</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments):</p> <p>Not to mention 28th regime at this stage</p> <p>FR</p> <p>(Drafting suggestions):</p> <p>The ECF should facilitate access to funding from Union programmes through user-centric, fast, simpler and harmonised procedures and improve coherence among Union instruments and with Member States investments. The ECF should put beneficiaries of Union funding, and notably industry, SMEs, start-ups and scale-ups startups, scaleups and small midcaps, including those established under the upcoming 28th regime, at the centre of the design of Union funding instruments.</p> <p>FR</p> <p>(Comments):</p> <p>La France regrette que le nouveau compromise ne mentionne pas les small mid-caps, entreprises essentielles pour la compétitivité européenne.</p>
<p>(18) [The ECF should operate through four policy windows that mirror Union’s key policy priorities: Clean Transition and Industrial Decarbonisation; Digital Leadership; Health, Biotech, Agriculture and Bioeconomy; Resilience and Security, Defence industry and Space.]</p>	<p>ES</p> <p>(Drafting suggestions):</p> <p>(18) [The ECF should operate through four policy windows that mirror Union’s key policy priorities: Clean Transition and Industrial Decarbonisation; Digital Leadership; Health, Biotech, Agriculture and Bioeconomy, Agriculture and the Blue Economy; Resilience and Security, Defence industry and Space.]</p> <p>ES</p> <p>(Comments):</p> <p>As per our overall comment.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>(19) Infrastructure is an essential enabler for European competitiveness. Investments in infrastructure are a necessary condition for the proper functioning of the EU's single market, the green and digital transition and for increasing the Union's resilience and security. For example, the trans-European transport network fosters sustainable forms of transport, promotes improved multimodal and interoperable digital and transport solutions, thereby contributing to a smooth functioning of the internal market. The trans-European networks for energy are key for a genuine Energy Union to enable the Union's energy and climate objectives by connecting Union countries' electricity and clean energy networks to ensure our energy independence and competitiveness. For this, the development of cross-border interconnectors, domestic transmission and distribution grids is essential. The ECF support will work in coherence and complementarity with the Connecting Europe Facility (CEF). It is essential for Europe's competitiveness to provide for synergies between the development of trans-European networks in energy and transport with strong cross-border impact supported by CEF, and investment support for the decarbonisation, modernisation and expansion of transport, energy and digital infrastructure under ECF.</p>	<p>SE (Drafting suggestions):</p> <p>Infrastructure is an essential enabler for European competitiveness. Investments in infrastructure are a necessary condition for the proper functioning of the EU's single market, the green and digital transition and for increasing the Union's resilience and security. For example, the trans-European transport network fosters sustainable forms of transport, promotes improved multimodal and interoperable digital and transport solutions, thereby contributing to a smooth functioning of the internal market. The trans-European networks for energy are key for a genuine Energy Union to enable the Union's energy and climate objectives by connecting Union countries' electricity and clean energy networks to ensure our energy independence and competitiveness. For this, the development of cross-border interconnectors, domestic transmission and distribution grids is essential.</p> <p><u>Transboundary cooperation and coordination of water infrastructure and water management are fundamental to secure access to water for all sectors and thereby growth and EU's competitiveness.</u> The ECF support will work in coherence and complementarity with the Connecting Europe Facility (CEF).</p> <p>SE (Comments):</p> <p>Access to water is fundamental for all sectors, including transport, energy, agriculture and defence. For instance, in relation to transport and energy: in summer 2022 low water levels in European rivers prevented transport of coal by cargo ship to power plants in Germany, and caused cooling water shortages for nuclear reactors in France.</p>
<p>(20) Furthermore, Trans-European digital networks are essential to interconnect national and international telecommunication networks,</p>	

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>enabling seamless, secure cross-border access to high-performance computing, cloud, data and AI capacities. In this regard, it is essential to develop, protect and maintain the infrastructures for competitiveness, such as terrestrial backbone networks and submarine cable infrastructures, ensuring continuity of service in case of incidents as well as increasing the detection capacities in sea basins to enhance undersea cables, as highlighted by the Joint Communication ‘EU Action Plan on Cable Security’.</p>	<p style="text-align: center; opacity: 0.5; font-size: 48px; transform: rotate(-30deg);">PUBLIC</p>
<p>(21) The competitive strength of the Union lies in its people. The Competitiveness Compass identifies promoting skills and quality jobs as a horizontal enabler. The European Council Conclusions highlight that “following the Commission communication of 5 March 2025 on a Union of Skills, further efforts should be made to enhance the acquisition, recognition and retention of skills across the EU, from the building of basic skills to engaging in life-long learning, reskilling and upskilling, in line with the European Pillar of Social Rights and its Action Plan”. A strong dialogue is part of this. Human capital is key to the prosperity of the Union, its economic resilience and unique social market economy. It is essential to foster prosperity, including high quality jobs, by boosting productivity growth, making Union industries more competitive and innovative, attracting additional investments, and supporting a dynamic single market and enhanced economic security. The ECF should contribute to the Union of Skills¹²by supporting the development of a skilled workforce equipped with the specific skills needed in the strategic investment areas of the Fund, through life-long learning, education, training projects and apprenticeships, and the creation of attractive quality jobs accessible to all and by accompanying ECF investments with skills investment to alleviate skills shortages in the given strategic sector of the ECF and indicate when it is included. This includes a Skills Guarantee that should enable workers in sectors undergoing restructuring to upskill and reskill, in line with relevant national, regional and/or sectoral transition strategies. The ECF should</p>	<p>SE (Comments): SE can accept the proposed revisions.</p> <p>ES (Drafting suggestions):</p> <p>(21) The competitive strength of the Union lies in its people. The Competitiveness Compass identifies promoting skills and quality jobs as a horizontal enabler. The European Council Conclusions highlight that “following the Commission communication of 5 March 2025 on a Union of Skills, further efforts should be made to enhance the acquisition, recognition and retention of skills across the EU, from the building of basic skills to engaging in life-long learning, reskilling and upskilling, in line with the European Pillar of Social Rights and its Action Plan”. A strong dialogue is part of this. Human capital is key to the prosperity of the Union, its economic resilience and unique social market economy. It is essential to foster prosperity, including high quality jobs, by boosting productivity growth, making Union industries more competitive and innovative, attracting additional investments, and supporting a dynamic single market and enhanced economic security. The ECF should contribute to the Union of Skills¹²by supporting the development of a skilled workforce equipped with the specific skills needed in the strategic investment areas of the Fund, through life-long learning, education, training projects and apprenticeships, and the creation of</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>support skills intelligence, upskilling and reskilling, and foster public-private partnerships between universities, VET providers, businesses, in particular SMEs, social partners and applied research institutes. The ECF could also support activities of University Alliances, also in cooperation with employers, to improve their delivery on innovation and the development of skills and talent.</p> <hr/> <p>12 Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, The Union of Skills, COM(2025) 90 final, 5.3.2025.</p>	<p>attractive quality jobs accessible to all and by accompanying ECF investments with skills investment to alleviate skills shortages in the given strategic sector of the ECF and indicate when it is included. This includes a Skills Guarantee that should enable workers in sectors undergoing restructuring to upskill and reskill, in line with relevant national, regional and/or sectoral transition strategies. The ECF should support skills intelligence, upskilling and reskilling, and foster public-private partnerships between universities, VET providers, businesses, in particular SMEs, social partners and applied research organisations institutes. The ECF could also support activities of University Alliances, also in cooperation with employers, to improve their delivery on innovation and the development of skills and talent.</p> <p>ES (Comments): In coherence with Horizon Europe. Research organisations is more appropriate. The word institutes is not used in any COM or Council document in the field of R&I policy.</p> <p>Research performing organisations (instead of institutions, organisations is the most frequent term) perform both basic and applied research, and they also have among their core functions training scientific, technical, and management staff, as well as to collaborate with universities in specialised and postgraduate education.</p> <p>FI (Drafting suggestions): (21) The competitive strength of the Union lies in its people. The Competitiveness Compass identifies promoting skills and quality jobs as a horizontal enabler. The European Council Conclusions highlight that “following the Commission communication of 5 March 2025 on a Union of Skills, further efforts should be made to enhance the acquisition, recognition</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>and retention of skills across the EU, from the building of basic skills to engaging in life-long learning, reskilling and upskilling, in line with the European Pillar of Social Rights and its Action Plan”. A strong dialogue is part of this. Human capital is key to the prosperity of the Union, its economic resilience and unique social market economy. It is essential to foster prosperity, including high quality jobs, by boosting productivity growth, making Union industries more competitive and innovative, attracting additional investments, and supporting a dynamic single market and enhanced economic security. The ECF should contribute to the Union of Skills¹²by supporting the development of a skilled workforce equipped with the specific skills needed in the strategic investment areas of the Fund, through life-long learning, education, training projects and apprenticeships, and the creation of attractive quality jobs accessible to all and by accompanying ECF investments with skills investment to alleviate skills shortages in the given strategic sector of the ECF and indicate when it is included. This includes a Skills Guarantee that should enable workers in sectors undergoing restructuring to upskill and reskill, in line with relevant national, regional and/or sectoral transition strategies. The ECF should support skills intelligence, upskilling and reskilling, and foster public-private partnerships between universities, VET providers, businesses, in particular SMEs, social partners and applied research institutes. The ECF could also support activities of University Alliances, when the EU added value is clear. also in cooperation with employers, to improve their delivery on innovation and the development of skills and talent.</p> <hr/> <p>12 Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, The Union of Skills, COM(2025) 90 final, 5.3.2025.</p> <p>FI (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>What activities of the University alliances would be supported? Seems like an open cheque given that education is national competence so to be edited.</p> <p>FR (Drafting suggestions):</p> <p>(21) The competitive strength of the Union lies in its people. The Competitiveness Compass identifies promoting skills and quality jobs as a horizontal enabler. The European Council Conclusions highlight that “following the Commission communication of 5 March 2025 on a Union of Skills, further efforts should be made to enhance the acquisition, recognition and retention of skills across the EU, from the building of basic skills to engaging in life-long learning, reskilling and upskilling, in line with the European Pillar of Social Rights and its Action Plan”. A strong dialogue is part of this. Human capital is key to the prosperity of the Union, its economic resilience and unique social market economy. It is essential to foster prosperity, including high quality jobs, by boosting productivity growth, making Union industries more competitive and innovative, attracting additional investments, and supporting a dynamic single market and enhanced economic security. The ECF should contribute to the Union of Skills¹²by supporting the development of a skilled workforce equipped with the specific skills needed in the strategic investment areas of the Fund, through life-long learning, education, training projects and apprenticeships, and the creation of attractive quality jobs accessible to all and by accompanying ECF investments with skills investment to alleviate skills shortages in the given strategic sector of the ECF and indicate when it is included. This includes a Skills Guarantee that should enable workers in sectors undergoing restructuring to upskill and reskill, in line with relevant national, regional and/or sectoral transition strategies. The ECF should support skills intelligence, upskilling and reskilling, and foster public-private partnerships between universities, VET providers, businesses, in particular SMEs, social partners and applied research institutes. In synergy with Erasmus+ and Horizon Europe, the ECF could also support the activities</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>of European University Alliances, to improve their delivery on innovation and the development of skills and talent.</p>
	<p>PL (Drafting suggestions): (36a) Rapid technological development, also in the military sector, makes the war easier to spread about and shrinks the territorial distance. To ensure security and defence of European citizens which remains a top priority, and having in mind that road and rail transport are not capable of ensuring supplies for military purposes in the event of a large-scale war, the ECF should also support investments aimed at strengthening and developing fuel capabilities for dual-use purposes, both in delivery and storage.</p> <p>PL (Comments):</p> <p>PL (Drafting suggestions): Additional recital proposed.</p>
<p>(41) [To ensure predictability for stakeholders and provide a sufficient level of certainty for investment planning, the ECF should set out an indicative budget distribution across the policy windows for the period 2028 to 2034 while maintaining flexibility to reallocate parts of the budget in accordance with new challenges and emerging priorities throughout the duration of the Multiannual Financial Framework.] To this extent, it should be ensured that a certain minimum budget envelope is available for long-term planning and commitments broken down over several years into annual instalments in each policy window, allowing the Union to consolidate its demand and enter into strategic long-term relations with recipients give long-term predictability to industry and financial ecosystem, and enable the setup of important Union infrastructures, such as for hydrogen and industrial carbon management, world-class satellite systems, underwater observation</p>	<p>BE (Comments): We support the beginning of this recital, which stresses the need for a balanced approach between flexibility and predictability.</p> <p>FR (Drafting suggestions): To this extent, it should be ensured that a certain minimum budget envelope is available for long-term planning and commitments broken down over several years into annual instalments in each policy window, allowing the Union to consolidate its demand and enter into strategic long-term relations with recipients give long-term predictability to industry and financial ecosystem, and enable the setup of important Union infrastructures, such as for hydrogen and industrial carbon management,</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>infrastructures, cybersecurity, semiconductors quantum, AI and high-performance computing or critical infrastructure, and defence or space projects of common interest.</p>	<p>world-class satellite systems, underwater observation infrastructures, cybersecurity, semiconductors quantum, AI and high-performance computing or critical infrastructure, and defence or space projects of common interest. <u>Given the specific nature of defence policies and the constraints related to long-term national planning, each action referred to in article 44(1) should be provided with an indicative budget.</u></p> <p>FR (Comments):</p> <p>La prévisibilité des financements de défense est particulièrement nécessaire pour mener ces investissements stratégiques et de long terme. Il est donc indispensable que chaque action définie à l'article 44(1) dispose d'une enveloppe budgétaire propre et prévisible sur l'ensemble de la durée du CFP.</p>
<p>(43) Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council applies to this basic act. It lays down the rules on the establishment and the implementation of the general budget of the Union, including the rules on grants, prizes, non-financial donations, procurement, indirect management, financial instruments and budgetary guarantees. In accordance with Regulation (EU, Euratom) 2024/2509, Regulation (EU, Euratom) No 883/2013 of the European Parliament and of the Council,¹⁸ Council Regulation (EC, Euratom) No 2988/95,¹⁹ Council Regulation (Euratom, EC) No 2185/96²⁰ and Council Regulation (EU) 2017/1939,²¹ the financial interests of the Union are to be protected through proportionate measures, including the prevention, detection, correction and investigation of irregularities and fraud, the recovery of funds lost, wrongly paid or incorrectly used and, where appropriate, the imposition of administrative sanctions. In particular, in accordance with Regulations (EU, Euratom) No 883/2013 and (Euratom, EC) No 2185/96, the European Anti-Fraud Office (OLAF) may carry out investigations, including on-the-spot checks and inspections, with a view to establishing whether there has been fraud,</p>	

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>corruption or any other illegal activity affecting the financial interests of the Union. In accordance with Regulation (EU) 2017/1939, the European Public Prosecutor's Office (EPPO) is competent to investigate and prosecute fraud and other criminal offences affecting the financial interests of the Union as provided for in Directive (EU) 2017/1371 of the European Parliament and of the Council.²² In accordance with Regulation (EU, Euratom) 2024/2509, any person or entity receiving Union funds is to fully cooperate in the protection of the Union's financial interests, to grant the necessary rights and access to the Commission, OLAF, the European Court of Auditors and, as appropriate, to the EPPO, and to ensure that any third parties involved in the implementation of Union funds grant equivalent rights.</p> <hr/> <p>18 Regulation (EU, Euratom) No 883/2013 of the European Parliament and of the Council of 11 September 2013 concerning investigations conducted by the European Anti-Fraud Office (OLAF) and repealing Regulation (EC) No 1073/1999 of the European Parliament and of the Council and Council Regulation (Euratom) No 1074/1999 (OJ L 248, 18.9.2013, p. 1, ELI: http://data.europa.eu/eli/reg/2013/883/oj).</p> <p>19 Council Regulation (EC, Euratom) No 2988/95 of 18 December 1995 on the protection of the European Communities financial interests (OJ L 312, 23.12.95, p. 1, ELI: http://data.europa.eu/eli/reg/1995/2988/oj).</p> <p>20 Council Regulation (Euratom, EC) No 2185/96 of 11 November 1996 concerning on-the-spot checks and inspections carried out by the Commission in order to protect the European Communities' financial interests against fraud and other irregularities (OJ L 292, 15.11.96, p. 2, ELI: http://data.europa.eu/eli/reg/1996/2185/oj).</p> <p>21 Council Regulation (EU) 2017/1939 of 12 October 2017 implementing enhanced cooperation on the establishment of the European Public Prosecutor's Office ('the EPPO') (OJ L 283, 31.10.2017, p. 1, ELI: http://data.europa.eu/eli/reg/2017/1939/oj).</p>	<p style="text-align: center; opacity: 0.5; font-size: 48px; transform: rotate(-30deg);">PUBLIC</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>22 Directive (EU) 2017/1371 of the European Parliament and of the Council of 5 July 2017 on the fight against fraud to the Union’s financial interests by means of criminal law (OJ L 198, 28.7.2017, p. 29, ELI: http://data.europa.eu/eli/dir/2017/1371/oj).</p>	<p style="text-align: center; opacity: 0.5; font-size: 48px; transform: rotate(-30deg);">PUBLIC</p>
<p>(44) To promote the Union’s competitiveness, in addition to its budget, wherever possible the ECF should attract and generate additional assigned external revenues. In this respect, the ECF should be open and facilitate synergies and cooperation for any financial or non-financial contributions that can support the competitiveness objectives, including from Member States, third countries and international organisations.</p>	
<p>(45) To promote the resilience of the Union economy, notably by reducing strategic dependencies, the ECF should enable Union preference for support to manufacturing and developing strategic technologies and sectors located in the Union, notably for actions related to Union strategic assets, interests, autonomy or security, in line with Union law and its international commitments. It is essential that European funding contributes to the uptake of strategic technologies developed in the Union and funded through European funding. To support the development and manufacturing in the Union of strategic technologies funded by the Union, the ECF should allow to condition its support through control restrictions, asset transfers restrictions and supply restrictions to the use of specific products and technologies.</p>	<p>SE (Drafting suggestions):</p> <p>(45) <u>In order to enhance European competitiveness, the respect of core principles such as rules-based open trade, effective competition on markets and a well-functioning Single Market are key. However, to promote the resilience of the Union economy, notably by reducing high-risk strategic dependencies, the ECF should enable Union preference for support to manufacturing and developing strategic technologies and sectors located in the Union, notably for actions related to Union strategic assets, interests autonomy or security, in line with Union law and its international commitments. It is essential that European funding contributes to the uptake of strategic technologies developed in the Union and funded through European funding.</u> To support the development and manufacturing in the Union of strategic technologies funded by the Union, the ECF should, <u>in duly justified cases,</u> allow to condition its support through control restrictions, asset transfers restrictions and supply restrictions to the use of</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>specific products and technologies. <u>Such conditions should be applied with caution, and be preceded by a thorough impact assessment, that takes its short- and long-term productivity costs into account.</u></p> <p>SE (Comments):</p> <p>SE reserves its position on this recital, as the issue of EU preference is bracketed for consideration in the MFF track.</p> <p>Measures to increase the EU's resilience may be necessary in certain specific areas, but these alone are not decisive in increasing the EU's competitiveness, this should be clearly stated in the text.</p> <p>Tools and conditions that in various ways entails more targeted support, and limits important principles such as open and competitive award procedures, must be preceded by a thorough impact assessment and be limited in its scope.</p> <p>SE believes that the ECF should focus on stages in the investment journey where the innovation potential and de-risking needs are the greatest. SE therefore proposes that manufacturing be excluded from this recital.</p> <p>DE (Comments):</p> <p>Germany reserves the right to comment on this recital at a later stage, together with the article on EU preference.</p> <p>FR (Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>45) To promote the resilience of the Union economy, notably by reducing strategic dependencies, the ECF should enable Union preference for support to production manufacturing and developing strategic technologies and sectors located in the Union, notably for actions related to Union strategic assets, interests, autonomy or security, in line with Union law and its international commitments. It is essential that European funding contributes to the uptake of strategic technologies and innovations developed in the Union and funded through European funding. To support the development and production manufacturing in the Union of strategic technologies and innovations funded by the Union, the ECF should allow to condition its support through control restrictions, asset transfers restrictions and supply restrictions to the use of specific products and technologies.</p> <p>FR (Comments):</p> <p>Le terme « production » serait plus adapté aux différents types d’activités économiques couverts par le FEC que ‘manufacturing’, qui induit automatiquement une portée industrielle.</p> <p>Il est important d’élargir la formulation au-delà des technologies pour couvrir l’ensemble des innovations.</p>
	<p>NL (Drafting suggestions):</p> <p><u>(45a) To ensure focus on reducing and preventing high-risk dependencies, the approach identified by the Commission (SWD(2021)352) shall be used as foundation. High risk dependencies then should be understood here as dependencies on external reliances on goods, services, data, capital or technology relevant for the Union’s economy and open international trading system, which are essential for the Union’s security and resilience that pose high vulnerability due to a high degree of market concentration, limited dispensability</u></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p><u>(substitutability), and exposure to coercive or unstable third countries in particular in a disproportionately unbalanced trade relationship.</u></p> <p>NL (Comments): In line with track in Article 3</p>
<p>(46) ECF activities should be open for cooperation with third countries where this is in the interest of the Union. To that extent, the Union may associate, fully or partially, third countries to the activities under the ECF. Association should be subject to a fair balance as regards between the contributions and benefits of the third countries and ensure the protection of the financial and, where relevant, security interest of the Union.</p>	<p>SE (Comments): SE can accept the proposed revisions.</p> <p>ES (Drafting suggestions): (46) ECF activities should be open for cooperation with third countries where this is in the interest of the Union. To that extent, the Union may associate, fully or partially, third countries to the activities under the ECF. Association should be subject to a fair balance as regards between the contributions and benefits of the third countries and ensure the protection of the financial and, where relevant, security interest of the Union. <u>Reciprocity should be also considered.</u></p> <p>FR (Drafting suggestions): 46) ECF activities should be open for cooperation with third countries where this is in the interest of the Union, <u>while bearing in mind specificities of third countries association regarding activities in support of activities referred to in Chapter 7.</u></p> <p>To that extent, the Union may associate, fully or partially, third countries to the activities under the ECF. Association should be subject to a fair balance as regards contributions and benefits of the third countries and ensure the protection of the financial and, where relevant, security interest of the Union.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>FR (Comments): La France rappelle que l'association des Etats tiers en matière de défense fait l'objet d'un article dédié, et souligne les spécificités de ce sujet au sein du fonds européen de compétitivité.</p> <p>La France demande à tenir compte de la spécificité des actions relatives à la défense, l'espace, la résilience et la sécurité en ce qui concerne l'association d'Etats tiers</p>
<p>(47) The ECF should be open and facilitate synergies with other Union activities that support policy areas closely linked with competitiveness, the including the Framework Programme for Research and Innovation, external policies and programmes in shared management with Member States. This should allow for the combination and cumulation of funding for actions supporting the objectives of more than one Union policy area. Cooperation between the Commission and Member States should be established to ensure consistency and complementarities between the ECF and the Regulation (EU) [XXX] [National and Regional partnership plans] Moreover, support from the Regulation (EU) [XXX] [National and Regional Partnership Plans] and from the ECF to projects that have been awarded the Competitiveness Seal should be facilitated, taking advantage of the assessment conducted prior to the attribution of the Seal and without prejudice to the State aid rules. The criteria for awarding the Competitiveness Seal should be designed in a manner that can enable tothe seal to also act as a quality guarantee providing assurances to institutional investors that the project has been appropriately vetted. The Competitiveness Seal should be awarded to high quality projects contributing to the objectives of the ECF, including to strategic projects under CRMA, NZIA and CMA and other strategic projects identified in Union legislation. The ECF may be implemented jointly with other Union</p>	<p>RO (Comments): The explicit provisions enabling cumulative financing across Union instruments should be detailed, clarifying the rules that apply when combining direct and shared management, and clear, predictable State aid rules should be envisaged, in order to deliver integrated investments and maximise the impact of the twin transitions and the competitiveness objectives of both the Union and the Member States.</p> <p>ES (Drafting suggestions): 47) The ECF should be open and facilitate synergies with other Union activities that support policy areas closely linked with competitiveness, the including the Framework Programme for Research and Innovation, external policies and programmes in shared management with Member States. This should allow for the combination and cumulation of funding for actions supporting the objectives of more than one Union policy area. Cooperation between the Commission and Member States should be established to ensure consistency and complementarities between the ECF and the Regulation (EU) [XXX] [National and Regional partnership plans]. Moreover, support from the</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>programmes or other co-donors or co-investors, and those partners should be able to participate in evaluation committees for jointly funded award procedures. The implementation of all those synergy activities should be simple. Reporting and record-keeping requirements for recipients should be reduced, where possible to a single contractual reporting and payment stream with a single set of rules for all support provided.</p>	<p>Regulation (EU) [XXX] [National and Regional Partnership Plans] and from the ECF to projects that have been awarded the Competitiveness Seal should be facilitated, taking advantage of the assessment conducted prior to the attribution of the Seal and without prejudice to the State aid rules <u>which shall be updated to include exceptions needed for Horizon Europe</u>. The criteria for awarding the Competitiveness Seal should be designed in a manner that can enable to the seal to also act as a quality guarantee providing assurances to institutional investors that the project has been appropriately vetted. The Competitiveness Seal should be awarded to high quality projects contributing to the objectives of the ECF, including to strategic projects under CRMA, NZIA and CMA and other strategic projects identified in Union legislation. The ECF may be implemented jointly with other Union programmes or other co-donors or co-investors, and those partners should be able to participate in <u>selection</u> evaluation committees for jointly funded award procedures. The implementation of all those synergy activities should be simple. Reporting and record-keeping requirements for recipients should be reduced, where possible to a single contractual reporting and payment stream with a single set of rules for all support provided.</p> <p>ES (Comments): Recital to be revisited in line with Horizon Europe Regulation regarding the definition of the Competitiveness Seal (or seals) and its use. State Aid rules shall be updated to include exceptions for the use of the Competitiveness Seal in Horizon Europe (% funding for companies in EIC Accelerator projects).</p> <p>There is no need to mention specific acts, as there will be others in the future.</p> <p>Regarding evaluation, it shall be objective and independent of funders. Other co-donors or co-investors my participate in the selection committee.</p> <p>FI</p>

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	<p>(Drafting suggestions):</p> <p>(47) The ECF should be open and facilitate synergies with other Union activities that support policy areas closely linked with competitiveness, the including the Framework Programme for Research and Innovation, external policies and programmes in shared management with Member States. This should allow for the combination and cumulation of funding for actions supporting the objectives of more than one Union policy area. Cooperation between the Commission and Member States should be established to ensure consistency and complementarities between the ECF and the Regulation (EU) [XXX] [National and Regional partnership plans] Moreover, support from the Regulation (EU) [XXX] [National and Regional Partnership Plans] and from the ECF to projects that have been awarded the Competitiveness Seal should be facilitated, taking advantage of the assessment conducted prior to the attribution of the Seal and without prejudice to the State aid rules. The criteria for awarding the Competitiveness Seal should be designed in a manner that can enable tothe seal to also act as a quality guarantee providing assurances to institutional investors that the project has been appropriately vetted. The Competitiveness Seal should be awarded to high quality projects contributing to the objectives of the ECF, including to strategic projects under CRMA, NZIA and CMA and other strategic projects identified in Union legislation. The ECF may be implemented jointly with other Union programmes or other co-donors or co-investors, and those partners should be able to participate in evaluation committees for jointly funded award procedures. The implementation of all those synergy activities should be simple. Reporting and record-keeping requirements for recipients should be reduced, where possible to a single contractual reporting and payment stream with a single set of rules for all support provided.</p> <p>FI</p> <p>(Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>We would prefer this to be shortened. We see quite a few unclarities with the seal and defining the strategic projects, single set of rules and also respecting state aid rules.</p> <p>HR (Comments): <u>HR comment: While we support the concept of the ‘Competitiveness Seal’ in principle, we consider it necessary to clearly define all financing sources through which Member States may support projects awarded the Seal, as well as the mechanisms that will ensure the simple and practical implementation of synergies and the combination of different funding source.</u></p> <p>EL (Drafting suggestions): The Competitiveness Seal should be awarded to high quality projects contributing to the objectives of the ECF, including to strategic projects under CRMA, NZIA, Chips Act, and CMA, projects of digital technology as well as other strategic projects identified in Union legislation.</p> <p>EL (Comments): The Competitiveness Seal is considered a main tool for the promotion of the referenced strategic projects. Thus, it would be essential to include the sector of digital technologies considering its significance in the current economic framework.</p> <p>We propose to add specific reference to Chips Act Regulation (EU) 2023/1781, in order to be clear that Integrated production facilities, Open EU foundries, design centre of excellence, European chips infrastructure consortiums are included in the scope of ECF.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>It needs to be taken into account that projects under the Chips Act are not characterised with the terminology “strategic” in the Regulation itself but they are strategic per se. We cannot leave margins for interpretation under the general reference “and other strategic projects”.</p> <p>FR (Drafting suggestions):</p> <p>(47) The ECF should be open and facilitate synergies with other Union activities that support policy areas closely linked with competitiveness, including external policies and programmes in shared management with Member States. This should allow for the combination and cumulation of funding for actions supporting the objectives of more than one Union policy area. Cooperation between the Commission and Member States should be established to ensure consistency and complementarities between the ECF and the Regulation (EU) [XXX] [National and Regional partnership plans] Moreover, support from the Regulation (EU) [XXX] [National and Regional Partnership Plans] and from the ECF to projects that have been awarded the Competitiveness Seal should be facilitated, taking advantage of the assessment conducted prior to the attribution of the Seal and without prejudice to the State aid rules. The criteria for awarding the Competitiveness Seal should be designed in a manner that can enable tothe seal to also act as a quality guarantee providing assurances to institutional investors that the project has been appropriately vetted. The Competitiveness Seal should be awarded to high quality projects contributing to the objectives of the ECF, including to strategic projects under CRMA, NZIA and CMA and other strategic projects identified in Union legislation. The ECF may be implemented jointly with other Union programmes or other co-donors or co-investors, and those partners should be able to participate in evaluation committees for jointly funded award procedures. The implementation of all</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>those synergy activities should be simple. Reporting and record-keeping requirements for recipients should be reduced, where possible to a single contractual reporting and payment stream with a single set of rules for all support provided.</p> <p>FR (Comments): Nous nous demandons pourquoi les synergies du FEC avec les autres programmes de l'Union font l'objet de 5 considérants distincts. Le lien avec le programme Horizon Europe est déjà évoqué en détail au considérant 10, et de nouveau au considérant 11.</p> <p>La France soutient l'ajout des législations européennes.</p>
<p>(48) Union support should focus on the achievement of policy objectives and European added value. In all cases, ECF funding should be provided in the form best able to achieve its objectives, while limiting administrative burden for recipients to the absolute minimum. When implementing the budget, the ECF should provide the full toolbox of Union support and ensure synergies between its supported policies, in particular by allowing for simplified common award procedures to pursue objectives of more than one policy. As such, the elimination of burdensome financial reporting through the widest possible use of financing not linked to cost should be pursued as a major simplification measure.</p>	<p>MT (Comments): IWe believe that the text should refer to the need for the ECF to support projects in peripheral or otherwise disadvantaged regions.</p> <p>SE (Comments): SE welcomes the proposed revisions.</p> <p>DE (Drafting suggestions): 48) Union support should focus on the achievement of policy objectives, provide European public goods and European added value. In all cases, ECF funding should be provided in the form best able to achieve its objectives, while limiting administrative burden for recipients to the absolute minimum. When implementing the budget, the ECF should provide the full toolbox of Union support and ensure synergies between its supported</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>policies, in particular by allowing for simplified common award procedures to pursue objectives of more than one policy. As such, the elimination of burdensome financial reporting through the widest possible use of financing not linked to cost should be pursued as a major simplification measure.</p> <p>DE (Comments):</p> <p>In Line with our general comment we propose to add the provision of European public goods</p> <p>ES (Drafting suggestions):</p> <p>(48) Union support should focus on the achievement of policy objectives and European added value. In all cases, ECF funding should be provided in the form best able to achieve its objectives, while limiting administrative burden for recipients to the absolute minimum. When implementing the budget, the ECF should provide the full toolbox of Union support and ensure synergies between its supported policies, in particular by allowing for simplified common award procedures to pursue objectives of more than one policy, <u>considering that for collaborative research and innovation activities grants shall be the main form of support</u>. As such, the elimination of burdensome financial reporting through the widest possible use of financing not linked to cost should be pursued <u>may be used</u> as a major simplification measure.</p> <p>ES (Comments):</p> <p>For collaborative research and innovation activities under the policy windows grants shall be the main form of support.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>Financing not linked to cost is a possibility to be used and should be considered. The major simplification of participants is the use of their own accounting practices.</p> <p>IE (Comments):</p> <p>IE consider the concept of ‘European Added Value’ is in strong need of clarification – does this refer to:</p> <ul style="list-style-type: none"> • Value added by European entities, • Value added by entities located in Europe, • Any value derived by European citizens from the enhancement of competitiveness / innovation (e.g. in achieving net-zero)? <p>IE also note that the current wording seems very close to ‘European preference’ - IE position on this issue is that it should not be applied broadly across EU instruments.</p> <p>FR (Comments):</p> <p>La France soutient l’ajout de valeur ajoutée européenne.</p>
<p>(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. 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</p>	<p>NL (Drafting suggestions):</p> <p>(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. 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)</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>depending on the instrument of budget implementation, be it grant, or procurement, and the specific policy objectives pursued. In accordance with Article 136 of the Financial Regulation, eligibility restrictions should apply to high-risk suppliers, for security reasons. Where work programmes lay down award criteria these should where applicable take into account the quality and impact of proposals in light of the ECF objectives as well as the ability of proposals to support the specific activities of the policy windows. 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.</p>	<p>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. In accordance with Article 136 of the Financial Regulation, eligibility restrictions should apply to high-risk suppliers, for security reasons. Where work programmes lay down award criteria these should where applicable take into account the quality and impact of proposals in light of the ECF objectives as well as the ability of proposals to support the specific activities of the policy windows. <u>These criteria take, in particular, account of the state-of-the-art nature, considering the pertinence and credibility of its design, as well as its innovative and technical merit, of the proposed action, as well the expected effectiveness of a proposed action in delivering measurable and lasting improvements to the Union’s competitiveness, in particular by its measurable contribution to raising productivity growth and increasing the Union’s strategic capacity to act.</u> 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.</p> <p>NL (Comments):</p> <p>To provide some further guidance for the implementation phase of the ECF on the meaning of Article 9a.</p> <p>SE (Drafting suggestions):</p> <p>(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</p>

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	<p>instruments, with a view to provide predictability to implementing partners. 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. In accordance with Article 136 of the Financial Regulation, eligibility restrictions should apply to high-risk suppliers, for security reasons. Where work programmes lay down award criteria these should where applicable take into account the quality and impact of proposals, <u>in light of the ECF objectives as well as the ability of proposals to support the specific activities of the policy windows.</u> 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.</p> <p>SE (Comments): SE is thankful for the Presidency’s explanatory note award criteria. It was very helpful to grasp the different relevant aspects to keep in mind, and we are open to discuss how article 9a can be structured. We do, however, still see merit in having more detail than in the current text (which is the case for the award criteria in the defence part of the regulation).</p> <p>DE (Drafting suggestions): ... Where work programmes lay down award criteria, <u>the assessment of the proposals</u> these should where applicable be based on the take into account</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>the quality and impact of proposals in light of the ECF objectives as well as, the ability of proposals to support the specific activities of the policy windows, <u>the additionality of financing as well as the innovation potential of the proposals.</u></p> <p>DE (Comments): See our comment in Article 9a.</p> <p>FI (Drafting suggestions):</p> <p>(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. 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. In accordance with Article 136 of the Financial Regulation, eligibility restrictions should apply to high-risk suppliers, for security reasons. Where work programmes lay down award criteria these should where applicable take into account the <u>excellence, quality and impact of proposals as well as the highest relevance to the European competitiveness</u> in light of the ECF objectives as well as the ability of proposals to support the specific activities of the policy windows. Work programmes are also the appropriate place to</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>allocate budget in accordance with evolving policy priorities, and they should set out contributions, specific conditions and expected results.</p> <p>FI (Comments):</p> <p>The reference to award criteria should be strengthened.</p> <p>IE (Drafting suggestions):</p> <p>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. 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. In accordance with Article 136 of the Financial Regulation, eligibility restrictions should apply to high-risk suppliers, for security reasons. Where work programmes lay down award criteria these should where applicable take into account the quality and impact of proposals in light of the ECF objectives as well as the ability of proposals to support the specific activities of the policy windows. <u>These criteria take into account, in particular, the state-of-the-art nature as well as the innovative and technical merit, of the proposed action, as well the expected effectiveness of a proposed action in delivering measurable and lasting improvements to the Union’s competitiveness, in particular by its measurable contribution to raising</u></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p><u>productivity growth and increasing the Union’s strategic capacity to act.</u></p> <p>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.</p> <p>IE (Comments):</p> <p>IE recommend anchoring the award criteria in work programmes</p> <p>IE - Suggested text amendment - to provide some further guidance for the implementation phase of the ECF on the meaning of Article 9a.</p> <p>IT (Drafting suggestions):</p> <p>(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, <u>as is the case of the ECF InvestEU Instrument.</u> 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. In accordance with Article 136 of the Financial Regulation, eligibility restrictions should apply to high-risk suppliers, for security reasons. Where work programmes lay down award criteria these should where applicable take into account the quality and</p>

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	<p>impact of proposals in light of the ECF objectives as well as the ability of proposals to support the specific activities of the policy windows. 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.</p> <p>IT (Comments): Work programmes in the multi-annual format would provide greater predictability for implementing partners in relation to budgetary guarantees and financial instruments.</p> <p>BE (Drafting suggestions): (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. 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 the Technology Readiness Levels (TRLs), specific eligibility and award criteria depending on the instrument of budget implementation, be it grant, or procurement, and the specific policy objectives pursued. In accordance with Article 136 of the Financial</p>

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	<p>Regulation, eligibility restrictions should apply to high-risk suppliers, for security reasons. Where work programmes lay down award criteria these should where applicable take into account the quality and impact of proposals in light of the ECF objectives as well as the ability of proposals to support the specific activities of the policy windows. Work 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.</p> <p>BE (Comments): Mentioning TRLs is important to ensure transparency and provide guidance to applicants. Amendments are proposed accordingly to article 15.</p> <p>FR (Drafting suggestions): (50) The ECF should be implemented through work programmes as set out in this Regulation. Work programmes should be adopted under an annual or multi-annual format, except in specific cases. 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. 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,</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>and should recall eligibility and award criteria depending on the instrument of budget implementation, be it grant, or procurement, and the specific policy objectives pursued. In accordance with Article 136 of the Financial Regulation, eligibility restrictions should apply to high-risk suppliers, for security reasons. Where work programmes lay down award criteria these should <u>where applicable</u> take into account the quality and impact of proposals in light of the ECF objectives as well as the ability of proposals to support the specific activities of the policy windows. 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.</p> <p>FR (Comments):</p> <p>Concernant le contenu des programmes de travail et des documents relatifs aux appels à projets, ceux-ci doivent uniquement rappeler et/ou spécifier les règles d'éligibilité et les critères de sélection. Les critères d'éligibilité et de sélection doivent être définis dans le règlement, afin de clarifier et stabiliser les règles pour les déposants.</p> <p>La Présidence pourrait-elle préciser à quoi fait référence le « where applicable » ?</p>
<p>(50a) SMEs are an integral part of the European economy and an important source of employment and growth potential, but they are also faced with challenges and barriers that can warrant specific attention. To make sure that the needs of SMEs are properly taken into account, work programmes under the ECF shall describe in a specific dedicated part how they aim to support SMEs.</p>	<p>SI (Drafting suggestions):</p> <p>(50a) SMEs are an integral part of the European economy and an important source of employment and growth potential, but they are also faced with challenges and barriers that can warrant specific attention. To make sure that the needs of SMEs are properly taken into account,</p>

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	<p>work programmes under the ECF shall describe in a specific dedicated part how they shall aim to support SMEs.</p> <p>ES (Comments): We agree to have specific support for SMEs, however for collaborative research and innovation activities, the support shall be included in the same work programme for the aim of simplification. Topics dedicated to SMEs should be added to the specific R&I activities work programme.</p> <p>IE (Comments): IE very much welcome the inclusion of this new test. Support to SMEs is welcome</p> <p>IE - Elsewhere, in the context of the European Innovation Act, the Commission is considering definitions of ‘innovative start-ups and scale-ups’. It is not clear whether SMEs here includes these types of companies.</p> <p>IT (Drafting suggestions): (50a) SMEs are an integral part of the European economy and an important source of employment and growth potential, but they are also faced with challenges and barriers that can warrant specific attention. To make sure that the needs of SMEs are properly taken into account, work programmes under the ECF shall describe in a specific dedicated part how they aim to support SMEs, <u>and widen the Advisory services, European business networ, Cluster Alliance support to SMEs.</u></p> <p>LU (Drafting suggestions): (50a) SMEs are an integral part of the European economy and an important source of employment and growth potential, but they are also faced with</p>

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	<p>challenges and barriers that can warrant specific attention. To make sure that the needs of SMEs across all sectors of the economy are properly taken into account, work programmes under the ECF shall describe in a specific dedicated part how they aim to support SMEs.</p> <p>PT (Comments): PT is still considering if this directed and specific support to SMEs should be based on financial targets, with a % of funding dedicated to SMEs.</p> <p>EE (Comments): EE: Support the amendment as this is important aspects for our companies.</p> <p>EL (Comments): Ensuring sufficient support and access to finance to SMEs across all sectors of the economy promoting competitiveness in a demonstrable way</p>
<p>(51) For financial instruments and the budgetary guarantee to effectively crowd in private money, implementing partners need to be closely associated. This ensures policy steer and alignment, as well as project pipeline generation. The experience and lessons learnt with the implementation of the InvestEU Programme emphasise the importance of investment guidelines in creating this buy-in and providing the necessary predictability and visibility to the implementing partners and investors, in order for them to set up their organisational capacity and originate the pipeline of investments, while allowing the necessary flexibility to ensure an adequate policy steer during implementation. Investment guidelines should include detailed description of the policy areas of intervention and investment focus with a view to ensuring</p>	<p>SE (Comments): SE welcomes the proposed revisions.</p> <p>FR (Drafting suggestions): 51) For financial instruments and the budgetary guarantee to effectively crowd in private money, implementing partners need to be closely associated. This ensures policy steer and alignment, as well as project pipeline generation. The experience and lessons learnt with the implementation of the InvestEU Programme emphasise the importance of investment guidelines in</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>additionality and incentivise crowding in especially private capital and institutional investors as well as crowding in and public investment funding in a proportionate manner in support of the Union’s policy objectives and strategic projects. The investment guidelines should be prepared in consultation with implementing partners to benefit from their market knowledge, and enable them to invest in Union priority areas and incentivise them for more risk taking. [To cater for evolving needs and developments, the investment guidelines may be reviewed in the context of the MFF mid-term review.]</p>	<p>creating this buy-in and providing the necessary predictability and visibility to the implementing partners and investors, in order for them to set up their organisational capacity and originate the pipeline of investments, while allowing the necessary flexibility to ensure an adequate policy steer during implementation. Investment guidelines should include detailed description of the policy areas of intervention and investment focus with a view to ensuring additionality and incentivise crowding in especially private capital and institutional investors as well as crowding in and public investment funding in a proportionate manner in support of the Union’s policy objectives and strategic projects. The investment guidelines should be prepared in consultation with implementing partners to benefit from their market knowledge, and enable them to invest in Union priority areas and incentivise them for more risk taking. [To cater for evolving needs and developments, the investment guidelines may be reviewed in the context of the MFF mid-term review.] <u>Investment guidelines as regards strategic investment in the field of defence should be should be approved by the Defence Industry committee</u></p> <p>FR (Comments):</p> <p>Au regard du caractère stratégique des investissements de défense, un contrôle des Etats membres au sujet des lignes directrices d’investissement d’InvestEU pour le secteur de la défense doit être assuré.</p>
<p>(52) Deep-tech scale-up scaleup financing under the Scaleup Europe Fund announced in the Startup Scaleup Strategy, existing at the time of the entry into force of the present Regulation, should be carried out under the terms agreed in the MFF 2021-2027. All scaleup financing under the MFF 2028-2034 should take place under the ECF.</p>	

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>(52a) Complementarities and synergies will be ensured between the EIC Fund and the ECF at all stages of implementation. The ECF InvestEU Instrument will be implemented in particular through risk-sharing budgetary guarantees and financial instruments by implementing partners responsible directly or via financial intermediaries for the selection of investments. The ECF InvestEU Instrument can support any economically viable final recipient and investment, at any stage of their development, from startup (seed financing and early growth) to scaleup, and all technologies including breakthrough. Union support transferred to final recipients can take a wide range of forms of e.g. loans, guarantees, quasi equity and equity investments. The EIC Fund should provide direct equity investment support to companies. Investment decisions by the EIC Fund should contain an assessment to ensure that the EIC Fund will invest in final recipients (typically deep-tech startups) that cannot meet all their financing needs from market sources or from the ECF, due to the risk level involved in novel technologies and/or new markets. The EIC Business Acceleration Services may provide non-financial support to EIC beneficiaries and final recipients, and target their specific needs of deep tech and disruptive innovation, while the ECF Project Advisory may provide broader advisory services in support of a broader range of beneficiaries. Synergies will be created so that final recipients of the EIC Accelerator and the EIC Fund may be financed in their scaleup phase by the ECF InvestEU Instrument provided they fulfil the conditions. These complementarities will be ensured for example by the cooperation of the Advisory Board on the ECF InvestEU Instrument and of the EIC Board.</p>	<p>MT (Drafting suggestions):</p> <p>(52a) Complementarities and synergies will be ensured between the EIC Fund and the ECF at all stages of implementation. The ECF InvestEU Instrument will be implemented in particular through risk-sharing budgetary guarantees and financial instruments by implementing partners responsible directly or via financial intermediaries for the selection of investments. The ECF InvestEU Instrument can support any economically viable final recipient and investment, at any stage of their development, from startup (seed financing and early growth) to scaleup, and all technologies including breakthrough. Union support transferred to final recipients can take a wide range of forms of e.g. loans, guarantees, quasi equity and equity investments. The EIC Fund should provide direct equity investment support to companies. Investment decisions by the EIC Fund should contain an assessment to ensure that the EIC Fund will invest in final recipients (typically deep-tech startups) that cannot meet all their financing needs from market sources or from the ECF, due to the risk level involved in novel technologies and/or new markets. The EIC Business Acceleration Services may provide non-financial support to EIC beneficiaries and final recipients, and target their specific needs of deep tech and disruptive innovation, while the ECF Project Advisory may provide broader advisory services in support of a broader range of beneficiaries. Synergies will be created so that final recipients of the EIC Accelerator and the EIC Fund may be financed in their scaleup phase by the ECF InvestEU Instrument provided they fulfil the conditions. These complementarities will be ensured for example by the cooperation of the Advisory Board on the ECF InvestEU Instrument and of the EIC Board.</p> <p>MT (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>MT believes that the addition of this recital helps clarify the role of InvestEU. However, we note the inclusion of "typically deep-tech startups". There are many other entities that might benefit from this support and hence, we would prefer the removal of such reference.</p> <p>NL (Drafting suggestions):</p> <p>(52a) Complementarities and synergies will be ensured between the EIC Fund and the ECF at all stages of implementation. The ECF InvestEU Instrument will be implemented in particular through risk-sharing budgetary guarantees and financial instruments by implementing partners responsible directly or via financial intermediaries for the selection of investments. The ECF InvestEU Instrument can support any economically viable final recipient and investment, at any stage of their development, from startup (seed financing and early growth) to scaleup, and all technologies including breakthrough. Union support transferred to final recipients can take a wide range of forms of e.g. loans, guarantees, quasi equity and equity investments. The EIC Fund should provide direct equity investment support to companies. Investment decisions by the EIC Fund should contain an assessment to ensure that the EIC Fund will invest in final recipients (typically deep-tech startups) that cannot meet all their financing needs from market sources or from the ECF, due to the risk level involved in novel technologies and/or new markets. The EIC Business Acceleration Services may provide non-financial support to EIC beneficiaries and final recipients, and target their specific needs of deep tech and disruptive innovation, while the ECF Project Advisory may provide broader advisory services in support of a broader range of beneficiaries. Synergies will be created so that final recipients of the EIC Accelerator and the EIC Fund may be financed in their scaleup phase by the ECF InvestEU Instrument, <u>in particular the Scaleup Facility</u>, provided they fulfil the conditions. These complementarities will be</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>ensured for example by the cooperation of the Advisory Board on the ECF InvestEU Instrument and of the EIC Board.</p> <p>NL (Comments): Explicit reference to the Scaleup Facility is needed since this will be the main instrument that will work in synergy with the EIC.</p> <p>SE (Comments): SE welcomes the clearer delineation of tasks between the EIC and the ECF InvestEU instrument in accordance with this added recital. However, SE is still scrutinising the proposed legal text in the Horizon Europe proposal.</p> <p>SI (Drafting suggestions): (52a) Complementarities and synergies will be ensured between the EIC Fund and the ECF at all stages of implementation. The ECF InvestEU Instrument will be implemented in particular through risk-sharing budgetary guarantees and financial instruments by implementing partners responsible directly or via financial intermediaries for the selection of investments. The ECF InvestEU Instrument can support any economically viable final recipient and investment, at any stage of their development, from startup (seed financing and early growth) to scaleup, and all technologies including breakthrough. Union support transferred to final recipients can take a wide range of forms of e.g. loans, guarantees, quasi equity and equity investments. The EIC Fund should provide direct equity investment support to companies. Investment decisions by the EIC Fund should contain an assessment to ensure that the EIC Fund will invest in final recipients (typically deep-tech startups) that cannot meet all their</p>

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	<p>financing needs from market sources or from the ECF, due to the risk level involved in novel technologies and/or new markets. The EIC Business Acceleration Services may provide non-financial support to EIC beneficiaries and final recipients, and target their specific needs of deep tech and disruptive innovation, while the ECF Project Advisory may provide broader advisory services in support of a broader range of beneficiaries. Synergies will be created so that final recipients of the EIC Accelerator and the EIC Fund may be financed in their scaleup phase by the ECF InvestEU Instrument provided they fulfil the conditions. These complementarities will be ensured for example by the cooperation of the Advisory Board on the ECF InvestEU Instrument and of the EIC Board.</p> <p>FI</p> <p>(Drafting suggestions):</p> <p>(52a) Complementarities and synergies will be ensured between the EIC Fund and the ECF at all stages of implementation. The ECF InvestEU Instrument will be implemented in particular through risk-sharing budgetary guarantees and financial instruments by implementing partners responsible directly or via financial intermediaries for the selection of investments. The ECF InvestEU Instrument can support any economically viable final recipient and investment, at any stage of their development, from startup (seed financing and early growth) to scaleup, and all technologies including breakthrough. Union support transferred to final recipients can take a wide range of forms of e.g. loans, guarantees, quasi equity and equity investments. The EIC Fund should provide direct equity investment support to companies. Investment decisions by the EIC Fund should contain an assessment to ensure that the EIC Fund will invest in final recipients (typically deep-tech startups) that cannot meet all their financing needs <u>in terms of amounts and/or type of funding</u> from market sources or from the ECF, due to the risk level involved in novel technologies and/or new markets or otherwise. The EIC Business</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>Acceleration Services may provide non-financial support to EIC beneficiaries and final recipients, and target their specific needs of deep tech and disruptive innovation, while the ECF Project Advisory may provide broader advisory services in support of a broader range of beneficiaries. Synergies will be created so that final recipients of the EIC Accelerator and the EIC Fund may be financed in their scaleup phase by the ECF InvestEU Instrument provided they fulfil the conditions. These complementarities will be ensured for example by the cooperation of the Advisory Board on the ECF InvestEU Instrument and of the EIC Board.</p> <p>FI (Comments):</p> <p>Are recital 52 and 52a really coherent as it stands?</p> <p>We thank for this information on what the Cion is envisaging and how the EIC Fund and ECF would complement each others. There are nevertheless a bit different texts and interpretations also in the Horizon on this same issue. There is still work to do and the design of the new Scaleup Europe fund sets a precedence we need to take into account.</p> <p>IE (Drafting suggestions):</p> <p>52a) Complementarities and synergies will be ensured between the EIC Fund and the ECF at all stages of implementation. The ECF InvestEU Instrument will be implemented in particular through risk-sharing budgetary guarantees and financial instruments by implementing partners responsible directly or via financial intermediaries for the selection of investments. The ECF InvestEU Instrument can support any economically viable final recipient and investment, at any stage of their development, from startup (seed financing and early growth) to scaleup, and all technologies including breakthrough. Union support transferred to final recipients can take a</p>

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	<p>wide range of forms of e.g. loans, guarantees, quasi equity and equity investments. The EIC Fund should provide direct equity investment support to companies. Investment decisions by the EIC Fund should contain an assessment to ensure that the EIC Fund will invest in final recipients (typically deep-tech startups) that cannot meet all their financing needs from market sources or from the ECF, due to the risk level involved in novel technologies and/or new markets. The EIC Business Acceleration Services may provide non-financial support to EIC beneficiaries and final recipients, and target their specific needs of deep tech and disruptive innovation, while the ECF Project Advisory may provide broader advisory services in support of a broader range of beneficiaries. Synergies will be created so that final recipients of the EIC Accelerator and the EIC Fund may be financed in their scaleup phase by the ECF InvestEU Instrument, in particular the Scaleup Facility, provided they fulfil the conditions. These complementarities will be ensured for example by the cooperation of the Advisory Board on the ECF InvestEU Instrument and of the EIC Board.</p> <p>IE (Comments): IE Suggested text amendment to include explicit reference to the Scaleup Facility</p> <p>PT (Comments): PT welcomes this clarification on the complementary role of ECF and EIC, which, for the sake of consistency, has also been included in the HE proposal.</p> <p>Nevertheless, more detail would be desirable, especially in what concerns the mechanisms to ensure synergies. This recital mentions cooperation between</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>the Advisory Board on the ECF InvestEU and the EIC Board, which places this cooperation at governance levels. PT would like to better understand how such cooperation is to be structured and maintained throughout the programme.</p> <p>Though such cooperation is welcomed, synergies often rely on those at operational level, providing support to SMEs, startups and scaleups. In this sense, support structures, at EU and national level, must be designed and trained with this purpose in mind.</p> <p>BE (Drafting suggestions):</p> <p>Complementarities and synergies will be ensured between the EIC Fund and the ECF at all stages of implementation. The ECF InvestEU Instrument will be implemented in particular through risk-sharing budgetary guarantees and financial instruments by implementing partners responsible directly or via financial intermediaries for the selection of investments. The ECF InvestEU Instrument can support any economically viable final recipient and investment, at any stage of their development, from startup (seed financing and early growth) to scaleup, and all technologies including breakthrough. Union support transferred to final recipients can take a wide range of forms of e.g. loans, guarantees, quasi equity and equity investments. The EIC Fund should provide direct equity investment support to <u>non-bankable deep-tech</u> companies. Investment decisions by the EIC Fund should contain an assessment to ensure that the EIC Fund will invest in final recipients (typically deep-tech startups) that cannot meet all their financing needs from market sources or from the ECF, due to the risk level involved in novel technologies and/or new markets. The EIC Business Acceleration</p>

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	<p>Services may provide non-financial support to EIC beneficiaries and final recipients, and target their specific needs of deep tech and disruptive innovation, while the ECF Project Advisory may provide broader advisory services in support of a broader range of beneficiaries.</p> <p>Synergies will be created so that final recipients of the EIC Accelerator and the EIC Fund may be financed in their scaleup phase by the ECF InvestEU Instrument provided they fulfil the conditions. These complementarities will be ensured for example by the cooperation of the Advisory Board on the ECF InvestEU Instrument and of the EIC Board.</p> <p>BE (Comments): We don't think all this information should be included in an ECF-recital</p> <p>FR (Comments): Nous nous interrogeons toujours sur la complémentarité entre le Fonds EIC et InvestEU, puisque la formulation de ce considérant semble indiquer que les deux instruments couvriront les mêmes bénéficiaires (ex : InvestEU financera de l'innovation de rupture et couvrira toutes les étapes de développement).</p> <p>Par ailleurs, les décisions d'investissement du Fonds EIC sont déjà similaires à ce qui est décrit dans le considérant. Il faut s'assurer que la décision d'investir ou non soit rapide En outre, la différence entre les BAS de l'EIC et le Project Advisory du FEC manque toujours de clarté.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>(54) Strengthening the industrial base of the European Union is essential for enhancing the Union’s resilience and economic security, ensuring continuity of supply during crises, and safeguarding long-term competitiveness especially in strategic sectors. In order to foster resilient Union value chains spanning across multiple Member States, the work programmes may include special value-chains scale up calls which shall support both. project preparation and especially crowding in of additional public and private capital and institutional investors as well as crowding in public funding in a proportionate manner to integrate suppliers, manufacturers, and innovators from different Member States and diversify sources of supply. Value chain calls may contribute to strengthening the operation of the Single Market including through developing cross-border value chains including SMEs while avoiding distortions.</p>	<p>SE (Drafting suggestions): Strengthening the industrial base of the European Union is essential for enhancing the Union’s resilience and economic security, ensuring continuity of supply during crises, and safeguarding long-term competitiveness especially in strategic sectors. In order to foster resilient Union value chains spanning across multiple Member States, the work programmes may include special value-chains scale up calls which shall support both. project preparation and especially crowding in of additional public and private capital and institutional investors as well as crowding in public funding in a proportionate manner to integrate suppliers, manufacturers, and innovators from different Member States and diversify sources of supply. Value chain calls may contribute to strengthening the operation of the Single Market including through developing cross-border value chains including SMEs while avoiding <u>market</u> distortions.</p> <p>SE (Comments): Sweden welcomes the proposed amendments in principle, but would like to add “market” ahead of distortions to specify.</p> <p>SI (Drafting suggestions): (54) Strengthening the industrial base of the European Union is essential for enhancing the Union’s resilience and economic security, ensuring continuity of supply during crises, and safeguarding long-term competitiveness especially in strategic sectors. In order to foster resilient Union value chains spanning across multiple Member States, the work programmes may include special value-chains scale up calls which shall support both. project preparation and especially crowding in of additional public and private capital and institutional investors as well as crowding</p>

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	<p>in public funding in a proportionate manner to integrate suppliers, manufacturers, and innovators from different Member States and diversify sources of supply. Value chain calls may contribute to strengthening the operation of the Single Market including through developing cross-border value chains including SMEs while avoiding <u>market</u> distortions.</p> <p>IE (Comments):</p> <p>IE welcome the commitment to scaling up value-chains, including cross-border value-chains, and note similarities in proposed scale up calls to existing Horizon Europe calls under the Interregional Innovation Investments (I3) Instrument, which supports strengthening regional innovation ecosystems via shared smart specialisation. IE would like to see clarification as to how this is distinct from and/or relates to the I3 Instrument</p> <p>BE (Drafting suggestions):</p> <p>(54) Strengthening the industrial base of the European Union is essential for enhancing the Union’s resilience and economic security, ensuring continuity of supply during crises, and safeguarding long-term competitiveness especially in strategic sectors. <u>A robust industrial base is also indispensable for maintaining the Union’s global leadership in decarbonisation, in particular by supporting the development, deployment and scaling of clean and low-carbon technologies across all relevant value chains.</u> In order to foster resilient Union value chains spanning across multiple Member States and regions, the work programmes may include special value-chains scale up calls which shall support both project preparation and especially crowding in-of additional public and private capital and institutional investors as well as crowding in public funding in a proportionate manner to integrate suppliers, manufacturers, and innovators from different Member States and regions and diversify sources of supply. Value chain calls may contribute to strengthening the</p>

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	<p>operation of the Single Market including through developing cross-border value chains including SMEs while avoiding distortions.</p> <p>BE (Comments):</p> <p>It is important to reflect the Union’s leadership in industrial decarbonisation and to safeguard the progress achieved by frontrunner industries. Ensuring that industrial decarbonisation is referenced here reflects the policy objective of a clean transition and industrial decarbonisation.</p> <p>FR (Drafting suggestions):</p> <p>(54) Strengthening the <u>industrial economical</u> base of the European Union is essential for enhancing the Union’s resilience and economic security, ensuring continuity of supply during crises, and safeguarding long-term competitiveness especially in strategic sectors. In order to foster resilient Union value chains spanning across multiple Member States, the work programmes may include special value-chains scale up calls which shall support both. project preparation and especially crowding in of additional public and private capital and institutional investors as well as crowding in public funding in a proportionate manner to integrate suppliers, manufacturers, and innovators from different Member States and diversify sources of supply. Value chain calls may contribute to strengthening the operation of the Single Market including through developing cross-border value chains including SMEs while avoiding distortions.</p> <p>FR (Comments):</p> <p>Soutien de la France.</p>

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	<p>Le terme “industrial” ne permet pas de décrire l’ensemble des secteurs économiques couverts par le FEC, et nous proposons de le modifier en “economical”.</p>
<p>(55) In order to foster competitiveness of European industry through industry-driven bottom-up innovation, the work programmes may include special 2-stage bottom-up award procedures to identify and support EU Tech frontrunners through industry-driven consortia.</p>	<p>NL (Drafting suggestions):</p> <p>(55) In order to foster competitiveness of European industry through industry-driven bottom-up innovation, the work programmes may include special 2-stage bottom-up award procedures to identify and support EU Tech frontrunners through industry-driven consortia, <u>in synergy with Horizon Europe.</u></p> <p>NL (Comments):</p> <p>A connection with Horizon is needed due to the nature of the Tech frontrunners instrument.</p> <p>IE (Comments):</p> <p>.</p>
<p>(56) A horizontal, cross-cutting funding toolbox should be set at the service of all policy windows, offering every form of support allowed by Regulation (EU, Euratom) 2024/2059, such as financial instruments, including support provided in the form of equity. The choice of the specific funding instrument and in particular whether support will be repayable or not, shall depend on the nature of the actions to be funded (for example underlying market failures, the specific need, the nature of the industry, the stage of development or type of the beneficiary). Union support should derisk projects to the degree necessary for the private sector to invest and for the</p>	<p>SE (Comments):</p> <p>SE can accept the proposed revisions.</p> <p>AT (Drafting suggestions):</p> <p>(56) A horizontal, cross-cutting funding toolbox should be set at the service of all policy windows, offering every form of support allowed by</p>

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<p>project to be successfully delivered. [Co-financing rates should be as low as possible and as high as needed to realise the supported project.] A mix of funding tools could be used, including blending operations and combination of funding. The ECF should also provide each policy area with advice on be implemented in a way that ensures that the most appropriate funding tool towill be used for itsthe specific actions in each work programme, depending on, inter alia, the development stage, the specific industry needs and underlying market failures.</p>	<p>Regulation (EU, Euratom) 2024/2059, such as financial instruments, including support provided in the form of indirect or quasi-equity. The choice of the specific funding instrument and in particular whether support will be repayable or not, shall depend on the nature of the actions to be funded (for example underlying market failures, the specific need, the nature of the industry, the stage of development or type of the beneficiary). Union support should derisk projects to the degree necessary for the private sector to invest and for the project to be successfully delivered. [Co-financing rates should be as low as possible and as high as needed to realise the supported project.] A mix of funding tools could be used, including blending operations and combination of funding. The ECF should be implemented in a way that ensures that the most appropriate funding tool will be used for the specific actions in each work programme, depending on, inter alia, the development stage, the specific industry needs and underlying market failures.</p> <p>AT (Comments): We remain skeptical towards direct ownership taken by and ownership rights performed by the EC or potential implementing partners like the EIB. The COM's explanation at the AHWP on 5 November was very useful: the COM does not intend to invest directly in companies, but implementing partners would typically do these investments via funds. We hope that the inclusion of "indirect" is mirroring this explanation.</p> <p>ES (Drafting suggestions): (56) A horizontal, cross-cutting funding toolbox should be set at the service of all policy windows, offering every form of support allowed by Regulation (EU, Euratom) 2024/2059, such as financial instruments, including support provided in the form of equity. The choice of the specific funding instrument and in particular whether support will be repayable or not, shall depend on the nature of the actions to be funded (for example underlying market failures, the</p>

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	<p>specific need, the nature of the industry, the stage of development or type of the beneficiary). Union support should derisk projects to the degree necessary for the private sector to invest and for the project to be successfully delivered. [Co-financing rates should be as low as possible and as high as needed to realise the supported project.] A mix of funding tools could be used, including blending operations and combination of funding. The ECF should also provide each policy area with advice on be implemented in a way that ensures that the most appropriate funding tool to will be used for its the specific actions in each work programme taking into account the specific characteristics of each dimension included in the different policy windows, depending on, inter alia, the development stage, the specific industry needs and underlying market failures.</p> <p>IE (Comments):</p> <p>IE Welcome text, but we need to consider how State Aid rules can sometimes run counter to programme objectives especially in the context of state aid for innovative start-ups and SMEs which often fail the Undertaking in Difficulty test.</p> <p>EL (Comments):</p> <p>Ensuring sufficient support and access to finance to SMEs across all sectors of the economy promoting competitiveness in a demonstrable way</p> <p>FR (Drafting suggestions):</p> <p>(56) A horizontal, cross-cutting funding toolbox should be set at the service of all policy windows, offering every form of support allowed by Regulation (EU, Euratom) 2024/2059, such as financial instruments, including support provided in the form of equity. The choice of the specific</p>

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	<p>funding instrument and in particular whether support will be repayable or not, shall depend on the nature of the actions to be funded (for example underlying market failures, the specific need, the nature of the industry, the stage of development or type of the beneficiary). Union support should derisk projects to the degree necessary for the private sector to invest and for the project to be successfully delivered. [Co-financing rates should be as low as possible and as high as needed to realise the supported project.] A mix of funding tools could be used, including blending operations and combination of funding. The ECF should also provide each policy area with advice on be implemented in a way that ensures that the most appropriate funding tool towill be used for its the specific actions in each work programme, depending on, inter alia, the development stage, the specific <u>industry economic sector</u> needs and underlying market failures.</p> <p>FR (Comments): Le terme “industry” ne permet pas de décrire l’ensemble des secteurs économiques couverts par le FEC, et nous proposons de le modifier en “economic sector”.</p>
<p>(56a) To ensure that Member States can provide strategic input at an early stage in the development of work programmes, the ECF General Committee shall provide guidance and advice to the Commission on the overall strategic direction for the ECF taking into account long term competitiveness trends and areas of market failures. The General Committee shall also provide advice on potential actions to support SMEs and startups to allow the needs of SMEs and startups from all across the Union to be taken into account in the design of actions targeting SMEs. The ECF General Committee will also serve as a forum for facilitating cooperation and information sharing among Member States on issues related to the ECF. The Commission shall take the</p>	<p>NL (Comments): This recital does not reflect the responsibility of the general committee regarding the R&I programming (“taking into account long term competitiveness trends and areas of market failures”). It is important that we reflect on how R&I perspectives are taken into account, also in light of possible links with Horizon Europe in terms of governance.</p> <p>SE (Comments): SE welcomes the added recital.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>advice provided by the ECF General Committee into account in the preparation and implementation of the ECF work programmes.</p>	<p>RO (Drafting suggestions): To ensure that Member States can provide strategic input at an early stage in the development of work programmes, the ECF General Committee shall provide guidance and advice to the Commission on the overall strategic direction for the ECF, taking into account long term competitiveness trends, and areas of market failures, as well as ensuring the full potential of every region.</p> <p>RO (Comments): To close the innovation gap by ensuring that less-developed regions are effectively connected to EU value chains, making the Union as a whole better positioned to compete globally.</p> <p>SI (Drafting suggestions): (56a) To ensure that Member States can provide strategic input at an early stage in the development of work programmes, the ECF General Committee shall provide guidance and advice to the Commission on the overall strategic direction for the ECF taking into account long term <u>research and</u> competitiveness trends and areas of market failures. The General Committee shall also provide advice on potential actions to support SMEs and startups to allow the needs of SMEs and startups from all across the Union to be taken into account in the design of actions targeting SMEs. The ECF General Committee will also serve as a forum for facilitating cooperation and information sharing among Member States on issues related to the ECF. The Commission shall take the advice provided by the ECF General Committee into account in the preparation and implementation of the ECF work programmes.</p> <p>DE</p>

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	<p>(Drafting suggestions):</p> <p>(56a) To ensure that Member States can provide strategic input at an early stage in the development of work programmes, the ECF General Committee shall provide guidance and advice to the Commission on the overall strategic direction for the ECF taking into account long term competitiveness trends and areas of market failures. The General Committee shall also provide advice on potential actions to support SMEs and startups to allow the needs of SMEs and startups from all across the Union to be taken into account in the design of actions targeting SMEs. The ECF General Committee will also serve as a forum for facilitating cooperation and information sharing among Member States on issues related to the ECF. The Commission shall take the advice provided by the ECF General Committee into account in the preparation and implementation of the ECF work programmes. The ECF General Committee shall hold regular exchanges with the Horizon Europe General Committee.</p> <p>DE</p> <p>(Comments):</p> <p>To ensure MS control for the whole investment journey.</p> <p>ES</p> <p>(Drafting suggestions):</p> <p>(56a) To ensure that Member States can provide strategic input at an early stage in the development of work programmes, the ECF General Committee shall provide guidance and advice to the Commission on the overall strategic direction for the ECF taking into account long term competitiveness trends and areas of market failures. The General Committee shall also provide advice on potential actions to support SMEs and startups to allow the needs of SMEs and startups from all across the Union to be taken into account in the design of actions targeting SMEs. The ECF General Committee will also serve as a forum for facilitating cooperation and information sharing among Member</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>States on issues related to the ECF. <u>It should meet yearly, with a timeline that enables its advice to feed into the steering mechanism and the budgetary procedure decisions.</u> The Commission shall take the advice provided by the ECF General Committee into account in the preparation and implementation of the ECF work programmes.</p> <p>LU (Drafting suggestions):</p> <p>(56a) To ensure that Member States can provide strategic input at an early stage in the development of work programmes, the ECF General Committee shall provide guidance and advice to the Commission on the overall strategic direction for the ECF taking into account long term competitiveness trends and areas of market failures. The General Committee shall also provide advice on potential actions to support SMEs and startups to allow the needs of SMEs and startups from all across the Union <u>and all sectors of the economy</u> to be taken into account in the design of actions targeting SMEs. The ECF General Committee will also serve as a forum for facilitating cooperation and information sharing among Member States on issues related to the ECF. The Commission shall take the advice provided by the ECF General Committee into account in the preparation and implementation of the ECF work programmes.</p> <p>PT (Comments):</p> <p>PT welcomes the inclusion of this recital, which further reinforces the role do be played by MS in the strategic implementation of ECF. Clarification is also welcomed regarding the special attention to be given to SMEs and startups, from all across the Union.</p> <p>FR (Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>56a) To ensure that Member States can provide strategic input at an early stage in the development of work programmes, the ECF General Committee shall <u>act as strategic steering board</u> provide guidance and advice to the Commission on the overall strategic direction for the ECF taking into account long term competitiveness trends and areas of market failures. In order to foster the articulation with the Framework Programme for Research and Innovation, the ECF General Committee should regularly meet the Strategic Configuration of Horizon Europe committee to define common priorities. The ECF General Committee shall also provide advice on potential actions to support SMEs and startups to allow the needs of SMEs and startups from all across the Union to be taken into account in the design of actions targeting SMEs. The ECF General Committee will also serve as a forum for facilitating cooperation and information sharing among Member States on issues related to the ECF, and should ensure the overall coherence of work programmes.</p> <p>The Commission shall take the <u>advice decision</u> provided by the ECF General Committee into account in the preparation and implementation of the ECF work programmes.</p>
<p>(57) Multistakeholder consultations, including those of researchers and industry, the social partners, as well as investors, end-users and civil society, from SME, small to large organisations, should contribute to the priorities of the ECF. Those consultations should be structured via advisory boards including the ECF Stakeholder Board whose task should be to provide insights and advise the Commission on policy trends, on investment needs, and on the implementation of the ECF from the perspective of stakeholders</p>	<p>NL (Drafting suggestions):</p> <p>(57) Multistakeholder consultations, including those of <u>experts</u>, researchers and industry, the social partners, as well as investors, end-users and civil society, from SME, small to large organisations, should contribute to the priorities of the ECF. Those consultations should be structured via <u>thematic</u> advisory boards, including the ECF Stakeholder Board, whose task should be to provide insights and advise the Commission on <u>R&I foresight</u>,</p>

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<p>including project promoters, with the aim to ensure that feedback from stakeholder communities is reflected in the design of work programmes.</p>	<p>policy trends, on investment needs, and on the implementation of the ECF from the perspective of stakeholders including project promoters, with the aim to ensure that diverse perspectives, novel ideas and feedback from stakeholder communities are reflected in the design of work programmes.</p> <p>NL (Comments): We don't think a stakeholder board covering all thematic priorities will work. Expecially for the programming of the R&I components, it is essential that R&I stakeholders and experts are involved at the thematic level. For R&I it is not only about feedback from stakeholder communities, it is about identifying the right and most promising avenues and ideas in the respective fields. If the stakeholder advisory boards are not the right forum, then such input should be incorporated elsewhere.</p> <p>SE (Comments): SE welcomes the proposed revisions.</p> <p>ES (Drafting suggestions): (57) Multistakeholder consultations, including those of researchers and industry, the social partners, as well as investors, end-users and civil society organisations, from SME, small to large organisations, should contribute to the priorities of the ECF. Those consultations should be structured via advisory boards including the ECF Stakeholder Board whose task should be to provide insights and advise the Commission on policy trends, on investment needs, and on the implementation of the ECF from the perspective of stakeholders including project promoters, with the aim to ensure that feedback from stakeholder communities is reflected in the design of work programmes.</p>

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	<p>IE (Drafting suggestions):</p> <p>57) Multistakeholder consultations, including those of experts, researchers and industry, the social partners, as well as investors, end-users and civil society, from SME, small to large organisations, should contribute to the priorities of the ECF. Those consultations should be structured via thematic advisory boards, including the ECF Stakeholder Board, whose task should be to provide insights and advise the Commission on R&I foresight, policy trends, on investment needs, and on the implementation of the ECF from the perspective of stakeholders including project promoters, with the aim to ensure that diverse perspectives, novel ideas and feedback from stakeholder communities are reflected in the design of work programmes.</p> <p>IE (Comments):</p> <p>IE suggested text amendments- For the programming of the R&I components, it is essential that R&I stakeholders and experts are involved at the thematic level.</p> <p>BE (Drafting suggestions):</p> <p>(57) Multistakeholder consultations, including those of researchers and industry, the social partners, as well as investors, end-users and civil society, from SME, small to large organisations, should contribute to the priorities of the ECF. Those consultations should be structured via advisory boards including the ECF Stakeholder Board whose task should be to provide insights and advise the Commission on policy trends, on investment needs, and on the implementation of the ECF from the perspective of stakeholders including project promoters, with the aim to ensure that feedback from stakeholder communities is reflected in the design of work programmes. A balanced representation should ensure participation of private actors as</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p><u>well as key public non-profit RD&I actors such as RTOs supporting Industry.</u></p> <p>BE (Comments):</p> <p>The inclusion of RTOs as public actors should be guaranteed, and their participation in the ECF Stakeholder Board would be highly welcome.</p>
<p>(58) Important Projects of Common European Interest (IPCEIs) are a state aid instrument and industrial policy tool assessed by the Commission pursuant to Article 107(3), point (b), TFEU²³. They contribute significantly to economic growth, job creation, the green and digital transition and competitiveness and resilience of the Union industry and economy. IPCEIs make it possible to bring together knowledge, expertise, financial resources, and economic actors throughout the Union and create positive spillover effects for the entire Union. IPCEIs also allow to crowd-in private investments in high-risk projects that are essential to bring breakthrough innovation closer to industrial deployment and infrastructures projects of great importance to the Union with open and non-discriminatory access. [Given the commonalities of objectives pursued, the ECF will foster synergies between Union funding and IPCEIs by supporting specific projects integrated within IPCEIs, based on their contribution to Union strategic priorities, such as the resilience of the Union, and on the ability of ECF financing to broaden participation, notably of SMEs, or broaden Member State coverage, as well as increase Union added value.]</p> <hr/> <p>23 Communication from the Commission, Criteria for the analysis of the compatibility with the internal market of State aid to promote the execution of important projects of common European interest C/2021/8481 (OJ C 528, 30.12.2021, p. 10).</p>	

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>(59) [The ever-evolving geopolitical situation underlines the need for Europe to ensure its own strategic autonomy and avoid strategic dependencies. The ECF will include the possibility to support production ramp up and undertake accelerated competitiveness actions for projects that offer specific support to European strategic autonomy.] This is for example the case for projects that have been selected as strategic under Regulation (EU) 2024/1252 (Critical Raw Materials Act), Regulation (EU) 2024/1724 (Net Zero Industry Act) and the Regulation (EU) 2025/102 (Critical Medicines Act).</p>	<p style="text-align: center; opacity: 0.5; font-size: 48px; transform: rotate(-30deg);">PUBLIC</p>
<p>(60) The mutual insurance mechanism (MIM) set up pursuant to Horizon Europe and managed by the Commission has proved to be an important safeguard mechanism which mitigates the risks associated with the amounts due and not reimbursed by defaulting participants. Therefore, the MIM should be continued and, where relevant open to use by actions under the ECF.</p>	<p>ES (Drafting suggestions): (60) The mutual insurance mechanism (MIM) set up pursuant to Horizon Europe and managed by the Commission has proved to be an important safeguard mechanism which mitigates the risks associated with the amounts due and not reimbursed by defaulting participants. Therefore, the MIM should be continued and, where relevant open to use by actions under the ECF, <u>ensuring that the Horizon Europe budget is solely used for research and innovation activities.</u></p>
<p>(61) To explore all possible venues to improve European competitiveness, the ECF should provide a structured framework for targeted experimentation in the award and implementation of Union support, in particular to better target and accelerate Union award procedures and simplify and accelerate their implementation to the benefit of recipients. This should allow, within a concretely defined frame, to specify on a case-by-case basis certain actions or categories of actions to benefit from certain additions, derogations and exceptions from other Union legislation and to test the impact in a real-world environment for the limited period of the duration of the ECF while ensuring that appropriate safeguards, in particular a common European interest, are in</p>	<p>SE (Comments): SE is very hesitant to include the instrument outlined in article 20 in the ECF (and Horizon Europe). If it is to be included, SE calls for very clear limitations of its scope. See also the SE comment under Article 20, also pertaining to paragraph 2. Deems if difficult to have meaningful comments the corresponding recitals, before we have the outcome of the discussion in the MFF-track on Article 20.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>place. The application of experimental measures may provide lessons for the assessment of future changes to the horizontal legal framework for the provision of Union support.</p>	<p>Asks for these recitals to be bracketed for discussion after clarifications have been made from COM.</p> <p>Further discussion is needed on the potential benefits and risks of targeted experimentation affecting research and innovation (R&I) components. Horizon Europe funds should not be used for this experimentation.</p> <p>PT (Drafting suggestions):</p> <p>To explore all possible venues to improve European competitiveness, the ECF should provide a structured framework for targeted experimentation in the award and implementation of Union support, in particular to better target and accelerate Union award procedures and simplify and accelerate their implementation to the benefit of recipients, including the establishment of Regulatory Sandboxes to test innovative technologies and business models under controlled and temporary regulatory conditions. (...)</p> <p>FR (Drafting suggestions):</p> <p>[To explore all possible venues to improve European competitiveness, the ECF should provide a structured framework for targeted experimentation in the award and implementation of Union support, in particular to better target and accelerate Union award procedures and simplify and accelerate their implementation to the benefit of recipients. This should allow, within a concretely defined frame, to specify on a case-by-case basis certain actions or categories of actions to benefit from certain additions, derogations and exceptions from other Union legislation and to test the impact in a real-world environment for the limited period of the duration of the ECF while ensuring that appropriate safeguards, in particular a common European interest, are in place. The application of experimental measures may provide lessons for the assessment of future changes to the horizontal legal framework for the provision of Union support.]</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>FR (Comments): Ce considérant devrait être entre crochet au vu de la mise entre crochet de l'article 20.</p>
<p>(62) Where necessary and duly justified, the ECF should provide a targeted intervention mechanism to deliberately provide Union support to certain actions of strategic and economic importance. Where certain important projects could not be successfully implemented within the timeline for completion of regular competitive award procedures, the ECF should also provide for the possibility of directly taking-up excellent projects that remained unfunded under any Union programme or continue to financially support well-working projects seamlessly in their next steps along the investment journey, without imposing additional administrative burden for the recipients. In addition, in line with the approach taken by the relevant sectoral legislation, such as the Net Zero Industry Act (NZIA), the Critical Raw Materials Act (CRMA) or Renewable Energy Directive (RED III) and referenced in the Clean Industrial Deal (CID) communication and the Single Market Strategy, cases in which specific projects, such as strategic projects, are considered to be of public interest or presumed to be of overriding public interest may be identified in separate existing or future legislation.</p>	<p>ES (Drafting suggestions): (62) Exceptionally, Where where necessary and duly justified with prior agreement of the programme committee to be included in the work programme, the ECF may should provide a targeted intervention mechanism to deliberately provide Union support to certain actions of strategic and economic importance. Where certain important projects could not be successfully implemented within the timeline for completion of regular competitive award procedures, the ECF should also provide for the possibility of directly taking-up excellent projects that remained unfunded under any Union programme or continue to financially support well-working projects seamlessly in their next steps along the investment journey, without imposing additional administrative burden for the recipients. In addition, in line with the approach taken by the relevant sectoral legislation, such as the Net Zero Industry Act (NZIA), the Critical Raw Materials Act (CRMA) or Renewable Energy Directive (RED III) and referenced in the Clean Industrial Deal (CID) communication and the Single Market Strategy, cases in which specific projects, such as strategic projects, are considered to be of public interest or presumed to be of overriding public interest may be identified in separate existing or future legislation.</p> <p>ES (Comments): All activities to be supported with the Union budget shall be included in the work programmes and any special procedure or exception to be applied for the</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>implementation of the programme shall be approved by the programme committee.</p> <p>We support simplification and the reduction of administrative burden but not in this purpose.</p>
<p>(64) Where necessary and duly justified, the ECF should incentivise start-upsstartups and innovators established outside of the Union to relocate or invest, and to build up their business in the single market, by providing an ‘inducement intervention’ mechanism attracting successful start-upsstartups and innovators from all over the world, drawing also on its network of EU Delegation. For this purpose, the eligibility requirements, for example as regards establishment in the Member States or associated countries at the start of Union support, should be temporarily waived to allow recipient to resettle within a set timeframe with the assurance of subsequent Union support. The financial interest of the Union should be duly protected, and payments should not be provided until the eligibility requirements are fulfilled.</p>	<p>SE (Comments): SE can accept the proposed revisions.</p>
<p>(65) Where necessary and duly justified, the ECF should allow for a more flexible and accessible way of identifying, selecting and supporting innovative projects and ideas, including by providing for instrument-neutral award procedures that will allow researchers, entrepreneurs, companies and other citizens to propose their innovation solution without the initial artificial narrowing or limitation of Union support to a grant, procurement or other form of Union support. Ideas should be assessed and selected based on their merit in addressing the respective challenge or Union policy priority, and the most appropriate and effective instrument of budget implementation to support these ideas, whether grant, procurement or others, should be selected</p>	<p>FR (Drafting suggestions): (65) Where necessary and duly justified, the ECF should allow for a more flexible and accessible way of identifying, selecting and supporting innovative projects and ideas, including by providing for instrument-neutral award procedures that will allow researchers, entrepreneurs, companies and other citizens to propose their innovation solution without the initial artificial narrowing or limitation of Union support to a grant, procurement or other form of Union support. Ideas should be assessed and selected based on excellence and their capacity to addressing the respective challenge or</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>only afterwards based on the requirements and merits of the individual project.</p>	<p>Union policy priority, and the most appropriate and effective instrument of budget implementation to support these ideas, whether grant, procurement or others, should be selected only afterwards based on the requirements and merits of the individual project.</p> <p>FR (Comments): La France pourra soutenir l'intégration clair d'une sélection basé sur l'excellence.</p>
<p>(66) Where necessary and duly justified, the ECF should also simplify and accelerate the implementation of Union support for certain important projects.</p>	
<p>(67) The ECF InvestEU Instrument should provide the budgetary guarantee and financial instruments to mobilise additional investment across the Union to support European competitiveness in strategic technologies, services and sectors.</p>	<p>IT (Drafting suggestions): The ECF InvestEU Instrument should provide the budgetary guarantee and financial instruments to mobilise additional investment across the Union to support European competitiveness in strategic technologies, services and sectors. The EU guarantee should serve an instrument to increase the risk appetite of the Implementing Partners and contributing to crowd in private capital.</p> <p>IT (Comments): Considering the high provisioning rate, it is important to emphasize that EU budgetary guarantees should be leveraged to enhance the risk taking of</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	Implementing Partners, thereby enabling the mobilization of private capital and enhancing additionality.
<p>(68) The ECF InvestEU Instrument will be implemented by partners, including the European Investment Bank (EIB) Group, international financial institutions, the national promotional banks and institutions as well as export credit agencies. Given its role under the Treaties, its capacity to operate in all Member States and the existing experience under the current Invest EU Fund, the EIB Group should remain a privileged implementing partner under the ECF InvestEU Instrument EU compartment. In addition to the EIB Group, national promotional banks and institutions should be able to offer a complementary financial product range, given that their experience and capabilities at national and regional level could be beneficial for the maximisation of the impact of public funds on the whole territory of the Union, and for ensuring a fair geographical balance of projects based on anThe open architecture which will remain a key aspect of the ECF InvestEU Instrument, building on the broad collaboration and experience under the InvestEU Programme. The Commission and the EIB Group should work in partnership with the objective of supporting the implementation of the ECF InvestEU Instrument and fostering consistency, inclusivity, additionality, and efficient deployment.</p>	<p>SE (Drafting suggestions):</p> <p>(68) The ECF InvestEU Instrument will be implemented by partners, including the European Investment Bank (EIB) Group, international financial institutions, the national promotional banks and institutions as well as export credit agencies. Given its role under the Treaties, its capacity to operate in all Member States and the existing experience under the current Invest EU Fund, <u>the EIB Group should remain a privileged implementing partner under</u> the ECF InvestEU Instrument EU compartment. In addition to the EIB Group, national promotional banks and institutions should be able to offer a complementary financial product range, given that their experience and capabilities at national and regional level could be beneficial for the maximisation of the impact of public funds on the whole territory of the Union, and for ensuring a fair geographical balance of projects based on anThe open architecture which will remain a key aspect of the ECF InvestEU Instrument, building on the broad collaboration and experience under the InvestEU Programme. The Commission and the EIB Group should work in partnership with the objective of supporting the implementation of the ECF InvestEU Instrument and fostering consistency, inclusivity, additionality, and efficient deployment.</p> <p>SE (Comments):</p> <p>SE does not see the need for an earmarking of the budgetary guarantee to the EIB. If such an earmarking exists, it should be as low as possible.</p> <p>AT</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>(68) The ECF InvestEU Instrument will be implemented by partners, including the European Investment Bank (EIB) Group, international financial institutions, the national promotional banks and institutions as well as export credit agencies. Given its role under the Treaties, its capacity to operate in all Member States and the existing experience under the current Invest EU Find, the special role of the EIB Group is acknowledged. the EIB Group should remain a privileged implementing partner under the ECF InvestEU Instrument EU compartment. In addition to The EIB Group, national promotional banks and institutions should be able to offer a complementary financial product range, given that their experience and capabilities at national and regional level could be beneficial for the maximisation of the impact of public funds on the whole territory of the Union, and for ensuring a fair geographical balance of projects based on an open architecture which will remain a key aspect of the ECF InvestEU Instrument, building on the broad collaboration and experience under the InvestEU Programme. The Commission and the EIB Group should work in partnership with the objective of supporting the implementation of the ECF InvestEU Instrument and fostering consistency, inclusivity, additionality, and efficient deployment.</p> <p>FR</p> <p>(Drafting suggestions):</p> <p>(68) The ECF InvestEU Instrument will be implemented by partners, including the European Investment Bank (EIB) Group, international financial institutions, the national promotional banks and institutions as well as export credit agencies. Given its role under the Treaties, its capacity to operate in all Member States and the existing experience under the current Invest EU Find, the EIB Group should remain a privileged implementing partner under the ECF InvestEU Instrument EU compartment. In addition to the EIB Group, national promotional banks and institutions should be able to offer a complementary financial</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>product range, given that their experience and capabilities at national and regional level could be beneficial for the maximisation of the impact of public funds on the whole territory of the Union, and for ensuring a fair geographical balance of projects based on European preference criteria and open architecture which will remain a key aspect of the ECF InvestEU Instrument, building on the broad collaboration and experience under the InvestEU Programme. The Commission and the EIB Group should work in partnership with the objective of supporting the implementation of the ECF InvestEU Instrument and fostering consistency, inclusivity, additionality, and efficient deployment.</p> <p>FR (Comments): Ajout de la mention à la préférence européenne en italique dans le texte révisé et suppression de la mention à l'architecture ouverte.</p>
<p>(69) To avoid undue administrative burden and ensure a swift deployment and support to the market in continuity across programming periods, the implementation of the ECF InvestEU Instrument will build on the existing community of the InvestEU Programme pillar assessed implementing partners, contractual arrangements and relevant financial products. Moreover, to ensure sound financial management, a faster roll-out and simplification to entrusted entities, 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. This improves the impact of Union support and allows for more focus on efficiently supporting final recipients. The Commission may rely on and reuse in full or in part the agreements with implementing partners concluded under Regulation (EU) 2021/253, and on assessments made by itself or other entities in the context of agreements under that Regulation.</p>	<p>FI (Drafting suggestions): (69) To avoid undue administrative burden and ensure a swift deployment and support to the market in continuity across programming periods, the implementation of the ECF InvestEU Instrument will build on the existing community of the InvestEU Programme pillar assessed implementing partners, contractual arrangements and relevant financial products. Moreover, to ensure sound financial management, a faster roll-out and simplification to entrusted entities, 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, <u>including with reliance on the EIBG's rules, policies and procedures reflecting their role as EU treaty bodies.</u> This improves the impact of Union support and allows for more focus on efficiently supporting final recipients. The Commission may rely on and reuse in full or in part the</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	agreements with implementing partners concluded under Regulation (EU) 2021/253, and on assessments made by itself or other entities in the context of agreements under that Regulation.
<p>(70) To provide implementing partners with broader access to the ECF InvestEU Instrument, the Commission should be able to conclude agreements in indirect management with all the categories of entities listed under Article 62(1), point (c), Regulation (EU, Euratom) 2024/2059. To unlock private capital, bodies established in a Member State, governed by the private law of a Member State or Union law should also be eligible to be exceptionally entrusted, following a positive pillar assessment, with the implementation of financial instruments or budgetary guarantees, including when combined with grants or with other forms of non-repayable support in blending operations, to the extent that such bodies are provided with adequate financial guarantees. Such bodies should be selected taking due account of the nature of the financial instrument or budgetary guarantee to be implemented, the experience and the financial and operational capacity of those bodies, and their rules and procedures for verifying the economic viability of projects of final recipients. The selection should be transparent, justified on objective grounds and should not give rise to a conflict of interests.</p>	
<p>(71) To ensure consistency, the budgetary guarantee and financial instruments, including when combined with non-repayable support in blending operations, under the ECF InvestEU Instrument should be implemented in accordance with Title X of Regulation (EU, Euratom) 2024/2509.</p>	
<p>(72) To ensure consistency in the implementation of budgetary guarantees, financial instruments and blending operations under different Union</p>	AT

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>programmes, the Commission should develop guidance including technical arrangements, terms and conditions to deploy these forms of support under those programmes.</p>	<p>(Comments):</p> <ul style="list-style-type: none"> • We believe that the ECF regulation would benefit from further specification that is now only referred to in recital 72; we agree that consistency in the implementation of budgetary guarantees etc under different programmes should be ensured. • The recital recognises the need to go beyond what is enshrined in the Financial Regulation. We think that technical agreements, terms and conditions could be enshrined in the regulation(s) or at least in a delegated act. <p>FR</p> <p>(Drafting suggestions):</p> <p>To ensure consistency in the implementation of budgetary guarantees, financial instruments and blending operations under different Union programmes, the Commission should develop guidance including technical arrangements, terms and conditions to deploy these forms of support under those programmes. <u>By developing such arrangements, terms and conditions for defence programmes, the Commission should seek ways to rely most effectively on Member States and their expertise, in particular to assess the results of actions.</u></p> <p>FR</p> <p>(Comments):</p> <p>Il est crucial d’inviter la Commission à coopérer avec les Etats membres concernant l’appréciation de l’efficacité et la qualité des résultats des actions financées.</p>
<p>(73) To comply with the requirements of Regulation (EU, Euratom) 2024/2509, this Regulation should set out a maximum amount of the budgetary guarantee under the ECF InvestEU Instrument, a provisioning rate</p>	

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>for that budgetary guarantee in line with Article 214(1) of Regulation (EU, Euratom) 2024/2509, and an obligation for the Commission to assess every year that provisioning rate following in accordance with the assessment referred to in Article 41(5) of Regulation EU, Euratom) 2024/2509 and in line with the Commission’s risk management framework and the possibility for third parties and third countries to contribute specifically to the ECF InvestEU Instrument.</p>	<p style="text-align: center; opacity: 0.5; font-size: 48px; transform: rotate(-30deg);">PUBLIC</p>
<p>(74a) The ECF InvestEU Instrument should provide for the possibility to establish a Member State Compartment. The detailed terms and conditions governing the contribution of funds to the Member State Compartment, including the sources, amounts, provisioning rates and modalities of delivery, should be set out in a contribution agreement concluded between the Commission and the relevant Member State for that compartment. For the purposes of the Member State Compartment, representatives from contributing Member States should be invited to participate in the monitoring of the implementation of the activities under the relevant compartment, for example by participating in dedicated parts of the Policy Review Dialogues.</p>	<p>SE (Comments): SE can accept the added recital.</p> <p>RO (Drafting suggestions): The ECF InvestEU Instrument should provide for the possibility to establish a Member State Compartment. The detailed terms and conditions governing the contribution of funds to the Member State Compartment, including the sources, amounts, provisioning rates and modalities of delivery, should be set out in a contribution agreement concluded between the Commission and the relevant Member State for that compartment. Where this contribution tops up any guarantee product established under the EU Compartment, those guarantee products under the Member State Compartment are state aid consistent within the meaning of the Financial Regulation Article 212(2). The corresponding provisioning rate should be set based on similar considerations as those under the EU Compartment, with the aim to ensure additionality of ECF InvestEU financing in the relevant Member State. For the purposes of the Member State Compartment, representatives from contributing Member States should be invited to participate in the monitoring of the implementation of the activities under the relevant compartment, for example by participating in dedicated parts of the Policy Review Dialogues.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>RO (Comments): We need clarification on the meaning of the term <i>modalities of delivery</i>, as well as on whether the additional amounts in the MS Compartment can be provided only as a top-up of the approved financial products within the EU compartment or as tailor made products addressed to the respective contributor MS as well.</p> <p>The proposed wording is based on concerns regarding the differentiated, more restrictive treatment applied to the financial products financed from MS contribution, which would make them less attractive.</p> <p>SI (Drafting suggestions): (74a) The ECF InvestEU Instrument should provide for the possibility to establish a Member State Compartment. The detailed terms and conditions governing the contribution of funds to the Member State Compartment, including the sources, amounts, provisioning rates and modalities of delivery, should be set out in a contribution agreement concluded between the Commission and the relevant Member State for that compartment. For the purposes of the Member State Compartment, representatives from contributing Member States should be invited to participate in the monitoring of the implementation of the activities under the relevant compartment, for example by participating in dedicated parts of the Policy Review Dialogues.</p> <p>SI (Comments): What are Policy Review Dialogues?</p> <p>FI (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>We are not entirely convinced on this. How about the state aid rules?</p> <p>FR</p> <p>(Drafting suggestions):</p> <p>(74a) The ECF InvestEU Instrument should provide for the possibility to establish a Member State Compartment. The detailed terms and conditions governing the contribution of funds to the Member State Compartment, including the sources, amounts, provisioning rates and modalities of delivery, should be set out in a contribution agreement concluded between the Commission and the relevant Member State for that compartment. For the purposes of the Member State Compartment, representatives from contributing Member States should be invited to participate in the monitoring of the implementation of the activities under the relevant compartment, for example by participating in dedicated parts of the Policy Review Dialogues. <u>Reporting on Member-state compartment deployment for both financial product and policy objectives performance should be regularly provided to the ECF general committee assessing their contribution to the competitiveness’ general objectives</u></p> <p>FR</p> <p>(Comments):</p> <p>Le comité général du FEC, qui agit en tant qu'organe directeur du fonds, devrait être en mesure de contrôler le déploiement du MS-C et sa contribution aux objectifs spécifiques et généraux du FEC.</p>
<p>(75) The ECF InvestEU Instrument should provide a single, centralised place for establishment and management of a budgetary guarantee and all financial instruments contributing to objectives of Union’s internal policies,</p>	<p>RO</p> <p>(Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>which will contribute to improved efficiency and increase policy impact of Union financing. The financial products established under the InvestEU Regulation are State aid consistent within the meaning of the Article 212(2) of Regulation (Union, Euratom) 2024/2509. The Commission and the implementing partners should ensure that new financial products to be established under this Regulation are State aid consistent within the meaning of Article 212(2) of Regulation (Union, Euratom) 2024/2509 to ensure their swift deployment.</p>	<p>We need clarification on how the <i>state-aid consistency</i> can be ensured for MS compartment. We are concerned regarding the differentiated, more restrictive treatment applied to the financial products financed from MS contribution, which would make them less attractive.</p>
<p>(76) Whereas European innovative start-ups and scale-upsstartups and scaleups are essential engines of growth and competitiveness, and acknowledging that they face persistent barriers to access necessary financing in the Union, the ECF InvestEU Instrument should provide targeted financial support to growing and scaling up companies in the Union at all stages — from inception and start-up to scale-upstartup to scaleup and industrial manufacturing. The ECF InvestEU Instrument should provide direct and indirect funding for European companies with a view to attract private investors — thereby unlocking the full potential of European entrepreneurship and investment. This will empower start-ups and scale-upsstartups and scaleups and reinforce the Union’s global leadership in technology and industry, while bridging Europe’s innovation and investment gaps and delivering on the ambition of the Savings and Investment Union. The ECF InvestEU Instrument would include a facility aiming to ensure that high-growth enterprises developing or deploying innovative technologies, including in areas important for the Union’s strategic interests and economic security, can access adequate capital to scale up their businesses. It will mobilise investments from Europe’s capital markets, in line with Union’s policy priorities.</p>	

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>(77) A ECF Project Advisory should be established to support objectives of the ECF, building on the of InvestEU Advisory Hub. It should unify advisory support to private and public entities across Europe, offering tailored services to potential beneficiaries and contribute to development of a pipeline of potential investment operations under the ECF. At the same time, role of business support services such as the EU for Business Network, among others, should be to make European businesses become more innovative and competitive, grow and scale in the Single Market and to raise awareness and contribute to capacity building on avenues for accessing capital market-based funding. To avoid undue administrative burden and ensure a swift deployment and support to the market in continuity, the ECF may rely on the existing community of the InvestEU Programme pillar assessed advisory partners.</p>	<p>SE (Comments): SE can accept the proposed revision.</p> <p>FI (Drafting suggestions): (77) A ECF Project Advisory should be established to support objectives of the ECF, building on the of InvestEU Advisory Hub acknowledging the role of the EIBG. It should unify advisory support to private and public entities across Europe, offering tailored services to potential beneficiaries and contribute to development of a pipeline of potential investment operations under the ECF. At the same time, role of business support services such as the EU for Business Network, among others, should be to make European businesses become more innovative and competitive, grow and scale in the Single Market and to raise awareness and contribute to capacity building on avenues for accessing capital market-based funding. To avoid undue administrative burden and ensure a swift deployment and support to the market in continuity, the ECF may rely on the existing community of the InvestEU Programme pillar assessed advisory partners.</p> <p>IE (Comments): IE would welcome more clarity on the roles of the ECF Project Advisory and the EU for Business Network, particularly on workstreams and how duplication will be avoided</p> <p>LU (Drafting suggestions): (77) A ECF Project Advisory should be established by the Commission with the EIB Group as a privileged partner, to support objectives of the ECF, building on of InvestEU Advisory Hub. It should unify advisory support to private and public entities across Europe, offering tailored services</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>to potential beneficiaries and contribute to development of a pipeline of potential investment operations under the ECF. At the same time, role of business support services such as the EU for Business Network, among others, should be to make European businesses become more innovative and competitive, grow and scale in the Single Market and to raise awareness and contribute to capacity building on avenues for accessing capital market-based funding. To avoid undue administrative burden and ensure a swift deployment and support to the market in continuity, the ECF may rely on the existing community of the InvestEU Programme pillar assessed advisory partners.</p> <p>BE (Drafting suggestions):</p> <p>(77) A ECF Project Advisory should be established to support objectives of the ECF, building on the of InvestEU Advisory Hub. It should unify advisory support to private and public entities across Europe, offering tailored services to potential beneficiaries and contribute to development of a pipeline of potential investment operations under the ECF. <u>Upon project completion, promoters should have the opportunity to explore follow-up financing through the ECF Project Advisory.</u> At the same time, role of business support services such as the EU for Business Network, among others, should be to make European businesses become more innovative and competitive, grow and scale in the Single Market and to raise awareness and contribute to capacity building on avenues for accessing capital market-based funding. To avoid undue administrative burden and ensure a swift deployment and support to the market in continuity, the ECF may rely on the existing community of the InvestEU Programme pillar assessed advisory partners.</p> <p>BE (Comments):</p> <p>See proposed amendments art. 26. Providing project promoters with the opportunity to explore follow-up financing upon project completion ensures</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>continuity and scalability of successful initiatives. It encourages sustained innovation, strengthens the impact of ECF-supported projects, and facilitates the translation of project results into further development or commercialization, thereby maximizing the return on investment for the Union.</p> <p>EE (Drafting suggestions):</p> <p>(77) A ECF Project Advisory should be established to support objectives of the ECF, building on the of InvestEU Advisory Hub. It should unify advisory support to private and public entities across Europe, offering tailored services to potential beneficiaries and contribute to development of a pipeline of potential investment operations under the ECF. At the same time, role of business support services such as the EU for Business Network, among others, should be to make European businesses become more innovative and competitive, grow and scale in the Single Market and to raise awareness and contribute to capacity building on avenues for accessing capital market-based funding. To avoid undue administrative burden and ensure a swift deployment and support to the market in continuity, the ECF may rely on the existing community of the InvestEU Programme pillar assessed advisory partners. <u>To ensure effective geographical coverage across the Union and to guarantee equal and barrier-free access to advisory services, the ECF Project Advisory should ensure that advisory support related to both repayable and non-repayable instruments is locally accessible in all Member States in the local language. Close cooperation between the ECF advisory services and the Horizon Europe National Contact Point network should be fostered in order to provide comprehensive and coherent guidance to potential applicants.</u></p> <p>EE (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>It is important for us to emphasize that ECF Project Advisory is also actively focused on advising on bringing research and innovation results to the market, thereby supporting the ECF's overall goal of ensuring the valorisation of research results.</p>
<p>(78) SMEs make up more than 99 % of all businesses in the Union, provide two thirds of jobs, and contribute substantially to the creation of new quality jobs in all sectors. Scaling firms exist across all sectors and levels of innovative prowess. Stimulating the Union’s growth and innovation can only happen by boosting the many scalers that exist across the Union SME population. SMEs are essential to achieve the green and digital transformations of the economy, including the achievement of climate neutrality.</p>	<p>IT (Drafting suggestions):</p> <p>(78) SMEs make up more than 99 % of all businesses in the Union, provide two thirds of jobs, and contribute substantially to the creation of new quality jobs in all sectors. Scaling firms exist across all sectors and levels of innovative prowess. Stimulating the Union’s growth and innovation can only happen by boosting the many scalers that exist across the Union SME population. SMEs are essential to achieve the green and digital transformations of the economy, including the achievements<u>s</u> of climate neutrality <u>and climate resilience.</u></p> <p>IT (Comments):</p> <p>The Communication of the Commission “Forging a climate-resilient Europe - the new EU Strategy on Adaptation to Climate Change” (COM(2021) 82 final, of 24 February 2021) provides for the following:</p> <p>2. Forging a climate-resilient Union. [...] The long-term vision is that in 2050, the EU will be a climate-resilient society, fully adapted to the unavoidable impacts of climate change. This means that by 2050, when we aim to have reached climate neutrality, we will have reinforced adaptive capacity and minimised vulnerability to climate</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	impacts, in line with the Paris Agreement and the proposed European Climate Law.
<p>(79) However, access to finance is an important barrier for SMEs, especially for start-ups and scale-ups startups and scaleups, as they often rely on external financing to support their growth plans. SMEs face further barriers to innovation and growth that do not affect larger firms to the same extent, for example the lack of entrepreneurial skills, lack of access technology infrastructure, difficulties in protecting intellectual property or accessing export markets and value chains in order to develop their internationalisation activities.</p>	<p>LT (Drafting suggestions):</p> <p>(79) However, access to finance is an important barrier for SMEs, especially for start-ups and scale-ups startups and scaleups, as they often rely on external financing to support their growth plans. These challenges are particularly acute in Member States with smaller capital markets, where risk finance availability is structurally limited and private investment ecosystems remain underdeveloped. SMEs face further barriers to innovation and growth that do not affect larger firms to the same extent, for example the lack of entrepreneurial skills, lack of access technology infrastructure, difficulties in protecting intellectual property or accessing export markets and value chains in order to develop their internationalisation activities.</p> <p>LT (Comments):</p> <p>We would like to highlight the existing imbalance in the availability and effectiveness of financial instruments across Member States. The amendment provides a clearer rationale for targeted measures benefiting Lithuania and the wider region, ensuring that the European Competitiveness Fund addresses structural disparities in a more focused and equitable manner.</p> <p>SE (Comments):</p> <p>SE can accept the proposed revisions.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>(80) Evidence shows that direct financial support to SMEs is not enough on its own to support their scaling-up and that they need and benefit from dedicated advice at Union level. Providing advice on Single Market rules, innovation and access to finance contributes to Union competitiveness. Moreover, business support at local, regional and national level is diverse and should also connect less developed and outermost regions. Existing Union initiatives such as the Enterprise Europe Network, European Cluster Collaboration Platform and European Digital Innovation Hubs have helped bridge this gap. Accordingly, an ‘EU for Business Network’ shall be established, building on the Enterprise Europe Network (EEN), the European Cluster Collaboration Platform (ECCP) and other networks, to simplify and streamline advisory and partnership services.</p>	<p>LT (Drafting suggestions):</p> <p>(80) Evidence shows that direct financial support to SMEs is not enough on its own to support their scaling-up and that they need and benefit from dedicated advice at Union level. Providing advice on Single Market rules, innovation and access to finance contributes to Union competitiveness. Moreover, business support at local, regional and national level is diverse and should also connect less developed and outermost regions. Existing Union initiatives such as the Enterprise Europe Network, European Cluster Collaboration Platform and European Digital Innovation Hubs have helped bridge this gap. To ensure balanced participation across the Union, advisory and capacity-building activities should also aim to strengthen emerging innovation ecosystems in Member States with lower innovation performance, facilitate technology diffusion, and support their integration into cross-border value chains. Accordingly, an ‘EU for Business Network’ shall be established, building on the Enterprise Europe Network (EEN), the European Cluster Collaboration Platform (ECCP) and other networks, to simplify and streamline advisory and partnership services.</p> <p>LT (Comments):</p> <p>It should be emphasized that the proposal consistently reflects Lithuania’s and the region’s interest in ‘ecosystem bridging’ and incorporates the logic of strengthening ecosystems and promoting knowledge dissemination, which is particularly relevant for smaller markets.</p> <p>ES (Drafting suggestions):</p> <p>(80) Evidence shows that direct financial support to SMEs is not enough on its own to support their scaling-up and that they need and benefit from</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>dedicated advice at Union level. Providing advice on Single Market rules, innovation and access to finance contributes to Union competitiveness. Moreover, business support at local, regional and national level is diverse and should also connect less developed and outermost regions. Existing Union initiatives such as the Enterprise Europe Network, European Cluster Collaboration Platform and European Digital Innovation Hubs have helped bridge this gap. Accordingly, an ‘EU for Business Network’ shall be established, building on the Enterprise Europe Network (EEN), the European Cluster Collaboration Platform (ECCP) and other networks, to simplify and streamline advisory and partnership services. <u>Collaboration with Horizon Europe National Contact Points should be encouraged.</u></p> <p>BE (Drafting suggestions):</p> <p>(80) Evidence shows that direct financial support to SMEs is not enough on its own to support their scaling-up and that they need and benefit from dedicated advice at Union level. Providing advice on <u>legal matters</u>, Single Market rules, innovation and access to finance contributes to Union competitiveness. Moreover, business support at local, regional and national level is diverse and should also connect <u>different categories of regions</u>, less developed, <u>transition</u> and outermost regions. Existing Union initiatives such as the Enterprise Europe Network, European Cluster Collaboration Platform and European Digital Innovation Hubs have helped bridge this gap, <u>but also RTO’s and other innovation actors can provide specialised advice.</u> Accordingly, an ‘EU for Business Network’ shall be established, building on the Enterprise Europe Network (EEN), the European Cluster Collaboration Platform (ECCP) and other networks, to simplify and streamline advisory and partnership services.</p> <p>BE (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>Legal advice remains important for SMEs. See also amendment in article 28.1(a)</p> <p>Regional actors can also play a role in providing specialised expertise and advice.</p>
<p>(81) The ECF will support SME’s access to finance and strengthen the competitiveness of the Union SMEs via two main avenues: First, in addition complementary to the EU for Business Network, the ECF will also conduct additional cross-cutting activities focused on strengthening the competitiveness of SMEs. Second, the ECF policy windows should include dedicated SME actions targeting SMEs in strategic sectors, such as bonus systems to encourage SME participation, with a view to fostering SME innovation, growth and scaling-up. Special support may be granted for access to and the availability of finance for SMEs and small mid-cap companies across all sectors of the economy, including micro-finance, support for social enterprises. Furthermore, a flexible financial toolbox under the ECF should ensure that SMEs could receive the type of support that best fits their needs along their investment journey.</p>	<p>LT</p> <p>(Drafting suggestions):</p> <p>(81) The ECF will support SME’s access to finance and strengthen the competitiveness of the Union SMEs via two main avenues: First, in addition complementary to the EU for Business Network, the ECF will also conduct additional cross-cutting activities focused on strengthening the competitiveness of SMEs. Second, the ECF policy windows should include dedicated SME actions targeting SMEs in strategic sectors, such as bonus systems to encourage SME participation, with a view to fostering SME innovation, growth and scaling-up. Work programmes should ensure a clearly defined SME dimension, including dedicated budgetary envelopes, simplified procedures and proportionate reporting obligations, so that SMEs from all Member States — including those operating in less developed ecosystems — can effectively benefit from ECF support. Special support may be granted for access to and the availability of finance for SMEs and small mid-cap companies across all sectors of the economy, including micro-finance, support for social enterprises. Furthermore, a flexible financial toolbox under the ECF should ensure that SMEs could receive the type of support that best fits their needs along their investment journey. In designing the flexible financial toolbox, particular attention should be given to addressing the structural financing gaps in Member States with smaller or less mature capital markets, including through tailored financial products and enhanced cooperation with national promotional institutions.</p> <p>LT</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments):</p> <p>Lithuanian authorities consider this proposal essential to enhance SME participation. It establishes a mandatory SME share in work programmes, aligns the design of financial instruments with the needs of smaller capital markets, and provides a robust basis for advocating additional financing measures, such as venture capital funds through the EIB/EIF.</p> <p>SE (Comments):</p> <p>SE can accept the proposed revisions.</p> <p>PT (Comments):</p> <p>“Bonus systems” concern which measures in specific? Clarification here is welcomed.</p> <p>FR (Comments):</p> <p>Il est important d’éviter toute redondance avec le futur EU for Business Network. Les actions de soutien direct aux PME via des appels à propositions ciblés sont pertinentes, mais il ne faut pas multiplier les dispositifs parallèles, afin de prévenir les doublons et de garantir une offre claire et lisible pour les entreprises.</p> <p>Nous comprenons qu’il y aura des actions transverses en lien avec la compétitivité des PME complémentaires au réseau EEN, mais cela reste encore flou, comment cela pourrait se concrétiser ?</p>
(82) To further support the principles of simplification and easy access to Union funding opportunities for beneficiaries, the ECF should offer a single	<p>BE (Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>portal centralising information on and access to all Union funding opportunities and support other activities. The single portal should facilitate and accelerate access to Union and other funding, financing and investments, streamlining the approach while building on the Funding and Tenders Portal, InvestEU Portal, Access to Finance Portal, STEP Portal and other relevant platforms. It should also be possible to directly apply for funding opportunities on the single portal.</p>	<p>(82) To further support the principles of simplification and easy access to Union funding opportunities for beneficiaries, the ECF should offer a single portal centralising information on and access to all Union funding opportunities, <u>including accelerated and targeted actions for competitiveness</u>, and support other activities. The single portal should facilitate and accelerate access to Union and other funding, financing and investments, streamlining the approach while building on the Funding and Tenders Portal, InvestEU Portal, Access to Finance Portal, STEP Portal and other relevant platforms. It should also be possible to directly apply for funding opportunities on the single portal.</p> <p>BE (Comments): For the two-stage bottom up calls (ATAC) it will be important that the call for interest is also communicated on the funding portal. Please bear in mind that for companies it is important to know about these calls. They do not know all the details of the individual mechanisms. It is crucial that all calls (from which mechanism it might be) are communicated centrally (e.g. funding and tenders portal).</p> <p>FR (Drafting suggestions): (82) To further support the principles of simplification and easy access to Union funding opportunities for beneficiaries, the ECF should offer a single portal centralising information on and access to all Union funding opportunities and support other activities. The single portal should facilitate and accelerate access to Union and other funding, financing and investments, streamlining the approach while building on the Funding and Tenders Portal, InvestEU Portal, Access to Finance Portal, STEP Portal and other relevant platforms. It should also be possible to directly apply for funding opportunities on the single portal, <u>taking into account necessity for specific</u></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p><u>security of information guarantees regarding certain activities such as defence industry and security policies</u></p> <p>FR (Comments): La France a des interrogations concernant la sécurité de l'information, en particulier concernant les activités liées à l'industrie de défense ou en matière de sécurité.</p>
<p>(85) In order to achieve the general and specific objectives of the ECF, the power to adopt acts in accordance with Article 290 of the TFEU should be delegated to the Commission in respect of the adoption of ECF InvestEU Instrument investment guidelines, changes to the maximum amount of the budgetary guarantee and the provisioning rate, as well as in respect of certain measures in support of space policy. It is of particular importance that the Commission carries out appropriate consultations during its preparatory work, including at expert level, and that those consultations be conducted in accordance with the principles laid down in the Interinstitutional Agreement of 13 April 2016 on Better Law-Making.²⁵ In particular, to ensure equal participation in the preparation of delegated acts, the European Parliament and the Council receive all documents at the same time as Member States' experts, and their experts systematically have access to meetings of Commission expert groups dealing with the preparation of delegated acts.</p> <hr/> <p>²⁵ OJ L 123, 12.5.2016, p. 1, ELI: http://data.europa.eu/eli/agree_interinst/2016/512/oj.</p>	<p>SE (Comments): SE can accept the proposed revisions.</p> <p>EE (Drafting suggestions): (85) In order to achieve the general and specific objectives of the ECF, the power to adopt acts in accordance with Article 290 of the TFEU should be delegated to the Commission the implementing acts should be used in respect of the adoption of ECF InvestEU Instrument investment guidelines, changes to the maximum amount of the budgetary guarantee and the provisioning rate, as well as in respect of certain measures in support of space policy. It is of particular importance that the Commission carries out appropriate consultations during its preparatory work, including at expert level, and that those consultations be conducted in accordance with the principles laid down in the Interinstitutional Agreement of 13 April 2016 on Better Law-Making.²⁵ In particular, to ensure equal participation in the preparation of delegated implementing acts, the European Parliament and the Council receive all documents at the same time as Member States' experts, and their experts systematically have access to meetings of Commission expert groups dealing with the preparation of implementing delegated acts.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>25 OJ L 123, 12.5.2016, p. 1, ELI: http://data.europa.eu/eli/agree_interinst/2016/512/oj.</p> <p>EE (Comments): The ECF InvestEU Instrument investment guidelines, changes to the maximum amount of the budgetary guarantee and the provisioning rate, as well as in respect of certain measures in support of space policy, should be adopted with an implementing act (not delegated act), with participation of the MS representatives.</p> <p>FR (Drafting suggestions): In order to achieve the general and specific objectives of the ECF, the power to adopt acts in accordance with Article 290 of the TFEU should be delegated to the Commission after the approval of the ECF general committee in respect of the adoption of ECF InvestEU Instrument investment guidelines.</p> <p>FR (Comments): D'après l'expérience passée, les lignes directrices en matière d'investissement constituent un élément crucial et déterminant pour une mise en œuvre efficace. Les États membres doivent avoir leur mot à dire.</p>
<p>(86) In order to ensure uniform conditions for the implementation of the ECF through certain measures set out in work programmes as well as certain</p>	<p>DE (Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>measures in support of space policy, implementing powers should be conferred on the Commission. Those powers should be exercised in accordance with Regulation (EU) No 182/2011 of the European Parliament and of the Council.²⁶</p> <hr/> <p>26 Regulation (EU) No 182/2011 of the European Parliament and of the Council of 16 February 2011 laying down the rules and general principles concerning mechanisms for control by Member States of the Commission’s exercise of implementing powers, OJ L 55, 28.2.2011, p. 13–18.</p>	<p>(86) In order to ensure uniform conditions for the implementation of the ECF through certain measures set out in work programmes as well as certain measures in support of space policy, implementing powers should be conferred on the Commission, <u>without prejudice to the competences of the Member States in these fields</u>. Those powers should be exercised in accordance with Regulation (EU) No 182/2011 of the European Parliament and of the Council.²⁶</p> <p>DE (Comments): ”Certain measures in space policy” is still very vague and needs clarification or at the minimum a reference to the competences of the Member States in this particular field, in line with the TFEU.</p> <p>FR (Drafting suggestions): In order to ensure uniform conditions for the implementation of the ECF through certain measures set out in work programmes as well as certain measures in support of space policy <u>(bearing in mind related security and defence stakes)</u>, implementing powers should be conferred on the Commission. Those powers should be exercised in accordance with Regulation (EU) No 182/2011 of the European Parliament and of the Council.²⁶</p> <p>FR (Comments): Demande d’ajout prenant en compte le caractère dual des activités spatiales.</p>
<p>(87) Although Work programmes and other acts implementing this Regulation concern specific budget implementation tasks which do not require a conferral of implementing powers and which should not normally</p>	<p>SE (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>fall within the scope of implementing acts referred to in be adopted in accordance with Regulation (EU) No 182/2011, the advisory. The examination procedure should be used for the adoption of certain acts as defined in this Regulation, including work programmes implementing activities for clean transition, health, biotech, agriculture and bioeconomy, and digital leadership, resilience and security, defence industry and space, given that those acts should be fully supported and create synergies with national and shared management activities conducted by the Member States. Due the sensitivity and particular importance of synergies and full coordination with Member States in For some implementing acts of a technical nature under the area of resilience and security, defence industry support and space, the examination the advisory procedure should be used for the adoption of work programmes in these areas.</p>	<p>SE can accept the proposed revisions.</p> <p>SI (Drafting suggestions): (87) Although Work programmes and other acts implementing this Regulation concern specific budget implementation tasks which do not require a conferral of implementing powers and which should not normally fall within the scope of implementing acts referred to in be adopted in accordance with Regulation (EU) No 182/2011, the advisory. The examination procedure should be used for the adoption of certain acts as defined in this Regulation, including work programmes implementing activities for clean transition, health, biotech, agriculture and bioeconomy, and digital leadership, resilience and security, defence industry and space, given that those acts should be fully supported and create synergies with national and shared management activities conducted by the Member States. Due the sensitivity and particular importance of synergies and full coordination with Member States in For some implementing acts of a technical nature under the area of resilience and security, defence industry support and space, the examination the advisory procedure should be used for the adoption of work programmes in these areas.</p> <p>SI (Comments): At least within a single policy window the same rules should apply.</p> <p>PT (Comments): PT welcomes and supports the changes introduced in this recital which directly address MS claims of more active role in the decision-making process.</p> <p>However, there seems to be an inconsistency between the last sentence and the content of art. 15.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>The last paragraph of recital 87 states the following (clean version): For some implementing acts of a technical nature under the area of space the advisory procedure should be used.</p> <p>Art. 15 states the following:</p> <p><i>1a. The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2) and the horizontal activities referred to in Chapter III. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 83(3).</i></p> <p>There is no reference to any exception. In this sense, we would like to confirm whether the exception mentioned in recital 87 is a mistake.</p>
	<p>DE (Drafting suggestions):</p> <p>(87a) Work programmes should set clear priorities which are to be based on fact-based analyses such as the risk analyses in the context of the Economic Security Strategy.</p> <p>DE (Comments):</p> <p>Complementary to our changes in Art. 15/1.</p>
<p>(88) The Commission should adopt immediately applicable implementing acts in duly justified cases where a work programme has not been adopted sufficiently prior to the year of budget implementation in order to ensure business continuity of Union support, in particular of critical operational activities, such as satellite systems and critical infrastructures, or need to be adopted in expedited fashion to immediately react to a crisis or other similar</p>	<p>SE (Comments):</p> <p>SE can accept the proposed revisions.</p> <p>FR (Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>exceptional and duly substantiated emergencies, imperative grounds of urgency so require.</p>	<p>88) — The Commission should adopt immediately applicable implementing acts in duly justified cases where a work programme has not been adopted sufficiently prior to the year of budget implementation in order to ensure business continuity of Union support, in particular of critical operational activities, such as satellite systems and critical infrastructures, or need to be adopted in expedited fashion to immediately react to a crisis or other similar exceptional and duly substantiated emergencies, imperative grounds of urgency so require.</p> <p>FR (Comments): Demande de suppression du considérant en cohérence avec suppression à l'article 15 des dispositions afférentes</p>
<p>(89) The ECF replaces the programmes established by Regulations (EU) 2021/522,²⁷ (EU) 2021/694,²⁸ (EU) 2021/696,²⁹ (EU) 2021/697,³⁰ (EU) 2021/783,³¹ (EU) 2023/588,³², repeals provisions of Regulations (EU) 2021/696, (EU) 2023/588 and (EU) [EDIP].</p> <hr/> <p>27 Regulation (EU) 2021/522 of the European Parliament and of the Council of 24 March 2021 establishing a Programme for the Union's action in the field of health ('EU4Health Programme') for the period 2021-2027, and repealing Regulation (EU) No 282/2014 (OJ L 107, 26.3.2021, p. 1, ELI: http://data.europa.eu/eli/reg/2021/522/oj).</p> <p>28 Regulation (EU) 2021/694 of the European Parliament and of the Council of 29 April 2021 establishing the Digital Europe Programme and repealing Decision (EU) 2015/2240 (OJ L 166, 11.5.2021, p. 1, ELI: http://data.europa.eu/eli/reg/2021/694/oj).</p>	<p>IT (Drafting suggestions):</p> <p>(89) The ECF replaces the programmes established by Regulations (EU) 2021/522,²⁷ (EU) 2021/694,²⁸ (EU) 2021/696,²⁹ (EU) 2021/697,³⁰ (EU) 2021/783,³¹ (EU) 2023/588,³², repeals provisions of Regulations (EU) 2021/696, (EU) 2023/588 and (EU) [EDIP].</p> <hr/> <p>27 Regulation (EU) 2021/522 of the European Parliament and of the Council of 24 March 2021 establishing a Programme for the Union's action in the field of health ('EU4Health Programme') for the period 2021-2027, and repealing Regulation (EU) No 282/2014 (OJ L 107, 26.3.2021, p. 1, ELI: http://data.europa.eu/eli/reg/2021/522/oj).</p> <p>28 Regulation (EU) 2021/694 of the European Parliament and of the Council of 29 April 2021 establishing the Digital Europe Programme and repealing Decision (EU)</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>29 Regulation (EU) 2021/696 of the European Parliament and of the Council of 28 April 2021 establishing the Union Space Programme and the European Union Agency for the Space Programme and repealing Regulations (EU) No 912/2010, (EU) No 1285/2013 and (EU) No 377/2014 and Decision No 541/2014/EU (OJ L 170, 12.5.2021, p. 69, ELI: http://data.europa.eu/eli/reg/2021/696/oj).</p> <p>30 Regulation (EU) 2021/697 of the European Parliament and of the Council of 29 April 2021 establishing the European Defence Fund and repealing Regulation (EU) 2018/1092 (OJ L 170, 12.5.2021, p. 149, ELI: http://data.europa.eu/eli/reg/2021/697/oj).</p> <p>31 Regulation (EU) 2021/783 of the European Parliament and of the Council of 29 April 2021 establishing a Programme for the Environment and Climate Action (LIFE), and repealing Regulation (EU) No 1293/2013 (OJ L 172, 17.5.2021, p. 53, ELI: http://data.europa.eu/eli/reg/2021/783/oj).</p> <p>32 Regulation (EU) 2023/588 of the European Parliament and of the Council of 15 March 2023 establishing the Union Secure Connectivity Programme for the period 2023-2027 (OJ L 79, 17.3.2023, p. 1, ELI: http://data.europa.eu/eli/reg/2023/588/oj).</p>	<p>2015/2240 (OJ L 166, 11.5.2021, p. 1, ELI: http://data.europa.eu/eli/reg/2021/694/oj).</p> <p>29 Regulation (EU) 2021/696 of the European Parliament and of the Council of 28 April 2021 establishing the Union Space Programme and the European Union Agency for the Space Programme and repealing Regulations (EU) No 912/2010, (EU) No 1285/2013 and (EU) No 377/2014 and Decision No 541/2014/EU (OJ L 170, 12.5.2021, p. 69, ELI: http://data.europa.eu/eli/reg/2021/696/oj).</p> <p>30 Regulation (EU) 2021/697 of the European Parliament and of the Council of 29 April 2021 establishing the European Defence Fund and repealing Regulation (EU) 2018/1092 (OJ L 170, 12.5.2021, p. 149, ELI: http://data.europa.eu/eli/reg/2021/697/oj).</p> <p>31 Regulation (EU) 2021/783 of the European Parliament and of the Council of 29 April 2021 establishing a Programme for the Environment and Climate Action (LIFE), and repealing Regulation (EU) No 1293/2013 (OJ L 172, 17.5.2021, p. 53, ELI: http://data.europa.eu/eli/reg/2021/783/oj).</p> <p>32 Regulation (EU) 2023/588 of the European Parliament and of the Council of 15 March 2023 establishing the Union Secure Connectivity Programme for the period 2023-2027 (OJ L 79, 17.3.2023, p. 1, ELI: http://data.europa.eu/eli/reg/2023/588/oj)</p> <p>IT (Comments): The same issues identified above on “LIFE stand-alone request” apply here.</p>
<p>HAVE ADOPTED THIS REGULATION:</p>	

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p style="text-align: center;">Chapter I General Provisions</p>	<p>BG (Comments): It is necessary to provide a clearer designation of 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</p> <p>FR (Comments): La Commission devrait intégrer la définition de la compétitivité dans cet article.</p>
<p style="text-align: center;">SECTION 1 OBJECTIVES AND STRUCTURE OF THE FUND</p>	
<p style="text-align: center;"><i>Article 1</i> [Subject Matter]</p>	
<p>1. [This Regulation establishes the European Competitiveness Fund (the ‘ECF’), including a specific programme on defence research and innovation referred to in Article 182(3) TFEU and lays down the objectives of the ECF, its budget for the period 2028-2034, the forms of Union support and the rules for providing such support under cross-cutting activities and specific policies supported by the ECF.</p>	

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
2. This Regulation lays down:	
(a) A ‘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);	
(b) A ‘Health, Biotech, Agriculture and Bioeconomy’ window – implemented through the activities set out in Chapter II and Chapter V, and contributing to the specific objectives set out in Article 3(2), point (b);	
(c) A ‘Digital Leadership’ window – implemented through the activities set out in Chapter II and Chapter VI, and contributing to the specific objectives set out in Article 3(2), point (c);	
(d) A ‘Resilience and Security, Defence Industry, and Space’ window – implemented through 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).	
	PT (Drafting suggestions): Add a new paragraph 4: “4. In implementing this Regulation, due account shall be taken of the specific situation of the Union’s outermost regions within the meaning of Article 349 TFEU, in order to address their permanent structural constraints and to ensure

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>that they can fully benefit from the Union’s competitiveness agenda, including in the field of essential public services and health.”</p> <p>PT (Comments):</p> <p>This paragraph makes the reference to outermost regions operational in the basic act itself, ensuring that the design and implementation of the ECF systematically integrates the constraints and opportunities of these territories, as already recognised in Recital (9) and in primary law.</p>
<p>3. The Regulation also sets up a legal framework aiming at ensuring security of supply, removing investment obstacles and production bottlenecks and supporting the competitiveness of the Union’s industrial base.]</p>	<p>IT (Drafting suggestions):</p> <p>The Regulation also sets up a legal framework aiming at ensuring security of supply, removing investment obstacles, <u>skills gap</u>, and production bottlenecks and supporting the competitiveness of the Union’s industrial base.</p>
<p style="text-align: center;"><i>Article 2</i> Definitions</p>	
<p>1. For the purposes of this Regulation, the following definitions apply:</p>	<p>EL (Comments):</p> <p>In line with our comments in art. 22 and 29 below, we propose to include the definitions of scale-ups and start-ups in order to ensure clarity, and define accurately the scope of the provisions.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>(1) ‘Advisory agreement’ means a legal instrument whereby the Commission and the advisory partner specify the conditions of the implementation of the project advisory services;</p>	<p>IT (Comments): Advisory services are essential and, building on the positive experience of the Invest EU advisory hub, Italy proposes to increase the allocated funding.</p>
<p>(2) ‘Advisory partner’ means an eligible counterpart such as a financial institution or other entity with whom the Commission has concluded an advisory agreement for the purpose of implementing one or more advisory initiatives, other than advisory initiatives implemented through external service providers contracted by the Commission or through executive agencies;</p>	
<p>(3) ‘Compartment’ means a part of the ECF InvestEU Instrument defined by the origin of the resources backing the support;</p>	
	<p>FR (Drafting suggestions): (3a) ‘Competitiveness’ means the EU’s capacity to raise productivity growth, high living standards and strategic autonomy in a rapidly evolving global landscape. This general objective extends beyond the traditionnal cost-based competition, emphasizing innovation</p> <p>FR (Comments): La France rappelle la nécessité de définir la compétitivité dans le règlement.</p>
<p>(4) ‘Control’ means the ability to exercise a decisive influence over a legal entity directly, or indirectly through one or more intermediate legal entities;</p>	

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>(4a) ‘Defence products’ means any defence-related products as referred to in the Annex to Directive 2009/43/EC, as well as works, supplies and services directly related to those products for any and all elements of their life cycle within the meaning of Article 2, point (c), of Directive 2009/81/EC;</p>	<p>SE (Comments): SE can accept the added paragraph.</p> <p>FR (Comments): Cette définition est en grande partie reprise d’EDIP. Pourquoi la Présidence n’a pas aligné parfaitement ces définitions, ce qui aurait davantage de sens en termes légistiques ?</p>
<p>(5) ‘Executive management structure’ means the body of a legal entity appointed in accordance with national law, and which, where applicable, reports to the chief executive officer or any other person having comparable decisional power, and which is empowered to establish the legal entity’s strategy, objectives and overall direction, and oversees and monitors management decision-making;</p>	
<p>(6) ‘EIB Group’ means the European Investment Bank (EIB), its subsidiaries, and other entities established under Article 28(1) of Protocol No 5 on the Statute of the European Investment Bank (the EIB Statute);</p>	
<p>(7) ‘guarantee agreement’ means a legal instrument whereby the Commission and an implementing partner specify the conditions for proposing financing and investment operations in order for them to be granted the benefit of the ECF InvestEU Instrument guarantee, for providing the budgetary guarantee for those operations and for implementing them in accordance with this Regulation;</p>	

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>(8) ‘Imperative public interest’ means, for the purpose of Article 20, an overriding reason for providing Union support for a certain action, or set of actions, due to a clear and significant contribution to the achievement of policy objectives under the ECF, which justifies the application of accelerated and simplified rules to the award;</p>	
<p>(9) ‘Implementing partner’ means an eligible financial institution or intermediary with whom the Commission has concluded a guarantee agreement;</p>	
<p>(10) ‘Important project of common European interest’ (IPCEI) means a project that fulfils all the criteria laid down in the Commission Communication on Criteria for the analysis of the compatibility with the internal market of State aid to promote the execution of important projects of common European interest or any subsequent revision of that Communication;</p>	
<p>(11) ‘Investment journey’ means the continuum of public and private financial support and policy support mechanisms provided to recipients across its entire development chain, including a comprehensive series of activities involved in the allocation of financial resources and provision of support to foster innovation and economic growth. This journey includes, but is not limited to, the initiation from fundamental and applied research phases, progressing through stages of scaling up, industrial deployment, and advancing to the culmination in full-scale manufacturing and industrial maturity and internationalisation;</p>	<p>SE (Drafting suggestions): ‘Investment journey’ means the continuum of public and private financial support and policy support mechanisms provided to recipients across its entire development chain, including a comprehensive series of activities involved in the allocation of financial resources and provision of support to foster innovation and economic growth. This journey includes, <u>but is not limited to</u>, the initiation from fundamental and applied research phases, progressing through stages of scaling up, industrial deployment, and advancing to the culmination in full-scale manufacturing <u>and industrial maturity and internationalisation;</u></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>SE (Comments): The definition of an investment journey should be revised given that it defines the ECF’s scope in the legal text. The definition should not include industrial maturity and internationalisation as subsidies are not a sustainable solution and do not bring about long-term competitiveness, and as it risks crowding out private capital.</p>
<p>(12) ‘Financing and investment operations’ or ‘financing or investment operations’ means operations to provide finance directly or indirectly to final recipients through financial products, carried out by an implementing partner in its own name, provided by the implementing partner in accordance with its internal rules, policies and procedures and accounted for in the implementing partner’s financial statements or, where applicable, disclosed in the notes to those financial statements;</p>	
<p>(13) ‘Legal entities’ means a legal person created and recognised as such under Union, national or international law, including Structures for European Armament Programme (SEAP), established in accordance with Regulation (EU) [XXX]³³ of the European Parliament and of the Council [EDIP], which has legal personality and the capacity to act in its own name, exercise rights and be subject to obligations, or an entity which does not have legal personality as referred to in Article 200(2), point (c), of the Financial Regulation;</p> <hr/> <p>33 OJ L., p</p>	

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>(14) ‘Policy window’ means a targeted area for support by the ECF Toolbox as specified in Article 3(2);</p>	<p>FR (Drafting suggestions): ‘Policy window’ means a targeted area for support by the ECF Toolbox as specified in Article 3(2), <u>divided in several sections</u> ;</p> <p>FR (Comments): Les autorités françaises estiment qu’une clarification de la définition des policy windows s’avère nécessaire. Ces policy windows étant elles-mêmes divisées en plusieurs fenêtres, qu’il conviendrait d’identifier clairement.</p>
<p>(15) ‘Pre-commercial procurement’ means the procurement of research and development services involving risk-benefit sharing under market conditions where there is a clear separation of the research and development services procured from the deployment of commercial volumes of end-products;’</p>	
<p>(16) ‘Project advisory’ means advisory that supports investment, including capacity building and market development activities, and business acceleration services provided by advisory partners, by external service providers contracted by the Commission or through executive agencies;</p>	
<p>(17) ‘Competitiveness Seal’ means a quality label awarded to a proposal submitted to a call for proposals that meets all the quality requirements set out in the award procedure but might receive support from other Union or national funding sources;</p>	<p>SE (Drafting suggestions): (17) ‘Competitiveness Seal’ means a quality label awarded to a proposal submitted to a call for proposals that meets all the quality requirements set out in the award procedure <u>but might receive support from other Union or national funding sources;</u></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>SE (Comments): SE suggest deleting the last part of the sentence. See also comments under Article 8.</p> <p>SI (Drafting suggestions): (17) ‘Competitiveness Seal’ means a quality label awarded to a proposal submitted to a call for proposals that meets all the quality requirements set out in the award procedure and is thus eligible to but might receive support from other Union or national funding sources;</p> <p>HR (Comments): <u>HR comment: While we support the concept of the ‘Competitiveness Seal’ in principle, we consider it necessary to clearly define all financing sources through which Member States may support projects awarded the Seal, as well as the mechanisms that will ensure the simple and practical implementation of synergies and the combination of different funding source.</u></p>
(18) ‘Small mid-cap company’ means an entity as defined in the Commission recommendation 2025/3500 final;	
(19) ‘Small and medium-sized enterprise’ or ‘SME’ means a micro, small or medium-sized enterprise within the meaning of the Annex to Commission Recommendation 2003/361/EC;	
(20) ‘Stakeholders’ means individuals, groups, or organizations that are affected by and can be involved in the programme implementation;	

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>(21) ‘Infrastructure’ means all physical and virtual elements necessary for the provision of services and economic activities, including networks, grids and assets, as well as mobile assets linked to infrastructure, fostering decarbonisation, resilience, efficiency, digitalisation, and interoperability;</p>	<p>PL (Drafting suggestions): (21) ‘Infrastructure’ means all physical and virtual elements necessary for the provision of services and economic activities, including networks, grids and assets, as well as mobile assets linked to infrastructure, fostering decarbonisation, resilience, efficiency, digitalisation, and interoperability, security and defence;</p> <p>PL (Comments):</p> <p>PL (Drafting suggestions): Merely an editorial correction: since EDPCIs and a host of measures related to defence are included in the scope of the ECF, we should leave no doubt as to defence & security infrastructure also being included.</p>
	<p>SE (Drafting suggestions): .</p> <p>SE (Comments): .</p> <p>SI (Drafting suggestions): <u>(22) ‘Skills’ are 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></p> <p>SI</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments):</p> <p>SI would like to add a new definition under Article 2, once the text will be opened to negotiations.</p> <p>Given that the ECF often refers to skills, and in order to avoid any ambiguity regarding the concept and possible overlaps with formal degrees and qualification systems, we suggest a definition of "skills". Please find our proposal based on Council Recommendation on key competences for lifelong learning, available here: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=oj:JOC_2018_189_R_0001</p> <p>DE</p> <p>(Drafting suggestions):</p> <p><u>(22) ‘Strategic dependency’ means dependencies on external reliances on goods, services, data, capital or technology relevant for the Union’s economy and open international trading system, which are essential for the Union’s security and resilience that pose high vulnerability due to a high degree of market concentration, limited dispensability (substitutability), and exposure to coercive or unstable partners in particular in a disproportionately unbalanced trade relationship.</u></p> <p>DE</p> <p>(Comments):</p> <p>We are in favour of defining this term since it is important for the regulation.</p> <p>BE</p> <p>(Drafting suggestions):</p> <p><u>(22) Technology Infrastructures means facilities, equipment, capabilities and resources required to develop, test, upscale and validate technology, from pre-competitive applied research services up to demonstration and validation; , enabling and accelerating technological innovations towards societal/market adoption, fostering industrial competitiveness;</u></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	BE (Comments): When including definitions in accordance with the FP10 text, the most recent version should be used.

Article 3
Objectives

MT

(Comments):

All Member States should benefit from the ECF. If the objective is to build European Competitiveness then solutions are needed that excellence and competitiveness is built and spread throughout the Union.

In its written comments, Malta has underlined the issue of leverage. Both Mr Letta and Mr Draghi in their reports clearly stated that the EU needs about EUR 800 billion in capital investment each year to enhance European Competitiveness coming both from the private sector with leveraging from the public sector. When considering the EUR 250 billion budget for ECF over a seven-year period, one firmly understands that leverage will be an important tool. Most EU Member State finances are under strain and leverage will mostly likely be essential.

AT

(Comments):

A reference to the cost-effectiveness of fundings should be included. This will ensure that public funds are used in a way that maximizes their benefit for decarbonization and competitiveness, and that subsidies are targeted, economical, and have the greatest possible impact, while at the same time ensuring that no resources are tied up in disproportionately expensive or ineffective measures.

PT

(Comments):

Regarding this Article 3, we consider that the ECF **must** ensure a **balanced geographical coverage** and promote **equal access of stakeholders from all Member States**. We consider that **this should be more explicit in this article**.

We would also welcome more **clarity regarding the link between Article 3 and Article 33**.

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(E.g.: Article 3 refers to the economic, social, and environmental impact, while Article 33 maps this onto the eligible activities, where for example tourism SMEs are explicitly mentioned (point m). Thus, it would be important to clarify that Article 3 should ensure that service sectors - such as tourism which have a strong territorial impact - are not deprioritised in comparison with industrial sectors).</p> <p>EL (Comments): Maintaining fairness and balance in the distribution of ECF resources: 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.</p> <p>ECF to be Simple, flexible, but also with inclusivity- balance</p> <p>The implementation of the Fund shall ensure a balanced geographical distribution of investments across the Union. Ensure the participation of less developed regions and SMEs in the Union’s competitiveness agenda.</p> <p>The work programmes may set minimum thresholds for investments by SMEs indicatively quota $\geq 50\%$ and a minimum allocation for regions lagging behind to be determined by a suitable calibrated formula.</p>
<p>1. The general objective of the ECF is to increase European strengthen the Union's competitiveness, notably in strategic sectors and technologies along the investment journey by:</p>	<p>CZ (Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>1. The general objective of the ECF is to strengthen the Union's competitiveness, resilience and security, notably in strategic sectors and technologies along the investment journey by:</p> <p>CZ (Comments): CZ – this amendment reflect the fact that ECF also covers and addresses additional areas that are not adequately captured by the term “competitiveness”</p> <p>MT (Comments): Commencing with 1a and 1b, Malta with other fourteen EU Member States have been putting forward the argument that this is a significant political issue concerning geographic balance / widening. As it currently stands, the ECF is going to be designed for a limited number of MSs other than InvestEU, and to a certain extent, the limited opening for SMEs. Malta understands that the horizontal MFF is dealing with the issue of geopolitical balance / widening.</p> <p>NL (Drafting suggestions): The general objective of the ECF is to increase Europeanstrengthen the Union's competitiveness, by addressing market failures (including transition failures) while ensuring European added value and promoting innovation and productivity growth, notably in strategic sectors and technologies along the investment journey by:</p> <p>NL (Comments): Promoting innovation and productivity growth are key elements of strengthening competitiveness and should be anchored in the overarching</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>objective of the ECF. The Draghi report put these at the centre of the competitiveness agenda. Furthermore, important that the ECF focuses on market failures (including transition failures). Productivity growth as just one of many in the list insufficiently recognizes its key importance to our competitiveness and standard of living.</p> <p>SE (Drafting suggestions): The general objective of the ECF is to increase Europeanstrengthen the Union's competitiveness and ensuring European added value, with a clear focus on addressing market failures and promoting innovation and productivity growth, notably in strategic sectors and technologies along the investment journey by:</p> <p>SE (Comments): SE thinks it's imperative to mention the main purpose of the ECF, that includes addressing well-defined market failures, as well as the main drivers of competitiveness in this context, in an overarching paragraph, given the long list of general objectives and lack of hierarchy amongst them. The principles mentioned here should also be applied when considering other general objectives.</p> <p>SK (Drafting suggestions): 1. The general objective of the ECF is to increase Europeanstrengthen the Union's competitiveness all across the Union while respecting the principle of technological neutrality, notably in strategic sectors and technologies along the investment journey by:</p> <p>SI</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>1. The general objective of the ECF is to increase Europeanstrengthen the Union's competitiveness, notably in strategic sectors <u>defined by the policy windows in knowledge</u> production and <u>in</u> technologies along the investment journey by:</p> <p>AT</p> <p>(Drafting suggestions):</p> <p>The general objective of the ECF is to increase Europeanstrengthen the Union's competitiveness, notably in strategic sectors and technologies along the investment journey by taking into account cost-efficiency requirements:</p> <p>IE</p> <p>(Drafting suggestions):</p> <p>The general objective of the ECF is to increase Europeanstrengthen the Union's competitiveness, <u>by addressing market failures (including transition failures) while ensuring European added value and promoting innovation and productivity growth.</u> notably in strategic sectors and technologies along the investment journey by:</p> <p>IE</p> <p>(Comments):</p> <p>IE suggested text amendment- Promoting innovation and productivity growth are key elements of strengthening competitiveness and should be anchored in the overarching objective of the ECF. Furthermore, important that the ECF focuses on market failures (including transition failures).</p> <p>IT</p> <p>(Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>1. The general objective of the ECF is to strengthen the Union's competitiveness, industrial renewal and modernisation, notably in strategic sectors and technologies along the investment journey by:</p> <p>IT (Comments): We deem it important to frame the ECF along the priorities set forth by the Oct. 2025 European Council Conclusions.</p> <p>PT (Comments): The clarification of the three policy windows is welcomed; however, further specification is needed to ensure that the Health & Biotechnology window explicitly covers health-system resilience, digital health capacities and supply-chain robustness, particularly for insular and outermost regions.</p> <p>BE (Drafting suggestions): 1. The general objective of the ECF is to increase European strengthen the Union's competitiveness and its resilience, by reinforcing the Union's industrial base and its value chains, notably in strategic sectors, by fostering industrial uptake and deployment of strategic technologies and by supporting technologies along the investment journey by:</p> <p>BE (Comments): The general objective of the ECF needs to be defined more clearly.</p> <p>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</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p><u>growth, high living standards and strategic autonomy in a rapidly evolving global landscape, and sovereignty</u> notably in strategic sectors, <u>including in terms of sovereignty</u>, and technologies <u>innovations, resilience and industrial strength</u> along the investment journey by:</p> <p>FR (Comments): La France rappelle la nécessité de définir la compétitivité dans le règlement. La France soutient l'intégration de la mention d'autonomie stratégique, de souveraineté dans cet article.</p> <p>L'article 1 (<i>subject matter</i>) du FEC fait référence à l'innovation, plus large et plus pertinent pour plusieurs des fenêtres FEC que "technologies".</p>
	<p>LV (Drafting suggestions): a¹) supporting the protection and restoration of ecosystems, and measures to halt and reverse biodiversity loss, in line with the Union's biodiversity and climate objectives;</p> <p>LV (Comments): This new separate point is proposed to ensure proper visibility and continuity of nature and biodiversity priorities within the ECF objectives, in line with the Union's climate and biodiversity objectives and the LIFE Programme's long-standing role in delivering protection and restoration of ecosystems.</p>
<p>(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</p>	<p>CZ (Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>technologies with significant economic potential, including by raising productivity and developing and accelerating their manufacturing and industrial and market deployment;</p>	<p>(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 economic potential, including by collaborative research and raising productivity and developing and accelerating their manufacturing and industrial and market deployment;</p> <p>CZ (Comments): CZ - In view of their knowledge/innovation potential and the role research organizations are expected to play along the entire innovation chain up to or even including manufacturing, it would be appropriate to include a reference here, or elsewhere in this Article, to such organizations. An example is here by adding the reference to the principle of collaborative research as another important and integral element supporting competitiveness.</p> <p>LV (Drafting suggestions): 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 economic potential, including by raising productivity and developing and accelerating their manufacturing and industrial and market deployment, as well as actions that safeguard and restore environmental systems essential for long-term economic resilience and innovation capacity;</p> <p>MT (Drafting suggestions): (a) delivering technological, economic, social and environmental impact from the Union's investments, including by developing disruptive and incremental innovation, and emerging, cutting-edge, dual-use, and strategic</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>technologies with significant economic potential, including by raising productivity and developing and accelerating and broadening their manufacturing and industrial and market deployment;</p> <p>MT (Comments):</p> <p>Malta would like to insert the concept of broadening of manufacturing excellency and technology. The concept of broadening dovetails the importance that European Competitiveness Fund is there to support cross border pan European investments that create a value-added and strengthen European industrial competitiveness. The concept of broadening reinforces the importance of having positive spillovers and that all MSs and regions of the European Union would benefit from the European Competitiveness Fund.</p> <p>SI (Drafting suggestions):</p> <p>(a) delivering know how, technological, economic, social, climate and environmental impact from the Union's investments, including by supporting research and developing disruptive and incremental innovation, based on underlying research, and emerging, cutting-edge, dual-use, and strategic technologies with significant societal and economic potential, including by raising productivity and developing and accelerating their manufacturing and industrial and market deployment, without crowding out private investors and initiatives;</p> <p>AT (Drafting suggestions):</p> <p>(a) delivering technological, economic, societal 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 economic potential, including by raising</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>productivity and developing and accelerating their manufacturing and industrial and market deployment;</p> <p>AT (Comments): AT supports the inclusion of the impact of the Union’s investments on the society. However, the term “social” only refers to issues of living standards or social welfare. AT suggests using the term “societal” as it encompasses a broader set of impacts, e.g. access to education and health care, the impact of new technologies on citizens, or the societal consequences of conflicts and crisis.</p> <p>PT (Drafting suggestions): ...technologies with significant economic and environmental potential, including by raising productivity and developing and accelerating their manufacturing and industrial and market deployment, <u>while reducing environmental degradation and improving the management of natural resources.</u></p> <p>PT (Comments): The first objective lists ‘technological, economic, social and environmental impact’ to be attained through ECF but the examples covered are related with the technological and economic dimensions essentially.</p> <p>PT suggestion reinforces the environmental dimension and its inextricable relation with a competitive economy, as the Policy Windows testify. It also translates the existing compromise of collaborative R&I activities with SDGs, which will continue under ECF policy Windows.</p> <p>BE (Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(a) delivering technological, economic, social, societal and environmental impact from the Union's investments, including by developing disruptive and incremental innovation, and emerging, cutting-edge, dual-use, and strategic technologies with significant economic potential, including by raising productivity and developing and accelerating their manufacturing and industrial and market deployment;</p> <p>EL (Drafting suggestions): <u>(a1) engaging and connecting the full competitiveness capacity across EU by promoting EU collaboration</u></p> <p>EL (Comments): New paragraph to stress the need for synergies in EU</p> <p>FR (Drafting suggestions): 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 economic potential, including by raising productivity, fostering excellent research and developing and accelerating their their production manufacturing and industrial and market deployment;</p> <p>FR (Comments): Reprise des éléments des considérants. Proposition (“production”) d’élargissement de la formulation au-delà des secteurs industriels (“manufacturing and industrial”) de façon à couvrir tous les secteurs, y compris non industriels, des fenêtres du FEC.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>SI (Drafting suggestions): <u>(a1) engaging and connecting the full competitiveness pool across the Union by promoting pan-European collaboration;</u></p>
<p>(b) reducing or preventing the Union’s strategic dependencies, and reinforcing the Union’s resilience, sovereignty and economic security, including through diversifying sources and markets, circular use of resources, support to ramp up of Europeanthe Union's production of strategic technologies and creating, strengthening and protectingsafeguarding critical Union value chains and infrastructure, including from hybrid and cyber threats;</p>	<p>CZ (Comments): CZ suggests avoiding the term 'sovereignty' due to its potentially ambiguous interpretations. CZ considers it imperative to bear in mind the importance of openness and international cooperation for EU competitiveness and would oppose any changes that restrict the participation of third-country entities in ECF actions.</p> <p>LT (Drafting suggestions): (b) reducing or preventing the Union’s strategic dependencies, and reinforcing the Union’s resilience, sovereignty and economic security, including through diversifying sources and markets, circular use of resources, support to ramp up of Europeanthe Union's production of strategic technologies and creating, strengthening and protectingsafeguarding critical Union value chains and infrastructure, including from hybrid and cyber threats;</p> <p>LT (Comments): There is no agreed language speaking about EU sovereignty. We do not agree mentioning here.</p> <p>LV (Drafting suggestions): reducing or preventing the Union’s strategic dependencies, and reinforcing the Union’s resilience, sovereignty and economic security, including through</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>diversifying sources and markets, support to ramp up of Europeanthe Union's production of strategic technologies and creating, strengthening and safeguarding critical Union value chains and infrastructure, including from hybrid and cyber threats; while ensuring the sustainable use of natural resources and contributing to biodiversity conservation and restoration;</p> <p>LV (Comments): Reflects the Union’s biodiversity objectives and supports sustainable resource use, ensuring continuity of LIFE Programme actions on nature and biodiversity within the new fund.</p> <p>MT (Drafting suggestions): (b) reducing or preventing the Union’s strategic dependencies, and reinforcing the Union’s resilience, sovereignty and economic security, including through diversifying sources and markets, circular use of resources, support to ramp up of Europeanthe Union's production of strategic technologies and creating, expanding, strengthening and protectingsafeguarding critical Union value chains and infrastructure, including from hybrid and cyber threats;</p> <p>MT (Comments): Besides creating new and strengthening and safeguarding existing value chains, the latter should also be expanded to build greater resilience through diversification of sources (internal and external).</p> <p>NL</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>(b) reducing or preventing the Union’s high-risk strategic dependencies, and reinforcing strengthening the Union’s resilience, sovereignty in an open manner and economic security, including through diversifying sources and markets, decarbonisation, circular use of resources, support to ramp up of Europeanthe Union's production of strategic technologies and creating, strengthening and protectingsafeguarding critical Union value chains and infrastructure, including from hybrid and cyber threats; To ensure focus on reducing and preventing high-risk strategic dependencies, the approach identified by the Commission (SWD(2021)352) shall be used as foundation. High risk strategic dependencies then should be understood here as dependencies on external reliances on goods, services, data, capital or technology relevant for the Union’s economy and open international trading system, which are essential for the Union’s security and resilience that pose high vulnerability due to a high degree of market concentration, limited dispensability (substitutability), and exposure to coercive or unstable partners in particular in a disproportionately unbalanced trade relationship. The Commission, in cooperation with Member States, shall apply and regularly update the methodology set out in SWD (2021) 352 to identify, classify and monitor dependencies, taking into account dispensability and reciprocity. Action shall focus on high-risk strategic dependencies with limited substitutability and asymmetric exposure, including in non-trade areas such as technology, data and capital.</p> <p>SE</p> <p>(Drafting suggestions):</p> <p>reducing or preventing the Union’s strategic dependencies, and reinforcing the Union’s resilience, sovereignty and economic security, including through diversifying sources and markets, clean and circular use of resources, support to ramp up of Europeanthe Union's production of strategic technologies and creating, strengthening and protectingsafeguarding critical</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>Union value chains and infrastructure, including from hybrid and cyber threats;</p> <p>SE (Comments): To not avoid hazards, circular use of resources needs to be <u>clean</u></p> <p>SK (Drafting suggestions): (b) reducing or preventing the Union’s strategic dependencies, and reinforcing the Union’s resilience, sovereignty and economic security, including through diversifying sources and markets, circular use of resources, support to ramp up of Europeanthe Union's production of strategic technologies and creating, strengthening and protectingsafeguarding critical Union value chains, including by strengthening their diversification and geographical balance, and infrastructure, including from hybrid and cyber threats;</p> <p>SI (Drafting suggestions): (b) reducing or preventing the Union’s strategic dependencies, and reinforcing the Union’s resilience, sovereignty, food security and economic security, including through diversifying sources and markets, circular use of resources, support to ramp up of Europeanthe Union's production of strategic technologies and creating, strengthening and protectingsafeguarding critical Union value chains and infrastructure, including from hybrid and cyber threats;</p> <p>AT (Drafting suggestions): b. <u>The Union shall reduce and prevent high risk dependencies and strengthen its</u> resilience and economic security, inter alia through diversification and circular use of resources and</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>markets, and by supporting a European market for and production of strategic technologies that create and protect critical Union value chains and vital infrastructure. To ensure focus on reducing and preventing high-risk dependencies, the approach identified by the Commission (SWD(2021)352) shall be used as foundation. High risk dependencies then should be understood here as dependencies on external reliances on goods, services, data, capital or technology relevant for the Union's economy and open international trading system, which are essential for the Union's security and resilience that pose high vulnerability due to a high degree of market concentration, limited dispensability (substitutability), and exposure to coercive or unstable third countries in particular in a disproportionately unbalanced trade relationship.</p> <p>The Commission, in cooperation with Member States, shall apply and regularly update the methodology set out in SWD (2021) 352 to identify, classify and monitor dependencies, taking into account dispensability and reciprocity. Action shall focus on high-risk dependencies with limited substitutability and asymmetric exposure, including in non-trade areas such as technology, data and capital.</p> <p>AT (Comments): AT supports the NL suggestions (compare copy in column 2)</p> <p>ES (Drafting suggestions):</p> <p>(b) reducing or preventing the Union's strategic dependencies, and reinforcing the Union's resilience, sovereignty and economic security, including through diversifying sources and markets, circular use of resources, support to ramp up of European the Union's production of strategic technologies and creating, strengthening and protecting safeguarding critical Union value chains, key industrial capabilities and infrastructure, including from hybrid and cyber threats;</p> <p>ES (Comments): The inclusion of circular economy, recycling, innovation and critical infrastructure strengthens the alignment of the ECF with EU's priorities of</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>reindustrialisation, resilience and strategic autonomy; however, it does not explicitly address key industrial capabilities.</p> <p>IE (Drafting suggestions):</p> <p>b) reducing or preventing the Union’s high-risk strategic dependencies, and reinforcing strengthening the Union’s resilience, sovereignty in an open manner and economic security, including through diversifying sources and markets, decarbonisation, circular use of resources, support to ramp up of European the the Union's production of strategic technologies and creating, strengthening and protecting safeguarding critical Union value chains and infrastructure, including from hybrid and cyber threats;</p> <p><u>To ensure focus on reducing and preventing high-risk dependencies, the approach identified by the Commission (SWD (2021) 352) shall be used as a foundation. High risk dependencies then should be understood here as dependencies on external reliance on goods, services, data, capital or technology relevant for the Union’s economy and open international trading system, which are essential for the Union’s security and resilience that pose high vulnerability due to a high degree of market concentration, limited dispensability (substitutability), and exposure to coercive or unstable third countries in particular in a disproportionately unbalanced trade relationship.</u></p> <p><u>The Commission, in cooperation with Member States, shall apply and regularly update the methodology set out in SWD (2021) 352 to identify, classify and monitor dependencies, taking into account dispensability and reciprocity. Action shall focus on high-risk strategic dependencies with limited substitutability and asymmetric exposure, including in non-trade areas such as technology, data and capital.</u></p> <p>IE</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments):</p> <p>IE Suggested Text Amendment</p> <p>Ireland proposes to add a clarification on the type of dependencies the ECF is aiming to address. Not all dependencies are problematic, nor can all high-risk dependencies be addressed by the ECF. Therefore, the objective in Art 3.1(b) should specify that where the focus of the ECF is to address the Union's economic security, only those dependencies that are</p> <ol style="list-style-type: none"> 1) essential to the Union's security and resilience, while also 2) having a high vulnerability for being instrumentalized by a third country and 3) simultaneously having limited substitutability options and a high degree of market concentration. <p>This definition is based on the approach put forward by the European Commission in its study on identifying this category of high-risk dependencies.</p> <p>As dependencies may evolve in their nature and risks, and new high-risk dependencies may arise, the Commission should update their identification on a regular basis. As a point of reference, Ireland suggests using the study's methodology referred to above trade relationships.</p> <p>IE welcomes the addition of circular use of resources</p> <p>PT</p> <p>(Drafting suggestions):</p> <p>...including from <u>environmental</u>, hybrid and cyber threats;</p> <p>PT</p> <p>(Comments):</p> <p>The environmental dimension, in what concerns threats to infrastructure as well as value chains, should be included.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>BE (Comments): We particularly support the added reference to “circular use of resources”</p> <p>EE (Drafting suggestions): (b) reducing or preventing the Union’s strategic dependencies, and reinforcing the Union’s resilience, sovereignty and economic security, including through diversifying sources and markets, circular use of resources, support to ramp up of European the Union's production of strategic technologies and creating, strengthening and protectingsafeguarding critical Union value chains and infrastructure, including from hybrid, and cyber threats, and physical threats;</p> <p>EE (Comments): EE: Estonia proposes referring to physical threats alongside hybrid and cyber threats to reflect the full spectrum of critical infrastructure risks.</p> <p>EL (Drafting suggestions): (c) addressing market failures and suboptimal investment situations across EU,</p> <p>EL (Comments): Add “across EU”</p> <p>FR (Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>reducing or preventing the Union’s strategic dependencies, and reinforcing the Union’s resilience, sustainability, sovereignty and economic security, including through priority to European players in participating in the programme, diversifying sources and markets, circular use of resources, support to ramp up of Europeanthe Union's production of strategic technologies strategic technologies and creating, strengthening and protectingsafeguarding critical Union value chains, nature resources, biodiversity and infrastructure, including from extreme climatic and pandemic events and hybrid and cyber threats notably associated with unauthorized access by third-country authorities.</p> <p>FR (Comments):</p> <p>La France souhaite intégrer la notion de préférence européenne dans les objectifs généraux.</p> <p>Ajout de la dimension de durabilité, qui va au-delà de l’objectif de dépendance / autonomie et comporte une importante dimension de compétitivité, et est également crucial pour la résilience de l’UE.</p> <p>Par ailleurs, le rapport Nexus de l’IPBES rappelle la nécessité d’avoir une lecture intégrée des interdépendances entre la biodiversité, les systèmes hydriques, alimentaires, sanitaires et climatiques, afin d’éclairer les décisions publiques dans une perspective de durabilité et de résilience. Ici, il est donc important de rappeler que la résilience, la durabilité et la souveraineté de l’Union ne s’obtiendront pas sans des ressources naturelles et une biodiversité bien gérées et préservées.</p>
(c) addressing market failures and suboptimal investment situations, including especially by crowding in private capital and institutional investors	MT

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>as well as crowding in public funding in a proportionate manner, whileensuring additionality, by avoiding duplication and without crowding out other private or public investors; serving as an integrated platform for delivering targeted financial support to companies across all development phases start-ups, scale-ups, and strategic companies, including those actively pursuing manufacturing, industrial and market deployment;</p>	<p>(Drafting suggestions):</p> <p>(c) addressing market failures and suboptimal investment situations, includingespecially by crowding in private capital and institutional investors as well as where necessary leveraging on crowding in public funding in a proportionate manner, whileensuring additionality, by avoiding duplication and without crowding out other private or public investors; serving as an integrated platform for delivering targeted financial support to companies across all development phases start-ups, scale-ups, and strategic companies, including those actively pursuing manufacturing, industrial and market deployment;</p> <p>MT</p> <p>(Comments):</p> <p>Using the concept of ‘crowding in’ public funding looks a bit strange in terms of free market economic policy. The role of public funding is mainly to reduce the initial risk premium related to breakthrough technology commercialisation. Public funding is solely intended to leverage the much-needed private investment and financing. Having the concept of ‘crowding in’ public funding and later having a reference to crowding out of private investors looks contradictory at best. MT is recommending deleting crowding in with reference to public funding and adding ‘where necessary leveraging on’ public funding. The reality is the Draghi Report was speaking of a requirement of EUR 800 billion of capital investment each year required to push forward European competitiveness. The European Competitiveness Fund has EUR 250 billion with EUR 131 billion targeted for Defence and Space. The concept of leverage is essential in terms of ECF to crowd in private financing.</p> <p>SE</p> <p>(Drafting suggestions):</p> <p>(c) addressing market failures and suboptimal investment situations, includingespecially by crowding in private capital and institutional investors</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>as well as crowding in public funding in a proportionate manner, whileensuring additionality, by avoiding duplication and without crowding out other private or public investors; serving as an integrated platform for delivering targeted financial support to companies across all development phases start-ups, scale-ups, and strategic companies, including those actively pursuing manufacturing, industrial and market deployment; <u>primarily supporting projects in phases with strong potential to increase productivity.</u></p> <p>SE (Comments):</p> <p>This sub-paragraph speaks to the overall purpose of the ECF and should be seen as core objective that should also apply when meeting the other general objectives. The concept of addressing market failures can be developed under 3.1c but should also be mentioned in the overarching part of 3.1. (see proposal above). That is, treated in a similar way that e.g. strategic technologies are.</p> <p>SE sees that projects in the production phase should generally be able to attract private capital without public risk sharing.</p> <p>SI (Drafting suggestions):</p> <p>(c) addressing market failures and suboptimal investment situations, includingespecially by crowding in private capital and institutional investors as well as crowding in public funding in a proportionate manner, whileensuring additionality, by avoiding duplication and without crowding out other private or public investors; serving as an integrated platform for delivering targeted financial support to companies across all development phases start-ups, scale-ups, and strategic companies, including those actively</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>pursuing manufacturing, industrial and market deployment <u>with Union added value</u>;</p> <p>SI (Comments):</p> <p>Only the first objective of crowding in private and public funding stresses the additionality of ECF intervention, while the second objective of supporting companies does not explain that this support will focus on those that pursue activities which benefit the entire Union. Without this addition, the objective of ECF is to support companies across the board (which could be an objective at national level, subject to state-aid rules) without reasonable justification of action at Union level.</p> <p>ES (Comments):</p> <p>The wording is somewhat unclear. It is open to interpretation whether public investment is always necessary and whether institutional investors are public or private.</p> <p>IE (Comments):</p> <p>IE welcomes the reference to additionality</p> <p>FR (Drafting suggestions):</p> <p>(c) addressing market failures and suboptimal investment situations, including especially by crowding in private capital and institutional investors as well as crowding in public funding in a proportionate manner, while ensuring additionality, by avoiding duplication and without crowding out other private or public investors; serving as an integrated platform for delivering targeted financial support to companies across all development phases start-ups, scale-ups, small mid-caps and strategic companies,</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>including those actively pursuing manufacturing, industrial production and market deployment;</p> <p>FR (Comments):</p> <p>Proposition d'élargissement de la formulation au-delà des secteurs industriels de façon à couvrir tous les secteurs, y compris non industriels, des fenêtres du FEC.</p> <p>La France souhaite obtenir davantage de précisions sur ce que recouvre la notion de « financement public de manière proportionnée » et les raisons justifiant la suppression des mentions de startups, scaleups et entreprises stratégiques et défendre cette mention en ajoutant une référence au small mid-caps.</p> <p>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.</p>
<p>(d) furthering the integration of Union capital markets in alignmentline with the objective of delivering the Savings and InvestmentInvestments Union, including solutiontools 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;</p>	<p>MT (Drafting suggestions):</p> <p>(d) furthering the integration of Union capital markets in alignmentline with the objective of delivering the Savings and InvestmentInvestments Union, including solutiontools including pan European ones, 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;</p> <p>MT</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments):</p> <p>Malta would like to add the wording ‘pan European’ to tools because there is a significant problem in terms of access to finance for the smaller EU Member States that do not have a high deal flow of traffic in terms of venture capital and risk capital. Basically, the smaller Member States would not have enough transitional economies of scale and scope. On numerous occasions, their start-ups and scale-ups would need to travel to larger European financial centres to pitch their venture to raise the required capital in terms of risk capital equity. Through InvestEU having the EIB Group structure more pan European financial instruments other than guarantees would really assist the ability for all Member States enterprises to have enhanced opportunity to raise risk capital. A pan European dimension of tools creates the much required European value-added in terms of access to finance related to risk capital. There is a commercial rationale through the generation of pan European deal flows and there is an equal opportunity for all Member States start-ups and scale-ups to benefit and pitch to raise risk capital.</p> <p>.</p> <p>SE</p> <p>(Comments):</p> <p>SE can accept the proposed revisions.</p> <p>IE</p> <p>(Drafting suggestions):</p> <p>(d) furthering the integration of Union capital markets in line with the objective of delivering the Savings and Investments Union, including tools to address the fragmentation of Union capital markets, improve access to finance, 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;</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>IE (Comments): IE suggested text amendment which aligns with the Draghi report findings on the need to improve access to finance</p> <p>IT (Drafting suggestions): (d) furthering the integration of Union capital markets in alignment with the objective of delivering the Savings and Investment Investments Union, including solutions tools measures 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;</p> <p>IT (Comments): The term “tools” isn’t broad enough to encompass all policy measures.</p>
<p>(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 while fostering an innovative European economy;</p>	<p>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 while fostering an innovative European economy;</p> <p>LT (Comments): Lithuania considers that ECF should acknowledge and address the existing national disparities in the European Union.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>If the suggestion is too strict we could stay within this: “pooling resources of all MS and aligning...”.</p> <p>LV (Drafting suggestions):</p> <p>(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;</p> <p>LV (Comments):</p> <p>Please explain how the development of innovations is planned to ensure “securing the future of manufacturing in Europe”.</p> <p>To avoid the interpretation that "research excellence" only means research excellence, please clarify the wording, allowing for other types of excellence to be supported.</p> <p>MT (Drafting suggestions):</p> <p>(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 while fostering an innovative pan European economy;</p> <p>MT (Comments):</p> <p>Malta supports the updated Presidency text that included while fostering an innovative European economy. Malta is also recommending to place the</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>word ‘pan’ in front of European economy. Since the ECF will be promoting cross border European value-added projects, Malta would like to further push forward the concept that all EU Member States would benefit from the ECF.</p> <p>SE (Drafting suggestions):</p> <p>aligning research, innovation and industrial policy support to translating Union’s research excellence into Union industrial strength on global markets and securing the future of manufacturing in Europe while fostering an innovative European economy;</p> <p>SE (Comments):</p> <p>SE welcomes the stronger emphasis on innovation, but considers that aligning research, innovation and industrial policy is not a general objective in itself, but rather to promote research excellence to foster innovation and productivity.</p> <p>SI (Drafting suggestions):</p> <p>(e) combining and aligning research, innovation and industrial policy support to support translate Union’s research excellence and translate it into Union industrial strength and increased knowledge capacity on global markets and securing the future of the broader innovation-to-market ecosystem as well as of manufacturing in Europe while fostering a just transition to a resilient and innovative European economy;</p> <p>SI (Comments):</p> <p>R&I and industrial policies should not only align but also combing their strengths. We should support research excellence and thereby enable its translation into concrete results that have global impact.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>The goal should be to strengthen the entire innovation-to-market ecosystem, not just manufacturing.</p> <p>ES (Drafting suggestions):</p> <p>(e) aligning research, innovation and industrial and sectoral policy support to translate Union’s research excellence into Union industrial strength on global markets and securing the future of manufacturing in Europe while fostering an innovative European economy and confronting global challenges;</p> <p>ES (Comments):</p> <p>Not all collaborative R&I activities of Horizon Europe are linked to industry and manufacturing.</p> <p>IE (Comments):</p> <p>IE welcome emphasis on the role of innovation and research activities in strengthening European Competitiveness</p> <p>IT (Drafting suggestions):</p> <p>(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 while fostering an innovative European economy, in synergy with Horizon Europe, through complementarity between research and industrial deployment.</p> <p>IT (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>This amendment explicitly acknowledges the structural and operational link between HE and the ECF, highlighting the connection between research and industrialization and recognizing HE as a driver of scientific and technological excellence.</p> <p>EE (Drafting suggestions):</p> <p>(e) aligning research, innovation and industrial policy support via valorisation and rapid transfer of research and innovation results to industry to translate Union’s research excellence into Union industrial strength on global markets and securing the future of manufacturing in Europe while fostering an innovative European economy;</p> <p>FR (Drafting suggestions):</p> <p>(e) aligning research, innovation and EU’s sectoral policies 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 while fostering an innovative European economy;</p> <p>(e) covering, in close collaboration with Horizon Europe, the whole research and innovation journey from the emergence of ideas in research labs to the commercialisation on global markets, enabling the scaling up of research results into innovative solutions and contributing to reinforcing the Union’s industrial competitiveness;</p> <p>FR (Comments):</p> <p>Remplacer la notion de manufacturing par production et industriel par sectoriel.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>La formulation actuelle limite le champ de la recherche et de l'innovation aux seules industries et aux secteurs manufacturiers. Nous proposons d'élargir la formulation de façon à ce qu'elle soit en ligne avec les objectifs d'Horizon Europe (Art 3, rédigé de façon générique et sans utiliser le terme "industrie"), ainsi qu'avec les chapitres du FEC sur ses fenêtres, qui ne singularisent pas l'industrie et la production manufacturière.</p> <p>Il nous semble plus pertinent d'évoquer la couverture de l'ensemble de la chaîne de valeur de la R&I, en lien avec le considérant 10, afin de favoriser un parcours d'investissement. Cet objectif doit être mené en collaboration avec Horizon Europe, qui finance les activités de recherche et d'innovation. Dans la mesure où le FEC ne financera pas d'activités de R&I, il ne pourra à lui seul réussir à aligner les politiques de R&I et industrielle.</p> <p>Ce point est essentiel, la France le soutient.</p>
	<p>CZ (Drafting suggestions): <u>(ea) promoting and safeguarding public health by strengthening resilient, innovative and secure health systems and capacities, advancing prevention, treatment, diagnostics and medical technologies, as well as reinforcing preparedness for, and response to, serious cross-border threats;</u></p> <p>CZ (Comments): CZ - We believe this also falls under the general objectives/approaches „how to“ addressed by the ECF, and we consider it appropriate to incorporate this provision in keeping with the drafting style of the other provisions in here.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>We further wish to signal that for the Health area with its own specificities of not being fully market-driven, we will advocate for the establishment of a dedicated work programme and subcommittee within the respective policy window.</p>
<p>(f) developing and strengthening Union cross-border and critical infrastructure key toessential for the Union’s competitiveness, and strategic independence and resilience in particular for energy and, transport, digital and, security, defence and, space infrastructure as well as, water and social infrastructure, and related data and services;</p>	<p>LT (Drafting suggestions):</p> <p>(f) developing and strengthening Union cross-border and critical infrastructure following Critical Entities Directive (CER, 2022/2557) key toessential for the Union’s competitiveness, and strategic independence and resilience in particular for energy and, transport, digital and, security, defence and, space infrastructure as well as, water and social infrastructure, and related data and services, <u>including preparedness measures against hybrid threats;</u></p> <p>LT (Comments):</p> <p>We believe that resilience’s criteria should be applied not only to critical infrastructure, but also to the entities that provide essential services. Referring to the CER Directive can help close this gap and create a more effective and comprehensive resilience ecosystem.</p> <p>The amendment reinforces the importance of preparedness: EU infrastructure must be ready not only to resist hybrid threats but also to prevent and recover from them. This is vital for ensuring resilience and continuity across all critical sectors.</p> <p>LV (Drafting suggestions):</p> <p>developing and strengthening Union cross-border and critical infrastructure and materials key toessential for the Union’s competitiveness, and strategic</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>independence and resilience in particular for energyand, transport, digital and, security, defenceand, spaceinfrastructure as well as, water and social infrastructure, and related data and services;</p> <p>LV (Comments): Please also add critical materials that do not pass under critical infrastructure.</p> <p>MT (Drafting suggestions): (f) developing and strengthening Union cross-border and critical infrastructure key toessential for the Union's competitiveness, and strategic independence and resilience in particular for energyand, transport, digital and, security, defenceand, spaceinfrastructure as well as, water, security of water supply and social infrastructure, and related data and services;</p> <p>MT (Comments): Malta suggests that the term "security of energy supply" is added to the list of reasons why the ECF will support cross-border and critical energy infrastructure. Investment in infrastructure that secures energy supply will be beneficial to the EU economy, including industry, as it will ensure that affordable and clean energy is made available.</p> <p>SE (Comments): SE can accept the proposed revisions.</p> <p>RO</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>developing and strengthening Union cross-border and critical infrastructure essential for the Union’s competitiveness, strategic independence and resilience in particular for energy, transport, digital, security, defence, space, water, underwater and social infrastructure, and related data and services;</p> <p>RO</p> <p>(Comments):</p> <p>The underwater infrastructure (for ex. in the Black Sea area) is also of critical importance, especially in the current geopolitical and security context.</p> <p>We need additional information on how <i>water or social</i> infrastructure projects will be supported, as well as details on whether this kind of projects need to address both <i>cross-border</i> and <i>critical</i> infrastructure or just one of the two.</p> <p>Also, clarification is needed in order to set the complementarity with CEF for the energy and transport cross-border infrastructure projects.</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>(f) developing and strengthening Union cross-border and critical infrastructure key toessential for the Union’s competitiveness, and strategic independence and resilience in particular for <u>climate</u>, energy and, transport, digital and, security, defence and, space infrastructure as well as, water and social infrastructure, and related data and services;</p> <p>SI</p> <p>(Comments):</p> <p>Climate resilience is also key.</p> <p>ES</p> <p>(Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>f) developing and strengthening Union cross-border and critical infrastructure key to essential for the Union's competitiveness, and strategic independence and resilience in particular for energy and, transport, digital and, security, defence and, space infrastructure as well as, health water and social infrastructure, and related data and services;</p> <p>ES (Comments): Health should be mentioned in relation to resilience.</p> <p>IE (Drafting suggestions): (f) developing and strengthening Union cross-border and critical infrastructure essential for the Union's competitiveness, strategic independence and resilience in particular for energy, transport, digital, security, defence, space, wáter and social infrastructure, as well as shared research infrastructures, and related data and service</p> <p>IE (Comments): IE welcomes the addition of water infrastructure</p> <p>IE suggested text amendment - this point could benefit from an explicit reference to shared research infrastructure</p> <p>PL (Drafting suggestions): (f) developing and strengthening Union cross-border and, critical and EU added value infrastructure essential for the Union's competitiveness, strategic independence and resilience in particular for energy, transport, digital, security, defence, water and social infrastructure, and related data and services;</p> <p>PL</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments):</p> <p>PL</p> <p>(Drafting suggestions):</p> <p>Current wording is limited to cross-border and critical infrastructure. Yet some important infrastructure projects will be domestic in geographical scope and non-critical (in the sense that some strategic redundancies may exist). They may still be essential to EU's competitiveness – providing substantial added value despite not being cross-border or critical.</p> <p>PT</p> <p>(Drafting suggestions):</p> <p>“developing and strengthening Union cross-border and critical infrastructure essential for the Union’s competitiveness, strategic independence and resilience in particular for energy, transport, digital, security, defence, space, water and social infrastructure as well as <u>essential public healthcare infrastructure</u>, and related data and services;”</p> <p>BE</p> <p>(Drafting suggestions):</p> <p>(f) developing and strengthening Union cross-border and critical infrastructure key toessential for the Union’s competitiveness, and strategic independence and resilience in particular for energy and, transport, digital and, cybersecurity, security, defence and, space infrastructure as well as, water and social infrastructure, and related data and services;</p> <p>BE</p> <p>(Comments):</p> <p>We particularly support the addition of “and resilience” and “water” in the text</p> <p>EE</p> <p>(Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(f) developing and strengthening Union cross-border and critical infrastructure and capability development key toessential for the Union’s competitiveness, and strategic independence and resilience in particular for energy and, transport, digital and, security, defence and, space infrastructure as well as, water and social infrastructure, and related data and services; <u>including through deployment of enhanced physical protection and, 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 or physical nature;</u></p> <p>EE (Comments): EE: Estonia proposes referring to both physical protection and physical threats. Estonia also supports that the ECF invests into the protection and monitoring of the water infrastructure, but as a priority into critical undersea infrastructure and other associated spheres. Capability development is seen as key component to it. We believe that the specific capabilities to that end should also be eligible for the support. Currently specific capabilities such as multifunctional vessels are not covered. We believe that these capabilities are important since the critical undersea infrastructure is vulnerably exposed and is a backbone of the resilience of the EU Member States, among other important domains.</p> <p>FR (Drafting suggestions): developing and strengthening Union cross-border and critical infrastructure key toessential for the Union’s competitiveness, and strategic independence and resilience <u>under reliable and secure conditions, notably regarding the risks associated with dependencies and unauthorized Access by</u></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>third-country authorities, in particular for energy and, transport, digital and, security, defence and, space infrastructure as well as, water and social infrastructure, and related data and services;</p> <p>FR (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.</p>
<p>(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;</p>	<p>BG (Drafting suggestions): (g) strengthening the competitiveness of SMEs established in the Union, improving their access to finance, in particular to micro-finance, and supporting social enterprises, as well as facilitating access to Union funding; (gg) providing opportunities for growth and scaling up of the SMEs and small midcaps, in particular by facilitating their access to finance including private investment, through faster, simplified and harmonised procedures; reducing and ensuring a proportionate reporting burden;</p> <p>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.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>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</p> <p>LV (Drafting suggestions):</p> <p>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, including standardised e-application forms, digital submission platforms, reduced documentation requirements, and proportionate reporting obligations adapted to SME capacity; and reducing and ensuring a proportionate reporting burden;</p> <p>LV (Comments):</p> <p>The proposed addition clarifies what is meant by “simplified procedures” by specifying concrete examples such as standardised e-application forms, digital submission platforms, reduced documentation requirements, and proportionate reporting obligations. This ensures that SMEs can realistically access Union funding without being discouraged by administrative burden, thereby improving inclusiveness and effectiveness of the ECF implementation.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>NL (Drafting suggestions): strengthening the competitiveness of SMEs and small mid-cap companies established in the Union and in particular 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;</p> <p>SI (Drafting suggestions): (g) strengthening the competitiveness of SMEs and small mid-cap companies established in across the Union and their ability to grow and scale up, in particular by strengthening entrepreneurial support environment as well as by improving their access to finance, including 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;</p> <p>SI (Comments): As a Union programme, ECF should have the objective of supporting companies across the entire Union. Entrepreneurial support environment, such as networking, promotional and 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.</p> <p>AT</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments):</p> <p>AT called for the establishment of an SME committee in Article 83 (1) (aa), which was not added into the current proposal: AT again refers to the comments already submitted for ECF subgroup on Nov24 as well as for written comments on Nov 11.</p> <p>IE</p> <p>(Drafting suggestions):</p> <p>(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; including a once-only principle for beneficiary data across Union instruments</p> <p>IE</p> <p>(Comments):</p> <p>IE suggested text amendment - IE recommends the inclusion within the article of a “Once-only principle” focusing on reducing administrative burden for individuals and businesses. Suggested text amendment.</p> <p>PT</p> <p>(Drafting suggestions):</p> <p>(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</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>reducing and ensuring a proportionate reporting burden, <u>with particular attention to SMEs and small mid-caps located in less developed, outermost and island regions.</u></p> <p>BE (Drafting suggestions):</p> <p>(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; <u>but also by facilitating their participation in EU value chains through collaboration.</u></p> <p>EL (Drafting suggestions):</p> <p>(g) strengthening the competitiveness of SMEs and small mid-cap companies established in across the Union and their ability to <u>survive and continue operations in the EU,</u> 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;</p> <p>Set minimum thresholds for investments by SMEs indicatively quota \geq 50 %</p> <p><u>and a minimum allocation for regions lagging behind to be determined by a suitable calibrated formula.</u></p> <p><u>(g)(a) strengthening the competitiveness of small mid-cap companies</u></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p><u>established in the Union and their ability to survive and continue operations in the EU, grow and scale up, in particular by improving their access to finance, including private investment, as well as facilitating access to Union funding, through faster, simplified and harmonised procedures and reducing and ensuring a proportionate reporting burden;</u></p> <p>EL (Comments):</p> <p>Welcome the improvements in the text regarding SMES. However, we would insist that a high percentage of the budget to explicitly be dedicated to SMEs in accordance with the implementation of EU SME policy</p> <p>The work programmes may set minimum thresholds for investments by SMEs indicatively quota $\geq 50\%$ and a minimum allocation for regions lagging behind to be determined by a suitable calibrated formula.</p> <p>We believe that we should add in the objectives a specific reference not only to grow and scale up, but also to the survival of SMEs in order to continue their operations in the EU. We consider that there should be a discrete objective for the implementation of EU SME policy with specific budget line.</p> <p>We propose to include a specific objective to small mid-cap companies discrete from SMEs, due to their different needs.</p> <p>FR</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments):</p> <p>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.</p> <p>La France soutient l'ajout de l'eau comme domaine où il est essentiel de renforcer les infrastructures pour assurer la compétitivité, l'indépendance stratégique et la résilience de l'Union. En effet, la France a notamment soutenu la publication par la Commission de sa stratégie sur la résilience de l'eau, dans laquelle elle évoque le besoin d'une industrie européenne compétitive à ce sujet, la promotion des mesures d'économie d'eau comme levier de compétitivité des entreprises, le soutien à l'innovation des industries européennes pour une gestion durable des ressources en eau comme enjeu de compétitivité.</p>
<p>(h) promoting quality jobs and addressing shortages of skills critical to all kinds of quality jobs employment 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;</p>	<p>SE (Comments): SE can accept the proposed amendments.</p> <p>SI (Drafting suggestions):</p> <p>(h) promoting quality jobs and addressing current as well as future shortages of skills critical to all kinds of quality jobs employment 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;</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>SI (Comments): We need to address not only current shortages but also foresee and address future trends and skills shortages.</p> <p>DE (Drafting suggestions): (h) promoting quality jobs and addressing shortages of skills critical to all kinds of employment in strategic sectors for EU competitiveness, through both horizontal and primarily specific skills investment, contributing to the availability of skills in future emerging technologies, and by pursuing to accompany investments with skills investment; while ensuring a European added value;</p> <p>DE (Comments): To ensure that EU funding is used in a targeted way.</p> <p>FR (Drafting suggestions): (h) promoting quality jobs and addressing shortages of skills critical to all kinds of quality jobemployment in strategic sectors for EU competitiveness, strategic autonomy and sovereignty, through both horizontal and specific skills investment, contributing to the availability of skills in future in future emerging technologies, and skills to address climate and environmental transitions, and by pursuing to accompany investments with skills investment and indicate when it is included;</p> <p>FR (Comments): Ajout de la notion de souveraineté et d'autonomie stratégique.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>L'attractivité de certaines professions et la possibilité pour de nouvelles générations d'acquérir les compétences nécessaires aux transitions climatique et environnementale sont une question cruciale pour certains des secteurs stratégiques de l'UE (notamment l'agriculture, pour laquelle l'UE est confrontée à un défi de renouvellement des générations d'importance stratégique pour sa souveraineté alimentaire). La France soutient par exemple le développement du savoir-faire et des compétences européennes dans les métiers de l'eau, nécessaire au développement d'une industrie compétitive et innovante européenne</p>
<p>(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;</p>	<p>BE (Drafting suggestions):</p> <p>(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, <u>notably by supporting EU collaboration;</u></p> <p>EE (Drafting suggestions):</p> <p>(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 <u>giving explicit priority to projects located in the Eastern Border Member States to enhance regional resilience and socio-economic cohesion;</u></p> <p>EE (Comments):</p> <p>Although the text emphasizes geographical coverage, Estonia calls for explicit priority for the eastern border countries to compensate for the reduced interest in private investments due to geopolitical risks. The</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>inclusion of priority among the general objectives of Article 3 gives it horizontal weight.</p> <p>FR (Drafting suggestions):</p> <p>i) ensuring the integration of the Single Market, <u>in particular through the financing of market surveillance activities to prevent dangerous or non-compliant products and services from being made available in the single market and ensure a level playing field, including by supporting initiatives at any stage of the investment journey with positive spill-over effects</u> for the Single Market and resilience of its value chains; <u>in accordance with legislation applicable to each specific sector concerned by this Regulation.</u></p> <p>FR (Comments):</p> <p>La France soutient fermement ce point et estime que ce programme doit être maintenu, voire renforcé, compte tenu des défis liés au développement du commerce électronique. Il est crucial de renforcer les moyens de contrôle des produits vendus en ligne. Cela est essentiel pour assurer la sécurité des consommateurs, ainsi qu'un niveau de concurrence équitable et, par conséquent, la compétitivité des entreprises européennes. Au regard de ces enjeux, ce programme ne doit pas seulement être maintenu, mais également renforcé.</p> <p>Cet objectif transverse concerne tous les secteurs couverts par la régulation européenne. Cet ajout vise la prise en compte des régulations spécifiques à chaque secteur, qui conditionnent l'intégration de certains produits dans le marché.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>(j) supporting actions for the development, implementation, and monitoring of relevant Union legislation and policy;</p>	<p>SE (Comments): SE can accept restructuring of the article by placing this sub-para last.</p> <p>IT (Drafting suggestions):</p> <p><u>(j) contribute to the transition to a sustainable, resource-efficient, resilient economy, and which promotes the conservation and restoration of nature and biodiversity.</u></p> <p>IT (Comments):</p> <p>The green and clean transition and nature protection are clearly central pillars of the 2024-2029 Strategic Agenda. This is confirmed by the EEA Report "Europe's Environment 2025", which underlines how the protection of natural resources and climate action constitute a fundamental pillar of competitiveness, necessary to ensure economic prosperity, security and quality of life in Europe. In light of the above, it is appropriate to introduce an overall objective for the ECF focused on the transition to a sustainable, circular, resource-efficient (including energy) and climate-neutral economy, while contributing to halting the degradation of ecosystems deterioration and biodiversity loss (an overarching objective for the ECF, therefore, that goes beyond the concept of just transition). It is therefore proposed to add the above expressed general objective for the ECF, which would replace point (j) of Article 3(1); letter no longer present in the revised compromise text.</p>
	<p>SI</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p><u>(j) 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></p> <p>SI</p> <p>(Comments):</p> <p>Recital 23 should be reflected in the legal text, to ensure its applicability.</p>
<p>(k) ensuring a just transition to a sustainable, decarbonised and digital economy that is fair and supporting supportive of workers and communities;</p>	<p>LT</p> <p>(Drafting suggestions):</p> <p>ensuring a just transition to a sustainable, decarbonised and digital economy that is fair and supporting supportive of workers, and communities and businesses, particularly SMEs</p> <p>LT</p> <p>(Comments):</p> <p>LT suggest adding businesses and SMEs to emphasize their role in the green transition and necessary support.</p> <p>LV</p> <p>(Drafting suggestions):</p> <p>ensuring a just transition to a sustainable, decarbonised and digital economy that is fair and supportive of workers and communities, while ensuring the continuation of existing partnership opportunities between the public, private and non-governmental sectors;</p> <p>LV</p> <p>(Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>Preserves the partnership model established under LIFE programme, ensuring multi-stakeholder participation in implementation.</p> <p>NL (Drafting suggestions): ensuring a just twin transition to a sustainable, decarbonised and digital economy that is fair and supportingssupportive of workers and communities-;</p> <p>SE (Comments): SE can accept the proposed revisions.</p> <p>RO (Drafting suggestions): ensuring a just transition to a sustainable, decarbonised and digital economy that is fair and supportive of workers and communities, particularly for the regions and Member States that need enhanced efforts for adapting their industries to EU climate objectives;</p> <p>RO (Comments): Considering the special need of regions and MS to enhance efforts for adapting their industries to EU climate objectives.</p> <p>ES (Drafting suggestions): (k) ensuring a just transition to a sustainable, decarbonised and digital economy that is fair and supportingsupportive of workers and communities <u>and protects natural resources and biodiversity</u>;</p> <p>ES</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments):</p> <p>The objectives of the Fund should also highlight the need to protect the environment and biodiversity, in line with its streamlining throughout the Regulation (in the absence of a specific programme such as LIFE).</p> <p>IE</p> <p>(Drafting suggestions):</p> <p><u>(k) Ensuring proactive measures are taken to enhance the twin transition for a sustainable decarbonised and digital economy. For such a fundamental transformation to succeed, it must be fair and just, safeguarding job quality and supportive and protective of workers and communities, pragmatic, cost-effective and socially balanced</u></p> <p>IE</p> <p>(Comments):</p> <p>IE Suggested text amendment In line with the recent EUCO Conclusions to secure Europe's competitiveness and prosperity for present and future generations, IE calls for inclusion of the wording on twin transition within the text which is more fitting with the ECF's goal and the policy windows.</p> <p>IT</p> <p>(Drafting suggestions):</p> <p>(k) ensuring a just transition to a sustainable, decarbonised and digital economy that is fair and supporting supportive of workers and communities; <u>in particular in traditional industries;</u></p> <p>IT</p> <p>(Comments):</p> <p>This priority is underlined by the Oct. 2025 European Council Conclusions, and should in our view be reflected in the general objectives of the Fund</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(along with the specific industries mentioned in the Conclusions, which should be acknowledged across the specific objectives).</p> <p>PT (Drafting suggestions):</p> <p>(k) ensuring a just transition to a sustainable, decarbonised and digital economy <u>that is able to halt and reverse the decline of biodiversity and</u> that is fair and supportingsupportive of workers and communities, <u>including those in territories with permanent structural constraints such as outermost regions.</u></p> <p>PT (Comments):</p> <p>PT would like to reinforce, once more, the inextricable connection between a competitive EU economy and the environmental dimension that must be considered.</p> <p>FR (Drafting suggestions):</p> <p>(k) ensuring a just transition to a sustainable, <u>resilient</u>, decarbonised digital <u>and nature-positive</u> economy that is fair and supportive of workers, communities <u>and their environment.</u></p> <p>FR (Comments):</p> <p>Ajout de la notion de résilience</p>
	<p>CZ (Drafting suggestions):</p> <p><u>(kb) enhancing environmental quality contributing to promoting biodiversity protection and nature restoration</u></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>CZ (Comments):</p> <p>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 in the scope. The current proposal focuses primarily on technological solutions, overlooking their potential to contribute to environmental protection.</p> <p>PT (Drafting suggestions):</p> <p>I) ensuring positive differentiation for the Union’s outermost regions, by providing adapted eligibility conditions, increased co-financing rates, and dedicated calls to strengthen their integration into Union value chains and competitiveness objectives.</p>
<p>(ka) supporting actions for the development, implementation, and monitoring of relevant Union legislation and policy.</p>	<p>MT (Comments):</p> <p>Malta can support the text in ka but would like to place a cap on the amount of funding that is dedicated to supporting actions for the development, implementation, and monitoring of relevant Union legislation and policy. The emphasis and funding needs to go on the final beneficiaries and not reporting, monitoring and control mechanisms.</p> <p>SI (Drafting suggestions):</p> <p>(ka) — supporting actions for the development, implementation, and monitoring of relevant Union legislation and policy.</p> <p>SI (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>These actions should be financed from other sources of EC budget and not from ECF.</p> <p>DE (Comments): It should be clarified that this does not entail “normal” administrative tasks by the COM (that are to be financed under Heading 4 of the MFF)</p> <p>FI (Comments): We can very well live without this very general but potentially wide action line.</p> <p>BE (Comments): We support the addition of this element. This is of particular importance for providing a (financial) support to companies in particular SMEs to comply with legislation such as the AI Act and the cyberresilience act.</p> <p>EL (Drafting suggestions): <u>(kb): safeguarding a balanced distribution of opportunities across the Union, unlocking the potential of all regions and promoting integration into sustainable and resilient Union value chains.</u></p> <p>FR (Comments): La France s’interroge sur les actions poursuivies ici, et rappelle sa position relative à l’unité des dépenses administratives au sein de la rubrique 4</p>
	<p>CZ (Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p><u>(l) safeguarding a balanced distribution of opportunities across the Union, unlocking the full high-value potential of all regions, fostering cooperation, and promoting integration into sustainable and resilient Union value chains</u></p> <p>CZ (Comments):</p> <p>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.</p> <p>LV (Drafting suggestions):</p> <p>(l) safeguarding a balanced distribution of opportunities across the Union, unlocking the full high-value potential of all regions, fostering cooperation, and promoting integration into sustainable and resilient Union value chains</p> <p>LV (Comments):</p> <p>Latvia proposes a new objective in Article 3(1)(l) that would fully represent the intention and connection with Recital 8. In Article 3 para 2, Latvia wishes to strengthen the objectives of the ECF in relation to the agricultural and</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>bioeconomy policy area, therefore we propose to also emphasize animal health, zoonoses and antimicrobial resistance in accordance with the "One Health" approach, as an integral part of the implementation of the ECF</p> <p>MT (Comments): Malta suggests that it would be very helpful if the term "increasing security of energy supply" is included in article 3(2)(a). Investment in infrastructure that secure energy supply will be beneficial to the EU economy, including industry, as it will ensure that affordable and clean energy is made available. This is also in line with the text in Art 7(3) on diversified supply sources.</p> <p>SI (Drafting suggestions): <u>(l) promoting public health, strengthening health systems and enhancing health security;</u></p> <p>SI (Comments): SI suggests that Health challenges are dealt with in a dedicated (new) policy window to ensure more appropriate framework conditions and more effective support for public health objectives.</p> <p>AT (Drafting suggestions): New para (l) complementing Member States' actions to improve the health of people across the Union and to ensure a high level of health protection in all Union policies and activities. The ECF shall pursue the following general objectives, where appropriate in line with the "One Health" approach: (i) improving and promoting health in the Union in order to reduce the burden</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>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.</p> <p>AT (Comments):</p> <p>AT still strongly advocates to include a specific sub-paragraph on health in Article 3 (1). In the next MFF, there will be no stand-alone budget for health as it is currently in place with EU4Health. It was communicated that a substantial part of projects and actions currently funded under EU4Health will be covered by the ECF in the future. Hence, health priorities should be included in the objectives of the ECF. AT considers it insufficient to only mention health priorities and objectives in the description of the policy window. We therefore suggest again to include language from the EU4Health Regulation ((EU) 2021/522) in the objectives under Article 3 (1).</p> <p>LU (Drafting suggestions):</p> <p>(1) improving and protecting human health and strengthening the resilience, accessibility, and sustainability of health systems, including by addressing health inequalities, in line with Articles 9 and 168 TFEU.</p> <p>LU</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments):</p> <p>LU comment:</p> <p>Public health and health systems strengthening do not currently appear explicitly among the general objectives, although health is one of the policy windows and a key driver of productivity and competitiveness. Luxembourg proposes to add a specific general objective on health to reflect the Treaty obligation to ensure a high level of human health protection in all Union policies.</p> <p>PL</p> <p>(Drafting suggestions):</p> <p>(kb) closing or reducing the innovation divide, including by avoiding disproportional concentration of capability-expanding investments, guaranteeing pan-European relevance of ECF interventions.</p> <p>PL</p> <p>(Comments):</p> <p>PL</p> <p>(Drafting suggestions):</p> <p>We propose a way forward on the issue regarding the distribution of ECF’s benefits, inspired by the language championed at 24-Nov and 26-Nov meetings by SI and supported by a number of other MSs during those meetings.</p> <p>Under “guaranteeing pan-European relevance of ECF funding” we understand taking due care to avoid disproportionate concentration of ECF funding in some Member States at the cost of underrepresenting numerous others in the distribution of its benefits.</p> <p>PL is ready to offer flexibility on the wording, but not addressing this topic in the Regulation <i>at all</i> would be considered a critical failure within our Government and would trigger a negotiating stance from our Foreign Affairs Ministry pushing for making the ECF allocation as small as possible in the MFF debate. Hammering this out is therefore a no. 1 priority for us in the ECF talks.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>BE (Drafting suggestions): (Kb) Ensuring a rules-based market access, preventing trade distortions, unfair trading practices and promoting a global level playing field;</p> <p>BE (Comments): By using the ECF as a tool to keep the global level playing field for those sectors, which are currently being targeted by unfair trade practice, we do not risk losing these sectors in the Union.</p>
<p>SECTION 2 SINGLE RULEBOOK</p>	

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p style="text-align: center;"><i>Article 5</i> Additional resources</p>	<p>HR (Comments):</p> <p><u>HR comment: Article 5 enables the transfer of allocations from cohesion programmes into the ECF without territorial or governance safeguards. Without clear guarantees that such resources will create economic impact for the contributing Member State, this creates a risk that cohesion allocations are used primarily to address investment gaps in stronger economies, or as a tool to avoid n+X decommitments, rather than supporting the Treaty objective to reduce disparities across the Union. In justified cases where a strategic industrial investment must be located outside the contributing Member State, the absence of a compensation mechanism would lead to a permanent loss of both budget and economic benefit for the donor state, undermining cohesion credibility.</u></p> <p><u>HR question:</u> <u>How will the Regulation guarantee that resources transferred from Cohesion Policy to the ECF continue to deliver tangible economic benefits for the contributing Member State, either through investments implemented on its territory or, where a project is located or in another Member State for strategic EU reasons, through a clear compensation mechanism ensuring an equivalent return of benefits?</u></p> <p>IT (Comments):</p> <p>With regard to Articles 5 to 8, the possible relationship between the Competitiveness Fund and the National and Regional Partnership Plans should ideally be guided by a logic of reciprocity.</p>
	<p>FR (Comments):</p> <p>Les autorités françaises estiment qu'en raison de leur importance, les recettes affectées devraient être prises davantage en compte dans la</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>procédure budgétaire annuelle. Des informations plus consolidées que celles transmises aujourd’hui devraient être fournies à l’autorité budgétaire dans le projet de budget.</p>
<p>1. Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or other third parties, may make additional financial or non-financial contributions 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.</p>	
	<p>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.</p>
<p>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. TheyThose 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</p>	<p>SE (Drafting suggestions): Resources allocated to Member States under shared management may, at their request, in accordance with Article X of Regulation (EU) [XXX][NRPF regulation], be made available to the ECF. The Commission shall implement those resources directly or indirectly in accordance with Article 62(1), point (a) or (c) of Regulation, (EU, Euratom) 2024/2509. TheyThose resources shall be additional to the amount referred to in Article 4. Those resources and respect the Rule of Law conditionality, the conditionality of the</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>request of the Member State concerned, be transferred back to one or more respective chapters of the Plan or their successors.</p>	<p><u>Charter of Fundamental Rights of the European Union and state aid rules.</u> Those resources shall be used for the benefit of the Member State concerned. Where the Commission has not entered into a legal commitment under direct or indirect management for additional amounts thus made available to the ECF, the corresponding uncommitted amounts may, at the request of the Member State concerned, be transferred back to one or more respective chapters of the Plan or their successors</p> <p>SE (Comments): .</p> <p>DE (Drafting suggestions): . Resources allocated to Member States under shared management may, at their request, in accordance with Article X of Regulation (EU) [XXX][NRPF regulation], be made available to the ECF. The Commission shall implement those resources directly or indirectly in accordance with Article 62(1), point (a) or (c) of Regulation, (EU, Euratom) 2024/2509. TheyThose 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 <u>or their successors</u></p> <p>DE (Comments): MFF from 2035 onwards must not be prejudiced</p> <p>ES (Drafting suggestions):</p>

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	<p>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. TheyThose 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.</p> <p>ES (Comments): “Or their successors” to be deleted in coherence with the changes made in the Horizon Europe legal texts.</p> <p>FI (Drafting suggestions):</p> <p>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. TheyThose 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 <u>without prejudice to the state aid rules and co-financing requirements.</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</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>the request of the Member State concerned, be transferred back to one or more respective chapters of the Plan or their successors.</p> <p>LU (Drafting suggestions):</p> <p>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 NRPF/NRP 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.</p> <p>PT (Comments):</p> <p>PT would like to ensure that national promotional/development banks are included in the list of entity types – established in Article 62(1) of Regulation (EU, Euratom) 2024/2509 – that may design/implement the financial instruments to be envisaged.</p>
	<p>PT (Drafting suggestions):</p> <p><u>2a. When resources originate from national or regional programmes covering outermost regions, the contribution to the ECF shall ensure that the benefits for the contributing regions are preserved and that their</u></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p><u>specific structural constraints are duly taken into account in the design of the supported actions.</u></p> <p>PT (Comments): This safeguards that resources channelled from programmes that already address OR-specific needs are not reallocated in a way that weakens territorial cohesion or the capacity to address permanent additional costs (including in health).</p> <p>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 request of the Member State concerned, be transferred back to one or more respective chapters of the Plan or their successors</p> <p>FR (Comments): Formulation plus claire pour éviter les retards dans le transfert vers les programmes sources.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p style="text-align: center;"><i>Article 6</i> Alternative, combined and cumulative funding</p>	<p>HR (Comments): <u>HR comment: „Cohesion Policy funds are governed by Regulation (EU) 2021/1060 and national management and control systems, while Article 6 of the ECF proposal introduces “a single set of rules and a single legal commitment”. Without a clear hierarchy of rules and division of audit responsibilities, combined funding may result in duplicated audits, conflicting compliance requirements (especially for public procurement) and increased risk of financial corrections for Member States.“</u> <u>HR question:</u> <u>How will the full legal clarity on which compliance and audit framework applies be ensured when an action is co-funded by the ECF (direct/indirect management) and Cohesion Policy funds under shared management, in order to avoid overlapping controls and prevent Member States from bearing financial responsibility for decisions outside their control?</u></p> <p>FR (Drafting suggestions): <u>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.</u></p> <p>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.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>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.</p>	<p>LV (Comments): Does the term “Union programmes” referred to in Article 6 also apply to the national plan of the Member State? How is the condition “The rules of the relevant Union programme shall apply to the corresponding contribution...” applied in that case?</p> <p>MT (Comments): This sentence shall either read: <i>The rules of the relevant Union programme shall apply to the corresponding contribution...</i> Or <i>A single set of rules shall apply to all contributions...</i> The sentence in its current form is ambiguous and should be revised to clearly specify the circumstances in which each scenario would apply.</p> <p>SK (Comments): According to SK, synergies between ECF and NRPP should be clearer. However, the current draft wording does not fully reflect that.</p> <p>DE (Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>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 a general principle and in particular for the defense section, this single set of rules shall be the one of the ECF.</u></p> <p>If the Union contribution is based on eligible costs, the cumulative support from the Union budget shall not exceed the total eligible costs of the action and may be calculated on a pro-rata basis in accordance with the documents setting out the conditions for support.</p> <p>DE (Comments):</p> <p>For actions of the ECF, especially concerning the defence industry, it is important that contributions from another programme will not lead to a general waiver of the well-balanced rules established to be established in this regulation.</p> <p>ES (Drafting suggestions):</p> <p>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. <u>Only where the objectives of the action cannot be achieved otherwise</u> or a single set of rules may be applied to all contributions and a single legal commitment may be concluded. <u>When the action includes research and innovation activities, the rules of Horizon Europe will have preference over others and shall be included in the relevant Work Programme indicating the budget contribution from each programme.</u> If the Union contribution is based on</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>eligible costs. The cumulative support from the Union budget shall not exceed the total eligible costs of the action and may be calculated on a pro-rata basis in accordance with the documents setting out the conditions for support.</p> <p>ES (Comments):</p> <p>In line with our proposal for Horizon Europe (in line with the Single Rulebook approach).</p> <p>Explanations:</p> <ul style="list-style-type: none"> - For the sake of clarity. - The need for transparency and predictability for beneficiaries. - Horizon Europe funds must be used exclusively for R&I activities, and it must be possible to monitor them adequately. - Possibility of using different types of support. <p>Clear information is needed. When more than one programme contributes to an action, it must be specified how this will be done, how it will be decided whether common rules apply, and who will decide on funding (programme and body). Furthermore, the information must be clear to participants before proposals are submitted.</p> <p>HR (Drafting suggestions):</p> <p>1.</p> <p>HR (Comments):</p> <p>HR question: Regarding <u>“An action that has received a Union contribution from another programme may also receive another contribution under the ECF.”</u>, <u>how it will be monitored and managed in the context of double funding for same cost under an action?</u></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>IT (Drafting suggestions):</p> <p>1. The ECF shall be implemented in synergy with other Union programmes <u>ensuring full reciprocity in the coordination and bidirectional flow of resources</u>. An action that has received a Union contribution from another programme may also receive <u>another contribution support</u> under the ECF <u>and resources allocated to the ECF may, where appropriate, be transferred to National Plans or used to finance overbooked national projects, in order to maximise the territorial impact of Union funding</u>. The rules of the relevant Union programme shall apply to the corresponding contribution and a single legal commitment may be concluded. If the Union contribution is based on eligible costs, the cumulative support from the Union budget shall not exceed the total eligible costs of the action and may be calculated on a pro-rata basis in accordance with the documents setting out the conditions for support.</p> <p>IT (Comments):</p> <p>Article 11 of COM(2025) 565 (Additional resources and use of resources) provides for both the possibility that the Single Fund may be financed with additional resources from EU institutions (paragraph 1) and the possibility that National Plans may transfer resources to directly managed EU programmes (paragraph 2). Article 64, paragraph 5, establishes 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</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>does not cover the same costs. In light of this, it seems appropriate for the text to explicitly state the principle of reciprocity and the two-way flow of resources, in order to maximize 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 overlooked national projects. It is hoped that this possibility will be explicitly provided for in Article 6 or Article 7.</p>
	<p>FR (Drafting suggestions):</p> <p>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></p> <p>FR</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments):</p> <p>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 de convention de subvention « corporate » 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.</p> <p>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.</p> <p>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 répondre aux conditions spécifiques liées aux actions de l'industrie de défense (prévues aux articles 50 et 51 du FEC).</p>
<p>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 representatives of the partners to the joint award procedure may also be</p>	<p>LV</p> <p>(Comments):</p> <p>Please provide an example of how joint actions referred to in Article 6, Paragraph 2 could be carried out: “Award procedures under the ECF may be jointly conducted under direct or indirect management with Member States”.</p> <p>MT</p> <p>(Drafting suggestions):</p> <p>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</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>members of the evaluation committee referred to in Article 153(3) of Regulation (EU, Euratom) 2024/2509.</p>	<p>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 <u>carried out by the Union institutions, their departments, bodies and agencies</u>, representatives of the partners to the joint award procedure may also be members of the evaluation committee referred to in Article 153(3) of Regulation (EU, Euratom) 2024/2509.</p> <p>MT (Comments):</p> <p>Malta is proposing these changes to enhance the precision and clarity of the text.</p> <p>SI (Drafting suggestions):</p> <p>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 <u>and its values as enshrined in the Treaties respected</u>, 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,</p>

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	<p>Euratom) 2024/2509. In joint award procedures representatives of the partners to the joint award procedure may also be members of the evaluation committee referred to in Article 153(3) of Regulation (EU, Euratom) 2024/2509.</p> <p>ES (Drafting suggestions):</p> <p>2. Award procedures under the ECF may be jointly conducted under direct or, <u>in duly justified cases</u>, 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, representatives of the partners to the joint award procedure may also be members of the evaluation committee referred to in Article 153(3) of Regulation (EU, Euratom) 2024/2509 <u>without considering the contribution of resources during the evaluation, that should follow the general conditions of the Programme.</u></p> <p>ES (Comments):</p> <p>Indirect management should be limited and agreed with the Programme Committee.</p> <p>FI</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments):</p> <p>We still don't understand the single set of rules (which is different from rulebook as this concerns rules in MFF in general?) nor the single legal commitment. Particularly questionable is if this enables disregarding state aid rules and distorting the single market when the origin of the funding comes from national budget and/or the shared management funds would be treated as national funding.</p> <p>EL</p> <p>(Comments):</p> <p>We would like to emphasize 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.</p>
	<p>SK</p> <p>(Drafting suggestions):</p> <p><u>Article 6a (new)</u></p> <p><u>“European Partnerships”</u></p> <p><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></p> <p><u>2. European Partnerships shall be based on a Memorandum of Understanding, agreed and signed between the partners, stipulating:</u></p> <p><u>a) the results to be delivered, which shall be clear, measurable, time-bound;</u></p> <p><u>b) reporting requirements</u></p> <p><u>c) the related commitments from all partners;</u></p> <p><u>d) governance arrangements with a mechanism for partners to discuss and agree on the partnerships’ programming and activities.</u></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p><u>3. In duly justified cases European Partnerships will be implemented by entrusting budget implementation tasks from various Union funding programmes to bodies established pursuant to Articles 185 and 187 TFEU, in accordance with Article 62(1), point (c), of Regulation (EU, Euratom) 2024/2509.</u></p> <p><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></p> <p><u>5. European Partnerships shall:</u></p> <p><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></p> <p><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></p> <p><u>c) align with and assist in the implementation of major Union policies and policy initiatives.</u></p> <p><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></p> <p><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></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p><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></p> <p><u>6. Contributions from Partners other than the Union shall take the following forms:</u></p> <p><u>a) financial contributions to the operational budget of the initiative;</u></p> <p><u>b) co-financing by the Partners of their own participation, or that of their members, in projects funded through the initiative.</u></p> <p><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></p> <p>SK (Comments): According to the proposal, European R&I partnerships will be an important instrument for implementation of ECF's objectives. SK supports mirroring provisions to FP10 regulation.</p> <p>PT (Drafting suggestions): Add a new paragraph: <u>The Commission shall take the appropriate measures to foster the synchronisation and alignment of national funding instruments to Competitiveness Seal projects, ensuring the conditions to support, namely, transnational projects.</u></p> <p>PT (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>Taking into account the lessons learnt through STEP Seal, namely in what concerns the challenges providing alternative or combined funding to multi country 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.</p> <p>FR (Drafting suggestions):</p> <p>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 Regulation, or the partners may be entrusted with the implementation of the award procedure, where applicable, in accordance with Article 62(1), point (c), of Regulation (EU, Euratom) 2024/2509. In joint award procedures representatives of the partners to the joint award procedure may also be members of the evaluation committee referred to in Article 153(3) of Regulation (EU, Euratom) 2024/2509.</p> <p>FR (Comments):</p>

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	<p>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.</p> <p>Les règles de ce fond devraient s'appliquer dans tous les cas à une contribution de ce fonds à une action.</p> <p>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 ?</p>

Article 7
Coordination

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 reiterate our call for adoption of synergistic, but separate work programmes for both Horizon Europe and ECF.

These changes may require more strategic alignment with EU priorities and more active coordination across national and EU programmes, but they also open up additional opportunities for funding and partnership.

IT

(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.

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.

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>PT (Comments): We do not see any reference to the need to ensure coordination with the future Competitiveness Coordination Tool.</p> <p>BE (Comments): We believe that, within the proposed architecture, it is essential to build on existing structures. In particular, when considering Chapter VI and cyber-related programmes, pending the opinion of the CLS, it should be ensured that there is a direct link to Regulation (EU) 2021/887 establishing the European Cybersecurity Competence Centre (ECCC) and its governance framework. This connection should guarantee that the work carried out by the ECCC Governing Board in the field of cybersecurity legislation and strategic coordination is duly recognised and taken into account in the forthcoming MFF.</p>
	<p>FR (Comments): La délégation pourra souhaiter que les modalités effectives de cette coordination soient mentionnées à cet article, notamment en faisant référence au nouvel article 13a) – ECF General Committee et à l'article 14.</p>
<p>1. The Commission shall ensure the consistent implementation of the European Competitiveness Fund, the Framework Programme for Research and Innovation and the Innovation Fund.</p>	<p>CZ (Drafting suggestions): The Commission, together with the Member States, shall ensure the consistent implementation of the European Competitiveness Fund, the Framework Programme for Research and Innovation and the Innovation Fund.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>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, all the Committees and platforms and shall be seen as an equal partner to the Commission with regard to the implementation of the mentioned programmes.</p> <p>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></p> <p>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 reiterate our call for adoption of synergistic, but separate work programmes for both Horizon Europe and ECF.</p> <p>NL</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>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>The rules of the Framework Programme for Research and Innovation apply to the collaborative research and innovation activities funded under its Pillar II ‘Competitiveness’.</u></p> <p>NL</p> <p>(Comments):</p> <p>In order to adequately reflect recital 10.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>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 a close cooperation with Member States to align national and EU-level efforts.</u></p> <p>SI</p> <p>(Drafting suggestions):</p> <p>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></p> <p>AT</p> <p>(Drafting suggestions):</p> <p>1. The Commission shall ensure the strategic coherence and consistent implementation of the European Competitiveness Fund, the Framework Programme for Research and Innovation and the Innovation Fund.</p> <p>AT</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments):</p> <p>The value added of a coordinated approach to the ECF, Horizon Europe and the Innovation Fund lies not only in a consistent implementation but also in a consistent strategic coherence between the programmes in the identification of potential topics and priorities.</p> <p>IE</p> <p>(Drafting suggestions):</p> <p>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>The rules of the Framework Programme for Research and Innovation apply to the collaborative research and innovation activities funded under its Pillar II ‘Competitiveness’.</u></p> <p>IE</p> <p>(Comments):</p> <p>IE -Suggested text amendment in order to adequately reflect recital 10.</p> <p>PT</p> <p>(Comments):</p> <p>We see no explicit reference to the alignment between ECF and the Competitiveness component of Pillar II in HE.</p>
	<p>SI</p> <p>(Drafting suggestions):</p> <p><u>1a. Complementary to Horizon Europe the ECF shall provide support to R&I activities beyond TRL 7, including support for Technology Infrastructures, EU Missions and the roll-out component of the New European Bauhaus initiative.</u></p> <p>SI</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments):</p> <p>In order to avoid duplication and efficiency losses, a proper relationship between ECF and HE should be defined, both in terms of their complementarity and their delineation.</p> <p>SI for example believes that EU Missions, NEB and TIs should receive support from the ECF, while the two programmes should describe the type of activities they will mainly support in the innovation journey (HE TRL 1-6 and ECF TRL 7-9).</p> <p>DE</p> <p>(Drafting suggestions):</p> <p><u>Horizon Europe rules including, where relevant and unless otherwise specified, any cross-referred ECF provisions should apply to the collaborative research and innovation-activities funded under Horizon Europe Pillar II ‘Competitiveness’ part that should be integrated in a specific dedicated part in the ECF Work Programmes. This also should apply to rules on award criteria and procedures as well as evaluation committees.</u></p> <p>DE</p> <p>(Comments):</p> <p>We strongly suggest to incorporate new clarification from recital 10 into article 7 as it includes basic and relevant binding information on the respective applicability of the FP10 and ECF regulation.</p> <p>See also comment to Art 15 (4a)</p> <p>FR</p> <p>(Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>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.</p>
<p>2. The Commission and Member States shall, in a manner commensurate towith 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.</p>	<p>LV (Comments): We kindly request clarification on how exactly it is planned to implement the provision referred to in Article 7(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”. The Regulation on the plans does not contain a reference to ensuring such consistency. In our view, such coordination should not be required.</p> <p>SI (Drafting suggestions): 2. The Commission and Member States shall on a voluntary basis, if there is value added for Member States, in a manner commensurate towith 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.</p> <p>SI (Comments): It is crucial to explain that MS should cooperate on a voluntary basis and only in areas with EU added value.</p> <p>IE (Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>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.</p> <p><u>In doing so, the Commission should also promote balanced participation across all Member States. Particular attention should be given to facilitating access for smaller consortia of industry, research organisations, and other eligible entities</u></p> <p>IE (Comments): IE – suggested amendment - this additional text is intended to link with IE suggested text in Chapter III, Section 2, Article 27 EU for Business Network.</p> <p>PT (Drafting suggestions):</p> <p>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, <u>taking into account the specific situation of outermost regions under Article 349 TFEU.</u></p> <p>PT (Comments): We would appreciate clarifications regarding how the foreseen coordination between ECF and NRPP will be implemented.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>To ensure coherence between ECF and NRPP/NRPP-type instruments, and explicitly require that coordination mechanisms consider OR-specific obligations and opportunities, including for health-related investments.</p>
	<p>IT (Drafting suggestions):</p> <p><u>2a. In doing so, Commission and Member States shall promote a sectoral, vertical approach aligned with national industrial and technological priorities, starting with artificial intelligence, in order to strengthen the integration between research, industry, and education across strategic sectors and ensure coherent support along the entire innovation and industrial value chain.</u></p> <p>FR (Comments):</p> <p>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.</p> <p>Quel serait l'association du Strategic stakeholder board à cet égard ? Et quelle serait celle du nouveau ECF General Committee ?</p>
<p>3. The ECF willshall 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, as well as including the Connecting Europe Facility, the Single Market and Customs Programme, Erasmus+ and AgoraEU.</p>	<p>MT (Comments):</p> <p>Malta positively notes the inclusion of a reference to the Connecting Europe Facility in this Article. It is the understanding that while the CEF-E supports the development of cross-border energy infrastructure, the ECF will provide support to the expansion of domestic networks. Malta appreciates confirmation whether this interpretation of the interplay between the scope of CEF-E and the scope of proposed ECF is correct.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>SE (Comments): SE welcomes the proposed revisions.</p> <p>SI (Drafting suggestions): The ECF willshall 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, as well as the Connecting Europe Facility, the Single Market and Customs Programme, Erasmus+ and AgoraEU. <u>ECF shall offer additional opportunities for its activities through other programmes, such as the Connecting Europe Facility, Erasmus+, and AgoraEU.</u></p> <p>SI (Comments): How will these synergies work in reality? What programme will contribute to which? ECF to Erasmus+ for skills development related activities? More details are needed about this issue, including better and clearer provisions in this paragraph.</p> <p>ES (Drafting suggestions): 3. The ECF willshall be implemented in synergy <u>and in a complementary way</u> 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, as well as including the Connecting Europe Facility, the Single Market and Customs Programme, Erasmus+ and AgoraEU.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>ES (Comments): Synergies with different Union funds are mandatory, but also complementarity between them to avoid overlapping.</p> <p>IT (Drafting suggestions): 3. The ECF willshall 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, as well as including the Connecting Europe Facility, the LIFE Programme, the Single Market and Customs Programme, Erasmus+ and AgoraEU.</p> <p>IT (Comments): The same issues identified above on “LIFE stand-alone request” apply here.</p> <p>PT (Drafting suggestions): The ECF shall be implemented in synergy with other Union funds, including the Global Europe Fund to support global competitiveness, ensure diversified supply sources, and strengthen export potential and opportunities of European companies, as well as including the Connecting Europe Facility, the Single Market and Customs Programme, Erasmus+ and AgoraEU.</p>
	<p>SK (Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p><u>Article 7a (new)</u> <u>“Collaborative research and innovation”</u> <u>In supporting collaborative research and innovation, the programme shall:</u></p> <ol style="list-style-type: none"> <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> <u>2. Implement measures to ensure a balanced geographical coverage through scientific excellence, brain circulation, and new collaborations, supported by complimentary efforts by Member States.</u> <u>3. integrate SSH disciplines across all policy windows, with specific calls for SSH topics where appropriate.</u> <u>4. streamline administrative procedures and use a two-stage submission and evaluation procedure to reduce the burden for applicants and beneficiaries.</u> <p>SI (Drafting suggestions):</p> <p><u>Article 7a (new)</u> <u>“Collaborative research and innovation”</u> <u>In supporting collaborative research and innovation, the programme shall:</u></p> <ol style="list-style-type: none"> <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> <u>2. Implement measures to ensure a balanced geographical coverage through scientific excellence, brain circulation, and new collaborations, supported by complimentary efforts by Member States.</u> <u>3. integrate SSH disciplines across all policy windows, with specific calls for SSH topics where appropriate.</u>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p><u>4. streamline administrative procedures and use a two-stage submission and evaluation procedure to reduce the burden for applicants and beneficiaries.</u></p> <p>DE (Drafting suggestions):</p> <p><u>4. 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></p> <p>DE (Comments):</p> <p>This can ensure that there are no delays in the implementation and no increase of complexity in procedures. For enterprises this can be a major improvement/ simplification!</p> <p>BE (Drafting suggestions):</p> <p><u>4. (new) In areas related to cybersecurity, the Commission shall ensure coordination with the European Cybersecurity Competence Centre (ECCC) established by Regulation (EU) 2021/887, in order to guarantee coherence with the Union’s cybersecurity objectives, strategies and programmes.</u></p> <p>BE (Comments):</p> <p>Pending the opinion of the CLS we are of the opinion that the ECCC should be part of the governance. Cybersecurity is a fundamental component of the Union’s competitiveness, technological sovereignty and resilience. The European Cybersecurity Competence Centre (ECCC), established by Regulation (EU) 2021/887, is the Union’s dedicated body for coordinating, supporting and strategically guiding cybersecurity actions under relevant</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>Union programmes. As the European Competitiveness Fund (ECF) will support investments in strategic technologies, critical infrastructures and innovation capacities where cyber resilience forms an essential enabling condition, it is crucial to ensure consistency with the existing EU cybersecurity governance architecture.</p> <p>FR (Drafting suggestions):</p> <p>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, as well as including the Connecting Europe Facility, the Single Market and Customs Programme, Erasmus+ and AgoraEU. 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.</p> <p>FR (Comments):</p> <p>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.</p> <p>Quel serait l'association du Strategic stakeholder board à cet égard ? Et quelle serait celle du nouveau ECF General Committee ?</p>

Article 8
Competitiveness Seal

LV

(Drafting suggestions):

Seal of Excellence

LV

(Comments):

On Article 8, Latvia suggests renaming the “Competitiveness Seal” to “Seal of Excellence”, in line with the existing Horizon Europe terminology. The main reason of this change would be that stakeholders are already familiar with this term, and it more clearly reflects the nature of the instrument as a quality label for excellent but unfunded proposals.

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.

FI

(Comments):

Scrutiny reservation

IT

(Comments):

The general award criteria for the Competitiveness Seal should be explicitly defined by the regulation itself, ensuring transparency and predictability in the award process, and allowing applicants to clearly understand the requirements and standards expected for obtaining the Seal. By way of

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>example only: additionality, cross-border cooperation, in particular with SMEs and mid-caps, european added and strategic value; innovative, emerging and cutting-edge element with significant economic potential; contribution to reducing or preventing strategic dependencies of the Union.</p> <p>The introduction of the competitiveness seal provisions should be consistent with the investment journey principle.</p> <p>PT (Comments): .This article must be clarified and made consistent with the discussion that is taking place at the WG on Research.</p>
	<p>CZ (Comments): CZ - General comment: 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. At the same time, we would like to point out that the Competitiveness Seal will also be awarded in Horizon Europe, so the Seal of Excellence will cease to exist and it is therefore necessary to update the GBER anyway.</p>
<p>1. Where the work programme provides for the possibility to award a Competitiveness Seal, it shall may be awarded to high-quality proposals or actions which shall comply at least with the following cumulative conditions:</p>	<p>SE (Comments): SE welcomes the proposed revisions.</p> <p>FI (Comments): Good that it would not be an automatic tool</p> <p>HR</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments):</p> <p><u>HR comment: We consider it necessary to specify more clearly and precisely the funding sources to which the Competitiveness Seal may be linked. Furthermore, as already highlighted in our comments on the recitals, the Regulation should set out in concrete terms how the simple and practical implementation of synergies and the combination of different funding instruments and programmes is envisaged, especially in light of the differing rules that apply across them. It should also be clarified whether projects awarded the Competitiveness Seal will benefit from any form of prioritisation, will Seal have a defined period of validity, as is the case with similar instruments such as the Sovereignty Seal under the STEP Regulation, as well as how these technical aspects will be operationalised in practice.</u></p> <p>PT</p> <p>(Comments):</p> <p>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, in particular 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.</p>
(a) they have been assessed in an award procedure under the ECF;	
	<p>FR</p> <p>(Drafting suggestions):</p> <p>a) they have been assessed in an award procedure under the ECF <u>or Horizon Europe</u>;</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>FR (Comments): Le label de compétitivité s'appliquera également à Horizon Europe, et cet article est explicitement cité dans le règlement Horizon Europe.</p>
<p>(b) they comply with the minimum quality requirements of that award procedure;</p>	<p>NL (Drafting suggestions): they comply with the minimum quality requirements achieve at least [XX]% of the total evaluation score of that award procedure;</p> <p>NL (Comments): The Seal should signal excellence and should therefore have a higher bar than meeting the minimum requirements of an ECF award procedure. For the Seal to have a stronger signalling function, more selectivity in awarding such a Seal is needed.</p> <p>PT (Drafting suggestions): b) they comply with the minimum quality requirements and are above a threshold required in that award procedure;</p> <p>PT (Comments): PT maintains its position in what concerns the minimum quality requirement. In what concerns proposals which have not received funding, it is crucial that competitiveness is not given just above threshold.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>(ba) they comply with any additional conditions that may be set out in the work programme or the documents related to the award procedure.</p>	<p>SE (Comments): SE can accept the added sub-paragraph.</p> <p>IT (Drafting suggestions): (ba) they comply with any additional conditions that may be set out in the work programme or the documents related to the award procedure. <u>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></p> <p>IT (Comments): This facilitates continuity and recognition for Horizon Europe projects transitioning into ECF support</p>
	<p>SE (Drafting suggestions): <u>2. For collaborative research and innovation activities set out in Regulation (EU) [XXX] [Framework Programme for Research and Innovation] and identified in a specific dedicated part of the Work Programme, article XX of that regulation should apply.</u></p> <p>SE (Comments): SE believes that there is merit in keeping the Seal of Excellence for collaborative research activities as this is a well-established and valued procedure that protects the core values of research and innovation policies.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>As long as this is specified in the Horizon Europe regulation, this addition might be redundant.</p> <p>SI (Drafting suggestions): <u>(c) they achieve at least 80% of the maximum score across the evaluation criteria of the award procedure.</u></p> <p>SI (Comments): A clear and uniform threshold should be agreed and defined in advance.</p> <p>FR (Comments): La délégation pourra indiquer une réserve d'examen sur ce point.</p>
<p>2. The work programme or the documents related to the award procedure may set out additional conditions.</p>	
<p>3. Member States may support projects which have been awarded a Competitiveness Seal, or may provide support through the ECF by making additional resources available to the ECF in accordance with Article 5(1) or (2).</p>	<p>NL (Drafting suggestions): <u>Without prejudice to the State aid rules,</u> Member States may support projects which have been awarded a Competitiveness Seal, or may provide support through the ECF by making additional resources available to the ECF in accordance with Article 5(1) or (2).</p> <p>SE (Drafting suggestions): <u>3. Member States may support projects which have been awarded a Competitiveness 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></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>SE (Comments): SE advocates a return to strict state aid rules, and does not understand why the ECF Regulation, governing EU funding, should mention support from national budgets.</p> <p>SK (Drafting suggestions): 3. Member States may support projects which have been awarded a Competitiveness 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, Agriculture and Rural, Fisheries and Maritime Prosperity and Security allocated to them under shared management.</u></p> <p>SI (Drafting suggestions): 3. Member States may support projects which have been awarded a Competitiveness 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, Agriculture and Rural, Fisheries and Maritime Prosperity and Security allocated to them under shared management.</u></p> <p>ES (Drafting suggestions): 3. Member States may support projects which have been awarded a Competitiveness 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>in full compliance with State aid rules.</u></p> <p>ES</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments):</p> <p>It is essential to ensure that the label has operational effectiveness, visibility and the ability to act as a lever, particularly for strategic projects. Automatic granting would reinforce legal certainty and coherence across industrial instruments.</p> <p>IE</p> <p>(Drafting suggestions):</p> <p>3 . Without prejudice to State aid rules, Member States may support projects which have been awarded a Competitiveness Seal, or may provide support through the ECF by making additional resources available to the ECF in accordance with Article 5(1) or (2)</p> <p>IE</p> <p>(Comments):</p> <p>IE suggested text amendment - To foster innovation in a competitive market, State Aid should be limited to areas of market failure or temporary crisis supports.</p> <p>IT</p> <p>(Drafting suggestions):</p> <p>3. Member States may support projects that have been awarded a Competitiveness Seal, or may provide support through the ECF by making additional resources available in accordance with Article 5(1) or (2), ensuring that such support maximizes synergies between Union and national funds by increasing aid intensities where appropriate and aligning them with the percentage of contribution provided under direct Union funding or the ECF.</p> <p>IT</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments):</p> <p>It is essential that the European Commission streamlines synergies between EU and national funds by increasing the aid intensities that can be granted and aligning them with the percentage of contribution responded to in direct EU funds (and/or ECF).</p>
<p>4. Strategic projects under CRMA, NZIA, CMA and other Strategic projects identified in Union legislation that fulfil the conditions in paragraph 1, will be directly points (a) and (b), shall be granted the Competitiveness Seal.</p>	<p>SE (Comments): SE can accept the proposed revisions.</p> <p>RO (Drafting suggestions): Strategic projects under CRMA, NZIA, CMA and other Strategic projects identified in Union legislation that fulfil the conditions in paragraph 1, will be directly points (a) and (b), shall be granted the Competitiveness Seal.</p> <p>RO (Comments): Strategic projects under CRMA, NZIA, CMA should automatically receive the Competitiveness Seal or, at least, they should benefit from a simplified procedure. Also, the concept of <i>strategic projects identified in Union legislation</i> needs clarification.</p> <p>ES (Drafting suggestions): 4. Strategic projects under CRMA, NZIA, CMA and other Strategic projects identified in Union legislation that fulfil the conditions in paragraph 1, will be directly points (a) and (b), shall be granted the Competitiveness Seal.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>ES (Comments): Projects conditions referred to in all points of para.1 should be considered, not only (a) and (b). Strategic projects shall be defined in work programmes.</p> <p>FI (Comments): What are these strategic projects?</p> <p>BE (Comments): We support the proposed changes. As we support an EU-level evaluation of projects to be awarded the Competitiveness Seal, as this ensures a genuine level playing field across Member States. It is important to avoid a situation in which nationally validated projects would automatically be deemed eligible for, or automatically granted, the Competitiveness Seal without Union-level assessment.</p> <p>EE (Drafting suggestions): 4. Strategic projects under CRMA, NZIA, CMA and other Strategic projects identified in Union legislation that fulfil the conditions in paragraph 1, will be directly points (a), (b) and (ba), shall be granted the Competitiveness Seal.</p> <p>EE (Comments): In order to fit with the amendment to paragraph 1 (addition of (ba), reference to (ba) should be added</p> <p>EL (Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>Strategic projects under CRMA, NZIA, Chips Act, CMA and other-Strategic projects identified in Union legislation that fulfil the conditions in paragraph 1, will be directly points (a) and (b), shall be granted the Competitiveness Seal.</p> <p>EL (Comments):</p> <p>We believe that the specific reference to CRMA, NZIA, CMA should remain and add also the Chips Act – reference is also made in recital 47.</p>
	<p>FR (Drafting suggestions):</p> <p><u>Strategic projects under CRMA, NZIA, CMA and other</u> Strategic projects identified in Union legislation that fulfil the conditions in paragraph 1, points (a) and (b), shall be granted the Competitiveness Seal.</p> <p>FR (Comments):</p> <p>Important de garder les précédents acquis communautaires et tout particulièrement le règlement NZIA, qui devrait trouver un prolongement dans le FEC.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p style="text-align: center;"><i>Article 9</i> Eligibility</p>	<p>HR (Comments): <u>HR comment: „Article 9 provides wide eligibility for third-country entities, while Article 10 enables significant limitations on their participation through security- and autonomy-driven conditions. This creates legal uncertainty for applicants and for Member States supporting potential project pipelines, particularly smaller ecosystems with fewer EU-based industrial actors.“</u> <u>HR question:</u> <u>How will consistency be ensured between the broad eligibility of entities from associated and non-associated third countries and the strategic restrictions set out in Article 10, so that applicants are not considered eligible upfront but later excluded through work-programme conditions?</u></p>
<p>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.</p>	<p>NL (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 collaborative research and innovation parts funded under the Framework Programme for Research and Innovation.</u></p> <p>NL (Comments): In order to adequately reflect recital 10.</p> <p>SK (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</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>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></p> <p>SI (Drafting suggestions):</p> <p>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></p> <p>ES (Drafting suggestions):</p> <p>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>and included in the work programme.</u></p> <p>ES (Comments):</p> <p>Eligibility criteria should be general to ensure predictability for participants. Work programmes shall only add specific conditions.</p> <p>IE (Drafting suggestions):</p> <p>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 collaborative research and</u></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p><u>innovation parts funded under the Framework Programme for Research and Innovation.</u></p> <p>IE (Comments): IE - Suggested text amendment in order to adequately reflect recital 10.</p>
	<p>ES (Drafting suggestions): <u>1. bis Any legal entity, regardless of its place of establishment and including legal entities from non-associated third countries or international organisations, may participate in actions under the Programme, provided that the conditions laid down in this Regulation have been met together with any conditions laid down in the work programme or call for proposals.</u></p> <p>ES (Comments): In coherence with changes in Horizon Europe.</p> <p>EE (Drafting suggestions): Art 9(1)(a)(NEW): For the European Defence Industrial Sector eligibility criteria will be adjusted according to the conditions set in European Defence Industrial Programme (EDIP) and SAFE Loan Instrument Regulations</p> <p>EE (Comments): EE: Since the eligibility criteria are subtle subjects in the wholesome context, it's paramount to adjust the conditions as already settled in the comprehensive manners in the existing regulations, such as EDIP and SAFE.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>It is important for Estonia that the conditions for European preference support the need for Member States to rapidly increase their defence capabilities and are in line with the time constraints arising from the security situation and the need to ensure cost-effectiveness of solutions.</p> <p>FR (Drafting suggestions):</p> <p>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.</p>
<p>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:</p>	<p>RO (Drafting suggestions):</p> <p>Provided any specific condition laid down within each policy window or component are met, and without prejudice to paragraph 6, 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:</p> <p>RO (Comments):</p> <p>This should be correlated with paragraph 6, that mentions excluding third countries representatives from deliberations on <i>eligibility criteria</i>, while the present article mentions the eligibility of third countries in <i>award procedures</i>.</p>
	<p>FR (Drafting suggestions):</p> <p>Without prejudice to Provided any specific condition laid down within each policy window or component are met, one or more of the following</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	categories of legal entities may be eligible to receive Union support in award procedures under direct and indirect management
(a) entities established in a Member State or in Overseas Countries and Territories;	PT (Drafting suggestions): (a) entities established in a Member State or in Overseas Countries and Territories; this includes entities established in the Union's outermost regions;
	FR (Drafting suggestions): a) entities established in a Member State, including 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 (Comments): SE can accept the proposed revision.
(c) international organisations;	
(d) other entities established in non-associated third countries where the funding of such entities is essential for implementing the action and contributes to the objectives set out in Article 3.	NL (Comments):

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>Support the possibility of supporting entities in non-associated third countries. In specific cases in areas like access to critical raw materials this could be essential from a strategic point of view and the best route to diversify or improve resilience.</p> <p>IE (Comments):</p> <p>IE - support the possibility of supporting entities in non-associated third countries. In specific cases, for example, in areas like access to critical raw materials this may be essential from a strategic point of view and the best route to diversify or improve resilience</p>
	<p>FR (Comments):</p> <p>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 ?</p>
<p>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 (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.</p>	<p>SE (Comments):</p> <p>SE can accept the proposed revision.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>4. In award procedures, the following activities shall not be eligible for support:</p>	
<p>(a) activities that are prohibited by Union law, applicable international law, or by national law in all Member States;</p>	
	<p>DE (Drafting suggestions): 4 (a) The fields defined in Article 21 (10) of the Horizon Europe Regulation shall not be financed.</p> <p>DE (Comments): Currently, these activities are not explicitly excluded from ECF funding, i.e.: (b) activities aiming at human cloning for reproductive purposes; (c) activities intended to modify the genetic heritage of human beings which could make such modifications heritable, except research relating to cancer treatment of the gonads; (d) activities intended to create human embryos solely for the purpose of research, technological development and demonstration activities or for the purpose of stem cell procurement, including by means of somatic cell nuclear transfer; (e) research on human stem cells, both adult and embryonic, may be financed depending both on the contents of the scientific proposal and the legal framework of the Member States involved.</p> <p>IE (Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p><u>c) activities that raise discriminatory, unjustified or disproportionate obstacles and undermine the implementation and enforcement of Union law in the areas of the internal market for goods and services.</u></p> <p>IE (Comments): IE suggested text amendment aimed at further strengthening the Single Market</p>
(b) activities that are already fully financed from other public or private sources,-	
	<p>NL (Drafting suggestions): <u>(c) activities that raise discriminatory, unjustified or disproportionate obstacles and undermine the implementation and enforcement of Union law in the areas of the internal market for goods and services.</u></p>
(e)4a. 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.	<p>SE (Comments): SE wonders what constitutes a high-risk supplier in this context. Does not recognise this as an established term.</p>
	<p>FR (Drafting suggestions): In accordance with Article 136 of the Financial Regulation, <u>additional</u> eligibility restrictions shall apply to high-risk suppliers <u>defined in XXXX</u> in line with EU law, for security reasons.</p> <p>FR (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>Les autorités françaises demandent à ce que le terme high risk suppliers soit mieux défini, ou que le texte renvoie à d'autres textes de l'Union dans lesquels cette notion est définie afin d'éviter des erreurs d'interprétation. De plus, ces restrictions viennent s'ajouter aux critères d'éligibilité déjà existants.</p>
<p>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.</p>	<p>LV (Comments): In Latvia's view, an addition or subparagraph would be necessary, which would stipulate that, at the discretion of the Commission or Member States, where necessary, provisions may be included at the level of work programmes for the need for special participation from less developed regions or less mature innovation ecosystems with a view to increasing the overall level of scientific excellence in the EU.</p> <p>SE (Comments): SE welcomes the proposed revisions.</p> <p>PT (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. <u>Eligibility criteria shall be designed in such a way as to avoid indirect discrimination against entities established in outermost and island regions, taking into account their structural constraints.</u></p>
	<p>FR (Drafting suggestions): 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.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>FR (Comments): Les autorités françaises réitèrent leur demande de suppression de ce paragraphe : il ne doit pas revenir à un programme de travail de fixer les critères d'éligibilité. Il n'est pas souhaitable de rouvrir des négociations sans fin sur ces critères dans le cadre de programme de travail qui peuvent être revus annuellement et ne constituent pas un véhicule juridique stable et approprié.</p>
<p>6. Representatives of third countries or international organisations shall not be present in deliberations on eligibility/award eligibility criteria.</p>	<p>SE (Comments): SE welcomes the proposed revisions.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p style="text-align: center;"><i>Article 9a</i> Award criteria</p>	<p>LV (Comments): In the opinion of Latvia, horizontal criteria should be added to the Article 9a criterion, which should be applied equally to the program and to all support requirements in the work program, including the exceptions mentioned in Danish presidency paper.</p> <p>Please clarify whether the criteria of Article 9a should apply to financial instruments.</p> <p>ES (Comments): General award criteria should be set up. Work programmes shall only add specific conditions.</p> <p>Spain supports the general excellence-based approach to promoting the best projects and considers that the previous wording offered greater clarity by explicitly stating that the rules applicable to research and innovation were those of Horizon Europe.</p>
	<p>AT (Comments): AT strongly advocates for re-integrating the provision on the award criteria for R&I activities in this article. They are currently mentioned in recital 10.</p> <p>FR (Drafting suggestions): <u>This article shall not apply to activities under Chapter VII.</u></p> <p>FR (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>La France demande à tenir compte de la spécificité des actions relatives à la défense, l'espace et la sécurité en ce qui concerne les critères d'éligibilité. A ce titre, les activités définies à l'article 44 doivent être exclues du champ d'application de l'article 9 (elles seront couvertes par l'article 50).</p> <p>La France souhaite ajouter une mention sur le principe d'excellence.</p>
<p>1. Where relevant and appropriate depending on the nature of the award procedure, award criteria set out in the work programmes referred to in Article 15 shall take into account the following principles:</p>	<p>NL (Drafting suggestions):</p> <p>1. <u>As a rule</u>, Where relevant and appropriate depending on the nature of the award procedure, award criteria set out in the work programmes referred to in Article 15 shall take into account the following principles <u>award criteria</u>:</p> <p>NL (Comments):</p> <p>We highly appreciated the explanatory note from the DK presidency. We would like to propose some further targeted amendments. We understand the need for some flexibility given the various forms of implementation of the ECF or exceptional cases. A text that has too absolute terminology might therefore be unsuitable. But we prefer to change 'Where relevant and appropriate' to 'as a rule'. This still leaves necessary (legal) room but does emphasize better the generally applicable nature of this article.</p> <p>SE (Drafting suggestions):</p> <p>1. Where relevant and appropriate depending on the nature of the award procedure, a <u>award criteria set out in the work programmes referred to in Article 15 shall take into account the following principles:</u></p> <p>SE (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>SE is thankful for the Presidency’s explanatory note on award criteria. It was very helpful to grasp the different relevant aspects to keep in mind, and we are open to discuss how article 9a can be structured. We do, however, still see merit in having more detail than in the current text (which is the case for the award criteria in the defence part of the regulation).</p> <p>SE considers the reference to article 3 to be too wide and does not see the added value, since article 3 would be applicable whether or not mentioned in relation to the award criteria. Award criteria should not focus in the objectives themselves, but rather set out how these objectives are best fulfilled.</p> <p>SE does still not see why the award criteria wouldn’t be applicable, and if ultimately there are cases where exceptions must be made (such as for the ECF InvestEU), this could be referenced in the text along with relevant references to the financial regulation.</p> <p>SI (Drafting suggestions):</p> <p>1. Where relevant and appropriate depending on the nature of for the award procedure, award criteria set out in the work programmes referred to in Article 15 shall take into account the following principles:</p> <p>SI (Comments):</p> <p>If the award procedure includes criteria, these should always be appropriate.</p> <p>DE (Drafting suggestions):</p> <p>1. Where relevant and appropriate depending on the nature of the award procedure, according to the Financial Regulation, award criteria set out in</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>the work programmes referred to in Article 15 shall take into account be based on the following principles requirements</p> <p>DE (Comments):</p> <p>We would like to thank the PCY for further explanations on award criteria, i.a. in the explanatory PCY note from 2/12/2025. Our text proposal is intended to further specify the wording of this Article. We emphasize that award criteria for competitive selection procedures must be defined in the Regulation. Although the Financial Regulation establishes certain rules concerning the award of grants, it necessary to provide additional requirements as regards the award criteria, in order to take into account the specificity of the actions supported by the ECF.</p> <p>Since the Financial Regulation already specifies the cases in which funding is granted based on award criteria (i.a. Art. 203 Regulation 2024/2509), the phrase "...and appropriate depending on the nature of the award procedure" should be deleted as it gives the Commission too much discretion in determining the award criteria.</p> <p>Furthermore, we would like to point to our comments on new recital 3a that is connected to the setting of relevant award criteria.</p> <p>FI (Drafting suggestions):</p> <p>1. Where relevant and appropriate depending on the nature of the award procedure, award criteria set out in the work programmes referred to in Article 15 shall take into account the following principles:</p> <p>FI (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>This opening caviate is not necessary. We prefer to have work programmes with award criteria as a default, and when it is used in the WPs, it should always be used according to the article on award criteria.</p> <p>IE (Drafting suggestions):</p> <p>1. <u>As a rule, Where relevant and appropriate</u> depending on the nature of the award procedure, award criteria set out in the work programmes referred to in Article 15 shall take into account the following <u>principles award criteria</u>:</p> <p>IE (Comments):</p> <p>IE considers the phrase “ where relevant and appropriate depending on the nature of the award procedure” lacks clarity.</p> <p>IE suggested text amendment – While we understand the need for some flexibility we look to change ‘Where relevant and appropriate’ to ‘as a rule’. This still leaves the necessary flexibility but does emphasise better the generally applicable nature of this article.</p> <p>PL (Comments):</p> <p>PL (Comments):</p> <p>Minor editorial concern – is “principles” an adequate name for what we have in the following points? “Basic assessments” perhaps would be better (rewording point (c) for it to begin with “an assessment of the ability...” would bring additional consistency in such case)?</p>
	<p>FR (Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>1. <u>Where applicable and without prejudice to any specific condition laid down within each policy window, relevant and appropriate depending on the nature of the award procedure, award criteria set out in the work programmes referred to in Article 15 shall take into account the following principles in accordance with merit-based award criteria:</u></p> <p>FR (Comments):</p> <p>La délégation pourra souligner que l’ajout de la mention « Where relevant and appropriate depending on the nature of the award procedure » est une avancée par rapport à la seconde proposition de compromis mais pourra réitérer sa proposition de mentionner « Where applicable, and without prejudice to any specific condition laid down within each policy window or component » qui protège clairement les dispositions spécifiques du chapitre VII.</p> <p>La délégation pourra également demander l’inscription d’un principe de sélection basé sur l’excellence à la manière de l’article 53, paragraphe 1 dans l’en tête de ce paragraphe.</p>
<p>(a) an assessment of the quality of the proposals submitted in the light of the objectives set out in Article 3;</p>	<p>NL (Drafting suggestions):</p> <p>(a) an assessment of the quality of the proposals submitted in the light of the objectives set out in Article 3;</p> <p>NL (Comments):</p> <p>It is important to have such an article in the basic act itself, and welcome the DK proposal, but it would be useful to differentiate point a and b further while still connecting to the structure of Article 3. (a) will be looking at the design, coherence and maturity aspects of the proposal, while (b) focusses on the impact on the objective referred to. How much does it expected to</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>contribute to overall EU competitiveness, how much Union added value is there, what is the mobilizing/catalytic effect on private capital, to what extent does it enhance the EU's strategic capacity to act? Currently, there is too much overlap between the two.</p> <p>SE (Drafting suggestions):</p> <p>(a) an assessment of the quality of the proposals <u>submitted in the light of the objectives set out in Article 3;</u></p> <p>SI (Drafting suggestions):</p> <p>(a) an assessment of the quality of the proposals submitted in the light of the objectives set out in Article 3 <u>and in the work programme or the documents related to the award procedure;</u></p> <p>SI (Comments):</p> <p>Different forms of funding and different parts of the programme might require specific (additional) award criteria, but the approach should then be to describe these exceptions in corresponding parts.</p> <p>ES (Drafting suggestions):</p> <p>(a) an assessment of the quality of the proposals submitted in the light of the objectives set out in Article 3;</p> <p>ES (Comments):</p> <p>Quality should be assessed as such. The objectives of the Programme (art.3) shall be considered to define priorities in work programmes (and for calls for proposals). Criteria shall be general.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>IE (Drafting suggestions):</p> <p>a) an assessment of the quality of the proposals submitted in the light of the objectives set out in Article 3;</p> <p>IE (Comments):</p> <p> </p> <p>FR (Comments):</p> <p>La délégation pourra soutenir les paragraphes a, b et c tout en souhaitant voir mentionner une liste de critères types à la manière de l'article 53, paragraphe 1.b) afin de donner un cadre aux critères qui pourront figurer dans les programmes de travail.</p>
	<p>EL (Drafting suggestions):</p> <p>The work programmes shall lay down rules for dealing with ex aequo proposals, which shall include geographical diversity and participation of partners from less developed and transition regions as a tie-breaking element.</p> <p>EL (Comments):</p> <p>This addition promotes a more balanced territorial uptake of the ECF in cases where proposals have equal technical merit. Evidence from previous Union programmes shows strong concentration of funded projects in a few advanced innovation ecosystems. A tie-breaking element based on geographical diversity and participation from less developed and transition</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>regions supports Article 3 objectives on balanced competitiveness, without imposing quotas or altering excellence-based evaluation.</p> <p>FR (Drafting suggestions):</p> <p>an assessment of the quality of the proposals <u>including the financial modalities maximising when possible the use of financial products and mobilisation of private capital</u> submitted in the light of the objectives set out in Article 3</p>
<p>(b) an assessment of the expected results of the proposals and their impact on achieving the objectives set out in Article 3;</p>	<p>MT (Drafting suggestions):</p> <p>(b) an assessment of the expected results of the proposals and their <u>relative</u> impact on achieving the objectives set out in Article 3;</p> <p>MT (Comments):</p> <p>The inclusion of the word relative is meant to provide certainty that measuring impact does not exclude applicants requesting smaller amounts, such as SMEs.</p> <p>NL (Drafting suggestions):</p> <p>(b) an assessment of the expected results of the proposals and their impact on achieving the <u>general</u> objectives set out in Article 3(1);</p> <p>NL (Comments):</p> <p>See comment in 9a(1)(a)</p> <p>SE (Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>b) an assessment of the expected results of the proposals <u>and their impact on achieving the objectives set out in <u>in the light of the objectives set out in Article 3.1;</u></u></p> <p>SI (Drafting suggestions):</p> <p>(b) an assessment of the expected results of the proposals and their impact on achieving the objectives set out in Article 3 <u>and in the work programme or the documents related to the award procedure;</u></p> <p>ES (Drafting suggestions):</p> <p>b) an assessment of the expected results of the proposals and their impact on achieving the objectives set out in Article 3;</p> <p>IE (Drafting suggestions):</p> <p>b) an assessment of the expected results of the proposals and their impact on achieving the <u>general</u> objectives set out in Article <u>3(1);</u></p> <p>PT (Comments):</p> <p>We would like to have further clarification regarding expected results (e.g. type of innovation, internationalization, sustainability?) and on the notion of impact. It would be important to include territorial, environmental, and social impact.</p> <p>EL (Drafting suggestions):</p> <p>(b) an assessment of the expected results of the proposals and their impact on achieving the objectives set out in Article 3 <u>with particular attention to SMEs and to regions lagging behind in competitiveness and innovation performance;</u></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>EL (Comments): This addition clarifies that the assessment of impact should reflect the ECF's objectives in Article 3, including strengthened participation of SMEs and regions lagging behind in competitiveness and innovation. Evidence from previous programmes shows structural under-representation of such actors in large EU value chains. The proposed wording does not modify the excellence-based evaluation but ensures that ECF support delivers a more inclusive and balanced competitiveness impact.</p>
	<p>DE (Drafting suggestions): <u>ba) an assessment of the additionality of financing</u> <u>bb) an assessment of the innovation potential of the proposal.</u></p> <p>DE (Comments): See our general comment above</p> <p>FI (Drafting suggestions): new 2 bis Funding shall be awarded to the highest-ranking/top-scoring projects under the award criteria set out in Article 9a(1)(a-c)</p> <p>PL (Drafting suggestions): (ba) an assessment verifying the occurrence and intensity of underrepresentation of Member State(s) involved in the proposal in previous allocations of corresponding directly managed EU funds, with proportional corrective measures embedded in award criteria;</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>PL (Comments):</p> <p>PL (Drafting suggestions): New point (ba) proposed to tackle underrepresentation.</p> <p>FR (Drafting suggestions):</p> <p>an assessment of the expected results of the proposals and their impact on achieving the objectives set out in Article 3 <u>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</u></p> <p>FR (Comments):</p> <p>La délégation pourra soutenir l'intégration des paragraphes a, b et c tout en souhaitant voir mentionner une liste de critères types à la manière de l'article 53, paragraphe 1.b) afin de donner un cadre aux critères qui pourront figurer dans les programmes de travail.</p>
<p>(c) the ability of the proposals to support specific activities in Chapters III, IV, V, VI and VII, Sections 1, 3 and 4, considering the nature of the activities.</p>	<p>ES (Drafting suggestions):</p> <p>(c) the ability of the proposals to support specific activities in Chapters III, IV, V, VI and VII, Sections 1, 3 and 4, considering the nature of the activities, <u>on the basis of objective, transparent and measurable indicators defined in the work programme.</u></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>EL (Drafting suggestions): (c) the ability of the proposals to support specific activities in Chapters III, IV, V, VI and VII, Sections 1, 3 and 4, considering the nature of the activities, with EU coverage and the participation of partners from less developed, transition, insular and outermost regions.</p> <p>EL (Comments): This addition ensures that the assessment of proposals reflects the need for broad EU coverage and participation from less developed, transition, insular and outermost regions. It strengthens EU value chains and supports Article 3 objectives on balanced competitiveness and inclusiveness. The wording remains non-prescriptive and does not modify the excellence-based evaluation.</p>
	<p>LV (Drafting suggestions): (d) intends to cover a wider geographical coverage.</p> <p>LV (Comments): Latvia shares the view of EU Member States that the establishment of the ECF should also take into account regional inequalities and promote convergence by supporting projects of local and regional importance, not just large, centralised initiatives.</p> <p>SE (Drafting suggestions): <u>2. For the purposes of this Regulation, the following definitions apply:</u></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p><u>‘quality’ means the characterisation of a proposed action as state-of-the-art, considering the pertinence of its design, as well as its innovative and technical merit.</u></p> <p><u>‘impact’ means the expected effectiveness of a proposed action in delivering measurable improvements to the Union’s competitiveness, in particular its contribution to productivity growth.</u></p> <p>SK (Drafting suggestions): <u>(d) the pan-European coverage of the action;</u> <u>(e) The work programme shall lay down rules for dealing with ex aequo proposals, which shall include geographical diversity.</u></p> <p>RO (Drafting suggestions): <u>(d) the ability of the proposal to facilitate the spread and uptake of technology, knowledge and results across all Member States.</u></p> <p>RO (Comments): <u>In order to explicitly implement recital 8.</u> <u>In order to spread technology, knowledge and excellence in all EU MS and to develop wider and stronger value chains, RO supports prioritizing – when relevant – partnerships with entities from MS less-developed in a certain domain.</u></p> <p>SI (Drafting suggestions): <u>(d) the pan-EU coverage of the action.</u></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p><u>1a. The work programme shall lay down rules for dealing with ex aequo proposals, which shall include geographical diversity.</u></p> <p>SI (Comments): Actions supported at the Union level must always have a pan-EU relevance, which is most reliably guaranteed by their pan-EU coverage.</p> <p>Predictable rules for dealing with projects receiving the same score must be set out.</p> <p>DE (Drafting suggestions): <u>1a. The award criteria shall be further specified in the work programmes and in the calls for proposals, including any weighting to be applied.</u></p> <p>EE (Drafting suggestions): NEW d) un assessment of the scientific excellence and quality of the proposals of collaborative research and innovation activities.</p> <p>EE (Comments): It is important for us to ensure that the scientific excellence criterion is applied in the evaluation of research initiatives, which is why we propose its integration into the ECF award criteria.</p> <p>EL (Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(d) in the case of collaborative actions, the participation of partners from less developed and transition regions, including insular and outermost regions, and the establishment of research or production activities in those regions, in order to promote EU value chains and a balanced territorial impact of the ECF;</p> <p>e) Assessment of participation of partners from les developed regions in large consortia</p> <p>EL (Comments): This addition supports the formation of EU value chains by encouraging the participation of partners from less developed, transition, insular and outermost regions. It strengthens the ECF's balanced territorial impact in line with Article 3 objectives, while remaining non-prescriptive and fully compatible with excellence-based evaluation.</p> <p>Premiums for schemes that establish research/production activities in those regions</p> <p>FR (Drafting suggestions):</p> <p>(c) the ability of the proposals to support specific activities in Chapters III, IV, V, VI and VII, Sections 1, 3 and 4, considering the nature of the activities.</p> <p>FR (Comments): Les activités du chapitre 7 devraient bénéficier de critères d'attribution distincts.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>2. Representatives of third countries or international organisations shall not be present in deliberations on award criteria.</p>	<p>SE (Comments): SE can accept the amended paragraph.</p> <p>SI (Drafting suggestions):</p> <p>2. Representatives of third countries or international organisations shall not be present in deliberations on award criteria.</p> <p>SI (Comments): SI assumes that award criteria would be agreed in comitology settings. In these, international organisations are not present, while associated third countries are. Should this provision be understood as excluding these countries from examination of these parts of the work programme?</p> <p>ES (Comments): Support</p>
	<p>NL (Drafting suggestions):</p> <p>2a. Actions in the specific dedicated part of work programmes on collaborative research and innovation activities shall be assessed by the award criteria set out in the Horizon Europe rules.</p> <p>NL (Comments): To adequately reflect recital 10.</p> <p>IE (Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p><u>2a. Actions in the specific dedicated part of work programmes on collaborative research and innovation activities shall be assessed by the award criteria set out in the Horizon Europe rules.</u></p> <p>IE (Comments): IE suggested text amendment to adequately reflect recital 10.</p> <p>PT (Drafting suggestions): <u>2a. This article shall not apply to collaborative research and innovation activities included in a specific and dedicated part of Chapters III, IV, V, VI and VII Work Programmes, to be supported under the Regulation (EU) [XXX] [Horizon Europe Framework programme for Research and Innovation]</u></p> <p>PT (Comments): Following PT remarks and comments on the changes introduced in the 3rd compromise text. Following the clarifications by the PRES DK, PT suggests an alternative drafting, as we would be in favour of having this principle clearly stated in article 9a.</p>
<p>3. This article shall not apply to work programmes adopted to implement the activities under Chapter VII, Section 2.</p>	<p>SE (Comments): SE can accept the amended paragraph.</p> <p>DE (Drafting suggestions): This article shall not apply to work programmes adopted to implement the activities under Chapter VII, Section 2.</p> <p>DE</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments):</p> <p>This article should apply to the whole regulation. We would like to anchor this exception in chapter VII, Section 2</p> <p>ES</p> <p>(Comments):</p> <p>Support</p>
	<p>MT</p> <p>(Drafting suggestions):</p> <p>4. Actions in the specific work programmes on collaborative research and innovation activities as referred to in Article 15(2) of this Regulation shall be assessed by the award criteria set out in Article [X] of Regulation [XXX] [Horizon Europe].</p> <p>MT</p> <p>(Comments):</p> <p>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 reiterate our call for adoption of synergistic, but separate work programmes for both Horizon Europe and ECF.</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>4. Actions in the specific work programmes on collaborative research and innovation activities as referred to in Article 15(2) of this Regulation shall be assessed by the award criteria set out in Article [X] of Regulation [XXX] [Horizon Europe].</p> <p>SK</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments):</p> <p>Recover this specific provision to ensure that R&I activities have their own WP and ensure award criteria established in Horizon Europe programme.</p> <p>PT</p> <p>(Drafting suggestions):</p> <p><u>4. Allocation criteria and co-funding requirements shall be adapted, where appropriate, to the structural constraints of outermost regions.</u></p> <p>PT</p> <p>(Comments):</p> <p>Criteria should not disadvantage regions structurally affected by geography (isolation, scale, limited market size). The text should ensure that co-funding requirements remain proportionate and do not penalise regional health-sector entities.</p> <p>FR</p> <p>(Drafting suggestions):</p> <p>3. This article shall not apply to work programmes adopted to implement the activities under Chapter VII, Section 2.</p> <p>FR</p> <p>(Comments):</p> <p>Les activités du chapitre 7 devraient bénéficier de critères d’attribution distincts.</p>

<p style="text-align: center;"><i>Article 11</i></p> <p>Association of third countries to activities under the ECF</p>	<p>LV (Comments): Regarding Article 11, a more general comment, where we support maintaining openness towards like-minded third countries, subject to the conditions in the Regulation and full respect of the Union’s strategic interests.</p> <p>ES (Comments): Spain would like to request, in conjunction with its call for the creation of specific committees and dedicated work programmes within the ECF for collaborative R&I activities linked to Pillar II of Horizon Europe, that for third countries associated to Horizon Europe (in particular to Pillar II), participation in collaborative R&I activities and in the relevant programme committees under the ECF be fully consistent with their respective association agreements to Horizon Europe.</p> <p>HR (Comments): <u>HR comment: “Third-country participation in activities linked to security and critical infrastructure poses significant risks for the protection of sensitive technologies, classified information and industrial know-how. Leaving the conclusion of specific security agreements optional may result in uneven or insufficient safeguards, particularly affecting smaller Member States that rely more heavily on strong EU-level protection standards. Making these agreements mandatory would ensure a consistent and strong security framework, reduce exposure to geopolitical risks and preserve the Union’s strategic interests across all actions funded under the ECF.”</u> <u>HR question:</u> <u>Should the provision in Article 11(4) be made mandatory (replacing “may be concluded” with “shall be concluded”) to ensure that all activities involving security, secured services and critical assets are subject to specific and binding security arrangements with associated third countries?</u></p>
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Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>EL (Comments): 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.</p>
	<p>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 dédié à la préférence européenne. Cet article ne devrait pas s'appliquer au chapitre VII.</p>
<p>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:</p>	<p>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 third countries and not to adopt too restrictive measures for participation in the ECF where this would harm the research and innovation development of the technology concerned and stakeholders in the EU. NL (Drafting suggestions): The ECF may shall actively seek be opened to the participation of the following third countries through full or partial association, recognizing that cooperation with third countries is essential to achieve the Union's goals, establishing a framework for strategic partnerships with these countries, in accordance with the objectives laid down in Article 3 and in accordance</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>with the relevant international agreements or any decisions adopted under the framework of those agreements and applicable to:</p> <p>NL (Comments):</p> <p>Cooperation with third countries is indispensable for fulfilling the ECF’s general objective of increasing EU competitiveness and enhancing the Union’s role as a reliable global actor, particularly in strategic areas such as technology development, access to diversified markets and supply sources, fostering skills and talent. Furthermore, reducing of preventing the Union’s high-risk strategic dependencies has to be achieved through diversification.</p> <p>IE (Drafting suggestions):</p> <p>The ECF may be opened shall actively seek participation of the following third countries through full or partial association, recognizing that cooperation with third countries is essential to achieve the Union’s goals, establishing a framework for strategic partnerships with these countries, in accordance with the objectives laid down in Article 3 and in accordance with the relevant international agreements or any decisions adopted under the framework of those agreements and applicable to:</p> <p>IE (Comments):</p> <p>IE propose an addition to the text, in recognition of the benefits and critical need for openness. Cooperation with third countries is indispensable for fulfilling the ECF’s general objective of increasing EU competitiveness and enhancing the Union’s role as a reliable global actor, particularly in strategic areas such as technology development, access to diversified markets and supply sources, fostering skills and talent. Furthermore, reducing of preventing the Union’s high-risk strategic dependencies has to be achieved through diversification.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>FR (Drafting suggestions): The ECF may be opened to the participation of the following third countries through full or partial association, <u>with specific conditions or restrictions that can be laid down within each policy window of component</u>, in accordance with the objectives laid down in Article 3 and in accordance with the relevant international agreements or any decisions adopted under the framework of those agreements and applicable to</p> <p>FR (Comments): Proposition de reformulation afin d'assurer une cohérence 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).</p>
(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.	<p>RO (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>The term <i>other third countries</i> is too wide and undetermined, considering for example the security implications. A clearer determination is needed to establish the type of states foreseen.</p>
	<p>DE (Drafting suggestions):</p> <p><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></p> <p>DE (Comments):</p> <p>The interaction between the ECF and Horizon Europe association agreements should be clarified by stipulating that both associations <i>can</i> be established under a joint agreement and that participation in the research areas of the policy windows (with the exception of defence research) is possible through association with both the ECF and Horizon Europe. This is precisely what the modernised MFF and the introduction of the ECF are intended to achieve: simplification for users.</p>
<p>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:</p>	
<p>(a) ensure a fair balance as regards between the contributions and benefits of the third country participating in the ECF;</p>	<p>SE (Comments):</p> <p>SE can accept the proposed revision.</p> <p>ES (Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	(a) ensure a fair balance as regards between the contributions and benefits of the third country participating in the ECF <u>and also reciprocity for the Union participants;</u>
(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;	
(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.	<p>LV (Comments): In Article 11(2)(e) (ensure the protection of strategic, security, defence and public order interests of the Union and its Member States.) how will it be ensured that security restrictions will not be applied?</p> <p>SI (Drafting suggestions): (e) ensure the protection of strategic, security; and defence and public order interests <u>as well as human rights and international law interests</u> of the Union and its Member States.</p> <p>SI</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments): Still not clear who defines public order interests or how they are defined.</p>
	<p>SI (Drafting suggestions): <u>(f) condition association to the respect of human rights and international law.</u></p> <p>SI (Comments): SI suggests an additional element to the association agreements, namely the respect of the associated country of human rights and international law.</p> <p>BE (Drafting suggestions): <u>(f) ensure that the participation of third countries does not hamper a free and fair market:</u></p> <p>BE (Comments): Third countries should be able to participate in the ECF but should not by any means be given an unfair advantage for certain sectors to enter the EU internal market (cf. dumping).</p> <p>FR (Drafting suggestions): e) ensure the protection of strategic <u>economic, industrial</u>, security, defence and public order interests of the Union and its Member States.</p> <p>FR (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	Les intérêts industriels de l'UE doivent être pris en compte dans l'accès des acteurs de des pays-tiers au programme.
<p>3. For the purposes of point (d), the third country shall grant the necessary rights and access required under Regulations (EU, Euratom) 2024/2509 and (EU, Euratom) No 883/2013, and guarantee that enforcement decisions imposing a pecuniary obligation on the basis of Article 299 TFEU, as well as judgements and orders of the Court of Justice of the European Union, are enforceable. and 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.</p>	
<p>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.</p>	<p>DE (Drafting suggestions): 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.</p> <p>DE (Comments): We see no need for additional rules in this area.</p> <p>EL (Comments): What issues will the separate specific agreements be covering and what will be the correlation of these specific agreements to the association agreements of third countries with the EU already in force? The ECF specific objectives under art. 3(2)(d), such as diversification of markets, defence industry adjustment to [structural] changes or provision of information, data and</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>services supporting the Union policies, notably in the area of security, defence [...], resilience, global engagement and strategic independence, have core CFSP elements. With the ultimate view to streamline the ECF third country association criteria to these of the EDF and the EDIP instruments that will be repealed, by which voting system will the Council be required to act, when authorising the opening of negotiations, adopting negotiating directives and concluding them?</p>
	<p>NL (Drafting suggestions): <u>5. For the collaborative research and innovation parts of the ECF funded under the Framework Programme for Research and Innovation, the provisions as stated in the Horizon Europe rules apply.</u></p> <p>NL (Comments): To adequately reflect recital 10.</p> <p>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></p> <p>DE (Comments): The interaction between the ECF and Horizon Europe association agreements should be clarified by stipulating that both associations <i>can</i> be established under a joint agreement and that participation in the research areas of the policy windows (with the exception of defence research) is possible through association with both the ECF and Horizon Europe. This is precisely what</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>the modernised MFF and the introduction of the ECF are intended to achieve: simplification for users.</p> <p>IE (Drafting suggestions):</p> <p><u>5. For the collaborative research and innovation parts of the ECF funded under the Framework Programme for Research and Innovation, the provisions as stated in the Horizon Europe rules apply.</u></p> <p>IE (Comments):</p> <p>IE suggested text amendment to adequately reflect recital 10.</p> <p>FR (Drafting suggestions):</p> <p>Separate Complementary specific agreements may shall be concluded in accordance with Article 218 TFEU for activities under the ECF related to security topics related to the chapter VII of this regulation, and the provision of secured services and critical assets to the EU.</p> <p>FR (Comments):</p> <p>Certaines composantes dans des secteurs tels que la défense, l'espace et la sécurité nécessitent des politiques d'accès particulières. Ainsi, un accord général de participation au FEC, qu'il soit 'full' ou 'partial' ne peut en aucun cas suffire à acter la participation d'un Etat tiers aux composantes plus sensibles. Même si un Etat tiers signe un accord général de participation au titre du paragraphe 1, des accords spécifiques dédiés aux composantes plus sensibles devront obligatoirement être signées si l'Etat tiers souhaite pouvoir y participer. Ces accords spécifiques contiendront des dispositions adaptées aux enjeux portés par ces composantes.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p style="text-align: center;"><i>Article 12</i> Implementation and forms of Union support</p>	<p>BG (Comments): With a view to ensuring balanced development across the Union, an appropriate share of the resources under the ECF shall be allocated for entities established in Member State or region where GDP per capita is below the EU average.</p> <p>MT (Comments): These changes are generally positive, supporting flexibility, legal certainty, and the ability to participate in large-scale EU projects. However, they may require enhanced administrative coordination and vigilance to ensure national interests are protected in joint or cross-sectoral actions.</p> <p>PT (Comments): We need to ensure fair and effective access to mechanisms within the ECF. The text does not ensure that simpler and specific mechanisms are accessible to SMEs which often lack the technical and financial capacity to compete with large operators</p>
	<p>SI (Drafting suggestions): <u>1a. The content of the calls for proposals for all actions shall be included in the work programme.</u></p> <p>SI (Comments): It is important that ECF is primarily implemented via open competitive calls for proposals and that all calls are enshrined in the WP.</p> <p>FR</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p><u>This article shall not apply to activities under Chapter VII.</u></p> <p>FR</p> <p>(Comments):</p> <p>La France demande à tenir compte de la spécificité des actions relatives à la défense en ce qui concerne l'association des Etats tiers. A ce titre, les activités définies à l'article 44 doivent être exclues du champ d'application de l'article 9 (elles seront couvertes par l'article 50).</p>
<p>1. The ECF is to shall be implemented through work programmes in accordance with Article 110 of Regulation (EU, Euratom) 2024/2509.</p>	<p>SE</p> <p>(Comments):</p> <p>SE can accept the proposed revision.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>The ECF shall be implemented through work programmes in accordance with Article 110 of Regulation (EU, Euratom) 2024/2509. <u>For the purposes of the minimum amount referred to in paragraph 4 of article 21 under the ECF InvestEU Instrument, a work programme shall be adopted for the period from 1 January 2028 to 31 December 2034.</u></p> <p>DE</p> <p>(Comments):</p> <p>We would like to ask the EC (once again) how the InvestEU instrument is reflected in the work programmes. When defining respective rules and procedures, we should also keep in mind that the InvestEU instrument requires predictability in order to be implemented in the best possible way. Our text proposal here would be a way to reflect this in the regulation. Another way could be to carve out the InvestEU minimum amount from the work programmes. See also our addition in Article 21/5a.</p> <p>LU</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>1. The ECF shall be implemented through work programmes in accordance with Article 110 of Regulation (EU, Euratom) 2024/2509. <u>For the purposes of the ECF InvestEU Instrument, a work programme shall be adopted for the period from 1 January 2028 to 31 December 2034. To cater for evolving needs and developments, the work programme for the ECF InvestEU Instrument may be reviewed in the context of the MFF mid-term review.</u></p> <p>BE</p> <p>(Drafting suggestions):</p> <p>1. The ECF, <u>with the exception of the ECF InvestEU instrument</u>, is toshall be implemented through work programmes in accordance with Article 110 of Regulation (EU, Euratom) 2024/2509.</p> <p>BE</p> <p>(Comments):</p> <p><u>Article 12.1 states that the ECF will be implemented via work programmes. However, the current InvestEU has proven its effectiveness without being included in specific work programmes. As far as financial instruments are concerned, long-term programming is essential to provide predictability, catalyse private investment, and support strategic projects. Annual programming is ill-suited to the nature of financial instruments, which require a stable multi-year horizon. Therefore, the ECF InvestEU Instrument should not be implemented through work programmes. While the need for flexibility is understandable, it must be reconciled with the stability and visibility required for the effective deployment of financial instruments. Flexibility can be ensured within the ECF InvestEU Instrument through regular or continuously open calls for expressions of interest, enabling implementing partners to select the most appropriate instruments based on</u></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p><u>context and needs, and allowing the objectives of specific products to be adjusted. Overly prescriptive and short-term work programmes risk undermining this flexibility and fragmenting implementation.</u></p>
<p>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.</p>	<p>ES (Drafting suggestions):</p> <p>2. The ECF shall be implemented in accordance with Regulation (EU, Euratom) 2024/2509, under direct management or, in duly justified cases, under indirect management with entities referred to in Article 62(1), point (c) of that Regulation.</p> <p>ES (Comments):</p> <p>Indirect management shall be limited and used only in duly justified cases.</p> <p>IT (Drafting suggestions):</p> <p>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, with full respect for the principle of technological neutrality, ensuring that no specific technology is favored in its implementation.</p> <p>IT (Comments):</p> <p>Regarding implementation, the principle of technological neutrality must be duly emphasized.</p> <p>PT (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>PT would like to ensure that national promotional/development banks are included in the list of entity types – established in Article 62(1) of Regulation (EU, Euratom) 2024/2509 – that may design/implement the financial instruments to be envisaged.</p>
	<p>HR (Drafting suggestions):</p> <p><u>3. 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 Members States whose GNI per capita (in 2023) remains below the EU27 average, including safeguards for MSs with shorter EU membership status.</u></p> <p>HR (Comments):</p> <p><u>HR suggests insertion of a new paragraph 3. “ 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 Members States whose GNI per capita (in 2023) remains below 90% of the EU27 average, including safeguards for MSs with shorter EU membership status “.</u></p> <p><u>HR considers that pre-defined allocation should be establish and focused on MS's whose GNI per capita remains below 90% of the EU 27 average. (according to the CZ initiative.)</u></p>
<p>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</p>	<p>SK (Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>Regulation, which, in case of conflict, shall prevail over any other rules pertaining to the activities or subsequent implementing acts.</p>	<p>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></p> <p>SI (Drafting suggestions):</p> <p>3. Award procedures implemented under the ECF, <u>shall be primarily based on open, competitive calls for proposals and</u> 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></p> <p>ES (Drafting suggestions):</p> <p>3. Award procedures implemented under the ECF <u>excluding for collaborative research and innovation activities</u> 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>Award procedures of collaborative research and innovation activities shall comply with the rules for participation of Horizon Europe.</u></p> <p>ES (Comments):</p> <p>It is not clear whether this point applies to R&I collaboration activities of the policy windows, which shall follow HE rules for participation.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>IE (Drafting suggestions): 3. 3. Award procedures implemented under the ECF, based on open and competitive calls for proposals, 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.</p> <p>IE (Comments): IE would like to include the text, to encourage open and competitive calls</p> <p>IT (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, in particular in compliance with the award criteria set out in Article 9a, which, in case of conflict, shall prevail over any other rules pertaining to the activities or subsequent implementing acts.</p> <p>IT (Comments): A reference to the award criteria set by the new Art. 9a should be added.</p> <p>PL (Comments):</p> <p>PL (Comments): We'd be willing to withdraw our previous call for supplementing this provision with additional sentences related to the geographical balance theme, if our proposals for new articles 3(1)(kb) and 9a(1)(ba) were to form the basis for our further discussions. We recognise this solution would constitute better legislative technique.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>SK (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></p> <p>SK (Comments): ECF has to entail principles, measures and mechanics that will ensure that its objective to bring entire Europe together in addressing the shared challenges, as recommended by Draghi, and not result in creating new internal divides – a competitive divide on top of innovation divide or digital divide.</p> <p>PT (Comments): We believe that ensuring geographically 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.</p> <p>BE (Drafting suggestions): <u>3.a The award procedure shall be conducted in such a manner as to ensure that project selection is based on merit.</u></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>BE (Comments):</p> <p>It is essential that the award procedure is based on the merits of projects in order to ensure a targeted/goal-oriented distribution of resources. Selecting projects on the basis of their qualities, guarantees that public or private resources are used for initiatives that actually contribute to the policy objectives set.</p>
<p>4. Where award procedures concern more than one specific objective laid down in Article 3(2), the work programme may, on the basis of which of the applicable rules are most appropriate to the nature and specific characteristics of the activity in question and, if applicable, which component is predominant, 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 set out in Chapters IV to VII of this Regulation in addition to Regulation (EU, Euratom) 2024/2509 and the general rules set out in Chapter I and II of this Regulation.</p>	<p>LV (Comments):</p> <p>In Article 12(4), Latvia proposes the need for the Commission to regularly analyse the success of the EFC instruments by the geographical scope of company participation, so that it covers the entire EU single market and, in cases where the geographical concentration of the EFC instruments is not sufficiently dispersed, to ensure the necessary amendments to the EFC to improve the participation rates of different Member States.</p> <p>SE (Drafting suggestions):</p> <p>4. Where award procedures concern more than one specific objective laid down in Article 3(2), the work programme may, on the basis of which of the applicable rules are most appropriate to the nature and specific characteristics of the activity in question and, if applicable, which component is predominant, 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 set out in Chapters IV to VII of this Regulation in addition to Regulation (EU, Euratom) 2024/2509 and the general rules set out in Chapter I and</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>II of this Regulation. <u>The award criteria in article 9a should always apply.</u></p> <p>SE (Comments): SE can accept the amendments as long as it is clear that the award criteria in article 9a applies.</p> <p>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 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></p> <p>IE (Comments): IE query what, if any, is the mechanism for determining which objective is most relevant when there is a dispute as to which rules are applicable?</p> <p>PT</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments):</p> <p>This topic requires additional discussion, specifically in what concerns its implementation. The decision on which component shall be considered predominant must be discussed and decided in the Work Programme, with the involvement of Committees. This requires discussion and articulation among committees, and it is important to address the implementation.</p>
	<p>CZ</p> <p>(Drafting suggestions):</p> <p><u>4. The Commission shall implement the ECF on basis of a regular analysis of participation trends and access barriers. To that effect, the Commission shall take specific measures, in particular:</u></p> <p><u>(a) establishing minimum indicative thresholds for the allocation of funding to start-ups and first-time applicants under certain calls or instruments of the ECF, on the basis of objective and transparent criteria;</u></p> <p><u>(b) supporting the integration of entities from different Member States into Single Market value chains as referred in Article 16, notably through ensuring multinational composition of consortia or in the value chain.</u></p> <p><u>The Commission shall regularly involve Member States in the design and monitoring of such measures.</u></p> <p>CZ</p> <p>(Comments):</p> <p>CZ -The Czech Republic also proposes that the ECF includes measures to facilitate the participation of first-time applicants. Specifically, it calls for the introduction of more favorable and simpler conditions for entities participating in the program for the first time, for example through simplified administrative requirements, appropriate financial guarantees, and targeted support tools, including training and a clear definition of the minimum scope of consulting services for first-time applicants. Such an adjustment would</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>reduce barriers to entry, increase the diversity of participants, and contribute to expanding the fund's impact across the EU.</p> <p>SK (Drafting suggestions):</p> <p><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 participation trends and access barriers. To that effect, the Commission shall take specific measures, in particular:</u></p> <p><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></p> <p><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></p> <p><u>c) the Commission shall regularly involve Member States in the design and monitoring of such measures.</u></p> <p><u>In addition, and beyond indicators set out in the Performance Regulation, the Commission shall collect and report programme implementation and management data and information, including network analytics, in order to analyse participation trends and access barriers. It shall take preventive and corrective measures to prevent unjustified concentrations and ensure a wide pan-European impact of its actions.</u></p> <p>SK (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>There is a need for more balanced distribution of funding across all the Member States. Otherwise, we risk that many entities from certain Member States – especially those with relatively limited experience with Union-level instruments - will not be able to participate in collaborative efforts. Therefore, SK advocates for the introduction of measures that would better safeguard such balance within ECF.</p> <p>SI (Drafting suggestions):</p> <p><u>4a. In addition and beyond indicators set out in the Performance Regulation, the Commission shall collect and report programme implementation and management data and information, including network analytics, in order to analyse participation trends and access barriers. It shall take preventive and corrective measures to prevent unjustified concentrations and ensure a wide pan-European impact of its actions.</u></p> <p>PT (Drafting suggestions):</p> <p>Add a new paragraph: <u>In order to ensure a balanced distribution of resources within the Fund, the Commission shall implement it on basis of a regular analysis of participation trends and access barriers, and supporting the integration of entities from different Member States into Single Market value chains.</u></p> <p>PT (Comments):</p> <p>We believe that ensuring geographically balanced participation and fostering integration of stakeholders from all Member States into European industrial and innovation value chains is critical for strengthening the overall</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>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.</p> <p>FR (Drafting suggestions):</p> <p>Where award procedures concern more than one specific objective laid down in Article 3(2), the work programme shall may, on the basis of which of the applicable rules are most appropriate to the nature and specific characteristics of the activity in question and, if applicable, which component is predominant, 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 set out in Chapters IV to VII of this Regulation in addition to Regulation (EU, Euratom) 2024/2509 and the general rules set out in Chapter I and II of this Regulation. <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></p> <p>FR (Comments):</p> <p>La délégation pourra souligner que les amendements du paragraphe 4 portent à confusion et ne garantissent pas que, dans les cas où les objectifs de défense, spatiaux et de sécurité sont concernés, les règles spécifiques de ces</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>thématiques s’appliquent et ce sans interprétation par les programmes de travail.</p> <p>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).</p>
<p>5. In certain duly substantiated circumstances, Union funding may be granted without a call for proposals in accordance with As referred to in Article 198192 of Regulation (EU, Euratom) 2024/2509, grants shall be awarded following a publication of calls for proposals, except in the cases referred to in Article 198 of that Regulation, including with point (e).</p>	<p>SE (Comments): SE welcomes the proposed revisions.</p> <p>DE (Drafting suggestions): As referred to <u>In accordance with</u> Article 198192 of Regulation (EU, Euratom) 2024/2509, grants shall be awarded <u>in open, competitive and fair procedures</u>, following a publication of calls for proposals, except in the cases referred to in Article 198 of that Regulation, including with point (e).</p> <p>DE (Comments): To ensure the selection of the best projects and to support the ECF’s objectives, the Regulation shall reflect the importance of open, competitive and fair procedures.</p> <p>ES (Drafting suggestions): 5. In certain duly substantiated circumstances, Union funding may be granted without a call for proposals in accordance with As referred to in Article 198192 of Regulation (EU, Euratom) 2024/2509, grants shall be awarded following a publication of calls for proposals, except in the cases</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>referred to in Article 198 of that Regulation, including with point (e). <u>All such calls for proposals shall also be included in the work programmes. For collaborative research and innovation activities grants shall be the main form of support and shall be primarily awarded following open, competitive calls for proposals except in exceptional and duly justified cases to be determined by the Programme Committee and included in the work programme.</u></p> <p>ES (Comments): It is of utmost importance that all calls for proposals are included in the work programmes, and also grants not subject to calls for proposals.</p> <p>Grants should be the main form of support in Horizon Europe and open, competitive calls for proposals.</p> <p>FI (Drafting suggestions): In certain duly substantiated circumstances, Union funding may be granted without a call for proposals in accordance with As referred to in Article 198 192 of Regulation (EU, Euratom) 2024/2509, grants shall be awarded following a publication of calls for proposals and in accordance with Article 9a, except in the cases referred to in Article 198 of that Regulation, including with point (e).</p>
<p>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.</p>	<p>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.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p><u>Priority should be given to budgetary guarantees and financial instruments.</u></p> <p>SE (Comments):</p> <p>SE thinks it should be spelled out more clearly that support through the ECF InvestEU-instrument is to be a favoured means of implementation under the ECF.</p>
	<p>LV (Comments):</p> <p>Latvia proposes that the Regulation explicitly require the Commission to regularly analyse the geographical spread of ECF participation across the Single Market to prevent overconcentration of funding in specific country or region.</p>
<p>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 .</p>	
<p>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, and in accordance with the same regulation, 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</p>	<p>SE (Comments):</p> <p>SE can accept the proposed revisions.</p> <p>ES (Drafting suggestions):</p> <p>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</p>

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<p>necessary to enable other sources of funding, including financing from Member States.</p>	<p>with Title VIII of Regulation (EU, Euratom) 2024/2509 and in the form of financing not linked to costs in accordance with Article 125(1), point (a), of that Regulation (EU, Euratom) 2024/2509, or, where necessary, and in accordance with the same regulation, simplified cost options. Funding may be also provided in the form of actual eligible cost reimbursement where the objectives of an action cannot be achieved otherwise, <u>in particular for collaborative research and innovation activities</u>, or where this form is necessary to enable other sources of funding, including financing from Member States.</p> <p>ES (Comments):</p> <p>Funding not linked to costs shall be an option, not the general rule, especially for collaborative R&I actions. Only when necessary and appropriate for the objectives of an action funding may be provided in the form of financing not linked to costs or simplified costs options.</p> <p>IT (Drafting suggestions):</p> <p>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, and in accordance with the same regulation, simplified cost options <u>(lump sums, 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.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>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.</p>	<p>CZ (Drafting suggestions): <u>9a. National experts shall be included in the evaluation committee, based on their expertise in the area addressing Union competitiveness, ensuring an appropriate representation of knowledge and experience from across the Union.</u></p> <p>LT (Comments): We consider that for actions implementing research and innovation activities the evaluation committee composed of independent experts should remain a default option.</p> <p>MT (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.</p> <p>MT (Comments): Malta reiterates its call for all members of the evaluation committee to be independent and external. This is in line with the current practice under Horizon Europe 2021-2027. We see no need for a change.</p> <p>NL (Drafting suggestions): In accordance with Article 153(3) of Regulation (EU, Euratom) 2024/2509, for actions implementing research and innovation activities, the evaluation</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>committee may shall be composed partially or fully of independent external experts</p> <p>SI (Drafting suggestions):</p> <p>9. In accordance with Article 153(3) of Regulation (EU, Euratom) 2024/2509, for actions implementing research and innovation activities, the evaluation committee shall may 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></p> <p>SI (Comments):</p> <p>Proposals collected via calls for proposals should by default be evaluated by independent experts, except when this is not relevant or appropriate – such cases should be set out in advance in the work programme.</p> <p>AT (Drafting suggestions):</p> <p>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.</p> <p>AT (Comments):</p> <p>Conflicts of interest have to be avoided in evaluations.</p> <p>ES (Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>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.</p> <p>ES (Comments): In line with Horizon Europe. The participation of external independent experts is a must.</p> <p>IE (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</p> <p>IE (Comments): IE considers the text should provide for participation by independent experts.</p> <p>PL (Comments): PL (Comments): In the previous drafting round we proposed adding the words “...and should ensure representation from all Member States” at the end of this provision. We signal our willingness to alternatively support a solution more akin to the proposals of LV, SI and EL – adding a new paragraph (9a) stating that the Commission shall pay attention to ensuring gender and geographical parities in evaluation committees and other relevant advisory bodies such as boards and expert groups. We’re willing to iron out the precise wording or placement of such a provision. At the same time we stress the indispensibility of some form of arrangement around this issue.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>As far as we can see, none of the calls regarding this issue formulated previously by numerous MSs have been addressed in the revised text of the Regulation, and we see no explanation provided in the Explanatory Note.</p>
	<p>LV (Drafting suggestions): 9.a The Commission shall pay attention to ensuring, to the extent possible for impementing objectives under Article 3 concerned, gender and geographical balance in evaluation committees, as well as in other relevant advisory bodies such as boards and expert groups.</p> <p>LV (Comments): Latvia shares the view of EU Member States that the establishment of the ECF should also take into account regional inequalities and promote convergence by supporting projects of local and regional importance, not just large, centralised initiatives. To ensure balanced development across the EU, Latvia supports that part of the ECF resources should be directed to Member States whose gross national income per capita is below the EU average.</p> <p>SK (Drafting suggestions): <u>9a. The Commission shall pay attention to ensuring, to the extent possible subject to the situation in the field of R&I concerned, gender and geographical balance in evaluation committees, as well as in other relevant advisory bodies such as boards and expert groups.</u></p> <p>SI</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p><u>9a. The Commission shall pay attention to ensuring, to the extent possible and subject to the situation in the field of R&I concerned, gender and geographical balance in evaluation committees, as well as in other relevant advisory bodies such as boards and expert groups.</u></p> <p>SI</p> <p>(Comments):</p> <p>While gender balance is to a limited extent required by the Performance regulation, geographical balance is not and the scope of the requirement is too narrow for ECF.</p> <p>EL</p> <p>(Drafting suggestions):</p> <p><u>9 a The Commission shall pay attention to ensuring gender and geographical balance in evaluation committees, as well as in other relevant advisory bodies such as boards and expert groups</u></p> <p>EL</p> <p>(Comments):</p> <p>New paragraph which ensures diversity and fairness in the evaluation process, preventing concentration of influence and promoting balanced representation of expertise across Member States and genders.</p> <p>FR</p> <p>(Comments):</p> <p>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.?</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>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.</p>	<p style="text-align: center; opacity: 0.5; font-size: 48px; transform: rotate(-30deg);">PUBLIC</p>
<p>11. Where necessary to achieve the objectives set out in Article 3, parts of the ECF may be implemented through Public-Private or Public-public Partnerships established under the Framework Programme for Research and Innovation, in particular by entrusting budget implementation tasks, in accordance with Article 62(1), point (c) of Regulation (EU, Euratom) 2024/2509, to joint undertakings established pursuant to 187 TFEU. Support from the ECF shall be conditional upon efficient use of Union financing, a proportionate financial contribution from other partners at least matching the Union contribution and voting rights for the Union in the governing bodies ensuring protection of the interests of the Union in the partnership. For that purpose, joint undertakings shall be established through a single establishing act ensuring centralised administrative functions.</p>	<p>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.</p> <p>CZ (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 keeping only the reference to “proportionate funding” in the text, which is sufficient. The previous wording could cause serious issues in financing excellent projects in tripartite partnerships such as the Chips JU, where achieving an equal or higher contribution to a project by</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>Participating States compared to that that by the Commission is, in some cases, difficult to for practical reasons (e.g. numerous partners from multiple Participating States with limited budgets, 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.</p> <p>MT (Drafting suggestions):</p> <p>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. <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 partnership. For that purpose, joint undertakings shall be established through a single establishing act ensuring centralised administrative functions.</p> <p>MT (Comments):</p> <p>Malta highlights its position that due to high administrative and financial burdens, it is important to avoid having too many partnerships unless proven absolutely necessary.</p> <p>NL</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>11. Where necessary to achieve the objectives set out in Article 3, parts of the ECF may be implemented through Public-Private or Public-public Partnerships established under the Framework Programme for Research and Innovation, in particular by entrusting budget implementation tasks, in accordance with Article 62(1), point (c) of Regulation (EU, Euratom) 2024/2509, to joint undertakings established pursuant to 187 TFEU. Support from the ECF shall be conditional upon efficient use of Union financing, a proportionate financial contribution from other partners at least matching the Union contribution and voting rights for the Union in the governing bodies ensuring protection of the interests of the Union in the partnership. For that purpose, joint undertakings shall be established through a single establishing act ensuring centralised administrative functions. <u>The relevant Horizon Europe rules shall apply.</u></p> <p>NL</p> <p>(Comments):</p> <p>To adequately reflect recital 10.</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>11. Where necessary to achieve the objectives set out in Article 3 <u>that cannot be achieved by other means</u>, 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</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>shall be established through a single establishing act ensuring centralised administrative functions.</p> <p>SI (Comments):</p> <p>Delegation of implementation to Joint undertakings should be limited to only very few relevant cases.</p> <p>ES (Drafting suggestions):</p> <p>11. <u>In duly justified cases, and</u> 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 <u>Articles 185 and</u> 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, <u>and subject to KPIs on strengthening technological and manufacturing capacities in the Union.</u> For that purpose, joint undertakings shall be established through a single establishing act ensuring <u>common rules</u> centralised administrative functions.</p> <p>ES (Comments):</p> <p>We would like to reiterate the suggestions made in previous rounds to this point, and also ensure coherence with Horizon Europe provisions.</p> <p>Partnerships in general, and in particular public-private partnerships, may implement parts of the ECF or HE budgets in duly justified cases, when they</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>are needed to fulfil the objectives of the ECF and/or Horizon Europe collaborative R&I activities.</p> <p>IE (Drafting suggestions):</p> <p>11. Where necessary to achieve the objectives set out in Article 3, parts of the ECF may be implemented through Public-Private or Public-public Partnerships established under the Framework Programme for Research and Innovation, in particular by entrusting budget implementation tasks, in accordance with Article 62(1), point (c) of Regulation (EU, Euratom) 2024/2509, to joint undertakings established pursuant to 187 TFEU. Support from the ECF shall be conditional upon efficient use of Union financing, a proportionate financial contribution from other partners at least matching the Union contribution and voting rights for the Union in the governing bodies ensuring protection of the interests of the Union in the partnership. For that purpose, joint undertakings shall be established through a single establishing act ensuring centralised administrative functions. <u>The relevant Horizon Europe rules shall apply</u></p> <p>IE (Comments): NLxxxxxx</p>
	<p>FR (Drafting suggestions):</p> <p>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 <u>including Joint Undertakings</u> established under the Framework Programme for Research and Innovation <u>pursuant to article 187 TFEU</u>, in particular by entrusting budget implementation tasks, in accordance with Article 62(1), point (c) of Regulation (EU, Euratom)</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>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.</p> <p>FR (Comments): La contribution des autres partenaires ne devrait pas être uniquement financière, afin de tenir compte des contributions en nature (par exemple, EuroHPC).</p> <p>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 ?</p>
<p>11a. Where necessary to achieve the objectives set out in Article 3, parts of the ECF may be implemented through the framework of Multi-Country Projects established in accordance with Decision (EU) 2022/2481, including notably those implemented through the European Digital Infrastructure Consortias.</p>	<p>SE (Comments): SE can accept the added paragraph.</p> <p>ES (Drafting suggestions): 11a. Where necessary to achieve the objectives set out in Article 3, parts of the ECF may be implemented through the framework of Mmulti-Ccountry Pprojects established in accordance with Decision (EU) 2022/2481, including notably those implemented through the European Digital Infrastructure Consortia.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>ES (Comments): According to Decision (EU) 2022/2481, article 11.5 multi-country projects can be implemented in various ways such as Joint Undertakings European Research Infrastructure Consortia (ERICs), the Union’s agencies, independently by the Member States concerned, through the execution of Important Projects of Common European Interest European digital infrastructure consortia or through other appropriate implementation mechanisms. A specific reference to ERICs is not needed.</p> <p>EL (Comments): We propose to add a reference also to the European Chips Infrastructure Consortiums, provided for in article 7 of Reg. (EU)/2023/1781 (“Chips Act”)</p>
<p>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</p>	<p>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 a duly justified termination where the objectives of the action as established in the supporting agreement are unlikely to be achieved at all or within the set timelines, or the action has lost its policy relevance</p> <p>SI (Comments): Termination should be duly justified and anchored in evidence that the action will not be able to deliver on the objectives, as enshrined in the grant agreement.</p> <p>DE</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>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, other than regarding the space (sub-)components, 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</p> <p>DE</p> <p>(Comments):</p> <p>This termination clause is too broad and basically allows for unilateral discretionary termination – as such it cannot apply to any of the space subcomponents, given the certainty required in relation to services, data and infrastructure</p> <p>ES</p> <p>(Drafting suggestions):</p> <p>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.</p> <p>ES</p> <p>(Comments):</p> <p>Policy relevance should be taken into account in the definition of topics to be included when preparing the work programmes and calls for proposals, not after the project has been awarded.</p> <p>IT</p> <p>(Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p style="text-align: center;"><i>Article 12a</i> Unilateral withdrawal</p> <p>1. 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.</p> <p><u>2. In cases set out in previous subparagraph, except for the reasons referred to in Article 132 of Regulation (EU, Euratom) 2024/2509, the competent authority indemnifies the contractor by paying for the work performed or for the services and supplies performed, in addition to one tenth of the amount of the works, services or supplies not performed.</u></p> <p><u>3. When the circumstances referred to in paragraph 1 apply, before proceeding with termination, the competent authority shall evaluate the possibility of renegotiating the work program, based on the newly identified needs. In case of renegotiation, the compensation referred to in paragraph 2 is not due.</u></p> <p>IT (Comments):</p> <p>It would be appropriate to specify that award procedures, which are responsible for unilateral termination, must include: 1) mechanisms to protect the economic operator; 2) a prior attempt to renegotiate the contractual terms, based on emerging needs.</p> <p>The objective should be to avoid discouraging participation and to reduce litigation.</p> <p>Furthermore, it is recommended that more careful consideration be given to the requirement that the action has lost its policy relevance to trigger unilateral termination, as this appears too discretionary and subject to extreme volatility.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>BE (Drafting suggestions):</p> <p>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</p> <p>BE (Comments):</p> <p>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.</p>
<p>SECTION 1 GOVERNANCE</p>	
	<p>SI (Comments):</p> <p>Article 13 and 13a are missing. SI is questioning whether all the very specific provisions under the heading “Protection of classified information” are necessary at the level of the ECF regulation or could they be addressed within the relevant WP that contains EUCI topics.</p> <p>FR (Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p><u>The Commission acts in accordance with a pluriannual strategic guidance elaborated by the Council in coordination with the Commission.</u></p> <p><u>The pluriannual guidance is annexed to the present regulation. The investment guidelines for the InvestEU instrument shall also be defined in coherence with the overall guidelines of the fund.</u></p> <p>FR (Comments):</p> <p>La délégation pourra remercier la Présidence pour ce nouveau rôle du comité général qui permettrait aux Etats membres d’avoir une vue transversale du fonds de compétitivité et d’orienter son action. Ce dispositif pourrait être couplé à des priorités sectorielles définies pour chaque fenêtre du FEC et en amont de la période de programmation par le Conseil afin de garantir une prévisibilité et une planification à long terme du fonds.</p> <p>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.</p> <p>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’entiereté de la période de programmation.</p> <p>La délégation pourra saluer le rôle stratégique donné à ce comité dans cette nouvelle proposition de compromis. Elle pourra demander à ce que cette</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	prérogative soit uniquement celle de ce comité et soit donc retirée au Stakeholders Board. La délégation pourra demander à préciser davantage l'articulation entre ces deux instances.

Article 13b
Advisory role of the ECF General Committee

LT

(Comments):

Could you provide clarification on the composition and mandate of this committee, particularly regarding its role in formulating recommendations on support?

SE

(Comments):

SE welcomes the addition of this article in its entirety.

IE

(Comments):

IE welcomes the strengthening of the ECF General Committee role

IT

(Comments):

More clarity is needed on the composition of the General Committee. Furthermore, the hierarchy and interaction between this new proposed committee and the Stakeholders Board is unclear. It is strongly encouraged that Member States play a pivotal role in the framework of the General Committee, in order to ensure their broader participation in the Governance of the ECF.

PT

(Comments):

We would appreciate clarifications regarding how these new provisions will ensure an adequate role of MS in the governance and design of the Work Programmes and how they will ensure that the overall direction of the ECF is aligned with the priorities supported by NRPP.

EE

(Drafting suggestions):

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p style="text-align: center;">Article 13b Advisory <u>Strategic</u> role of the ECF General Committee</p> <p>EE (Comments):</p> <p>Although the role of ECF General Committee can be considered advisory it is important to underline the strategic importance of the Committee.</p> <p>EL (Comments):</p> <p>M-S participation is essential for providing the strategic direction of ECF.</p> <p>ECF general committee is a step towards this direction of strengthening the role of MS in governance and strategy of the fund, however the relation with the board needs to be clarified. We would like to see how this framework becomes functional and effective, while ensuring the strategic saying of the M-S.</p>
	<p>FR (Drafting suggestions):</p> <p>Article 13b <u>Steering</u> advisory role of the ECF General Committee</p> <p>FR (Comments):</p> <p>Nous devons œuvrer au renforcement du Comité général du FEC afin d'en faire un véritable organe directeur du fonds et un outil essentiel pour suivre la réalisation de ses objectifs en matière de compétitivité.</p> <p>La délégation pourra demander à ce que ce comité s'accompagne d'une meilleure redevabilité afin de doter cet organe de gouvernance de moyens permettant le plein exercice de ses missions.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>A notre sens, il n'est pas pertinent que les missions de ce comité de programme soient réparties entre deux articles différents dans deux chapitres distincts, à moins que ce rôle de conseil permette à un Etat membre de coprésider aux côtés de la Commission.</p>
<p>1. The ECF General Committee defined under Article 83(1), point (a) shall, in addition to its role as a committee within the meaning of Regulation (EU) 2011/182, advise the Commission and provide recommendations by:</p>	<p>RO (Comments): Additional information is needed on how the General Committee's <i>recommendations</i> would be correlated with the Strategic Stakeholders Board's <i>opinions</i>.</p> <p>AT (Drafting suggestions): The ECF General Committee defined under Article 83(1), point (a) shall, in addition to its role as a committee within the meaning of Regulation (EU) 2011/182, advise the Commission and provide recommendations by building on the work of the Strategic Stakeholders Board established in Article 14 by:</p> <p>AT (Comments): We welcome the Presidency's proposal to provide for extended responsibilities of the ECF General Committee. We are wondering, however, about the relationship to the Strategic Stakeholder Board. In addition, while we appreciate stronger MS involvement, we should not need to do without "external" expertise to be provided by the Stakeholder Board.</p> <p>IT (Comments): It is necessary to establish a principle for regulating the relationship between the General Committee and the Stakeholder Board: 1) place them on an equal</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>level, and, in this case, mechanisms must be provided for overcoming dissent; 2) recognise a "right of veto" of the General Committee with respect to the Stakeholder Board.</p>
	<p>FR (Drafting suggestions): The ECF General Committee defined under Article 83(1), point (a) shall, in addition to its role as a committee within the meaning of Regulation (EU) 2011/182, advise the Commission and provide recommendations by:</p> <p>FR (Comments): Combien de membres ce Comité devra-t-il compter ? Comment garantir la prise en compte des intérêts particuliers relevant de la défense, du spatial et de sécurité ?</p> <p>Enfin, les « conseils ou recommandations » données par ce comité devraient être prises en compte par la Commission.</p>
<p>(a) providing advice on the overall strategic direction for the ECF, on long-term competitiveness trends, on areas of market failures and on suboptimal investment situations;</p>	<p>MT (Drafting suggestions): (a) providing advice on the overall direction for the ECF, on long-term competitiveness trends, on areas of market failures, <u>broadening of excellence, access to finance</u> and on suboptimal investment situations;</p> <p>MT (Comments): Malta added broadening of excellence which is essential to improve European Competitiveness equally with the Union and the subject of access to finance which is key to the leverage / attraction of private financing.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>RO (Drafting suggestions): providing advice on the overall direction for the ECF, on long-term competitiveness trends, on areas of market failures, and on suboptimal investment situations, and on ensuring the full potential of every region;</p> <p>RO (Comments): In accordance with recital 8, ECF also has the objective to close the innovation gap by ensuring that less-developed regions are effectively connected to EU value chains, making the Union as a whole better positioned to compete globally.</p> <p>SI (Drafting suggestions): (a) providing advice on the overall strategic direction for the ECF, on long-term research and competitiveness trends, on areas of market failures and on suboptimal investment situations;</p> <p>AT (Drafting suggestions): (a) providing advice on the overall direction for the ECF, on long-term competitiveness trends, on areas of market failures and on suboptimal investment situations, taking into account advice provided by the General configuration of the committee assisting the Commission [reference to Horizon Europe];</p> <p>AT (Comments): AT suggests including considerations on research and innovation in the reflections of the ECF General Committee. The input on R&I shall be provided by the Horizon Europe General configuration.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>A similar cross-fertilizing reference shall be included in Article 18 of Horizon Europe to take the advice of the ECF General Committee into account.</p> <p>ES (Drafting suggestions):</p> <p>(a) providing advice on the overall strategic direction for the ECF, including for the preparation and implementation of work programmes, on long-term competitiveness trends, on areas of market failures and on suboptimal investment situations;</p> <p>ES (Comments):</p> <p>We would like to see a direct reference to the role of the ECF General Committee in steering work programmes. This is crucial to ensure sufficient European ownership in the definition of priorities.</p> <p>PT (Drafting suggestions):</p> <p>(a) providing advice on the overall strategic direction for the ECF, on long-term competitiveness trends, on areas of market failures and on suboptimal investment situations, <u>and overseeing and supporting a coherent implementation of the overall ECF activities;</u></p> <p>PT (Comments):</p> <p>Even though PT suggestion to change the name of this Committee was not included, we welcome the specific reference to the strategic reach of the committee's actions, which are also addressed in more detail in the new recital 56a.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>Nevertheless, PT continues to envision for this committee the role of overseeing and supporting a coherent implementation of the ECF activities and collaborative R&I activities under the different policy windows, in articulation with the FP10 strategic committee.</p>
	<p>ES (Drafting suggestions):</p> <p><u>(aa) providing advice on long-term competitiveness trends including industrial competitiveness, on areas of market failures and on suboptimal investment situations;</u></p> <p>FR (Drafting suggestions):</p> <p>(a) providing advice on the overall strategic direction for the ECF, on long-term competitiveness trends, on areas of market failures, <u>on european preference criteria</u> and on suboptimal investment situations;</p> <p><u>(a1) conducting an annual review of the ECF’s implementation and overall performance based on the evaluation and reporting requirements set out in the regulation 2024/2059 and the Performance regulation ;</u></p> <p><u>(a2) adopting strategic orientations based on recommendations from thematic window committees and the Strategic Stakeholder Board, adjusting priorities to evolving economic conditions and optimizing resource allocation</u></p> <p>(a3) providing advice on the overall strategic direction for the ECF, on long-term competitiveness trends, on areas of market failures and on suboptimal investment situations;</p> <p>FR (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>Proposition de développer les missions de ce comité. La mission de ce comité décrite au point a) étant redondante avec celle du Strategic Stakeholder Board, la délégation pourra demander à préciser l’articulation entre ces deux instances et la plus-value du Strategic Stakeholder Board dans une configuration où ce dernier serait maintenu.</p> <p>Quelle sera l’articulation avec le Strategic Stakeholder Board ?</p>
<p>(b) providing advice on potential actions to support SMEs and startups;</p>	<p>LV (Drafting suggestions): providing advice on potential actions to support SMEs and startups companies;</p> <p>LV (Comments): In Article 13a. b) Latvia considers that the “advisory role of the ECF General Committee” is important in providing recommendations on the implementation of potential activities for all types of companies, not just SMEs and startups.</p> <p>AT (Comments): Basically positive for AT, but unfortunately the ECF General Committee still only has an advisory role. Therefore AT asks again, how SME representation is ensured?AT refers to the same question already submitted for ECF subgroup on Nov24 as well as for written comments on Nov 11.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>FR (Drafting suggestions): (</p>
	<p>PL (Drafting suggestions): (ba) providing advice on potential actions to support the pan-European relevance of the ECF interventions ;</p> <p>PL (Comments):</p> <p>PL (Drafting suggestions): In a similar vein to the proposal regarding Article 3(1)(kb), we suggest building on the language proposed by SI and well received at our meetings on 24-Nov and 26-Nov. This would constitute progress on a no.1 issue of ours.</p> <p>FR (Drafting suggestions): (b) providing advice on potential actions to support SMEs, startups and small mid-caps;</p> <p>FR (Comments): X</p>
<p>(c) facilitating cooperation among Member States and exchange of information on issues related to this Regulation.</p>	<p>DE (Drafting suggestions): (c) facilitating cooperation among Member States and exchange of information as well as providing advice on issues related to this Regulation.</p> <p>DE</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments):</p> <p>The ECF GC is well placed to advise the EC on issues related to this Regulation. This should be clearly reflected in the text.</p>
	<p>AT</p> <p>(Drafting suggestions):</p> <p>The Commission shall contribute to the work of the ECF General Committee through timely information on advice provided by the ECF Strategic Stakeholders Board, informed by the observatory on emerging technologies, and research-related advice provided by the General configuration of the committee assisting the Commission [reference to Horizon Europe].</p> <p>AT</p> <p>(Comments):</p> <p>AT suggests ensuring that the ECF General Committee remains up to date on deliberations of other relevant advisory bodies. The necessary and timely information shall be provided by the Commission because she chairs and keeps track of the overall advisory mechanism in the ECF and Horizon Europe.</p> <p>To ensure mutual understanding and information, the Horizon Europe general/strategic configuration should also be informed about the advice e.g. stemming from the ECF Stakeholder Board.</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>(d) providing advice on strategic dependencies and economic security aspects.</p> <p>DE</p> <p>(Comments):</p> <p>To strengthen the role of MS in the economic security dimension of the ECF.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	FR (Comments): Qu'est-il sous-entendu par cet article ?
<p>2. At its first meeting in its advisory role, based on a proposal by the Commission, the ECF General Committee shall adopt its rules of procedure to be followed when the Committee acts in its advisory role.</p>	PT (Comments): PT welcomes and supports this change.
	FR (Drafting suggestions): At its first meeting in its <u>steering</u> role, based on a proposal by the Commission, the ECF General Committee shall adopt its rules of procedure to be followed when the Committee acts in its advisory role.
<p>3. The ECF General Committee shall hold ordinary meetings in its advisory role at least once a year. The Commission shall convene the meetings and prepare the agenda, after consulting the members of the ECF General Committee, in accordance with the advisory tasks of the ECF General Committee pursuant to this Regulation and with its rules of procedure.</p>	SI (Drafting suggestions): 3. The ECF General Committee shall hold ordinary meetings in its advisory role at least twice once a year. The Commission shall convene the meetings and prepare the agenda, after consulting the members of the ECF General Committee, in accordance with the advisory tasks of the ECF General Committee pursuant to this Regulation and with its rules of procedure. DE (Drafting suggestions): 3. The ECF General Committee shall hold ordinary meetings in its advisory role at least once a year. The Commission shall convene the meetings and prepare the agenda, after consulting the members of the ECF General Committee, in accordance with the advisory tasks of the ECF

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>General Committee pursuant to this Regulation and with its rules of procedure. <u>Representatives/ A representative of the Strategic Configuration of Horizon Europe Committee should be invited to the meetings and vice versa.</u></p> <p>DE (Comments): We would like to improve coherence and coordination between ECF and HE</p> <p>IT (Drafting suggestions):</p> <p>3. The ECF General Committee shall hold ordinary meetings in its advisory role at least one twice a year. The Commission shall convene the meetings and prepare the agenda, after consulting the members of the ECF General Committee, in accordance with the advisory tasks of the ECF General Committee pursuant to this Regulation and with its rules of procedure.</p> <p>PT (Comments): PT welcomes and supports this change.</p>
	<p>FR (Drafting suggestions):</p> <p>The ECF General Committee shall hold ordinary meetings in its <u>steering</u> role at least once a year. The Commission shall convene the meetings and prepare the agenda, after consulting the members of the ECF General Committee, in accordance with the advisory tasks of the ECF General Committee pursuant to this Regulation and with its rules of procedure.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p style="text-align: center;"><i>Article 14</i></p> <p>Governance and Advisory Boards ECF Strategic Stakeholders Board</p>	<p>LV (Comments):</p> <p>In Articles 14 and 14a we would prefer fewer and simpler governance structures, with comitology as the main tool and a strong role for Member States without overlapping advisory bodies.</p>
	<p>FR (Drafting suggestions):</p> <p>ECF Strategic Stakeholders Board</p> <p>FR (Comments):</p> <p>La Présidence pourrait-elle préciser l’articulation de ce Strategic Stakeholder Board avec le nouveau rôle stratégique du General Committee.</p> <p>A cet égard, devrait au moins être supprimé le terme « stratégique » qui apporte de la confusions dans es rôles entre les différents organes.</p> <p>Enfin, la délégation pourra demander des précisions sur la date de présentation du Competitiveness Coordination Tool.</p>
<p>1. An ECF Strategic Stakeholders Board is established.</p>	<p>LV (Comments):</p> <p>In Article 14 (governance and advisory councils), we want to reduce the number of different governance formats, favouring comitology with strong Member State involvement.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>IE (Comments): IE welcome the changes to ensure the independence of the ECF strategic stakeholder boards.</p>
	<p>FR (Drafting suggestions): 1. AAn ECF Expert Board is established.</p> <p>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). Combien de membres ce Conseil devra-t-il compter ? Comment garantir la prise en compte des intérêts particuliers relevant de la défense, du spatial et de sécurité ? La mission de ce Stratgeic Stakeholder Board semble être identique à celle du General Committe. Il faudrait définir comment ces deux organes interagissent, le rôle de pilotage stratégique devant être résev.</p>
<p>2. The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, following a transparent process and 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 sectoral balance in sector with particular attention to strategic sectors, organisation type, including private investors, and size, including SME representatives, expertise, gender, age and geographical distribution. The</p>	<p>CZ (Comments): CZ - Article 14(2) sets out the composition of the Strategic Stakeholders Board. Taking into account the link with FP10/Pillar II, it should be considered that at least one seat – or, depending on the size of the Board, a proportionate number of seats – for representatives of research organizations</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>term of members of the Board shall be limited to four years, renewable once. Members of the Board shouldshall act with integrity and probity.</p>	<p>(e.g. universities or public research institutes) could be included among the provisions ensuring balanced representation.</p> <p>LV (Drafting suggestions):</p> <p>The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, following a transparent process and 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 sectoral balance in sectorwith particular attention to strategic sectors, organisation type, including private investors, and size, including SME representatives, expertise, gender, age and geographical distribution. Member States shall be invited to nominate candidates in response to the open call. The term of members of the Board shall be limited to four years, renewable once. Members of the Board shouldshall act with integrity and probity.</p> <p>LV (Comments):</p> <p>It is necessary to clearly define the involvement of Member States in the composition and functioning of the ECF Strategic Stakeholders Board. It remains unclear whether the participation of Member States is foreseen and whether such participation would be mandatory. To ensure adequate national representation and geographical balance, it should be explicitly stated that Member States nominates candidates in response to the Commission's open call. Never the less, that "geographical distribution" is mentioned, a more detailed elaboration on what exactly is meant by it would be highly appreciated.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>NL (Drafting suggestions):</p> <p>2. The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, after consultation of the Council, following a transparent process and 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 sectoral balance in sector with particular attention to strategic sectors, organisation type, including private investors, and size, including SME representatives, expertise, gender, age and geographical distribution. The term of members of the Board shall be limited to four years, renewable once. Terms shall be non-renewable. Members of the Board shouldshall act with integrity and probity.</p> <p>NL (Comments):</p> <p>We welcome the changes made by the presidency.</p> <p>SE (Drafting suggestions):</p> <p>2. The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, following a transparent process and 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 sectoral balance in sector with particular attention to strategic sectors, organisation type, including private investors and representatives from the industry and size, including SME representatives, expertise, gender, age and geographical distribution. The term of members of the Board shall be limited to four years, renewable once. Members of the Board shouldshall act with integrity and probity.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>SE (Comments): SE emphasizes the importance of close dialogue with various stakeholders, including the industry, to ensure market adaptation.</p> <p>One of the committee's tasks is to provide advice on the identification strategic portfolios, so its composition should be based on broad expertise to enable this in a changing context, rather than on predefined strategic sectors.</p> <p>SI (Drafting suggestions): 2. The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, following a transparent process and 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 sectoral balance in sectorwith particular attention to strategic sectors, organisation type, including private investors, and size, including SME representatives, expertise, gender, age and geographical distribution. The term of members of the Board shall be limited to four years, renewable once. Members of the Board shouldshall act with integrity and probity.</p> <p>SI (Comments): How can you take into account the need for a sectoral balance and give particular attention to strategic sectors? It's either one or another, where SI would opt for the first.</p> <p>AT (Drafting suggestions): The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, following a transparent process and an open call for nominations or for expressions of interest, or both, whichever the</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>Commission finds more appropriate, and taking into account the need for sectoral balance in with particular attention to strategic sectors, organisation type, including private investors, and size, including SME representatives, expertise, gender, age and geographical distribution. The term of members of the Board shall be limited to four years, renewable once. Members of the Board shall act with independence, integrity and probity.</p> <p>DE (Drafting suggestions):</p> <p>2. The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, following a transparent process and 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 sectoral balance with particular attention to strategic sectors, organisation type, including private investors, and size, including SME representatives, expertise, including civil society and academia/ R&I experts, gender, age and geographical distribution. The term of members of the Board shall be limited to four years, renewable once. Members of the Board shouldshall act with integrity and probity.</p> <p>DE (Comments):</p> <p>Involving the participation of civil society and academia in the ECF Strategic Stakeholder Board enables science-based and participatory decision making on the direction of the ECF.</p> <p>For the development of the integrated work programmes of the four policy windows, it is also important to involve specific F&I experts. Their expertise shall ensure that specialised knowledge and R&I needs are appropriately addressed and reflected in the design of the work programmes</p> <p>ES (Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>2. The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, following a transparent process and 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 sectoral balance in sector with particular attention to strategic sectors, organisation type, including private investors, and size, including SME representatives, expertise, gender, age and geographical distribution. <u>The Board shall include a specific configuration focused on industrial competitiveness.</u> The term of members of the Board shall be limited to four years, renewable once. Members of the Board should shall act with integrity and probity.</p> <p>ES (Comments): It is necessary to ensure that the productive dimension carries effective weight within the ECF's strategic advisory function.</p> <p>IT (Drafting suggestions):</p> <p>2. The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, following a transparent process and 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 sectoral balance with particular attention to strategic sectors, organisation type, including private investors, and size, including SME, <u>startups and scaleups</u> representatives, <u>including through their trade associations</u>, expertise, gender, age and geographical distribution. The term of members of the Board shall be limited to four years, renewable once. Members of the Board shall act with integrity and probity.</p> <p>IT</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments):</p> <p>We welcome the opening of SME representation in the SSB and proposes further extending it to include startups and scaleups. It is recommended that representation, in all cases, also be ensured through trade bodies.</p> <p>LU</p> <p>(Drafting suggestions):</p> <p>2. The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, following a transparent process and 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 sectoral balance in sectors with particular attention to strategic sectors, organisation type, including private investors, and size, including SME representatives, expertise, gender, age and geographical distribution. <u>The EIB shall be duly represented in the ECF Strategic Stakeholders Board.</u></p> <p>The term of members of the Board shall be limited to four years, renewable once. Members of the Board shouldshall act with integrity and probity</p> <p>PT</p> <p>(Comments):</p> <p>The text refers the Commission’s commitment to ensuring diversity in terms of gender, age, type of organisation, and geographical location. However, the text does not mention any requirement for the representation of specific economic sectors, which could lead to imbalances and the predominance of large industrial or technological stakeholders. This concern should be considered.</p>
	<p>DE</p> <p>(Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p><u>2a. Notwithstanding Paragraph 2, the EIB Group shall have a permanent representative in the ECF Strategic Stakeholders Board.</u></p> <p>DE (Comments):</p> <p>The EIB Group is an important Implementing Partner with longstanding expertise. This role should be underlined with due representation in the ECF Strategic Stakeholders Board.</p>
<p>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 Strategic Stakeholders Board. Members of the Board shall be bound by these terms.</p>	<p>NL (Drafting suggestions):</p> <p>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 Strategic Stakeholders Board. Members of the Board shall be bound by these terms.</p> <p>AT (Drafting suggestions):</p> <p>The Commission shall establish the detailed rules on selection and composition, remuneration, rules of procedure, conflicts of interest and confidentiality for the ECF Strategic Stakeholders Board. Members of the Board shall be bound by these terms.</p> <p><u>3 (bis) On proposal by the Commission, the ECF Stakeholder Board shall adopt its rules of procedure upon constitution</u></p> <p>AT (Comments):</p> <p>We believe that governing bodies like the ECF Strategic Stakeholders Board should be in a position to vote on their Rules of Procedure in order to ensure inclusive working methods.</p> <p>DE</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>The Commission shall establish the detailed rules on selection and composition, remuneration, rules of procedure, conflicts of interest and confidentiality for the ECF Strategic Stakeholders Board. Members of the Board shall be bound by these terms.</p> <p>DE</p> <p>(Comments):</p> <p>In accordance with the general law of international organisations / international institutional law, it is for the committees and boards themselves to draft and adopt their own rules of procedure.</p> <p>Certainly, with regard to any committees and boards of relevance to space, given the strategic importance of space, reflected in the shared competence between COM and the MS, we would not support derogating from this fundamental rule of public international and international institutional law</p> <p>FR</p> <p>(Drafting suggestions):</p> <p>The Commission shall establish propose for adoption by the Council 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.</p> <p>The Commission shall establish the detailed rules on selection and composition, remuneration, rules of procedure, conflicts of interest and confidentiality for the ECF Stakeholder Expert Board. Members of the Board shall be bound by these terms. Those rules must be approved by the Council.</p> <p>FR</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments):</p> <p>Les règles applicables à ces importants organes du fonds devraient être adoptées par le Conseil.</p>
<p>4. The ECF Strategic StakeholderStakeholders 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. by:</p>	<p>SE (Comments): SE welcomes the clearer structure of this paragraph.</p> <p>PT (Comments): The role and implication of the observatory on emerging technologies needs to be clarified.</p> <p>FR (Drafting suggestions): The ECF Strategic StakeholderStakeholders Board, informed by an observatory on emerging technologies, shall advise the <u>ECF general committee</u> on the overall direction for the ECF. <u>As such, it should be composed of several working groups, at least one for each policy window.</u></p> <p>FR (Comments): La mission de ce Stratgeic Stakeholder Board semble être identique à celle du General Committe. Il faudrait définir comment ces deux organes interagissent. La délégation française s’interroge par ailleurs sur le rôle de l’observatoire des technologies émergentes qui semble redondant.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>Nous pensons qu'un groupe d'experts ne peut couvrir l'intégralité du Fonds, dans la mesure où il contient des thématiques et instruments extrêmement variés les uns des autres. Il semblerait plus pertinent d'agir au niveau de chaque fenêtre, en se concentrant sur la déclinaison des priorités stratégiques en thématiques pour les appels à projets. Ce comité aurait ainsi vocation à guider la Commission européenne dans la préparation des programmes de travail, qui seront ensuite discutés et adoptés en comités de programme.</p>
<p>(a) providing advice 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;</p>	<p>SI (Drafting suggestions):</p> <p>(a) providing advice on long-term research and competitiveness trends, advise on areas of market failures and suboptimal investment situations that could be addressed in the implementation of the ECF;</p> <p>SI (Comments):</p> <p>What is the difference between the role of the ECF general committee as prescribed in point a) of para 1 of article 13b) and the role of the Stakeholder board here?</p> <p>IT (Drafting suggestions):</p> <p>(a) providing advice 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>including advice on shortages of skills contributing to the availability of skills in investment in strategic sectors for EU competitiveness;</u></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>PL (Drafting suggestions): (a) providing advice on long-term competitiveness trends, advise advise on areas of market failures and suboptimal investment situations, as well as advice regarding patterns of uptake and deployment of support across the Union that could be addressed in the implementation of the ECF;</p> <p>PL (Comments):</p> <p>PL (Drafting suggestions): The proposed addition aims to strengthen the strategic oversight function of the ECF Stakeholder Board by explicitly including advice on the distribution of support in the EU. While the existing mandate covers long-term competitiveness trends, market failures and suboptimal investment situations, it does not explicitly refer to territorial and other aspects of implementation. This clarification enhances the coherence of the governance framework, supports transparency in the allocation of resources, and helps ensure that the ECF contributes effectively to competitiveness objectives throughout the Union.</p> <p>BE (Drafting suggestions): (a) providing advice on long-term competitiveness <u>and technological</u> trends, advise on areas of market failures and suboptimal investment situations that could be addressed in the implementation of the ECF;</p> <p>FR (Drafting suggestions): (a) providing advice 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;</p>
	FR

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>(aa) providing advice on scientific fields and technologies to be addressed by each policy window, and on activities to be financed for each policy window;</p> <p>FR</p> <p>(Comments):</p> <p>Nous attendons davantage d'informations sur le <i>Competitiveness Coordination Tool</i> avant de nous exprimer sur la plus-value de cette mission.</p>
<p>(b) providing advice 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.</p>	<p>FR</p> <p>(Drafting suggestions):</p> <p>(b) providing advice on the identification of strategic portfolios of projects within and across activities of the ECF, for which it may be composed in different sector-policy-oriented configurations.</p> <p>FR</p> <p>(Comments):</p> <p>Le terme de secteur serait ici plus approprié, car reflétant mieux le niveau où se déterminent les enjeux de compétitivité et le degré d'importance stratégique des projets permettant d'y répondre</p>
	<p>DE</p> <p>(Drafting suggestions):</p> <p>(ba) providing advice on coherence of ECF actions with the EU's economic security and resilience goals, making use of the Stakeholders' specific expertise.</p> <p>DE</p> <p>(Comments):</p> <p>To improve advice on the economic security dimension of the ECF.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>(c) The advice provided by the Strategic Stakeholders Board shall be shared with the ECF General Committee referred to in Article 13a.</p>	<p>NL (Comments): Welcome this addition</p> <p>SI (Drafting suggestions):</p> <p>(c) The advice provided by the Strategic Stakeholders Board shall be shared with the ECF General Committee referred to in Article 13ab.</p> <p>PT (Comments): PT welcomes this clarification as it addresses our concerns regarding the needed articulation between governance structures, while it further reinforces the strategic contribution given by General Committee.</p> <p>FR (Drafting suggestions):</p> <p>c) The advice provided by the <u>Expert</u> Board shall be shared with the ECF General Committee referred to in Article 13a.</p>
	<p>NL (Drafting suggestions):</p> <p><u>4a. In the performance of its tasks, the Strategic Stakeholder Board shall enjoy full independence in the discharge of its functions, performing its duties impartially and solely in the interest of the Union as a whole. It shall not seek nor take instructions from any government of a Member State, Union institutions or bodies or from any other public or private body.</u></p> <p><u>4b. On proposal by the Commission, the ECF Stakeholders Board shall adopt its rules of procedure upon constitution.</u></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>NL (Comments): Both new 4a and 4b to better anchor the independent functioning of this Board. To have the most added value of this Board as a part of the broader ECF governance structure, it is crucial to have more independent role. 4a track is similar to the change made in 14b(6).</p> <p>ES (Drafting suggestions): <u>(d) The Commission shall ensure that the Programme Committee is duly and timely informed of the recommendations of the observatory on emerging technologies, the Strategic Stakeholders Board and the thematic platforms.</u></p> <p>ES (Comments): The programme committee shall be informed.</p> <p>IT (Drafting suggestions): <i>Article 14bis</i> <i>Relations between the ECF General Committee and the Strategic Stakeholders Board</i> 1. In case of disagreement between the ECF General Committee and the Strategic Stakeholders Committee, the Commission convenes a Conciliation Committee, which shall be composed of the equal number of members representing both committees. 2. If the Conciliation Committee does not reach an agreement, the position of the ECF General Committee prevails, which adopts a duly justified decision.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>3. The Commission shall establish the detailed rules on composition and rules of procedure for the Conciliation Committee.</p> <p>IT (Comments):</p> <p>The need to define guidelines is emphasized for: 1. Formalizing a forum for discussion between the ECF General Committee (GC) and the Strategic Stakeholders Board (SSB); 2. Defining the rules for resolving conflicts between the two bodies, providing, alternatively or cumulatively (in the second case, with a view to multiple conciliation attempts), a "cooling-off procedure" or a right of veto within the GC.</p> <p>BE (Drafting suggestions):</p> <p><u>5. The Strategic Board shall consult regularly with the ERC Scientific Council and the EIC Board.</u></p> <p>BE (Comments):</p> <p>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.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p style="text-align: center;"><i>Article 14a</i> Thematic platforms</p>	<p>FR (Comments): Dans la mesure où les parties prenantes seront associées à l'élaboration des programmes de travail, à la fois à travers le comité d'experts et via leurs représentants nationaux dans les comités de programme, nous ne voyons pas la valeur-ajoutée de ces plateformes thématiques.</p>
<p>441. 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.</p>	<p>CZ (Drafting suggestions): The Commission shall ensure that stakeholders, <u>including research organizations, and Member States</u> are consulted in the development of the work programmes, with the creation of one or several thematic platforms per window.</p> <p>CZ (Comments): CZ - The current wording does not clearly specify which “stakeholders” are meant – whether it refers to the members of the Strategic Stakeholders Board, or to stakeholders in general, on an ad hoc basis. This point should be clarified, including the consultation process and, importantly, the weight such consultations would carry in shaping the work programme, if these were general stakeholders.</p> <p>AT (Comments): To AT it is unclear exactly what this process will look like. Who will be consulted and what will these platforms actually look like? AT refers to the</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>same question as already submitted for ECF subgroup on Nov24 as well as for written comments on Nov 11.</p> <p>DE (Comments): Experts from academia and civil society should be represented.</p> <p>ES (Drafting suggestions): 11. The Commission shall in close cooperation with Member States, ensure that stakeholders are consulted in the development of the work programmes, with the creation of one or several thematic platforms per window.</p> <p>LU (Comments): LU comment: Luxembourg supports the idea of thematic platforms and networks. For health, these platforms are essential to maintain and deepen the cooperation structures set up under EU4Health (e.g. joint actions and networks between authorities) and to ensure systematic involvement of public-interest stakeholders.</p> <p>PT (Comments): PT welcomes this clarification, as it opens the possibility for having technological and industrial platforms heard in the process for WP development. Nonetheless, further clarification is needed on the operationalisation of this process,</p>

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	<p>We do not see any reference to Cluster cooperation. 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.</p> <p>Thus, Competitiveness Clusters and similar collaborative structures shall be consulted and involved as relevant stakeholders. Thus, this dimension should be added or clarified.</p> <p>FR (Drafting suggestions):</p> <p>11.</p> <p>FR (Comments):</p> <p>Que signifie le terme « plateforme thématique » ? S'agit-il de sous programmes de travail ?</p> <p>La France demande à ce que l'adoption des programmes de travail en soutien des politiques de défense, du spatial, des industries de sécurité et de résilience suivent une gouvernance et une comitologie spécifiques, qui doivent respecter le rôle central des États membres en matière de défense.</p>
	<p>RO (Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>2. These thematic platforms shall also provide a centralised monitoring interface ensuring visibility and transparency of ECF-funded investments and access to financing by regions, Member States and policy windows, and shall facilitate clarity regarding the conditions and implementation of cumulative funding across Union instruments.</p> <p>RO (Comments):</p> <p>The addition reinforces transparency, monitoring and coordinated access to ECF funding, ensuring that stakeholders and Member States have clear visibility of investments by region, instrument and policy window, while supporting the practical implementation of cumulative funding under different management tools.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p style="text-align: center;"><i>Article 14b</i> ECF InvestEU Instrument governance</p>	<p>IT (Comments):</p> <p>For greater clarity and to draw parallels with the strategic bodies, two separate articles could be created, one for the Investment Committee and the other for the Advisory Board.</p> <p>FR (Comments):</p> <p>Les lignes directrices d’investissement de l’instrument InvestEU devraient être définies par la Commission, les Etats Membres et les partenaires de mise en œuvre au même moment que les priorités sectorielles du fonds et pour l’entièreté de la période de programmation.</p> <p>La délégation soutiendra des prérogatives accrues pour l’Advisory Board d’InvestEU qui devrait être un réel organe de pilotage de l’instrument bénéficiant d’un reporting par instrument et par thématique 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.</p>
<p>5. AA A fully independent Investment Committee shall be established under the ECF InvestEU Instrument (the ‘Investment Committee’).</p>	<p>SE (Comments):</p> <p>SE welcomes the proposed revisions.</p>
<p>6. The composition of the Investment Committee shall ensure that it has a wide knowledge of the sectors and technologies covered by the ECF and a wide knowledge of the geographic markets in the Union and the global value chains, and shall ensure that the Investment Committee as a whole is</p>	<p>SE (Comments):</p> <p>SE welcomes the proposed revisions.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>gender-balanced. The Investment Committee shall perform their duties impartially and in the sole interest of the Competitiveness Fund. The members of the Investment Committee 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.</p>	<p>IT (Drafting suggestions):</p> <p>6. The composition of the Investment Committee shall ensure that it has a wide knowledge of the sectors and technologies covered by the ECF and a wide knowledge of the geographic markets in the Union and the global value chains, skills gap, and shall ensure that the Investment Committee as a whole is gender-balanced. The Investment Committee shall perform their duties impartially and in the sole interest of the Competitiveness Fund. The members of the Investment Committee 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.</p> <p>PL (Drafting suggestions):</p> <p>(6) The composition of the Investment Committee shall ensure that it has a wide knowledge of the sectors and technologies covered by the ECF and a wide knowledge of the geographic markets in the Union and the global value chains, and shall ensure that the Investment Committee as a whole is gender-balanced guarantees appropriate gender and geographical representation. The Investment Committee shall perform their duties impartially and in the sole interest of the Competitiveness Fund. The members of the Investment Committee 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.</p> <p>PL (Comments):</p> <p>PL (Drafting suggestions):</p> <p>In our previous proposal we called for adding the phrase “includes representation from all Member States”. We signal that a more flexible phrase “guarantees appropriate (...) geographical representation” would also work here.</p> <p>BE</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments):</p> <p>We support this proposal</p> <p>FR</p> <p>(Drafting suggestions):</p> <p>The composition of the Investment Committee shall depend on its thematic configuration and ensure that it has a wide knowledge of the sectors and technologies covered by the thematic window of the ECF and a wide knowledge of the geographic markets in the Union and the global value chains, and shall ensure that the Investment Committee as a whole is gender-balanced and representative of the different sectors covered by the EFC.</p> <p>The Investment Committee shall perform their duties impartially and in the sole interest of the Competitiveness Fund. The members of the Investment Committee 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.</p> <p>FR</p> <p>(Comments):</p> <p>Réserve d'examen : Quelles sont les justifications derrière les modifications apportées au paragraphe 6 ?</p> <p>La connaissance de différents secteurs ne constitue pas à elle seule une garantie de bonne priorisation, et il serait utile d'assurer un équilibre de représentativité.</p>
<p>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. The</p>	<p>SE</p> <p>(Drafting suggestions):</p> <p>The Investment Committee shall examine the proposals for financing and investment operations submitted by implementing partners for coverage</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>Investment Committee shall give particular attention to the requirements set out in point (a), (b) and (d) in Article 212(2) of the Financial Regulation.</p>	<p>under the Union guarantee and verify the compliance with the applicable rules of the proposals for financing under the ECF InvestEU Instrument. The Investment Committee shall give particular attention to the requirements set out in point (a), (b) and (d) in Article 212(2) of the Financial Regulation. <u>The Investment Committee should inform the Advisory Board on ECF InvestEU on its decisions and main deliberations.</u></p> <p>ES (Drafting suggestions):</p> <p>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. The Investment Committee shall give particular attention to the requirements set out in point (a), (b) and (d) in Article 212(2) of the Financial Regulation. <u>The Investment Committee shall also duly take into account the Union’s industrial policy objectives and relevant Union industrial legislation.</u></p> <p>FR (Comments):</p> <p>Réserve d’examen : Pourquoi référence n’est-elle pas faite à l’article 212 dans sa globalité au paragraphe 7 ?</p> <p>Les lignes directrices d’investissement de l’instrument InvestEU devraient être définies par la Commission, les Etats Membres et les partenaires de mise en œuvre au même moment que les priorités sectorielles du fonds et pour l’entièreté de la période de programmation.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>7a. The Commission shall establish the detailed rules on selection and composition, remuneration, rules of procedure, conflicts of interest and confidentiality for the Investment Committee.</p>	<p>SE (Drafting suggestions):</p> <p>7a. 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.</p> <p>SI (Drafting suggestions):</p> <p>7a.— The Commission shall establish the detailed rules on selection and composition, remuneration, rules of procedure, conflicts of interest and confidentiality for the Investment Committee.</p> <p>SI (Comments):</p> <p>The members shall not seek or take instructions from the implementing partners, yet the Commission will establish detailed rules of the Committee?!</p> <p>AT (Drafting suggestions):</p> <p>The Commission shall establish the detailed rules on selection and composition, remuneration, rules of procedure, conflicts of interest and confidentiality for the Investment Committee.</p> <p><u>7 (bis) On proposal by the Commission, the Investment Committee shall adopt its rules of procedure upon constitution.</u></p> <p>AT (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>We believe that governing bodies like the Investment Committee should be in a position to vote on their Rules of Procedure in order to ensure inclusive working methods.</p> <p>EE (Drafting suggestions):</p> <p>7a. The Commission shall develop <u>establish</u> the detailed rules on selection and composition, remuneration, rules of procedure, conflicts of interest and confidentiality for the Investment Committee <u>and shall submit these rules for approval of the (representatives of the) Member States.</u></p> <p>EE (Comments):</p> <p>The detailed rules concerning the Investment Committee may be developed and proposed by the Commission but need to be approved by representatives of the Member States, in the most appropriate format related to ECF governance..</p> <p>FR (Drafting suggestions):</p> <p>7a. The Commission shall establish the detailed rules <u>to be adopted by the Council</u>, on selection and composition, remuneration, rules of procedure, conflicts of interest and confidentiality for the Investment Committee.</p> <p><u>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></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p><u>Implementing partners shall fill out the Scoreboard for their proposals for financing and investment operations</u> <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></p> <p><u>The Investment Committee shall use the Scoreboard in its assessment and verification of the proposed financial and investment operations.</u></p> <p><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</u></p> <p>FR (Comments): Compte tenu de l'importance de ce comité, il conviendrait que ses règles et composition soient adoptées par les Etats membres</p>
<p>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</p>	<p>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 of each Member State. The Advisory Board on ECF InvestEU Instrument shall, provide advice on the design of financial products and on</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>representative of the Commission. The representative of the EIB Group shall be the vice-chair.</p>	<p>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</p> <p>NL (Comments): Support addition of EIB Group as vice-chair</p> <p>SE (Comments): SE can accept the proposed revisions.</p> <p>SI (Drafting suggestions):</p> <p>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. The representative of the EIB Group shall be the vice-chair.</p> <p>SI (Comments): What is the foreseen role of the MS in co-chairing ?</p> <p>ES (Drafting suggestions):</p> <p>8. The Advisory Board on ECF InvestEU Instrument shall be composed of one representative of each implementing partner and one representative of</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>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, <u>ensuring alignment with Union industrial and competitiveness priorities</u>. It shall also provide advice on the coordination with the EIC to ensure complementarity with other Union funding or private investments. The Advisory Board shall be chaired by a representative of the Commission. The representative of the EIB Group shall be the vice-chair.</p> <p>ES (Comments): It is essential that financial criteria do not displace strategic industrial objectives. It ensures a balance between risk–return considerations and European productive capacity.</p> <p>PT (Comments): For the purpose of clarity, we would recommend placing the advisory board to ECFInvestEU in a separate article,</p> <p>EE (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. The representative of the EIB</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>Group and representative of the other implementing partners shall be the vice-chairs.</p> <p>EE (Comments):</p> <p>In order to provide for balanced representation of all implementing partners, representation of, it is appropriate that a representative of the implementing partners outside the EIB will be the other vice chair of the Advisory Board of the InvestEU Instrument.</p> <p>FR (Drafting suggestions):</p> <p>he Advisory Steering Board on ECF InvestEU Instrument shall be composed of one representative of each implementing partner and one representative of each Member State. †The Advisory Steering Board on ECF InvestEU Instrument shall, <u>annually oversee the performance and impact of financial instruments—including blending operations—with a focus on leverage effects and private capital mobilization. The steering board shall provide a consolidated oversight of the ECF InvestEU deployment and outcomes with the other programs to ensure complementarity with other Union funding and overall coherence and financial performance of the MFF. The steering board shall also oversight the reflows management including revenue, repayments and recoveries from financial instruments as well as any surplus of provisions for the budgetary guarantees funded from this Regulation, its predecessor. An annual reflows statement will be provided to the ECF strategic steering board.</u></p> <p>FR (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>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’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.</p> <p>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.</p> <p>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 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.</p> <p>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.</p>
<p>9. The Commission shall establish the detailed rules on selection and composition, remuneration, rules of procedure, conflicts of interest and</p>	<p>SE (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>confidentiality for the Investment Committee and for the Advisory Board on ECF InvestEU Instrument.</p>	<p>SE can accept the proposed revisions.</p> <p>AT (Drafting suggestions):</p> <p>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 for the Advisory Board on ECF InvestEU Instrument. <u>On proposal by the Commission, the Advisory Board on ECF InvestEU Instrument shall adopt its rules of procedure upon constitution.</u></p> <p>AT (Comments):</p> <p>We believe that governing bodies like the Advisory Board on ECF InvestEU Instrument should be in a position to vote on their Rules of Procedure in order to ensure inclusive working methods.</p> <p>DE (Drafting suggestions):</p> <p>9. The Commission shall establish the detailed rules <u>on selection and composition, remuneration, rules of procedure, conflicts of interest and confidentiality for the Investment Committee and</u> the Advisory Board on ECF InvestEU Instrument.</p> <p>DE (Comments):</p> <p>We did not understand why this kind of rules (confidentiality, remuneration etc.) mentioned in the original text are not relevant in these circumstances. By contrast, the rules of procedure should be set up by the committees themselves. We would therefore like to stick to our text proposal.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>EE (Drafting suggestions):</p> <p>9. The Commission shall selection and composition, remuneration, rules of procedure, conflicts of interest and confidentiality for the Investment Committee and develop establish the detailed rules on selection and composition, remuneration, rules of procedure, conflicts of interest and confidentiality for the Investment Committee and and shall submit these rules for approval of the (representatives of the) Member States.</p> <p>EE (Comments):</p> <p>The detailed rules concerning the Advisory Board on ECF InvestEU Instrument may be developed and proposed by the Commission but need to be approved by representatives of the Member States, in the most appropriate format related to ECF</p> <p>FR (Drafting suggestions):</p> <p>The Commission shall, by means of implementing acts, establish the detailed rules on selection and composition and remuneration for the Investment Committee and the Advisory Board on ECF InvestEU Instrument. The Commission shall jointly establish the detailed rules of procedure, conflicts of interest and confidentiality for the Investment Committee and the Advisory Board on ECF InvestEU Instrument. <u>Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 83(3).</u></p> <p>FR (Comments):</p> <p>Le Conseil devrait être associé à la définition de la composition du Comité et du Conseil d'administration ainsi qu'aux dispositions y afférentes,</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	notamment en garantissant une procédure de réexamen pour l'adoption de l'ensemble de ces dispositions.
<p>10. The Commission and Implementing partners shall establish regular Policy Review Dialogues with each implementing partner to discuss progress with the implementation of the financial products and engage on relevant policy developments.</p>	<p>CZ (Drafting suggestions): 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.</p> <p>SE (Comments): SE can accept the proposed revision.</p> <p>LU (Drafting suggestions): 10. The Commission shall establish regular Policy Review Dialogues with each implementing partner to discuss progress with the implementation of the financial and advisory products and engage on relevant policy developments.</p> <p>FR (Drafting suggestions): 10. The Commission and Implementing partners shall establish annual regular Policy Review Dialogues with each implementing partner to discuss progress with the implementation of the financial products and engage on relevant policy developments.</p> <p>The Commission and Implementing partners shall establish regular annual Policy Review Dialogues with each implementing partner to discuss</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>progress with the implementation of the financial products and engage on relevant policy developments.</p> <p>FR (Comments): Quelle est la fréquence de ces dialogues ?</p>
<p>Chapter II ECF TOOLBOX</p>	

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p style="text-align: center;">SECTION 1 GRANTS, PROCUREMENT AND INDUSTRIAL POLICY COORDINATION TOOLS</p>	<p>IT (Comments):</p> <p>Further clarification is needed.</p> <p>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?)</p> <p>FR (Drafting suggestions):</p> <p>SECTION 1 Grants, procurement and sectoral policies industrial policy coordination tools</p> <p>FR (Comments):</p> <p>L'industrie n'est pas le seul secteur économique concerné par cette section, dont le titre devrait être élargi en ce sens</p>

Article 15
Work Programmes

LV

(Comments):

In Article 15 on work programmes, we would support the inclusion of an award criteria that aims to spread the benefits of competitiveness and innovation across the whole Union in an inclusive way by raising the overall level of scientific and innovation excellence in the Union.

MT

(Comments):

Malta strongly supports the extension of the examination committee procedure to all work programmes under the ECF.

IT

(Comments):

The same issues identified on Recital 50 apply here. Furthermore, it is proposed to introduce a “no opinion clause” in Article 15, which would prevent the Commission from adopting implementing acts if the Committee has not expressed an opinion.

PT

(Comments):

Clarification is still needed on work programmes:
Is it envisaged one work programme per policy window? Will they be multiannual or annual?
What role is reserved for Member States in the design and adoption of the work programmes?

FR

(Comments):

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>La délégation pourra soutenir que les dispositions de cet article prennent en compte les spécificités des activités de l'article VII. Les autorités françaises pourront également demander que les critères d'éligibilité et d'attributions établis dans les programmes de travail le soient conformément aux articles 9, 9a, 51 et 53.</p> <p>La délégation pourra rappeler que le fonctionnement en programmes de travail pour chaque fenêtre thématique, ainsi que pour chaque objectif associé, devra être encadré de manière à être cohérent avec les dispositifs déjà en place et devrait s'appuyer autant que possible sur les bonnes pratiques existantes dans d'autres règlements (Horizon Europe par exemple).</p>
	<p>FR (Drafting suggestions):</p> <p>The work programmes may set out <u>for the entire budget period with a year breakdown:</u></p>
<p>1. The work programmes mayshall set out:</p>	<p>IT (Drafting suggestions):</p> <p>1. The work programmes, <u>whose strategic priorities shall be defined through the involvement of Member States,</u> mayshall set out:</p> <p>IT (Comments):</p> <p>Ensuring the involvement of Member States in defining the strategic priorities of the work programmes is pivotal.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>PT (Comments): We welcome the change from “may” to “shall”, which makes the clear definition of work programmes mandatory.</p> <p>EE (Drafting suggestions): 1. The work programmes may be multiannual or annual, and mayshall set out:</p> <p>EE (Comments): In order to provide for predictability of the ECF calls for proposals and their priorities for the coming years (and, consequently, enable to prepare higher quality applications and thus contribute to higher effectiveness and impact of the ECF), multiannual Work Programmes should lay out the mid-term plans for ECF implementation, The annual Work Programmes should specify the relevant aspects within the framework in more detail.</p> <p>FR (Drafting suggestions): The work programmes mayshall set out, <u>based on recommendations by the ECF General Committee:</u></p> <p>FR (Comments): X</p>
(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;	<p>MT (Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(a) actions and associated budget from ECF as well as <u>collaborative research and innovation activities and their dedicated budget set out in separate work programmes;</u> actions set out in the specific dedicated part of the work programmes indicated in paragraph 2;</p> <p>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 reiterate our call for adoption of synergistic, but separate work programmes for both Horizon Europe and ECF.</p> <p>SK (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;</p> <p>SK (Comments): The work programmes for collaborative R&I activities shall be independent.</p> <p>DE (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>the work programmes shall set clear priorities on which areas contribute most effectively and efficiently to the objectives of this programme.</u></p> <p>DE</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments):</p> <p>The work programmes should set clear priorities, particularly with regard to key strategic technologies and activities. DE’s priorities are based, among other things, on Germany’s High-Tech Agenda. Fact-based evaluations provide important points of reference – e.g. the risk analyses carried out as part of the economic security strategy. Consistency between the work programmes in individual areas is also crucial. Further information is also needed on the role of the Competitiveness Coordination Tool.</p> <p>ES</p> <p>(Drafting suggestions):</p> <p>(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;</p> <p>ES</p> <p>(Comments):</p> <p>The work programmes for collaborative R&I activities shall be independent.</p> <p>HR</p> <p>(Drafting suggestions):</p> <p>HR:</p> <p>HR suggest additional amendment:</p> <p><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></p>
	<p>BE</p> <p>(Drafting suggestions):</p> <p><u>(aa)The work programme shall clearly indicate the Technology Readiness Levels (TRLs) to which each call applies.</u></p> <p>BE</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments):</p> <p>Mentioning TRLs is important to ensure transparency and provide guidance to applicants. Amendments are proposed accordingly to recital 50.</p>
<p>(b) instruments and form of funding;</p>	<p>FR</p> <p>(Drafting suggestions):</p> <p>instruments and form of funding; when it comes to financial instruments it shall be decided based on the advice of implementing partners.</p> <p>FR</p> <p>(Comments):</p> <p>Étant donné que les programmes de travail déterminent le choix de la forme de financement ainsi que les contributions additionnelles des volets thématiques à l'instrument InvestEU, la délégation pourra soutenir que les partenaires financiers de l'instrument InvestEU (via leur intégration au SSB par exemple) ainsi que le Steering Board de l'instrument soit consultés dans l'élaboration de ces programmes. Des sous-groupes de travail pour la garantie et les instruments financiers qui associent les parties prenantes de cet instrument pourraient également être établis.</p>
<p>(c) eligibility and, where applicable, award criteria;</p>	<p>SE</p> <p>(Drafting suggestions):</p> <p>eligibility and, where applicable, award criteria;</p> <p>SE</p> <p>(Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>SE considers that award criteria should always be applicable, or that this article should explicitly spell out any areas where a derogation is necessary. See also comment under Article 9a.</p> <p>DE (Drafting suggestions): eligibility and, where applicable, award criteria;</p> <p>DE (Comments): See our Comment in Art. 9a.</p> <p>FI (Drafting suggestions): (c) eligibility and, where applicable, additional award criteria as to those set out in the article 9a;</p> <p>FR (Drafting suggestions): (c) eligibility and, where applicable, award criteria as set out in articles 9, 9a and 51;</p> <p>FR (Comments): Comme évoqué précédemment, les critères d'éligibilité et de sélection doivent être détaillés dans le règlement. Le programme de travail peut seulement les préciser et les spécifier si besoin.</p> <p>La France souligne que les critères d'éligibilité établis dans ce Règlement (articles 9, 9a, 51 et 53 pour l'industrie de la défense) représentent des exigences minimales qui ne peuvent être modifiées par les programmes de</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	travail, que pour augmenter progressivement les seuils de composants européens dans le produit final.
<p>(d) a single co-financing rate per action for actual cost grants;</p>	<p>ES (Drafting suggestions): (d) a single co-financing rate per action for actual cost grants;</p> <p>ES (Comments): Funding from the EU. It is clearer and in coherence with changes in Horizon Europe.</p> <p>HR (Comments): <u>HR comment: A single co-financing rate makes it harder for less developed Member States to secure the national funding they need. This is different from cohesion policy, where co-financing rates are adapted to regional realities. In Cohesion Policy Funds, co-financing rates are adjusted to the development level of regions and the type of intervention, so that less developed Member States and regions can compete on equal terms and successfully deliver investments. If ECF stays too rigid, some strong projects might not go ahead simply because the own-contribution is too high and that would limit participation and run against the idea of balanced development across the EU. HR question: How will flexibility be ensured for less developed Member States if work programmes apply a single co-financing rate per action, given differing fiscal capacities, cost structures and market maturity across the EU? Could differentiated rates (e.g., by region, beneficiary type, etc) be allowed to maintain accessibility and avoid excluding otherwise high-quality projects?</u></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
(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;	<p>FR (Drafting suggestions): rules applicable to actions concerning more than one specific objective, <u>within each policy window or component</u> ;</p> <p>FR (Comments): La délégation pourra soutenir un encadrement de ce point pour les activités du Chapitre 7</p> <p>Quelle est la signification du mot « règle » dans le cadre de cette disposition ? Quelles seraient les implications pour la sécurité et la défense ?</p>
(g) actions to which specific rules apply, in particular on ownership, exploitation and dissemination, transfer and licensing as well as access rights to results;	<p>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>within each policy window or component</u>,</p> <p>FR (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>Les autorités françaises souhaitent s’assurer que les mesures spécifiques crantées dans les articles issus des chapitres spécifiques ne puissent pas être remises en question.</p>
<p>(h) actions which benefit from the mechanisms set out in Article 20;</p>	<p>CZ (Drafting suggestions):</p> <p>(h) actions which benefit from the mechanisms set out in Article 20, <u>and, in order to foster flexibility, responsiveness and the optimization of Europe's potential in addressing emerging needs and opportunities, actions that allow for the possibility of the inclusion of additional beneficiaries during the course of their implementation</u></p> <p>CZ (Comments):</p> <p>CZ – in certain identified areas/topics of the work programmes (fiches) and when/where appropriate and justified, there should be a possibility to extend the consortium by including an additional partner during the implementation of the action (accompanied in work programme by clear rules and mechanisms). We do request amending Art. 15 para 1 with explicit statement. It may be also noted that such amendment would represent another element of flexibility, which is in line with the rationale and objectives behind Art. 17-20.</p>
	<p>PT (Drafting suggestions):</p> <p>Add a new paragraph: <u>The work programmes under this Regulation shall establish actions to which the award criteria should positively discriminate, in the context of merit assessment, consortia that include entities based in a Member State with a development level below 90% of the European average.</u></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>PT (Comments):</p> <p>We believe that ensuring geographically 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.</p>
<p>(ha) where applicable, the possibility to award a Competitiveness Seal as referred to in Article 8, and additional conditions if any.</p>	<p>BE (Comments):</p> <p>We refer to our comment on article 8: We support an EU-level evaluation of projects to be awarded the Competitiveness Seal, as this ensures a genuine level playing field across Member States. It is important to avoid a situation in which nationally validated projects would automatically be deemed eligible for, or automatically granted, the Competitiveness Seal without Union-level assessment.</p>
	<p>IT (Drafting suggestions):</p> <p>i) Skills gap analyses</p>
<p>1a. The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2) and the horizontal activities referred to in Chapter III.</p>	<p>SE (Comments):</p> <p>SE welcomes the added paragraph.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 83(3).</p>	<p>AT (Comments): For AT it is positive, that the examination procedures are applied. It is also positive, that all horizontal measures are included. However, reference may also be made to the demand for a “no opinion, no action” (NONA) examination (already submitted for ECF subgroup on Nov24 as well as for written comments on Nov 11).</p> <p>ES (Drafting suggestions): 1a. The Commission shall, by means of implementing acts, adopt the work programmes implementing all the specific objectives referred to in Article 3(2) and the horizontal activities referred to in Chapter III. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 83(3).</p> <p>ES (Comments): We consider it important to stress that all the specific objectives are adequately covered in the work programmes, including those with a specific societal impact such as the resilience of healthcare systems and public health.</p> <p>PT (Comments): PT welcomes and supports this change.</p> <p>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) and the horizontal activities referred to in Chapter III. There shall be</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p><u>specific and fully separate work programmes for each policy window sub-topic as set out in article 3.2. Those work programmes shall be adopted in the relevant committee configuration as set out in article 83.</u> 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 the third subparagraph of Article 5(4) of Regulation (EU) No 182/2011 shall apply.</u></p> <p>FR (Comments):</p> <p>Les autorités françaises demandent à faire apparaitre clairement que les programmes de travail soient adoptés de manière différenciée pour chaque volet des policy windows, ceci afin d’assurer la prévisibilité de financement desdites politiques.</p> <p>Les autorités françaises souhaitent par ailleurs qu’une clause de non-opinion soit ajoutée.</p>
	<p>SI (Drafting suggestions):</p> <p><u>1a. In the case of the implementing acts to be adopted 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.</u></p> <p>SI (Comments):</p> <p>SU supports the introduction of the no-opinion clause.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>2. The work programmes under this Regulationparagraph 1a shall integrate in a specific dedicated part the collaborative research and innovation activities referred to Article 15 (3) of [Horizon Europe], and their dedicated budget.</p>	<p>SE (Comments): SE welcomed the added clarity provided for in the proposed revisions. SE reminds about its scrutiny reservation under general comments above and calls for further clarifications regarding the proposed governance structure and possible consequences thereof. It is still not clear how the ECF comitology procedure and work programme rules will apply on and impact research and innovation.</p> <p>SK (Drafting suggestions): 2. — The work programmes under this Regulationparagraph 1a shall integrate in a specific dedicated part the collaborative research and innovation activities referred to Article 15 (3) of [Horizon Europe], and their dedicated budget.</p> <p>SK (Comments): SK support SI that collaborative R&I activities should be set and adopted under the Horizon Europe work programme.</p> <p>SI (Drafting suggestions): 2. — The work programmes under this Regulationparagraph 1a shall integrate in a specific dedicated part the collaborative research and innovation activities referred to Article 15 (3) of [Horizon Europe], and their dedicated budget.</p> <p>SI (Comments): SI is of the position that collaborative R&I activities are set and adopted under the HE work programme.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>DE (Drafting suggestions):</p> <p>2. The work programmes under paragraph 1a shall integrate in a specific dedicated part the collaborative research and innovation activities referred to <u>in</u> Article 15 (3) of [Horizon Europe], and their dedicated budget. <u>For the discussion of this part, dedicated subconfigurations of the programme committee of each policy window will be established. The ECF work programmes shall also set out policy priorities that will be taken into account when developing EIC challenges.</u></p> <p>DE (Comments):</p> <p>Separate subconfigurations are required for discussions on R&I parts of the policy windows' work programmes. Relevant MS representatives, who can assess the research needs and the current state of research, must be involved in the decision-making process. This requires sub-configurations of the thematic programme committees on R&I.</p> <p>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). The EIC Challenges shall be developed by the responsible mechanisms / committees of Horizon Europe / EIC but take the priorities of the Policy Windows into account.</p> <p>ES (Drafting suggestions):</p> <p>2. There shall be work programmes under this Regulation paragraph 1a shall integrate in a specific dedicated part <u>dedicated to the</u> collaborative research and innovation activities referred to Article 15 (3) of [Horizon Europe], and their dedicated budget.</p> <p>ES</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments):</p> <p>Collaborative research and innovation activities shall have their own work programme for each policy window.</p> <p>FR</p> <p>(Drafting suggestions):</p> <p>2. The work programmes under this Regulation paragraph 1a shall integrate in a specific dedicated part the collaborative research and innovation activities referred to Article 15 (3) of [Horizon Europe], and their dedicated budget.</p> <p><u>Each specific dedicated part must be discussed and adopted in a specific configuration of the most relevant programme committee.</u></p> <p><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></p> <p>FR</p> <p>(Comments):</p> <p>Il est important de disposer d'une vue indicative 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.</p> <p>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 ?</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>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.</p>
<p>2a. The work programmes under this Regulation shall describe in a specific dedicated part how they aim to support SMEs, including taking into account Article 29.</p>	<p>SE (Comments): SE can accept the added paragraph.</p> <p>SI (Drafting suggestions): 2a. The work programmes under this Regulation shall describe in a specific dedicated part how they shall aim to support SMEs, including taking into account Article 29.</p> <p>ES (Comments): Collaborative research and innovation activities shall have their own work programme for each policy window, that should include specific activities for SMEs.</p> <p>IT (Comments): It is also essential to increase (at least double) the current allocation for advisory activities, outside the windows, dedicated to the strategic advisory service and support networks for SMEs (art.27).</p> <p>LU (Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>2a. The work programmes under this Regulation shall describe in a specific dedicated part how they aim to support SMEs <u>across all sectors of the economy</u>, including taking into account Article 29.</p> <p>PL (Drafting suggestions):</p> <p>2a. The work programmes under this Regulation shall include a dedicated section describing how they aim to support SMEs, taking into account Article 29. This section shall include a provision stating the percentage of the budget of a particular work programme allocated to SMEs, which shall be no less than X%, separate from any allocations under InvestEU.</p> <p>PL (Comments):</p> <p>PL (Drafting suggestions): Previous drafting round revealed that an addition to this effect has been submitted by a number of MSs (RO, MT, PL) and has some support. We submit an alternative wording to signal openness to ironing out the details – continued discussion on this issue is warranted in our view.</p> <p>PT (Comments): We regret that ES proposal for having separate WP for collaborative R&I activities was not considered in the changes introduced. PT reiterates its support to this approach.</p> <p>The requirement that the work programmes include a dedicated section on SME support represents a relevant development. Such dedicated part will only contain support actions available to SMEs?</p>
	<p>DE (Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p><u>2b. Duration of the work programmes shall be limited, at a maximum to the duration of the MFF (2028-2034) With regard to space, each (sub-)component shall have a separate work programme not exceeding two years' duration.</u></p> <p>DE (Comments):</p> <p>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.</p> <p>In line with the parallel legislative competence, the Union and Member States enjoy under the EU treaties, Member States require an important role in co-steering the work programmes of the space (sub)components, their adoption, budgets, budgetary implementation etc.</p>
<p>3. The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2), points (a), (b), (c) and (d) and for the horizontal activities in Chapter III. Those implementing acts shall be adopted in accordance with the advisory procedure referred to in Article 83(2).</p>	<p>SE (Comments):</p> <p>SE welcomes the shift to examination procedure for all policy windows.</p>
<p>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).</p>	
	<p>SK (Drafting suggestions):</p> <p><u>4a. In the case of the implementing acts to be adopted under Article 15(4) where the Committee delivers no opinion, the Commission shall</u></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>not adopt the draft implementing act and the third subparagraph of Article 5(4) of Regulation (EU) No 182/2011 shall apply.</p>
<p>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.</p>	<p>SE (Comments): SE supports the deletion of this paragraph.</p> <p>AT (Comments): AT wants the former (and now deleted) Art. 15/5 to be reintroduced (comments already submitted for ECF subgroup on Nov24 as well as for written comments on Nov 11).</p>
	<p>DE (Drafting suggestions): <u>4a. The Commission shall adopt by means of implementing acts the decision on the approval of the funding of actions involving the use of human embryos and human embryonic stem cells. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article XX.</u></p> <p>DE (Comments): The Member States must be involved in the review process for research with human embryonic stem cells (hESC) 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. The comment also applies to Article 7 (1a) and Article 9</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>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).</p>	<p>NL (Comments): NL is not yet convinced of the necessity for this possibility under the ECF, given it is a long term investment fund and not a crisis instrument. In addition, the definition of crisis or other similar exceptional and duly substantiated emergencies is not sufficiently delineated. Can the Commission clarify the purpose of this Article and in what kind of situations the Commission might use it?</p> <p>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).</p> <p>SI (Comments): Not sure if the crisis and other emergencies are duly defined and justified. 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.</p> <p>AT (Comments): AT refers to the comments submitted for ECF subgroup on Nov24 as well as for written comments on Nov 11).</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>DE (Drafting suggestions):</p> <p>. 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 examination procedure shall apply according to Article 8 (4) of Regulation (EU) No 182/2011</u></p> <p>DE (Comments):</p> <p>There should at least be an effective retrospective control by MS.</p> <p>ES (Drafting suggestions):</p> <p>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, <u>including public health emergencies, natural disasters or severe economic security disturbances</u>, 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>In such cases, the Commission shall provide a written justification for the use of the urgency procedure and shall consult the chair of the Committee referred to in Article 83(1) prior to adoption. The use of this procedure shall be limited to actions whose total amount does not exceed [x]% of the annual budget of the Fund. The programme committee shall be duly and timely informed.</u></p> <p>ES (Comments):</p> <p>The amendment clarifies that the urgency procedure should be used only in clearly defined exceptional situations, which are also listed, and introduces</p>

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	<p>basic safeguards—a written justification, prior consultation of the committee chair, and a budgetary limit. We believe this approach strikes an appropriate balance between flexibility and the need to ensure accountability and proportionality while preserving Member States’ oversight.</p> <p>IT (Comments): At a minimum, the Commission should describe the reasons for urgency in order to justify its action, providing elements of transparency to the Member States.</p> <p>FR (Drafting suggestions): ——— 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).</p> <p>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?</p>
	<p>LU (Drafting suggestions): Work programmes covering the ‘Health, Biotechnology, Agriculture and Bioeconomy’ window shall include a dedicated section for public-health-</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>oriented activities, in particular prevention and health promotion, health-systems strengthening, preparedness for serious cross-border threats to health and support to health NGOs and civil-society actors.</p> <p>LU (Comments):</p> <p>LU comment:</p> <p>To avoid that public-health-oriented actions are diluted, Luxembourg proposes a specific public-health section in the relevant work programmes. This is important to ensure support for public health and to give visibility and predictability to health promotion, prevention, health-systems strengthening and NGO support.</p> <p>PL (Drafting suggestions):</p> <p>(7) The ECF shall maintain sufficient flexibility to support projects and work programmes based on smart specialisations relevant to all Member States and regions. Specific mechanisms, including thematic reserves, simplified procedures, application support, and widening measures, shall be established to guarantee pan-European relevance of the ECF intervention.</p> <p>PL (Comments):</p> <p>PL (Drafting suggestions): In a similar vein to the proposal regarding Article 3(1)(kb), we suggest building on the language proposed by SI and well received at our meetings on 24-Nov and 26-Nov (“guaranteeing pan-European relevance of ECF interventions”). This specific provision proposes a possible operationalisation of the principle of pan-European relevance.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p style="text-align: center;"><i>Article 16</i> Single Market value chains builder</p>	<p>SE (Comments): SE is generally doubtful of the need for industrial policy tools which involves deviations from important principles such as competitive calls for proposals and openness. Important to promote long-term competitiveness over short term industrial support, as well as not distorting the Single Market. Any such tools must be accompanied by clear award criteria that ensures that support is directed towards areas where there is a clear de-risking need, and in a way that supports innovation.</p> <p>PT (Comments): Articles 16–18 – Industrial Policy Tools, Testing and Scaling-Up Clarify eligibility and modalities for health-system testing, digital-health solutions and crisis-preparedness tools (aligned with EU4Health and HERA). Outermost regions require bespoke modalities for piloting due to infrastructural limitations.</p> <p>FR (Comments): Comment ces actions s’intègrent-elles dans le fonctionnement des programmes de travail ? Quelle sont les modalités de fonctionnement et la composition des comités d’évaluation ? Quels sont les co-financements associés à cette initiative ? Quel est le régime d’aide d’Etat applicable ? La Commission peut-elle préciser le champs compris comme « value chains building » qui pourraient bénéficier d’appels à projets spécifiques et donner des exemples.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>EL (Comments): General comment applicable to Articles 16–20. Agree in principle; request further clarification on complementarities between EIC Fund – ECF InvestEU and STEP / InvestEU tolos. Ensure consistency with EU Industrial Policy.</p>
<p>1. In order to foster resilient Union value chains, the work programmes may for strategic sectors 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 that can contribute to the Union’s resilience and economic security by strengthening and safeguarding critical Union value chains and diversifying sources of supply.</p>	<p>CZ (Comments): <i>CZ strongly believes that significant changes to this chapter are much needed.</i> · <i>First of all, the level of detail with regard to the procedural rules must be higher in order to strengthen legal certainty as to the application of these provisions. Secondly, Member States should be more directly involved in the implementation of these provisions. This could be for example achieved by an introduction of a new specific reporting obligation for the Commission to the ECF General Committee.</i> · <i>Lastly, we believe that these provisions should have a strong role in ensuring the balanced success of the ECF across the Union. Thus, we genuinely believe that there is a need to come back to the discussion of these provisions after the decision on the geographical balance within the negobox.</i></p> <p>SE (Drafting suggestions): 1. In order to foster resilient Union value chains, the work programmes may for strategic sectors 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 that can contribute</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>to the Union’s resilience and economic security by strengthening and safeguarding critical Union value chains and diversifying sources of supply <u>while not distorting the single market and safeguarding openness through rules-based trade.</u></p> <p>SE (Comments): SE welcomes the fact that the scope of the article is now more limited but continues to call for it to be made clear that the internal market should not be distorted.</p> <p>RO (Comments): RO underlines the added value of diversifying the sources of supply, production or innovation to include all MS, especially those currently not included in the traditional value chains. How can EFC ensure that value chains scale up calls include entities from less-developed regions? <i>Strategic sectors and critical value chains</i> should be defined.</p> <p>DE (Drafting suggestions): 1. In order to foster resilient Union value chains, the work programmes may for strategic sectors include dedicated value-chains scale up calls that can contribute <u>without disturbing competition in the single market</u> to the Union’s resilience and economic security by strengthening and safeguarding critical Union value chains and diversifying sources of supply. <u>This shall only be done when a market failure needs to be addressed.</u></p> <p>DE (Comments): We need to focus on strategic sectors where clear barriers for the creation of resilient value chains exist. We might add in a recital the explanation that</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>price differences between different suppliers or regions of suppliers do not constitute a market failure on their own.</p> <p>FR (Drafting suggestions):</p> <p>In order to foster resilient Union value chains, the work programmes may for strategic sectors 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 that can contribute to the Union’s resilience, <u>sovereignty</u>, and economic security by strengthening and safeguarding critical Union value Chains, <u>notably from the risks associated with dependencias and unauthorized Access by third-country authorities</u>, and diversifying sources of supply</p> <p>FR (Comments):</p> <p>Quels sont les ressources et mécanismes de financements associés à cet article ? Dans le cas où cette initiative inclut du mixage, comment la gouvernance de l’instrument InvestEU sera-t-elle mobilisée ?</p>
<p>1a. Single Market Value Chains builder calls 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.</p>	<p>NL (Drafting suggestions):</p> <p>1a. Single Market Value Chains builder calls shall support both project preparation and crowding in of additional public and, <u>in particular</u>, private capital to integrate suppliers, manufacturers, and innovators from different Member States and diversify sources of supply.</p> <p>SI</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>1a. Single Market Value Chains builder calls 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.</p> <p>SI</p> <p>(Comments):</p> <p>Why do we intend to support project preparation only within this instrument?</p> <p>AT</p> <p>(Drafting suggestions):</p> <p>Single Market Value Chains builder calls shall support both project preparation and crowding in of additional, <u>especially</u> public and private capital, as well as crowding in public funding in a proportionate manner to integrate suppliers, manufacturers, and innovators from different Member States and diversify sources of supply.</p> <p>AT</p> <p>(Comments):</p> <p>We believe that private and public capital should not be treated equally, and special emphasis should be put on the mobilization of private capital. Could you please align language with the new wording in Art. 3c, objectives?</p> <p>DE</p> <p>(Drafting suggestions):</p> <p>1a. Single Market Value Chains builder calls 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. For the implementation, open, competitive and transparent calls shall be published.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>SK (Drafting suggestions):</p> <p><u>2. The Commission shall facilitate pan-European integration of value chains, including by promoting internationally diverse composition of consortia.</u></p> <p>EL (Drafting suggestions):</p> <p><u>2. The Commission shall facilitate EU integration of value chains, including composition of consortia</u></p> <p>EL (Comments):</p> <p>Promotes cross-border industrial cooperation and inclusion of actors from all Member States, strengthening EU value chain resilience and reducing regional innovation gaps.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p style="text-align: center;"><i>Article 17</i> EU Tech frontrunners</p>	<p>PT (Comments): PT would like to revise this article after the questions regarding geographical balance are dealt with in the MFF ad hoc WP.</p> <p>FR (Comments): L’initiative EU Tech Front Runner apparaît comme un bon complément industriel, davantage orienté vers l’aspect appliqué de l’EIC. C’est une démarche positive. Néanmoins ces dispositions appellent quelques questions : quelle articulation entre EU Tech Frontrunners et les programmes européens déjà consacrés à l’innovation comme l’EIC ? Comment ces actions s’intègrent-elles dans le fonctionnement des programmes de travail ? Quelle sont les modalités de fonctionnement et la composition des comités d’évaluation ? Quels sont les co-financements associés à cette initiative ? Quel est le régime d’aide d’Etat applicable ?</p>
<p>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 partners and 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.</p>	<p>LV (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 with a minimum share of SMEs in consortia along with their European SME partners and 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.</p> <p>LV</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments):</p> <p>This addition ensures that small and medium-sized enterprises (SMEs) are not merely passive suppliers to large technology leaders, but active participants in innovation consortia. By including a requirement for a minimum share of SMEs, it promotes inclusive participation and ensures that SMEs genuinely benefit from ECF support. This helps strengthen SME competitiveness in practice, rather than just mentioning them theoretically as cooperation partners.</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>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 partners and suppliers through investments in new innovative solutions and ideas and identification of relevant partners. Project preparation as well as crowding in of additional public and, in particular, private capital may be supported.</p> <p>NL</p> <p>(Comments):</p> <p>In order to strengthen the innovative character of this concept.</p> <p>SE</p> <p>(Comments):</p> <p>SE can accept the proposed revisions.</p> <p>RO</p> <p>(Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>In order to reduce innovation gap between MS, RO supports stimulating partnerships between well-established industry-driven consortia and SME from MS less advanced in tech area. Partnerships with this kind of participation should have a special treatment.</p> <p>SI (Drafting suggestions):</p> <p>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 partners and suppliers <u>as well as academic R&I partners</u> 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.</p> <p>AT (Drafting suggestions):</p> <p>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, <u>especially public and private capital, as well as crowding in public funding in a proportionate manner</u> may be supported.</p> <p>AT (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>We believe that private and public capital should not be treated equally, and special emphasis should be put on the mobilization of private capital. Could you please align language with the new wording in Art. 3c, objectives?</p> <p>DE (Drafting suggestions):</p> <p>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. <u>Projects supported under this Article should entail high-risk or an outstanding innovation potential.</u></p> <p>DE (Comments):</p> <p>We need further guardrails for these projects.</p> <p>FI (Drafting suggestions):</p> <p>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 partners and suppliers through investments in R&I, new solutions and identification of relevant partners. <u>Support for the EU Tech Frontrunners will also include Horizon Europe funding linked to the ECF.</u> Project preparation as well as crowding in of additional public and private capital may be supported.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>FI (Comments): EU Tech Frontrunners instrument needs to include also RDI funding whether through ECF or designing the instrument to operate at the interface of Horizon and ECF.</p> <p>IE (Comments): IE welcome the rewording to allow SMEs to be project partners as well as suppliers, which we consider reflects the very strong capability of Europe's SMEs.</p> <p>BE (Drafting suggestions): 1. The work programmes may include dedicated two-stage bottom-up award procedures to identify and support EU Tech frontrunners through industry-driven consortia leveraging on their role as innovation and export drivers to strengthen their global competitive position along with their European SME partners and suppliers through investments in new solutions, investments in development and innovation and identification of relevant partners. Project preparation as well as crowding in of additional public and private capital may be supported.</p> <p>FR (Drafting suggestions): 1 The work programmes may include dedicated two-stage bottom-up award procedures to identify and support EU Tech frontrunners through businessindustry-driven consortia leveraging on their role as innovation and export drivers to strengthen their global competitive position along with their</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>European SME partners and 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.</p> <p>FR (Comments): La délégation pourra soutenir une inscription dans le règlement des critères d’attribution décrits dans la fiche technique.</p> <p>Proposition rédactionnelle pour couvrir au-delà de l’industrie l’ensemble des secteurs du FEC</p>
	<p>IT (Drafting suggestions): <u>1a. In this context, the Commission may also establish thematic platforms or European incubators dedicated to emerging technologies, including a European incubator for AI inspired to the CERN model, in order to facilitate collaboration between frontrunner companies, SMEs, research organisations, and investors, and accelerate the deployment of breakthrough innovations across the Union.</u></p>
<p>2. At the first stage, an open, competitive and transparent 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.</p>	<p>NL (Drafting suggestions): 2. At the first stage, an open, competitive and transparent call for expression of interest for goods, works or services, <u>including research and innovation activities</u>, 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.</p> <p>NL (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>Support changes made by Presidency. R&I activities should be possible so as to strengthen the innovative character of this concept.</p> <p>SE (Comments): SE welcomes the proposed revisions.</p> <p>IE (Drafting suggestions): 1. At the first stage, an open, competitive and transparent call for expression of interest for goods, works or services that might contribute to Union competitiveness in general, address specific market failures or in a specified sector, may be published without specification of the kind of activities or the instrument of budget implementation to be used.</p> <p>IE (Comments): IE welcome the reference to a competitive and transparent process IE suggested text amendment - to focus on addressing market failures.</p> <p>PT (Comments): PT welcomes and supports the inclusion of competitive and transparent.</p> <p>BE (Comments): We support these additions</p> <p>FR (Comments): Comment ce nouveau mécanisme serait-il structuré ?</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>3. At the second stage, analysis and crowding in of additional public and private capital shall be supported.</p>	<p>NL (Drafting suggestions): 3. At the second stage, analysis and crowding in of additional public and, in particular, private capital shall be supported.</p> <p>NL (Comments): Need a hierarchy, private capital needs to be the primary objective.</p> <p>AT (Drafting suggestions): At the second stage, analysis and crowding in of additional, especially public and private capital, as well as crowding in public funding in a proportionate manner may be supported.</p> <p>AT (Comments): We believe that private and public capital should not be treated equally, and special emphasis should be put on the mobilization of private capital. Could you please align language with the new wording in Art. 3c, objectives?</p>
<p>4. Proposals and offers shall be evaluated and ranked based on common award criteria such as their comparative contribution to Union competitiveness in accordance with Article 9a.</p>	<p>SE (Comments): SE welcomes the proposed revisions.</p> <p>SK (Drafting suggestions): 4. Proposals and offers shall be evaluated and ranked based on common award criteria such as their comparative contribution to Union</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>competitiveness in accordance with Article 9a <u>and pan-European coverage.</u></p> <p>SI (Drafting suggestions):</p> <p>4. Proposals and offers shall be evaluated and ranked based on common award criteria such as their comparative contribution to Union competitiveness in accordance with Article 9a <u>and based on their pan-EU coverage.</u></p> <p>FI (Drafting suggestions):</p> <p>4. Proposals and offers shall be evaluated and ranked based on common award criteria such as their comparative contribution to Union competitiveness <u>in accordance with Article 9^a according to their comparative contribution to the Union’s global competitiveness.</u></p> <p>PL (Drafting suggestions):</p> <p>Proposals and offers shall be evaluated and ranked based on common award criteria in accordance with Article 9a. The evaluation process shall explicitly include a criterion to identify and reward technological frontrunners from across the entire Union, ensuring pan-European relevance of ECF intervention. To this end, additional points shall be awarded to projects that are led by or include key partners from Member States with emerging science, technology and innovation capabilities.</p> <p>PL (Comments):</p> <p>PL (Drafting suggestions):</p> <p>In a similar vein to the proposal regarding Article 3(1)(kb), we suggest building on the language proposed by SI and well received at our meetings on 24-Nov and 26-Nov (“guaranteeing pan-European relevance of ECF interventions”). This specific provision proposes a possible operationalisation of the principle of pan-European relevance.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>PT (Comments): PT welcomes and supports this clarification.</p> <p>EL (Drafting suggestions): Proposals and offers shall be evaluated and ranked based on common award criteria in accordance with Article 9^a <u>including promotion of EU coverage.</u></p> <p>EL (Comments): This addition encourages broader participation across Member States and supports geographically diversified consortia, in line with Article 3 objectives on balanced competitiveness. The wording is non-prescriptive and does not modify excellence-based evaluation, while contributing to a more resilient and inclusive EU competitiveness landscape.</p>
<p>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.</p>	<p>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.</p> <p>EL (Comments): We believe that we should clarify the authority, the competence of the evaluation committee and procedures to be applied.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>FR (Comments): Quelle est la relation du comité d'évaluation mentionné avec les programmes de travail ? La délégation pourra souhaiter un encadrement plus spécifique de la composition de ces comités d'évaluation que celle décrite à l'article 153 du règlement financier.</p>

<p style="text-align: center;"><i>Article 18</i> Production Ramp up actions</p>	<p>NL (Drafting suggestions): Article 18 Production Ramp up actions</p> <p>NL (Comments): NL not convinced of possibility for retroactive support and prefers full deletion. At a minimum, a maximum amount of months after which support can be granted is needed.</p> <p>IE (Comments): IE notes that this is a very late stage of investment and there is a need to ensure that we are targeting market failure and not hampering Innovation</p> <p>IE –while noting that some narrowing has been introduced to limit the scope of the Article to ‘duly justified exceptional cases’, we remain concerned about what value the Article provides and what exact need it is addressing.</p> <p>IE suggest either deletion of this Article, or limiting to a maximum timespan of 6 months, after which support can be granted is needed. .</p> <p>FR (Comments): Soutien à cet article – essentiel pour assurer la montée en cadence de l’industrie européenne sur les secteurs stratégiques</p> <p>La fiche fait état de conditions pour cette aide dérogatoire, qui devrait être « temporaire, ciblée et justifiée par des impératifs de résilience et de sécurité économique » ; ces conditions devraient apparaître dans le règlement et être davantage détaillées.</p>
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Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>Comment ces actions s'intègrent-elles dans le fonctionnement des programmes de travail ? Quelle sont les modalités de fonctionnement et la composition des comités d'évaluation ? Quels sont les co-financements associés à cette initiative ? Quel est le régime d'aide d'Etat applicable ?</p> <p>La Commission peut-elle préciser la manière dont l'harmonisation des actions "Ramp Up" sera réalisée entre les différents programmes de travail ? S'agit-il d'un type d'action pouvant être fléché dans chaque programme de travail thématique du CFP ?</p>
<p>1. By way of derogation fromPursuant to Article 196(2)196(2)(a) of the Financial Regulation, financial contributions may in duly justified exceptional cases, where necessary for the implementation of manufacturing projects essential to support the generalUnion's resilience objective as indicated on as referred to in Article 3(1)3(1)(b), or activities required to ensure the security, resilience or service continuity to support the objectiveobjectives 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 .</p>	<p>NL (Drafting suggestions):</p> <p>1. — By way of derogation fromPursuant to Article 196(2)196(2)(a) of the Financial Regulation, financial contributions may in duly justified exceptional cases, where necessary for the implementation of manufacturing projects essential to support the generalUnion's resilience objective as indicated on as referred to in Article 3(1)3(1)(b), or activities required to ensure the security, resilience or service continuity to support the objectiveobjectives 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 .</p> <p>SE (Drafting suggestions):</p> <p>.</p> <p>SE (Comments):</p> <p>SE welcomes the clearer restrictions and narrowing of the scope.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>AT (Drafting suggestions):</p> <p>1. Pursuant to Article 196(2)(a) of the Financial Regulation, financial contributions may in duly justified exceptional cases, 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 .</p> <p>AT (Comments):</p> <p>Thank you for your explanations during the AHWP on Nov. 26th. We remain hesitant to allow for an open-ended grandfathering of projects that have started prior to the submission of a proposal. We could, however, support a maximum allowed timespan, e.g. 6 months.</p> <p>DE (Drafting suggestions):</p> <p>1. Pursuant to Article 196(2)(a) of the Financial Regulation, financial contributions may in duly justified exceptional cases, 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) <u>1), 2) and 4)</u> cover actions that started prior to the date of the submission of the proposal for those actions .</p> <p>DE (Comments):</p> <p>We wonder how additionality of funding can be guaranteed in projects under this article.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>In any case, the justification of the deviation from the Financial Regulation in “duly justified exceptional cases” is not sufficient. According to Art. 196 (2) of the Financial Regulation, this has to be specified in the basic act.</p> <p>From a space point of view, the second part of Art. 18(1) (referencing service continuity and specifically relating to space (draft Art (3(2)(d) (3)) must be deleted. Alternatively, it must be excluded that responsibilities for production ramp-up that already exist at ESA are shifted to the EU</p> <p>PT (Comments): How to avoid overlap with other existing instruments that also foresee production ramp up actions?</p> <p>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 production 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 up to six months prior to the date of the submission of the proposal for those actions.</p> <p>FR (Comments): La délégation pourra soutenir une inscription dans le règlement des critères d’attribution décrits dans la fiche technique.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>La résilience étant aussi un élément important des articles 3(1) et 3(2), nous proposons de supprimer les références restrictives aux sous-paragraphes des articles 3(1) et 3(2), et de remplacer “manufacturing” par “production”, mieux adapté à l’ensemble du champ de cet article 3.</p> <p>Quels sont les critères concrets permettant de définir un projet « essentiel à la résilience ou à la sécurité économique » ?</p> <p>Les autorités françaises remercieraient la Commission de préciser la manière dont l’harmonisation des actions “Ramp Up” sera réalisée entre les différents programmes de travail. S’agit-il d’un type d’action pouvant être fléché dans chaque programme de travail thématique du CFP?</p> <p>La France souhaite comprendre pourquoi cette modification a été faite : entre « by way of derogation » et « pursuant » ? En effet, la Commission argue que le soutien au ramp-up, ou aux lignes de production en fonctionnement n’est pas possible dans le cadre de l’ETS-IF, précisément du fait de cet article donc pourquoi enlever la mention “by way of derogation” ?</p>
<p>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.</p>	<p>NL (Drafting suggestions):</p> <p>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.</p> <p>NL (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>At a minimum, additionally of EU support needs to be explicitly added as one of the conditions</p> <p>SK (Drafting suggestions):</p> <p>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, of pan-European relevance excluding overcompensation and double funding ensures European added value, is temporary and decreases over time.</p> <p>SI (Drafting suggestions):</p> <p>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, of pan-EU relevance, excluding overcompensation and double funding, ensures Union added value, is temporary and decreases over time.</p> <p>EL (Drafting suggestions):</p> <p>. 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, across EU promoting a balanced geographical coverage excluding overcompensation and double funding, is temporary and decreases over time.</p> <p>EL (Comments):</p> <p>Encourages broader participation across Member States and promotes geographically diversified consortia, contributing to a more inclusive and resilient EU competitiveness landscape.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	FR (Comments): La Commission peut-elle préciser quelles sont les “conditions supplémentaires” mentionnées ?

<p style="text-align: center;"><i>Article 20</i></p> <p style="text-align: center;">Accelerated and Targeted Actions for Competitiveness</p>	<p>SE (Comments): SE is very hesitant to the need of this instrument in the ECF (and Horizon Europe) and stress the need for very clear limitations of its scope. Deems it difficult to have meaningful comments on para 2 before we have the outcome of the discussion in the MFF-track on para 1. Generally, SE remains unconvinced of having provisions that will grant funding without an award procedure/call as specified as a targeted intervention in para 2a or based in self-evaluation as specified in the accelerated actions in para 2b.</p> <p>DE (Comments): We have many questions on this article. COM is granted a very far-reaching deviation from ordinary procurement procedures, the justification for which is usually very broadly interpretable. We are extremely critical of awards without award procedure (paragraph 2a), awards based on the applicants' self-evaluation (paragraph 2b) or awards without a specific funding reason (paragraph 2d). We ask the COM for further information on this article.</p> <p>IT (Comments): Further clarification is needed. In particular, it is crucial to understand their functioning, as they could potentially enhance both the flexibility and speed of funding delivery.</p> <p>PT (Comments): How are MS consulted on the implementation of this article? Clarification is welcome.</p> <p>BE</p>
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Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments): Scrutiny reserve for this article FR (Comments): La délégation pourra soutenir une inscription dans le règlement des critères d’attribution décrits dans la fiche technique.</p>
	<p>RO (Comments): Implementing the exceptions in this article should be accompanied by guarantees on transparency, equal treatment for all MS and participants and on avoiding disproportionate advantages for entities already integrated in strong industrial ecosystems. These actions should not contribute to widening the gap between MS with different development levels, but moderate this gap. AT (Comments): We see the necessity for accelerated and targeted procedures in highly exceptional cases (e.g. in times of crisis). We do, however, remain skeptical regarding the procedures in general: We see some danger regarding potential misallocations of public funding and risks to the EU budget. AT would urge to foresee budgetary caps for accelerated and targeted actions, to ensure they apply only for truly exceptional cases. These could e.g. be introduced in the now bracketed para 1 of this article.</p>
<p>2. In accordance with paragraph 1, one or more of the following measures may be applied to an award procedure:</p>	<p>IT (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>The criteria for identifying actions of imperative public interest and the selection of beneficiaries need to be clearly defined and subject to Member State consultation. This will safeguard transparency and prevent potential distortions in the allocation of EU resources.</p>
<p>(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:</p>	<p>NL (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 in exceptional and duly justified cases specify that an award procedure takes the form of a targeted intervention to:</p> <p>NL (Comments): In order to clarify that this procedure should be used with great caution.</p> <p>IE (Drafting suggestions): a) For grants, without prejudice to the use of competitive procedures wherever appropriate in line with Article 192(1) and in addition to Article 198 of Regulation (EU, Euratom) 2024/2509, the work programme may in exceptional and duly justified cases specify that an award procedure takes the form of a targeted intervention to</p> <p>IE (Comments): IE suggested text amendment - to clarify the terms for the use of this measure</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>(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,</p>	<p>FR (Comments): La Commission peut-elle préciser ce qu'il faut entendre par "intérêts publics impératifs de l'Union" ?</p>
<p>(2) set out an amount up to which proposals may be identified and invited that have been awarded a seal referred to in Article 8 of this Regulation but have not received Union funding due to lack of budget. The applicants may be invited to resubmit their proposal without a call; where the proposal is resubmitted without substantial change, the granting authority may decide to fully rely on the prior positive evaluation and any previously conducted controls and submitted supporting documents; the reasons for the award of the individual action shall be duly substantiated in the award decision and the list of actions shall be published in the Annual Activity Report referred to in Article 74(9) of Regulation (EU, Euratom) 2024/2509; or,</p>	<p>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.</p>
<p>(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.</p>	<p>CZ (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 and increasing the maximum Union contribution. <u>Where projects funded under predecessor</u></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p><u>Union programmes demonstrate high added value and a need for continuation, the work programme may provide for a mechanism to enable transitional support or bridge funding under the ECF, in order to ensure continuity of activities and safeguard the results and investments achieved under those prior programmes.</u></p> <p>CZ (Comments): Purpose: To ensure transitional support or bridge funding for existing high-value projects financed under previous programmes.</p> <p>LT (Comments): We advocate for MSs’ representatives involvement in this process.</p> <p>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 and/or partners, or both and increasing the maximum Union contribution.</p> <p>ES (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</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>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 <u>shall be agreed by the Programme Committee and</u> 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, <u>ensuring that there is no double funding.</u></p> <p>ES (Comments): We request additional checks to ensure that funding is correctly channelled including through this accelerated procedure.</p> <p>EL (Drafting suggestions): , in accordance with and under the conditions set out in applicable legislation such as the Net Zero Industry Act Regulation 2024/1735, Critical Raw Materials Act Regulation (EU) 2024/1252, Chips Act Regulation (EU) 2023/1781, and RED III...</p> <p>EL (Comments): We propose to add the CRMA Regulation number as well as a reference to the Chips Act Regulation.</p> <p>FR (Comments): La Commission pourrait-elle préciser — y compris en donnant un exemple — ce que l’on entend par “catégories de bénéficiaires” ?</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>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+ ?</p>
<p>(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:</p>	<p>NL (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 and duly justified cases specify that an award procedure takes the form of an accelerated intervention to:</p> <p>NL (Comments): In order to clarify that this procedure should be used with great caution.</p> <p>IE (Drafting suggestions): (b) By way of derogation from Articles 199, 201, 203 regarding grants or from Article 170(1), points (b) and (c), and (2) regarding procurement, of Regulation (EU, Euratom) 2024/2509, the work programme may in <u>exceptional and duly justified cases</u> specify that an award procedure takes the form of an accelerated intervention to:</p> <p>IE (Comments): IE suggested text amendment to clarify the terms for the use of this measure</p>
<p>(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</p>	

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>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,</p>	
<p>(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.</p>	<p>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 ? La délégation pourra souhaiter un encadrement plus spécifique de la composition de ces comités d'évaluation que celle décrite à l'article 153 du règlement financier.</p>
<p>(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.</p>	

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>(d) The work programme may set up special two-stage bottom-up award procedures in accordance with the following rules:.</p>	<p>IT (Drafting suggestions):</p> <p>(d) The work programme, <u>defined with the involvement of Member states</u>, may set up special two-stage bottom-up award procedures in accordance with the following rules:.</p> <p>IT (Comments):</p> <p>The involvement of Member States (COMPET and CCT) in planning the use of these resources is crucial.</p>
<p>(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.</p>	
<p>(2) proposals and offers shall be evaluated and ranked based on common award criteria such as their comparative contribution to Union competitiveness in accordance with Article 9a. The evaluation committee shall determine the most appropriate instrument of budget implementation under direct or indirect management, in particular grant, procurement, non-financial donations, contribution agreements or other support, as well as propose the maximum amount and form of the Union contribution.</p>	<p>SE (Comments):</p> <p>SE welcomes the proposed revisions.</p> <p>SI (Drafting suggestions):</p> <p>(2) proposals and offers shall be evaluated and ranked based on common award criteria such as their comparative contribution to Union competitiveness in accordance with Article 9a and based on their pan-EU</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>coverage. The evaluation committee shall determine the most appropriate instrument of budget implementation under direct or indirect management, in particular grant, procurement, non-financial donations, contribution agreements or other support, as well as propose the maximum amount and form of the Union contribution.</p> <p>IE (Comments): IE welcome the inclusion of reference to Art 9a</p> <p>PT (Comments): PT welcomes and supports this clarification.</p>
<p>(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.</p>	<p>SK (Drafting suggestions): (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. Preference shall be given to projects or offers with larger pan-European coverage. 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.</p> <p>SI (Drafting suggestions): (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. Preference shall be given to projects or offers with larger pan-EU coverage. The award procedure shall otherwise proceed in</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>accordance with the rules set out in Article 12, as applicable to the respective instrument of budget implementation.</p>
	<p>SK (Drafting suggestions): 2a. During the award procedures in accordance with paragraph 2, the Commission shall encourage wide pan-European collaboration when relevant, including by organising targeted match-making events.</p> <p>SI (Drafting suggestions): 2a. During the award procedures in accordance with paragraph 2, the Commission shall encourage wide pan-EU collaboration when relevant, including by organising targeted match-making events.</p>
<p>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, Critical Raw Materials Act, 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.</p>	<p>RO (Comments): We appreciate defining the <i>public interest of imperative reason</i>; in the same context, we consider the term <i>critical time-sensitivity</i> (in paragraph 1) needs to be defined as well.</p> <p>EL (Drafting suggestions): in accordance with and under the conditions set out in applicable legislation such as the Net Zero Industry Act Regulation 2024/1735, Critical Raw Materials Act Regulation (EU) 2024/1252, Chips Act Regulation (EU) 2023/1781, and RED III...</p> <p>EL (Comments): We propose to add the CRMA Regulation number as well as a reference to the Chips Act Regulation.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	PT (Drafting suggestions): (4)
SECTION 2 ECF INVESTEU INSTRUMENT	

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p style="text-align: center;"><i>Article 21</i> General Framework</p>	<p>MT (Comments):</p> <p>It would be appreciated if the understanding that an economic operator which fully or partially proposes a supply chain from outside of the EU will also be eligible under the ECF / InvestEU, could be confirmed. Also, will there be any further criteria (beyond what is in the ECF regulation) that govern which companies are able to use these financial resources?</p> <p>FR (Comments):</p> <p>Les lignes directrices d’investissement de l’instrument InvestEU devraient être définies par la Commission, les Etats Membres et les partenaires de mise en œuvre au même moment que les priorités sectorielles du fonds et pour l’entièreté de la période de programmation.</p> <p>Concernant l’industrie de défense et au regard du caractère stratégique des investissements dans ce domaine, les lignes directrices d’investissement devraient être approuvées par le comité de programme spécifique à l’industrie de défense.</p> <p>La délégation soutiendra des prérogatives accrues pour l’Advisory Board d’InvestEU qui devrait être un réel organe de pilotage de l’instrument bénéficiant d’un reporting par instrument et par thématique 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.</p>
<p>1. As a horizontal delivery tool for Union internal policies, the ECF InvestEU Instrument shall contain the budgetary guarantee and financial instruments as defined in Article 2, numbers (9) and (30), of Regulation</p>	<p>SE (Comments):</p> <p>SE welcomes the clarity provided by the proposed revisions.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>(EU, Euratom) 2004/2509 , 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.</p>	<p>FR (Comments):</p> <p>La délégation pourra indiquer souhaiter bénéficier d'un reporting dédié pour l'instrument au service du Steering Board et dans le règlement performance.</p> <p>La France salue l'ambition du Fonds européen pour la compétitivité (FEC) de mobiliser les investissements privés par le biais de l'instrument InvestEU du FEC.</p> <p>Le financement devrait être conditionné à des critères de préférence européenne (tels que la production basée dans l'UE ou l'ancrage de la propriété intellectuelle dans l'Union) et reposer exclusivement sur les ressources existantes de l'Union, sans charge supplémentaire pour les budgets nationaux.</p> <p>Ce mécanisme devrait pouvoir prendre des participations temporaires afin d'aider les start-ups et les PME à atteindre un niveau de maturité suffisant pour attirer des investisseurs privés ou permettre des acquisitions industrielles, sans imposer de niveau minimum de co-investissement privé comme condition d'éligibilité lorsque le profil de risque ou l'importance stratégique du projet le justifie.</p>
<p>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.</p>	<p>AT (Drafting suggestions):</p> <p>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 indirect equity or quasi-equity investments, provided directly or indirectly through financial intermediaries, funds, investment platforms or other vehicles to be channelled to final recipients.</p> <p>AT</p>

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	<p>(Comments):</p> <p>We remain skeptical towards direct ownership taken by and ownership rights performed by the EC or potential implementing partners like the EIB. The COM's explanation at the AHWP on 5 November was very useful: the COM does not intend to invest directly in companies, but implementing partners would typically do these investments via funds. We hope that the inclusion of "indirect" is mirroring this explanation.</p> <p>IT</p> <p>(Drafting suggestions):</p> <p>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. The EU guarantee shall serve an instrument to increase the risk appetite of the Implementing Partners and contributing to crowd in private capital.</p> <p>IT</p> <p>(Comments):</p> <p>Considering the high provisioning rate, it is important to emphasize that EU budgetary guarantees should be leveraged to enhance the risk taking of Implementing Partners, thereby enabling the mobilization of private capital and enhancing additionality.</p>

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<p>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 %.</p>	<p>NL (Comments): NL supports 50%</p> <p>RO (Comments): With regard to the provisioning level for the EU compartment, we could show flexibility for a lower provisioning rate, with a maximum reduction of 5 percentage points. Based on the explanations provided by the Commission and the indications from the EIB, a provisioning rate of 45% (5 pp higher than the rate foreseen for InvestEU), with the possibility of having fully financed financial instruments (100% provisioned), could be considered in order to free up additional budgetary resources for financing.</p> <p>ES (Drafting suggestions): 3. [The maximum amount of the budgetary guarantee under the EU Compartment of the ECF InvestEU Instrument shall be EUR 70 000 000 000 in current prices.] It shall be provisioned at the rate of 50 40%.</p> <p>ES (Comments): We thank the Commission for the clarifications on this issue, but we still remind unconvinced that a higher provisioning rate is necessary. It would be useful, for example, to have information about the level of use of the guarantee of previous programs. An excessively cautious provisioning rate locks in resources that could be productively used.</p> <p>IT (Drafting suggestions):</p>

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	<p>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 <u>40</u> %.</p> <p>IT (Comments): A provisioning level of 40% would be preferable, given the reflows generated by the EFSI Programme – which operated with a 35% provisioning – and which are now being channelled into the InvestEU Programme, thanks to the adoption of the Omnibus II package. Raising the provisioning to 50% could be an acceptable alternative, provided that the text explicitly includes provisions requiring Implementing Partners (IPs) to increase the risk profile of their portfolios, particularly through the assumption of subordinated positions, in order to achieve greater investment additionality.</p> <p>PT (Comments): PT is discussing the provision rate foreseen under ECF InvestEU, and reserves its position for a later stage of discussions.</p> <p>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 <u>40</u>50 %.</p> <p>FR (Comments): La délégation pourra soutenir un taux adapté au risque et au maximum identique à l'actuel (40%) et indiquer ne pas être convaincu par les éléments communiquées par la Commission dans sa fiche technique. Au vu de la</p>

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	diversité des actions envisagées et des risques associés pour l'utilisation de cet instrument, la Commission envisage-t-elle des flexibilités à ce taux ?
<p>3a. <input checked="" type="checkbox"/> % of the EU guarantee under the EU compartment shall be granted to the EIB Group.</p>	<p>SE (Drafting suggestions): {X} % of the EU guarantee under the EU compartment shall be granted to the EIB Group.</p> <p>SE (Comments): SE does not see any need for earmarking of the guarantee.</p> <p>SI (Drafting suggestions): 3a. — [X] % of the EU guarantee under the EU compartment shall be granted to the EIB Group.</p> <p>SI (Comments): If this provision will stay in the text. SI suggests limiting this share to maximum of 75% and make more EU guarantee available to implementing financial institutions in MS.</p> <p>AT (Drafting suggestions): 3a. — [X] % of the EU guarantee under the EU compartment shall be granted to the EIB Group.</p> <p>AT (Comments):</p>

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	<p>We are still of the view that we should aim for a pure open architecture approach.</p> <p>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.</p> <p>DE (Drafting suggestions):</p> <p>3a. [X] % of the EU guarantee under the EU compartment shall be granted to the EIB Group. <u>The EIB Group shall provide an aggregate financial contribution amounting to [X]</u></p> <p>DE (Comments):</p> <p>The EIB (and other Implementing Partners) should have skin in the game.</p> <p>ES (Drafting suggestions):</p> <p>3a. <u>At least [X] % of the EU guarantee under the EU compartment shall be granted to the EIB Group. Irrespective of the size of the EU compartment, the pre-allocation to the EIB Group should at least amount to EUR [X].</u></p> <p>ES (Comments):</p> <p>A defined minimum amount gives more predictability to the EIB. Establishing minimums instead of set allocations allows for both some predictability and flexibility.</p>

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	<p>IE (Comments): IE welcomes the references to EIB Group in sub-articles 3(a) and (5)</p> <p>EE (Comments): The share of the EU guarantee under the EU compartment that shall be granted to the EIB group should not be higher than in the InvestEU programme in 2021-2027 (i.e. not higher than 75%), in order to provide for involvement of other implementing partners.</p>
	<p>NL (Drafting suggestions):</p> <p><u>3b. 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 division in paragraph 3a of this Article, as well as 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.</u></p> <p><u>3c. The Commission and the EIB Group shall form a partnership under this Regulation with the objective of supporting the implementation of the InvestEU Programme and fostering consistency, inclusivity, additionality, and efficient deployment:</u></p> <ul style="list-style-type: none"> <u>- the EIB Group shall implement the portion of the EU guarantee specified in Article art 3a;</u> <u>- the EIB Group shall support the implementation of the EU compartment of the InvestEU Fund....PM [which actions are logical should also be checked with CLS]</u>

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	<p>NL (Comments): NL welcomes this new 3a. An evaluation of this % would be a good idea, therefore proposal for 3b. We also find it logical to include some elements of this partnership in this regulation. If this article does not survive, alternative would be to have this in Investment guidelines (as well as the selection of other implementing partners, details of the Guarantee Agreements and coverage and terms of the EU Guarantee.)</p>
<p>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.</p>	<p>NL (Comments): 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.] An additional amount shall be used in support of the specific objectives set out in Article 3 (2) point (a) to (d), whereas that amount shall be allocated from the contributions according to Article 4 (2) point (b) to (e) and thereby increasing the minimum amount, as follows: (a) [X %] from the amount referred to in Article 4 (2), point (b); (b) [X %] from the amount referred to in Article 4 (2), point (c); (c) [X %] from the amount referred to in Article 4 (2), point (d); (d) [X %] from the amount referred to in Article 4 (2), point (e).]</p> <p>SE (Drafting suggestions): 4. Support through the ECF InvestEU Instrument shall be a favoured means of implementation under the ECF. [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</p>

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	<p>increased by the contributions <u>from the four policy windows in Article 4</u> through the work programmes set out in Article 15. The be a favoured means of implementation under the ECF and used for provisioning of the budgetary guarantee or financing of the financial instruments <u>shall be made from the budget in Article 4.</u></p> <p>SE (Comments): SE considers this article to be in need of clarity to specify that priority should be given to support though the ECF InvestEU over grants.</p> <p>DE (Drafting suggestions):</p> <p>[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.] <u>An additional amount shall be used in support of the specific objectives set out in Article 3 (2) point (a) to (d), whereas that amount shall be allocated from the contributions according to Article 4 (2) point (b) to (e) and thereby increasing the minimum amount, as follows:</u></p> <p><u>(a) [X %] from the amount referred to in Article 4 (2), point (b);</u> <u>(b) [X %] from the amount referred to in Article 4 (2), point (c);</u> <u>(c) [X %] from the amount referred to in Article 4 (2), point (d);</u> <u>(d) [X %] from the amount referred to in Article 4 (2), point (e).]</u></p> <p><u>4a.</u> This minimum amount shall be increased by the <u>further</u> 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</p> <p>DE</p>

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	<p>(Comments):</p> <p>We would also like to discuss minimum quotas for this instrument from thematic policy windows.</p> <p>ES</p> <p>(Comments):</p> <p>We believe that a minimum amount of 17bn is insufficient and that this figure should be revised upwards as part of the upcoming discussions on size and distribution of funds.</p> <p>IT</p> <p>(Drafting suggestions):</p> <p>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 multiannual 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.</p> <p>IT</p> <p>(Comments):</p> <p>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:</p> <p>(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</p>

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	<p>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.</p> <p>FR (Drafting suggestions):</p> <p>This minimum amount shall be increased by the contributions from the work programmes set out in Article 15. <u>The minimum contributions for each policy window is set at [XXX]% of the annual budget adopted.</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</p> <p>FR (Comments):</p> <p>La délégation pourra indiquer souhaiter que les partenaires de mise en œuvre soient associés dans le cas de contributions additionnelles provenant des fenêtres thématiques du FEC.</p>
	<p>ES (Drafting suggestions):</p>

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	<p>4a. At least EUR [X] of the InvestEU guarantee will be used to support SMEs</p> <p>ES (Comments):</p> <p>As with the work programmes, we believe there is merit in reserving an amount for the support of SMEs. SME instruments under the current InvestEU programme have proven very successful and this experience should thus feed into the next MFF.</p>
<p>5. The Commission is empowered to adopt investment guidelines set out by the Commission shall define as delegated acts in accordance with Article 84 in order to supplement this Regulation by 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 EIB Group and other potential implementing partners.</p>	<p>MT (Comments):</p> <p>A guidance note on how private companies could access InvestEU resources would also be useful. This could be part of the investment guidelines referred to in this Article.</p> <p>NL (Comments):</p> <p>Support addition EIB group</p> <p>SE (Comments):</p> <p>SE can accept the proposed revisions.</p> <p>DE (Drafting suggestions):</p> <p>The Commission is empowered to adopt investment guidelines set out by the Commission shall define as delegated acts in accordance with Article 84 in order to supplement this Regulation by 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 set out details on the Partnership between the Commission and the EIB Group, the Selection</p>

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	<p><u>of implementing partners other than the EIB Group, details of the Guarantee Agreements and coverage and terms of the EU Guarantee.</u></p> <p>The investment guidelines shall be prepared in close dialogue with the EIB Group and other potential implementing partners</p> <p>DE (Comments):</p> <p>Taking into account the explanation by COM, we are still not convinced that all the necessary requirements that are currently prescribed in the InvestEU Regulation should be deleted. In particular, we have doubts with regards to:</p> <ul style="list-style-type: none"> - 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 19 (Coverage and terms of the EU guarantee) <p>Our preference would be to have the details explicitly laid down in the ECF Regulation. However, due to the complexity of the necessary changes and the high technicality, we could also consider to include potential additions in the Investment Guidelines.</p> <p>PT (Comments):</p> <p>As requested at the meeting on 5 November, Portugal considers that there are doubts about the proposed amendment, as the definition of investment guidelines in a delegated act, which in practice is very difficult to oppose effectively by the European Parliament or the Council.</p> <p>EE (Drafting suggestions):</p>

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	<p>The Commission is empowered to adopt investment guidelines set out by the Commission shall define as delegated acts in accordance with Article 84 in order to supplement this Regulation by will defining in more detail the scope of intervention in support of the general and specific objectives set out in Article 3 and shall be approved with an implementing act. The investment guidelines shall be prepared in close dialogue with the EIB Group and other potential implementing partners.</p> <p>EE (Comments):</p> <p>The investment guidelines should be adopted with an implementing act, with approval of the representative of the Member States, as these guidelines are substantial to implementing the ECF Regulation.</p> <p>FR (Drafting suggestions):</p> <p>The Commission is empowered to adopt investment guidelines set out by the Commission shall define as delegated acts upon the approval of the ECF general committee, in accordance with Article 84 in order to supplement this Regulation by 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 Member States, EIB Group and other potential implementing partners.</p> <p><u>The investment guidelines should be reviewed annually by the Steering Board.</u></p> <p><u>Investment guidelines as regards strategic investment in support of Actions referred to in Article 44(1) should be approved by the Defence Industry committee referred to in Article 83(1)(e).</u></p> <p>FR</p>

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	<p>(Comments):</p> <p>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’entièreté de la période de programmation.</p> <p>Au regard du caractère stratégique des investissements de défense, les lignes directrices d’investissement devraient être approuvées par le comité de programme spécifique à l’industrie de défense.</p>
	<p>NL</p> <p>(Drafting suggestions):</p> <p><u>5a. In respect of the minimum amount, the Investment Guidelines shall specify the conditions of implementation</u></p> <p>BE</p> <p>(Drafting suggestions):</p> <p><u>5.a. The implementation of the ECF InvestEU Instrument shall build on the existing community of the InvestEU Programme pillar assessed implementing partners, contractual arrangements, relevant financial products, existing guarantee agreements, templates for legal and contractual arrangements, as well as established monitoring and reporting tools.</u></p> <p>BE</p> <p>(Comments):</p> <p>This to avoid that an entirely new negotiation procedure is required, with the risk of spending another (estimated) 1,5 or 2 years for such procedure.</p>

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<p>6. The following rules shall apply to the provisioning referred to in paragraph 3:</p>	
<p>(a) the provisioning rate shall be assessed every year, taking into account the portfolio risk, and in accordance with the assessment referred to in Article 41(5) of Regulation (EU, Euratom) 2024/2509;</p>	<p>NL (Comments): NL welcomes this addition</p> <p>SE (Comments): SE welcomes the proposed revisions.</p> <p>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></p>
<p>(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;</p>	
<p>(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.</p>	

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>(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.</p>	<p>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 ?</p>
<p>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 in light of the economic and financial circumstances.</p>	<p>NL (Comments): preconditions for the minimum to be considered</p> <p>SE (Comments): SE can accept the proposed revisions.</p> <p>SI (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% of that amount in light of the economic and financial circumstances.</p> <p>SI (Comments): These circumstances need to be specified.</p> <p>EE (Drafting suggestions): 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 2010% of that amount in light of the economic and financial circumstances.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>EE (Comments): The amount of the budgetary guarantee is huge, consequently the empowerment to adjust the provisioning rate and the maximum amount of the budgetary guarantee should be limited to 10% of that amount. (This is proportional to the scale of other amendments.)</p> <p>FR (Drafting suggestions): 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% of that amount in light of the economic and financial circumstances.</p> <p>FR (Comments): La Commission peut-elle expliquer l'augmentation du seuil d'ajustement de 15 % à 20 % ? La délégation pourra demander à préciser la mention « economic and financial circumstances » ? Quelle est la justification pour que cette modification du taux de provisionnement soit faite au travers d'actes délégués plutôt que via des implementing acts ?</p>
	<p>NL (Drafting suggestions): [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]</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>NL (Comments): We thank the EC for their note on the combination of portfolio's. We understand now the complexity this will give for the next MFF with all different implementing partners. However, this is linked to the outcome of article 5. Therefore we would like to keep this possibility on the table</p> <p>LU (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></p> <p><u>9. By derogation of Article 212(3) of the Financial Regulation, resources paid back, before the end of the eligibility period, to financial instruments from investments in final recipients or from the release of resources set aside for guarantee contracts, including capital repayments and any type of generated income that is attributable to the support from the Funds, may be re-used in the same or other financial instruments or budgetary guarantees for further investments in final recipients, to cover the losses in the nominal amount of the Funds contribution to the financial instrument resulting from negative interest, [,] or for any management costs and fees associated to such further investments, taking into account the principle of sound financial management.</u></p>

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	<p><u>10. 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></p> <p>LU (Comments):</p> <p>Luxembourg comments:</p> <p>To allow combinations with other programmes, in order to optimise the use of EU budgetary resources.</p> <p>To allow combinations with reflows from legacy portfolios in order to optimise the use of EU budgetary resources.</p>

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<p style="text-align: center;"><i>Article 22</i></p> <p>Support to scaleups and startups Scaleup Facility</p>	<p>SE (Comments): SE can accept the changes made to this article as whole (only have a smaller remark in paragraph 2a).</p> <p>FI (Comments): Scrutiny reservation</p> <p>FR (Comments): Quelle est l’articulation de cet article avec les initiatives portées par ailleurs comme le Scale_up Europe Fund et ETCI ? La délégation pourra rappeler qu’un lien clair et lisible devra être fait avec l’EIC et que celui-ci devra être garanti à la fois à travers le règlement du FEC et le règlement Horizon Europe. Quels sont les mécanismes transitoires associés le cas échéant ? Quelle est la valeur ajoutée de cette facilité par rapport à l’instrument InvestEU dont le périmètre inclue également le scale-up ? La gamme d’instruments listés en 2b est similaire à celle des produits de l’instrument Invest EU Quelles seraient sa gouvernance ? ses modalités de déploiement ? son budget ?</p> <p>En réponse à la fiche technique, la délégation pourra indiquer que les mécanismes d’une continuité de financement entre l’EIC Fund et le EIC Accelerator avec l’instrument InvestEU doivent être décrits dans le règlement et mieux encadré. La France pourra notamment proposer que cela soit fait en fonction des dimensions du financement à apporter (seuil à définir).</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>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.</p>	<p>BG (Comments): Focusing the Scaleup Facility on high growth medium-sized enterprises and midcap enterprises may lead to neglecting fast growing micro- and small enterprises as well as startup enterprises. As a continuation, we suggest that there should be developed a Startup Facility focusing on innovative startups, startup ecosystem development, relation between science and SMEs, spin out enterprises, etc.</p> <p>EL (Comments): EIC fund- ECF complementarities need to be further addressed. Clarify the application procedure of the linkage between the two frameworks.</p> <p>FR (Comments): La délégation pourra interroger la Présidence sur la suppression de ce paragraphe.</p>
<p>2. The Commission shall in particular develop a Scale-upScaleup 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</p>	<p>LV (Comments): We do not agree with the deletion of SMEs and small mid cap companies, because: - Scale-up can be an SME or mid-cap company;</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>facilitate exit options. The facility shall target SMEs and small mid-cap companies and Mid-cap companies.</p>	<p>- But not every SME or mid-cap company can also bet a scale-up which is depending on their level and speed of growth.</p> <p>Therefore, we ask a consistency within the text, the keep listing all the individual company development categories as Start-ups, scale-ups, SMEs, mid-caps and large companies.</p> <p>PL (Drafting suggestions):</p> <p>2. The Commission shall in particular develop a Scale-upScaleup 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. The facility shall target SMEs and small mid-cap companies and Mid-cap companies.</p> <p>PL (Comments):</p> <p>PL (Drafting suggestions): We postulate restoring the sentence specifically mentioning SMEs. We believe the Scaleup Facility should particularly serve the purpose of fuelling the transition of SMEs into larger enterprises.</p> <p>EL (Comments): We believe it is important to include the definition of scale-ups in Article 2-Definitions, in order to ensure clarity, and define accurately the scope of the provision.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>FR (Drafting suggestions):</p> <p>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, 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.</p> <p>FR (Comments):</p> <p>Un lien clair et lisible devra être établi avec le Fonds EIC. Celui-ci doit être garanti à la fois à travers le règlement FEC et le règlement Horizon Europe.</p>
<p>2a. It shall ensure that high-potential European scaleups 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.</p>	<p>NL (Drafting suggestions):</p> <p>2a. It shall ensure that <u>high-potential growth, high-risk, innovative and strategic</u> European scaleups 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.</p> <p>NL (Comments):</p> <p>NL requests to use the same wording as in (3), see suggestions</p> <p>SE</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>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</p> <p>SE</p> <p>(Comments):</p> <p>SE proposes to delete “high potential” as this is not a term that is used anywhere else in the regulation</p> <p>SI</p> <p>(Drafting suggestions):</p> <p>2a. It shall ensure that high-potential European startups and scaleups 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.</p> <p>FR</p> <p>(Comments):</p> <p>Comment cet objectif doit-il être atteint ?</p>
<p>2b. The Facility shall provide, in a coordinated and consistent manner, a comprehensive set of financing tools tailored to the unique needs of scaleups, 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.</p>	<p>NL</p> <p>(Drafting suggestions):</p> <p>The Facility shall provide, in a coordinated and consistent manner, <u>also with regard to existing national, regional and supranational initiatives</u>, a comprehensive <u>overview</u> set of financing tools tailored to the unique needs of scaleups, including indirect and direct equity and quasi-equity,</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>venture debt, loans, guarantees and blended finance, with a view to attract private investors in supporting scale up financing and facilitate exit options.</p> <p>NL (Comments): If we have the same set of tools, is there sufficient additionality to the rest of INEU? Should this facility not focus on (indirect, quasi) equity and venture debt? The set of financing tools this facility offers should be clearly distinguished from the activities described under article 21.</p> <p>AT (Drafting suggestions): The facility shall provide, in a coordinated and consistent manner, a comprehensive set of financing tools tailored to the unique needs of scaleups, 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.</p> <p>AT (Comments): We remain skeptical towards direct ownership taken by and ownership rights performed by the EC or potential implementing partners like the EIB. The COM's explanation at the AHWP on 5 November was very useful: the COM does not intend to invest directly in companies, but implementing partners would typically do these investments via funds. We hope that the inclusion of "indirect" is mirroring this explanation.</p> <p>DE (Drafting suggestions): 2b. The Facility shall provide, in a coordinated and consistent manner, a comprehensive set of financing tools tailored to the unique needs of scaleups, including indirect and direct equity and quasi-equity, venture debt, loans,</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>guarantees and blended finance, with a view to attract private investors in supporting scale up financing and facilitate exit options.</p> <p>DE (Comments):</p> <p>We are not fully convinced of the added value of Article 22. The proposal is vague and unclear to us, also with a view on governance and how political influence on investment decisions will be prevented. In that sense, these questions are of particular relevance in case of direct equity investments. Hence, we believe direct equity should not be in the tool-box of the Facility.</p> <p>IE (Comments):</p> <p>IE welcome the inclusion of this text</p> <p>FR (Drafting suggestions):</p> <p>The facility shall provide in a coordinated and consistent manner, a comprehensive set of financing tools tailored to the unique needs of scale-ups <u>detailed in the investment guidelines</u>, 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. <u>The facility shall target SMEs and small mid-cap companies and Mid-cap companies.</u></p> <p>FR (Comments):</p> <p>La gamme d'instruments énumérés au point 2b semble similaire à celle proposée par InvestEU. Quelle est l'additionnalité de ce mécanisme ?</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>3. The Facility shall intervene where market investors cannot provide sufficient financing for European high-growth, innovative and strategic companiesscaleups, including if needed to protect the Union's strategic assets, interests, autonomy or economic security.</p>	<p>NL (Drafting suggestions): The Facility shall intervene where market investors cannot provide sufficient financing for European high-growth, high-risk innovative and strategic scaleups, including if needed to protect the Union's strategic assets, interests, autonomy or economic security.</p> <p>NL (Comments): We disagree with deletion of innovative and strategic. Please add high-risk as well</p> <p>IE (Drafting suggestions): 3. The Facility shall intervene where market investors cannot provide sufficient financing for innovative European high-growth, innovative and strategic companiesscaleups, including if needed to protect the Union's strategic assets, interests, autonomy or economic security.</p> <p>The Facility shall intervene where market investors cannot provide sufficient financing for European high-growth, high-risk innovative and strategic scaleups, including if needed to protect the Union's strategic assets, interests, autonomy or economic security.</p> <p>IE (Comments): IE would like clarity on the consistency with European Innovation Act under development.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>IE suggested text amendments to re-insert the term ‘innovative’ and to add the term ‘high risk.. scale ups’</p> <p>EL (Comments): We see a need to clarify the mode and content of “intervention” as well as the precise procedure through which this intervention will be activated. Such clarification could be added as an example in the recitals.</p> <p>FR (Drafting suggestions): The Facility shall intervene where market investors cannot provide sufficient financing for European high-growth, innovative and strategic companies startups, and scaleups and mid-caps, including if needed to protect the Union's strategic assets, interests, autonomy or economic security.</p> <p>FR (Comments): La délégation pourra interroger la Présidence sur la suppression de la mention « strategic companies » au paragraphe 3 ? Qu’est-ce qui justifie cette suppression ?</p>
<p>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 scaleups.</p>	<p>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</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>deepening <u>the Union's</u> capital markets and fostering sustainable growth of scale-up companies scaleups.</p> <p>FR (Comments):</p> <p>Comment propose-t-on d'atteindre cet objectif ? Des détails opérationnels sont nécessaires.</p>
	<p>DE (Drafting suggestions):</p> <p><u>5. The EIB shall be the exclusive implementing partner for the implementation of the budget under the EU Compartment of the ECF InvestEU Instrument for the purpose of the facility.</u></p> <p>DE (Comments):</p> <p>Promoting Scale ups in the EU is certainly an important task. However, in our view, the EIB Group and particularly the EIF is already in a good position to finance Scale ups, with the expertise in place. EIF's track record and positive influence on the relevant venture capital ecosystem is unmatched. While we see the potential upside of the facility, there is still a lot of unclarity with regards to Article 22 and how this would be set up. Therefore and as a measure to limit crowding out by different instruments and implementing partners, we propose that funding from the ECF InvestEU Instrument to be implemented through the facility should in any case be implemented by the EIB.</p> <p>However, we are still not convinced that Article 22 is legally needed in order to launch instruments/ initiatives for the promotion of scale ups. Thus, we</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	propose having a discussion of different options, amongst those also a full deletion of Article 22
<p style="text-align: center;"><i>Article 23</i> Exclusivity clause</p>	
<p>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.</p>	<p>NL (Comments): Can you confirm that, due to the phrasing ‘directly implemented by the Commission’, this clause is not applicable to financing under the to be set up, privately managed Scale-up Europe Fund?</p> <p>FR (Comments): La délégation soulignera que le paragraphe 2 ne mentionne pas le fond du Conseil européen de l’innovation (CEI) alors même que cette clause l’exclusivité reconnaît la prééminence de l’instrument InvestEU sur le déploiement de l’ensemble des instruments financiers déployés sur le CFP.</p>
<p style="text-align: center;"><i>Article 24</i> EU Compartment and Member States Compartment</p>	<p>FR (Comments): S’agissant des compartiments Etats membres de l’instrument, la délégation pourra soutenir davantage d’information consolidée au niveau de l’Advisory Board permettant un pilotage global de l’instrument incluant également les opérations de blending.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>1. The ECF InvestEU Instrument shall consist of an EU Compartment and a Member State Compartment. Where appropriate, these compartments may be used in a complementary manner, including through a combination of resources in a layered structure to achieve better risk coverage.</p>	<p>NL (Comments): NL is against this addition. We do not see why InvestEU compartment should take first loss over national (NRPP?) contributions.</p> <p>SE (Drafting suggestions): 1. The ECF InvestEU Instrument shall consist of an EU Compartment and a Member State Compartment. Where appropriate, these compartments may be used in a complementary manner, including through a combination of resources in a layered structure to achieve better risk coverage.</p> <p>SE (Comments): SE is hesitant to include the text on MS compartments. It must be made clear that the risk is being taken by the national compartments, and that this does not mean that funds are being transferred from the EU compartment to MS compartment.</p> <p>RO (Drafting suggestions): The ECF InvestEU Instrument shall consist of an EU Compartment and a Member State Compartment. Where appropriate, these compartments may be used in a complementary manner, including through a combination of resources in a layered structure to achieve better risk coverage in a proportionate manner.</p> <p>RO (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>We consider that contributions to a layered structure should be guided by the <i>pari passu</i> rule, i.e. risk should be covered proportionately to the contributions from the MS and EU compartment respectively.</p> <p>DE (Drafting suggestions):</p> <p>1. The ECF InvestEU Instrument shall consist of an EU Compartment and a Member State Compartment. Where appropriate, these compartments may be used in a complementary manner, including through a combination of resources in a layered structure to achieve better risk coverage.</p> <p>DE (Comments):</p> <p>We are strictly opposed to this addition.</p> <p>ES (Comments):</p> <p>We can support the proposed change.</p> <p>FI (Comments):</p> <p>The complementarity cannot override excellence based funding, open competition or state aid rules.</p> <p>FR (Drafting suggestions):</p> <p>The ECF InvestEU Instrument shall consist of an EU Compartment and a Member State Compartment. Where appropriate, these compartments may be used in a complementary manner, including through a combination of resources in a layered structure to achieve better risk coverage.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>FR (Comments):</p> <p>La délégation pourra interroger la Présidence sur l’ajout de la seconde phrase. La délégation demandera à la Commission d’expliciter la structure multi-tranche envisagée et les risques afférents au compartiment UE. La délégation soulignera que la France n’est pas favorable à une structure multi-tranche permettant de mobiliser de la garantie UE pour couvrir les pertes des compartiments Etats-membres</p>
	<p>FR (Drafting suggestions):</p> <p><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></p>
<p>2. Specific contributions to the ECF InvestEU Instrument under Article 5(1) may be made in accordance with Articles 211(2) and 221(2) of Regulation (EU, Euratom) 2024/2509. Specific contributions to the budgetary guarantee under the ECF InvestEU Instrument shall result in an additional amount of the budgetary guarantee referred to in Article 21(3).</p>	
	<p>NL (Drafting suggestions):</p> <p>New art 2a: <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></p> <p><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</u></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p><u>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></p> <p><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></p> <p><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></p> <p><u>(d) any contribution from funds to the ECF InvestEU Advisory activities;</u></p> <p><u>(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</u></p> <p><u>(f) provisions on the remuneration for the part of the EU guarantee under the Member State compartment;</u></p> <p>NL (Comments):</p> <p>As we stated before, we think legal details of the MS compartment are not sufficient in the ECF regulation. We would like to support earlier FR drafting suggestion of bringing back details of the contribution agreement, but still also like to hear from CLS if this is sufficient for the working of the MS compartment.</p> <p>FR (Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p><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></p> <p><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></p> <p><u>The contribution agreement shall at least contain the following elements:</u></p> <p><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></p> <p><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></p> <p><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></p> <p><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></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p style="text-align: center;"><i>Article 25</i> Community of implementing partners</p>	<p>DE (Comments): According to recital 69, the implementation of the ECF InvestEU Instrument would build on existing guarantee agreements and contractual arrangements. We should discuss if this idea should be explicitly mentioned in the text of the regulation as well</p> <p>FR (Comments): La délégation pourra interroger la Commission sur une potentielle continuité des règles pour les partenaires de mise en œuvre. Elle pourra soutenir l'intégration de 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. Par ailleurs, cet article devrait faire mention des enjeux de consolidation de reporting.</p>
<p>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, while acknowledging the special role of the EIB Group.</p>	<p>MT (Comments): MT would like to have more information on the "open architecture model", particularly as to how this would work in practice.</p> <p>NL (Comments): Welcome the stronger text on the EIBG</p> <p>SE (Drafting suggestions): 1. The ECF InvestEU Instrument will be implemented by partners in an open architecture model, including the European Investment Bank (EIB) Group, international financial institutions, the national promotional banks and institutions, while acknowledging the special role of the EIB Group.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>SE (Comments): SE prefers the original text on EIB, i.e. only explicitly mentioning EIB as an implementing party rather than the addition of a special role for the EIB.</p> <p>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 and other national financial institutions, while acknowledging the special role of the EIB Group.</p> <p>SI (Comments): We suggest to add reference to other national financial institution since the financial instruments are implemented also through other financial institutions such as public funds.</p> <p>IE (Comments): IE welcomes the reference to the EIB Group. IE would welcome clarification on the role and definition of implementing partners.</p> <p>BE (Comments): Support for this special role of the EIB group</p> <p>EL</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>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, while acknowledging the existing special role of the European Investment Bank (EIB) Group and allowing for participation of new partners to broaden geographic coverage and SME access to funding</p> <p>EL</p> <p>(Comments):</p> <p>We welcome ensuring the continuation of the existing role of EIB group with its capacity and expertise, while on the same time we consider that the community of implementing partners should remain open and not be limited to existing ones.</p>
	<p>FR</p> <p>(Drafting suggestions):</p> <p><u>1.a. Consolidated reporting will be made available to the Steering Board of the instrument to ensure appropriate monitoring and decision-making of the instrument.</u></p> <p><u>1.b. 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></p> <p>FR</p> <p>(Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>Cet article devrait mentionner les défis liés à la consolidation des rapports des différents partenaires afin d’assurer une gestion efficace de cet instrument.</p> <p>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.</p>
<p>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.</p>	
<p>3. In addition to entities referred to in Article 62(1), first subparagraph, point (c), and Article 211(5) of Regulation (EU Euratom) 2024/2029, bodies established in a Member State, governed by the private law of a Member State or Union law may also be exceptionally entrusted, following a positive pillar assessment, with the implementation of a budgetary guarantee or financial instrument, including when combined with non-repayable support in a blending operation, to the extent that such bodies are provided with adequate financial guarantees which may be, for each action, limited to the maximum amount of the Union support. Those bodies governed by private law shall be selected with due account to the nature of the financial instrument or budgetary guarantee to be implemented, the experience and the financial and operational capacity, and their rules and procedures for verifying the economic viability of projects of final recipients. The selection shall be transparent, justified on objective grounds and shall not give rise to a conflict of interests.</p>	<p>NL</p> <p>(Drafting suggestions):</p> <p>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</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>shall be transparent, justified on objective grounds and shall not give rise to a conflict of interests.</p> <p>NL (Comments): Sill not convinced following the last AHWP discussion, propose to delete;</p> <p>RO (Comments): We kindly ask the Commission for examples of private bodies established in a MS and of the activities / sectors where these bodies would exceptionally be entrusted with the implementation of the ECF InvestEU.</p> <p>DE (Drafting suggestions): 3. — In addition to entities referred to in Article 62(1), first subparagraph, point (c), and Article 211(5) of Regulation (EU Euratom) 2024/2029, bodies established in a Member State, governed by the private law of a Member State or Union law may also be exceptionally entrusted, following a positive pillar assessment, with the implementation of a budgetary guarantee or financial instrument, including when combined with non-repayable support in a blending operation, to the extent that such bodies are provided with adequate financial guarantees which may be, for each action, limited to the maximum amount of the Union support. Those bodies governed by private law shall be selected with due account to the nature of the financial instrument or budgetary guarantee to be implemented, the experience and the financial and operational capacity, and their rules and procedures for verifying the economic viability of projects of final recipients. The selection shall be transparent, justified on objective grounds and shall not give rise to a conflict of interests.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>DE (Comments): We cannot follow the explanations provided so far why entities governed by private law would need to be added here. Therefore, we ask for deletion.</p> <p>BE (Drafting suggestions): 3. — In addition to entities referred to in Article 62(1), first subparagraph, point (c), and Article 211(5) of Regulation (EU Euratom) 2024/2029, bodies established in a Member State, governed by the private law of a Member State or Union law may also be exceptionally entrusted, following a positive pillar assessment, with the implementation of a budgetary guarantee or financial instrument, including when combined with non-repayable support in a blending operation, to the extent that such bodies are provided with adequate financial guarantees which may be, for each action, limited to the maximum amount of the Union support. Those bodies governed by private law shall be selected with due account to the nature of the financial instrument or budgetary guarantee to be implemented, the experience and the financial and operational capacity, and their rules and procedures for verifying the economic viability of projects of final recipients. The selection shall be transparent, justified on objective grounds and shall not give rise to a conflict of interests.</p> <p>BE (Comments): The best insurance for an implementation of the EU budget guarantee that clearly takes into account the EU interests and policy goals is through the EIB Group, NPBIs and international financial institutions, as it is the case under the current InvestEU programme.</p> <p>FR</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>3. In addition to entities referred to in Article 62(1), first subparagraph, point (c), and Article 211(5) of Regulation (EU Euratom) 2024/2029, bodies established in a Member State, governed by the private law of a Member State or Union law may also be exceptionally entrusted, following a positive pillar assessment, with the implementation of a budgetary guarantee or financial instrument, including when combined with non-repayable support in a blending operation, to the extent that such bodies are provided with adequate financial guarantees which may be, for each action, limited to the maximum amount of the Union support. Those bodies governed by private law shall be selected with due account to the nature of the financial instrument or budgetary guarantee to be implemented, the experience and the financial and operational capacity, and their rules and procedures for verifying the economic viability of projects of final recipients. The selection shall be transparent, justified on objective grounds and shall not give rise to a conflict of interests.</p> <p>FR (Comments):</p> <p>Nous ne sommes pas favorables à une architecture ouverte étendue aux acteurs privés, mais soutenons plutôt la consolidation du réseau de partenaires de mise en œuvre composé de banques publiques.</p>
	<p>FR (Drafting suggestions):</p> <p><u>3a</u> <u>The Commission may rely on in full or in part the agreements with implementing partners concluded under Regulation (EU) 2021/253, and</u></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p><u>on assessments made by itself or other entities in the context of agreements under that Regulation.</u></p> <p>FR (Comments): La France soutient la possibilité de continuité de spillar assessment, qui ne doit pas relever d'un simple considérant</p>
<p>Chapter III Project Advisory, SME Collaboration, skills development and Access to Funding Horizontal activities</p>	<p>AT (Comments): Horizontal activities: AT asks why the term “SME collaboration” was removed, because this weakens the visibility of SMEs (compare comment submitted for ECF subgroup on Nov24 as well as for written comments on Nov 11.</p> <p>FR (Comments): La délégation pourra indiquer que les dépenses visées à ce chapitre peuvent recouvrir un champ important, sans réel possibilité de suivi budgétaire pour le Conseil.</p> <p>A défaut, d'un encadrement plus étroit dans le règlement, la nomenclature budgétaire devra être adaptée de manière à ce que l'autorité budgétaire puisse disposer d'une visibilité sur ces dépenses et leur évolution.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>SECTION 1 PROJECT ADVISORY</p>	
	<p>PL (Drafting suggestions):</p> <p style="text-align: center;">Article 25b Horizontal work programmes</p> <p>The ECF shall support work programmes in sectors not explicitly covered by the four policy windows referred to in Article 1(2), while being consistent with the strategic priorities and capacities of the Member States, provided that such support contributes to the general objectives set out in Article 3(1) and complements the activities under this Regulation.</p> <p>PL (Comments):</p> <p>PL (Drafting proposals): This provision allows the ECF to support work programmes in sectors not covered by the four policy windows, while ensuring that such support is aligned with the strategic priorities and capacities of different Member States. By taking into account the strengths and capabilities of countries or groups of countries, e.g., those in Eastern or Southern Europe, not only from the perspective of the Union as a whole, the Fund can respond effectively to the needs of Member States as well as to emerging technological, industrial, and economic opportunities across different Member States. Linking these interventions to the general objectives set out in Article 3(1) and to the activities under the Regulation ensures coherence and prevents overlap, while fostering innovation and growth in sectors that are or may become strategically important for the Union and its Member States. This approach maximises the relevance and impact of the Fund’s support, ensuring that all Member States can engage with emerging opportunities in a manner consistent with their priorities and capacities.</p>

Article 26
ECF Project Advisory

NL

(Comments):

Can the Commission clarify the links with the EIC under Horizon Europe, which will perform (partially) similar activities as are foreseen for the Project Advisory?

SE

(Comments):

SE can accept the revisions in this article as whole but have some smaller remarks in paragraph 6.

IE

(Comments):

IE - Can the Commission clarify the links with the EIC under Horizon Europe, which will perform (partially) similar activities as are foreseen for the Project Advisory?

FR

(Comments):

Les autorités françaises sollicitent davantage de précisions quant aux propositions de la Commission afin de permettre la complémentarité avec les dispositifs déjà existants, la bonne coordination avec les acteurs nationaux et la visibilité de ces initiatives pour les porteurs de projets.

La délégation pourra souligner qu'il est inscrit dans la fiche technique que ces activités de conseil contribueront à « identifier un pipeline de projets éligibles aux financements du FEC, avec une large couverture géographique » et relever que le principe de mérite devrait être au centre de la sélection des projets. La délégation pourra réitérer ce

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>commentaire en réaction à la mention d'objectifs géographique au paragraphe 4.</p> <p>Est-ce que la Commission peut préciser la complémentarité avec le EU for Business Network ? L'articulation et les synergies avec les actions du « Business Accélération Service » de l'EIC doivent être envisagées dans cet article.</p>
<p>1. The ECF 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 IV, V, VI and VII.</p>	<p>IT (Comments): This is a key instrument for SMEs and microenterprises. It is important to double the current budget of €400 million for advisory activities. The positive experience of the INVESTEU Advisory Hub should be continued on a large scale.</p> <p>EL (Drafting suggestions): ... Chapters IV, V, VI and VII. Every Member State should have at least a national contact point for advisory services to businesses.</p> <p>FR (Comments): Il est pertinent de maintenir une distinction claire entre le futur EU for Business Network et le ECF Project Advisory tel qu'il existe aujourd'hui. L'ECF Project Advisory doit rester exclusivement dédié aux investissements privés, et non à l'accès aux programmes de financement par subvention de l'ECF. Cette séparation est importante, comme c'est déjà le cas entre EEN et</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	InvestEU, afin de garantir la clarté des missions et d'éviter toute confusion pour les entreprises.
<p>2. A centralised access to specialised advisory and business acceleration services shall be provided, which may include:</p>	<p>EL (Drafting suggestions): A centralised access to specialised advisory and business acceleration services shall be provided, securing that proposals that receive advisory support will not be favoured (in terms of scoring). Proposals should be approved through evaluation procedures. This centralised access may include:</p> <p>EL (Comments): It is essential to secure equal treatment among interested actors. Therefore, it needs to be clear that no advisory will affect the evaluation process.</p> <p>FR (Comments): L'articulation et les synergies avec les actions du « Business Accélération Service » de l'EIC doivent être envisagées.</p>
<p>(a) investment advisory services, including market development activities in strategic sectors 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;</p>	<p>RO (Drafting suggestions): (a) investment advisory services, including market development activities in strategic sectors and advisory support for the identification, preparation, development, structuring, procuring and implementation of investment projects. Particular attention should be given to investment projects promoted by two or more Members States.</p> <p>RO</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments):</p> <p>EU competitiveness is better supported at pan-European level, by facilitating collaborative investment projects in at least two MS.</p> <p>EE</p> <p>(Drafting suggestions):</p> <p>(a) investment advisory services, including market development activities in strategic sectors, and advisory support for the identification, preparation, development, structuring, procuring and implementation of investment projects, <u>and specific support for the valorisation and market uptake of research and innovation results funded under the ECF and other Union research programmes</u>, 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;</p> <p>EE</p> <p>(Comments):</p> <p>It is important for us to emphasize that ECF Project Advisory is also actively focused on advising on bringing research and innovation results to the market, thereby supporting the ECF's overall goal of ensuring the valorisation of research results.</p>
<p>(aa) 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;</p>	

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>(b) specialised advisory and business-coaching and acceleration services targeting potential ECF beneficiaries and other project promoters as well as companies in strategic sectors, including SMEs and small mid-cap companies, start-ups and scale-ups startups and scaleups, especially those developing or deploying innovative solutions, 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;</p>	<p>HR (Drafting suggestions):</p> <p>HR: HR suggest additional amendment. <i>b)offered by capital market based financing; as well as support for improving managerial and governance capacities of SMEs.</i></p> <p>IE (Comments): IE welcome the additions to the text, which bring greater clarity and focus</p> <p>IT (Drafting suggestions):</p> <p>(b) specialised advisory and business-coaching and acceleration services targeting potential ECF beneficiaries and other project promoters business-project promoters as well as companies in strategic sectors, including with a special attention to be devoted to SMEs and small mid-cap companies, startups and scaleups, especially those developing or deploying innovative solutions, supporting and facilitating their access to ECF funding and financing fostering synergies with different funding sources, and facilitating matchmaking with private investors and promoting understanding of the opportunities offered by capital market based financing;</p> <p>IT (Comments): A specific focus on SMEs should be embedded in this article. Creating synergies with different funding sources is crucial for ensuring more flexibly according to the specific needs at each stage.</p> <p>PT</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments):</p> <p>It is necessary to ensure that these “Project Advisory” services and capacity-building support are provided in a decentralized and accessible manner to SMEs in the Member States.</p> <p>BE</p> <p>(Comments):</p> <p>We understand the focus on companies but how will other beneficiaries referred to in recital 5 be accompanied? Could National Contact Points be nominated and NCP networks be supported (for instance under art 31?) as it is the case in many current programmes integrated in ECF (LIFE and Digital Europe for instance)</p>
	<p>SI</p> <p>(Drafting suggestions):</p> <p><u>(c) specific advisory services for first-time applicants and Member States referred to, in paragraph 3 of Article 12;</u></p> <p><u>(c1) support activities aimed at improving the quality of proposals from legal entities from low performing Member States, such as professional pre-proposal checks and advice, and boosting the activities of national advisory structures supporting international networking;</u></p> <p>SI</p> <p>(Comments):</p> <p>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</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	introduction of measures that would better safeguard such balance within ECF.
<p>(ba) support for the generation of project pipelines and the development of potential investment projects under the ECF InvestEU Instrument and contribute to their further development.</p>	<p>FR (Comments): La délégation pourra souligner que le paragraphe 2.(ba) mentionne que ces activités de conseil contribueront à « identifier un pipeline de projets éligibles aux financements du FEC, avec une large couverture géographique » et relever que le principe d'excellence devrait être au centre de la sélection des projets. La délégation pourra réitérer ce commentaire en réaction à la mention d'objectifs géographique au paragraphe 4.</p>
	<p>CZ (Drafting suggestions): <u>(c) tailored project advisory and proposal screening services supporting first-time applicants, aimed at reducing barriers to entry and facilitating successful participation and contribution;</u></p> <p>SK (Drafting suggestions): <u>e) specific advisory services for first-time applicants and Member States referred to, in paragraph 3 of Article 12;</u> <u>(c1) support activities aimed at improving the quality of proposals from legal entities from low performing Member States, such as professional pre-proposal checks and advice, and boosting the activities of national advisory structures supporting international networking;</u></p> <p>HR (Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>HR: HR suggest adding a new letter c) 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></p> <p>BE (Drafting suggestions):</p> <p><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></p> <p><u>(d) Clear, upfront guidance on the available funding and financing mechanisms for each development stage, along with the next steps in the potential funding trajectory (start-up, scale-up, roll-out). This gives project promoters a transparent view of the full pathway and enables ECF to anticipate early on to maximise project roll-out</u></p> <p>BE (Comments):</p> <p>c) 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.</p> <p>d) Providing project promoters with the opportunity to explore follow-up financing upon project completion ensures continuity and scalability of successful initiatives. It encourages sustained innovation, strengthens the impact of ECF-supported projects, and facilitates the translation of project results into further development or commercialization, thereby maximizing the return on investment for the Union. Recital 77 has been amended accordingly.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>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 or other relevant European groupings. It Project advisory shall be available under each policy window referred, covering all relevant sectors under that window. In addition, advisory, and may also provide support may cover general objectives and for cross-cutting actions and general objectives.</p>	<p>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 Project advisory shall be available in each Member State under each policy window referred, covering all relevant sectors under that window. In addition, advisory, and may also provide support may cover general objectives and for cross-cutting actions and general objectives.</p> <p>ES (Drafting suggestions): 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, Horizon Europe National Contact Points or other relevant European groupings. It Project advisory shall be available under each policy window referred, covering all relevant sectors under that window. In addition, advisory, and may also provide support may cover general objectives and for cross-cutting actions and general objectives.</p> <p>IE (Drafting suggestions): .3. Project advisory shall cooperate with industrial alliances and European clusters including regional business networks and/or nascent, sector-specific clusters, or other relevant European groupings. It shall be available under each policy window covering all relevant sectors and may also provide support for cross-cutting actions and general objectives.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>IE (Comments): IE notes the draft assumes existing clusters are sufficient.</p> <p>IE suggested text amendment aims to ensure the ECF encourages new cluster formation and supports SMEs to organise and access funding collaboratively, to address the need for knowledge and capacity-building.</p> <p>IT (Comments): Strong support to this provision.</p> <p>PT (Comments): It is necessary to ensure that these “Project Advisory” services and capacity-building support are provided in a decentralized and accessible manner to SMEs in the Member States.</p> <p>FR (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 and networks. It. Project advisory shall be available under each policy window referred, covering all relevant sectors under that window. In addition, advisory, and may also provide support may cover general objectives and for cross-cutting actions and general objectives.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>FR (Comments): Proposition d'ajout de la notion "networks" pour être certain que Enterprise Europe Network soit bien intégré ici.</p>
<p>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.</p>	<p>BG (Comments): We suggest the EC to use the currently developed national Governing Bodies of European funding and their experienced experts in the process of evaluation of projects.</p> <p>EE (Drafting suggestions): 4. The Commission may conclude advisory agreements with advisory partners and service providers in line with the needs of each policy windows. The Commission and the advisory partners, including the EIB Group, shall cooperate closely with a view to ensuring efficiency, synergies and local accessibility of advisory services effective geographic coverage across the Union, while taking account of existing structures and work. The Commission shall ensure close cooperation between Project Advisory services and Horizon Europe NCP net work in order to provide comprehensive advice on research projects.</p> <p>EE (Comments): It is essential to ensure the local accessibility of advisory services for repayable and non-repayable instruments in every Member State so that that they are easily and without barriers available for the applicants, preferably in the local language. Close</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>cooperation between ECF advisory services and Horizon NCP network is needed.</p> <p>EL (Drafting suggestions):</p> <p>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. <u>National advisory partners as agreed with Member States may act as antennas to ensure geographical coverage and facilitate access for SMEs and first-time applicants.</u></p> <p>EL (Comments):</p> <p>Taking into consideration the importance of Project advisory for preparation of Projects, we propose to build on the structure and experience of current InvestEU advisory hub and also use new advisory partners as antennas for geographical coverage at national and regional level , in a coherent way so the same quality of advice is everywhere provided. Otherwise, the gap of support widens and consequently makes the access to the fund resources unequal. Propose to enrich the pool of advisory partners so other bodies can become partners at act as antennas at national and regional level.</p> <p>FR (Drafting suggestions):</p> <p>The Commission may conclude advisory agreements with advisory partners and service providers in line with the needs of each policy windows. The</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>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.</p> <p>FR (Comments):</p> <p>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 ?</p> <p>La France recommande de renforcer les fonctions de veille technologique et de prospective stratégique afin d'identifier les technologies de rupture à un stade précoce et d'orienter les investissements en conséquence. Une cartographie technologique et industrielle régulière à l'échelle de l'UE devrait être produite et partagée avec les États membres afin d'orienter les priorités d'investissement et l'allocation des ressources du FEC.</p>
	<p>LU (Drafting suggestions):</p> <p>4a. 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 and for other advisory support the Commission may request.</p>
<p>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</p>	

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
and equal treatment, avoidance of conflict of interest, including conflicting professional interests.	
<p>6. When implementing the ECF 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.</p>	<p>NL (Drafting suggestions):</p> <p>6. When implementing the ECF 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 and transnational National Contact Point Networks.</p> <p>NL (Comments):</p> <p>The extend, diversity and unfamiliarity of the ECF to the wider public requires extensive promotion and support, both at European as well as national level. The NCP network has been developed to ensure impartiality, equal opportunities, the security of business information, and accessibility of tools (also in the native language). This becomes even more important with the proposed scale of the ECF. The NCP network has a proven trackrecord of support and are a prerequisite for success of the ECF.</p> <p>With this addition, there is a focus on strengthened collaboration between central project advisory services and national experts.</p> <p>SE (Drafting suggestions):</p> <p>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</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>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></p> <p>SE (Comments):</p> <p>SE generally considers that the regulation should clarify the role that national actors will play in the implementation of the ECF, and emphasizes the importance of including them.</p> <p>IT (Drafting suggestions):</p> <p>6. When implementing the ECF 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>and other EU networks on the ground.</u></p> <p>IT (Comments):</p> <p>Strong support to this provision. The involvement of EU for Business Network and other EU networks on the ground should be safeguarded.</p>
<p>SECTION 2 SME COLLABORATION</p>	

Article 27
EU for Business Network

SK

(Drafting suggestions):

Article 27

~~EU for Business Network~~

Enterprise Europe Network - EEN

SK

(Comments):

SK prefers keeping the brand “Enterprise Europe Network - EEN”, since it already has a solid recognition and reputation among EU SMEs.

SI

(Comments):

We suggest keeping the brand “Enterprise Europe Network - EEN”, since it already has a good recognition among EU SMEs. In addition to that also promotional material and branding already exists for EEN and there would be no need for additional costs.

FR

(Comments):

La création d’un « EU for Business Network » répond à un besoin réel de mutualisation et de coordination des réseaux existants. Cependant, il serait dommage de perdre l’investissement réalisé depuis 20 ans sur la notoriété de Enterprise Europe Network (EEN), qui couvre déjà l’ensemble des missions prévues par ce futur réseau, de l’accès aux marchés à l’accompagnement à l’innovation, en passant par la durabilité et la digitalisation. La conservation du nom et de la marque EEN semble donc essentielle, avis partagé par le Steering and Advisory Group du réseau.

Il est également crucial que le futur réseau puisse s’adresser à toutes les entreprises, sans restriction de secteur ou de taille. Les expériences passées ont montré que des réseaux trop ciblés risquent de limiter l’accès et l’efficacité de l’accompagnement proposé aux PME.

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>Par ailleurs, la France regrette l'ajout d'une mention des régions en transition.</p> <p>La France souhaite que cet article soit davantage développé. Quel est le montant indicatif associé à cet article ? La Commission peut-elle expliciter ce qu'elle entend par des « systèmes de bonus pour encourager la participation des PME » (fiche technique n°3) ? La Commission peut-elle donner un exemple d'appels dédiés pour les PME ?</p> <p>Comment la Commission entend-elle rendre ces initiatives visibles pour les PME et ETI ? Comment envisage-t-elle les collaborations avec les acteurs nationaux/régionaux déjà existants, notamment Enterprise Europe Network (EEN) ? S'agira-t-il d'un réseau « chapeau » regroupant les réseaux déjà existants ou d'une nouvelle entité indépendante ? Quels réseaux seront inclus exactement ? Quelle sera la plus-value réelle pour les entreprises, afin d'éviter les doublons et la complexité inutile ?</p> <p>Enfin, des clarifications sont nécessaires sur la structure et la valeur ajoutée de ce nouveau réseau : s'agira-t-il d'un réseau « chapeau » regroupant les autres réseaux, ou d'une nouvelle entité indépendante ? Quels réseaux seront inclus exactement (EEN, ECCP, SME Envoy Network...) ? Et surtout, quelle sera la plus-value réelle pour les entreprises, afin d'éviter doublons et complexité inutile.</p> <p>L'argumentaire indique que le réseau apporte la dimension UE et favorise les synergies. Or, le réseau EEN réalise déjà cette fonction, c'est l'essence même de son action depuis longtemps et plus particulièrement depuis 2022 avec le client journey. Il ne s'agit donc pas d'un apport nouveau</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>1. The “EU for Business” Network shall be established to help Union businesses become more competitive and innovate, grow and scale in the Single Market and beyond, with a particular emphasis on SMEs, startups, scaleups and small mid-cap companies. The network shall have a Union-wide and geographically balanced coverage, taking into account the specificities of all types of regions in the Union, including the less developed regions and the Union outermost regions.</p>	<p>CZ (Drafting suggestions): The “EU for Business” Network shall be established <u>in each Member State under its coordination.</u></p> <p>CZ (Comments): We believe it necessary in advisory services to know the specifics of individual countries and the environment in which the project will be implemented.</p> <ul style="list-style-type: none"> · Our request is simple. We need to create such an advisory structure that applicant can be granted advice locally taking it account their needs and specificities. · We believe that project advisory in a Member State should be coordinated by a single institution. Moreover, the EU for Business should follow up on most of the current functions of the EEN. · We submit that it is necessary to make use of the current structures that the Member States have already built. Whether it is NCPs or experienced structures built within the framework of cohesion policy, which know the environment in which the project will be implemented. <p>SE (Comments): SE can accept the proposed revisions to this article.</p> <p>EL</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments):</p> <p>The new wording of the Network should reflect the specific challenges of insular, outermost, less developed and transition regions. These areas face structural disadvantages that hinder business competitiveness and scaling, and should be explicitly considered in the design of the EU for Business Network.”</p> <p>FR</p> <p>(Comments):</p> <p>La délégation pourra demander des précisions à la Présidence sur ces modifications au paragraphe 1. Elle pourra regretter l’ajout d’une mention des régions en transition au paragraphe 1.b et saluer le maintien de la mention aux small mid caps.</p>
<p>1a. The objective of the Network is 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.</p>	<p>RO</p> <p>(Drafting suggestions):</p> <p>The objective of the Network is to help Union businesses become more competitive and innovate, grow and scale in the Single Market and beyond, with a particular emphasis primary focus on SMEs, and a particular emphasis on startups, scaleups and small mid-cap companies.</p> <p>IT</p> <p>(Drafting suggestions):</p> <p>1a. The objective of the Network is to help Union businesses, become more competitive and innovate, grow and scale in the Single Market and beyond, supporting skills development with a particular emphasis on SMEs, startups, scaleups and small mid-cap companies.</p> <p>IT</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Comments):</p> <p>Strong support to this provision.</p> <p>Skills development is key to innovate, increase productivity, and adapt to new technologies and market demands.</p>
<p>1b. 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.</p>	<p>RO</p> <p>(Comments):</p> <p>RO supports the principle of balanced geographical coverage and underlines the need to clarify how the effective participation of entities from less developed regions will be secured, ensuring that they can fully benefit from the opportunities offered by the network and contribute to European cohesion and competitiveness.</p> <p>IT</p> <p>(Drafting suggestions):</p> <p>1b. The network, <u>funded with adequate resources</u>, 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. <u>The network should streamline all the existing EU networks on the ground.</u></p> <p>IT</p> <p>(Comments):</p> <p>Strong support to this provision.</p> <p>A budget of more than 600 million euros is needed because it contains the future EEN and the future Cluster Alliance.</p> <p>EL</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>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, <u>insular areas</u> and the Union outermost regions.</p> <p>EL</p> <p>(Comments):</p> <p>Insular areas are areas with specificities where businesses face greater challenges and deserve special attention.</p> <p>FR</p> <p>(Drafting suggestions):</p> <p>1b. The network shall have a Union-wide 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.</p> <p>FR</p> <p>(Comments):</p> <p>La Commission peut-elle garantir que les principes de mérite, de préférence européenne et de renforcement de notre autonomie stratégique resteront les seuls principes directeurs des actions de ce fonds ?</p> <p>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 ? Comment la Commission entend-elle rendre ces initiatives visibles pour les PME et ETI ? Comment envisage-t-elle les collaborations avec les acteurs nationaux/régionaux ?</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>CZ (Drafting suggestions):</p> <p><u>2. 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. The Commission shall ensure effective sharing of relevant information to national advisory authorities in good time, enabling swift and seamless implementation of program updates and conditions at national and regional levels.</u></p> <p>CZ (Comments):</p> <p>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.</p> <p>In accordance with Article 4, dedicated funds for each Member State should be indicated, while the allocation key should reflect the experience and success rate of each Member State and support strengthen participation across the EU.</p> <p>PT (Drafting suggestions):</p> <p><u>(1c) The Project Advisory and EU for Business Network shall ensure effective territorial outreach, including specific mechanisms to support operators and public authorities in outermost regions.</u></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>PT (Comments):</p> <p>Clear division of competences is needed to avoid duplication and ensure meaningful territorial coverage. Advisory structures must be reachable by outermost regions operators and public health authorities.</p>
<p><i>Article 28</i> Business support</p>	<p>IE (Comments):</p> <p>IE would like to see clarity in the text on the use of all public monies, to include safeguards to avoid deadweight.</p> <p>FR (Comments):</p> <p>La délégation pourra souhaiter que cet article soit davantage développé. Quel est le montant indicatif associé à cet article ?</p> <p>La délégation pourra regretter l'ajout d'une mention des régions en transition et pourra soutenir l'ajout concernant la prise en considération des structures existantes. Elle pourra également rappeler l'importance des activités de recherche et d'innovation qui sont la première étape vers des activités de développement d'innovations et de technologies.</p> <p>Comment la Commission entend-elle rendre ces initiatives visibles pour les PME et ETI ? Comment envisage-t-elle les collaborations avec les acteurs nationaux/régionaux ?</p>
<p>1. The ECF shall conduct cross-cutting activities focused on strengthening the competitiveness of the SMEs and achieve additionality at</p>	<p>BG</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>Union level, taking into account existing structures and work, including through the following measures:</p>	<p>(Comments):</p> <p>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.</p> <p>Advisory support should be directed towards business associations, specialised associations and organisations, as well as the authorities of the Member States.</p> <p>CZ (Comments): CZ thanks the PRES for incorporating the continuity of existing structures.</p> <p>LV (Drafting suggestions):</p> <p>The ECF shall conduct cross-cutting activities focused on strengthening the competitiveness of business the SME and achieve additionality at Union level, 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, taking into account existing structures and work, including through the following measures:</p> <p>LV (Comments):</p> <p>Considering that this is a horizontal issue, we would like to clarify that business support is applicable to all types of companies.</p> <p>In Article 28.1 we would like to have an addition inspired by the last sentence of Article 27, with a more clear focus on the Union and all types of</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>regions in the Union, including the less developed regions, transition regions, and the Union outermost regions.</p> <p>SE (Drafting suggestions):</p> <p>1. The ECF shall conduct cross-cutting activities focused on strengthening the competitiveness of the SMEs and achieve additionality at Union level, taking into account existing structures and work, such as national advisory and support service providers, including through the following measures:</p> <p>SE (Comments):</p> <p>SE generally considers that the regulation should clarify the role that national actors will play in the implementation of the ECF and emphasizes the importance of including them.</p> <p>PT (Comments):</p> <p>PT welcomes this change as it acknowledges MS comments on the need to avoid duplication of structures. In this sense, PT would like to see this principle clearly stated in the article, following the remarks PT sent previously in what concerns the continuity of EEN.</p> <p>FR (Drafting suggestions):</p> <p>The ECF shall conduct cross-cutting activities focused on strengthening the competitiveness of the SMEs and achieve additionality at Union level, taking into account existing structures and work, including through the</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>following measures all actions and services carried out by the EU for Business network :</p> <p>FR (Comments): Comment la Commission entend-elle rendre ces initiatives visibles pour les PME et ETI ? Comment envisage-t-elle les collaborations avec les acteurs nationaux/régionaux ?</p>
<p>(a) provision of integrated business advice and support to companies, including through financial support to third parties;</p>	<p>NL (Comments): If the proposed business support is to be built on the EEN network, it is necessary to validate that the executing partners of this network are actually equipped to provide funding. An important value of FSTP is its decentralised provision, to support bottom-up programming and improve access to EU funding for smaller entities. Building on existing infrastructures for FSTP provision may prove more efficient (and effective).</p> <p>IE (Comments): .</p> <p>BE (Drafting suggestions): (a) provision of integrated business advice, including legal advice, and support to companies, including through financial support to third parties;</p>
<p>(b) provision of partnering opportunities and capacity building;</p>	<p>NL (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>Specifically, what is meant by partnering opportunities, and how does it differ from the matchmaking mentioned in Art. 26 2 (b)? Importantly, what is meant with capacity building? And for what?</p> <p>Consider for example that EEN is typically not equipped to provide financial, legal or technical trainings to support EU funding access - activities currently provided by other networks and capacities on which EEN relies.</p> <p>IE (Comments): IE would like clarification of the term ‘partnering opportunities’, and explanation of how it differs from the matchmaking mentioned in Art. 26 2 (b)? IE would also like clarification of the term ‘capacity building’?</p> <p>IT (Drafting suggestions): (b) provision of partnering opportunities and capacity building; also to make synergies among different funding sources possible.</p>
<p>(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;</p>	<p>LV (Drafting suggestions): support and assistance for access to technologies, technology infrastructure and facilities, support market uptake of innovation and support business organisations, SMEs, big businesses and small mid-cap companies, including startups and scaleups, to participate in collaborative platforms and sectors;</p> <p>LV (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>Considering that this is a horizontal issue, we would like to clarify that business support is applicable to all types of companies.</p> <p>NL (Comments):</p> <p>Access to technology infrastructures and facilities may be organised through already funded and appointed entities, consider for example EDIHs and Testing and Experimentation Facilities. How does this Article relate to that?</p> <p>EL (Comments):</p> <p>Equal access for all enterprises across EU with</p> <ul style="list-style-type: none"> - antennas of support in each MS - coverage of the different needs of all regions - include reference as in par to less developed regions, transition regions, insular and outermost regions <p>FR (Drafting suggestions):</p> <p>support and assistance for access to research and innovation activities, as well as to technologies, technology infrastructure and facilities, support market uptake of innovation and support business organisations, SMEs and small mid-cap companies, including startups and scaleups, to participate in collaborative platforms and sectors;</p> <p>FR (Comments):</p> <p>Important de mettre ici en exergue le rôle que jouent les PME dans certains secteurs économiques pour générer de la connaissance et des innovations, qui ne sont pas seulement d'ordre technologique et peuvent gagner d'importantes parts de marchés en Europe et à l'étranger.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>(d) promoting business understanding of Union policies, as well as obtaining feedback on their effectiveness;</p>	<p>SE (Comments): SE can accept the proposed revisions.</p>
<p>(e) increasing the access and the availability of finance in particular for SMEs as a priority, while also including micro-finance and support to social enterprises, and as well as for small mid-cap companies;</p>	<p>SE (Comments): SE can accept the proposed revisions.</p> <p>AT (Comments): AT asks, if there are competitive calls planned as “Business Support” (similar as it is at the current internal market program)? AT refers to the same question submitted for ECF subgroup on Nov24 as well as for written comments on Nov 11.</p> <p>IE (Comments): IE welcome the text on increasing access to finance for SMEs as a priority.</p>
<p>(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;</p>	<p>LV (Drafting suggestions): facilitation access to markets including through support to the internationalisation of SMEs businesses and provision of market intelligence, including in less developed regions, transition regions, and outermost regions;</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>LV (Comments): Considering that this is a horizontal issue, we would like to clarify that business support is applicable to all types of companies. The end of the sentence deleted because of the addition in Article 28.1</p> <p>SE (Comments): SE can accept the proposed revisions.</p> <p>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, transition regions, insular and outermost regions;</p> <p>EL (Comments): Addition of insular areas</p> <p>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;</p> <p>FR (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>La France souhaite que les principes d'excellence, de préférence européenne et de renforcement de notre autonomie stratégique restent les seuls principes directeurs des actions de ce fonds</p>
<p>(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;</p>	<p>LV (Drafting suggestions): improving the business environment for SMEs businesses and promote new business opportunities for SMEs businesses by supporting among others intellectual property valorisation, standard setting and public procurement;</p> <p>LV (Comments): Considering that this is a horizontal issue, we would like to clarify that business support is applicable to all types of companies.</p> <p>SI (Drafting suggestions): (g) improving the business environment for SMEs and promote new business opportunities for SMEs by supporting among others their transition to more sustainable business models, intellectual property valorisation, standard setting and public procurement;</p> <p>IE (Drafting suggestions): g) improving the business environment for SMEs and promote new business opportunities for SMEs by supporting among others intellectual property valorisation, standard setting and public procurement of innovation;</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>IE (Comments): IE suggested text amendment to emphasise the important role of innovation</p> <p>IE welcome the proposed support for standard-setting in draft Article 28 (g) “Business support” – “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.</p>
<p>(h) promoting entrepreneurship, including women and youth entrepreneurship and the acquisition of entrepreneurial and business skills.</p>	<p>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.</p> <p>SI (Drafting suggestions): (h) promoting entrepreneurship, including women and youth entrepreneurship and the acquisition of design thinking, design management, entrepreneurial and business skills.</p> <p>SI (Comments): Promoting also design thinking and design management skills in SMEs is of utmost importance, since these skills and knowledge strongly contribute to innovation performance of SMEs.</p>
	<p>BE (Drafting suggestions):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p><u>(i) providing SMEs with ex ante guidance for which European funding they might be eligible, including this Regulation;</u></p> <p>BE (Comments):</p> <p>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.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p style="text-align: center;"><i>Article 29</i></p> <p style="text-align: center;">Dedicated SME Actions to increase SME participation</p>	<p>LV (Drafting suggestions): Dedicated SME Actions to increase SME and small mid-cap companies participation</p> <p>LV (Comments): Considering that article 29 includes small mid-cap companies, the chapter name was requested to be clarified accordingly.</p> <p>EL (Comments): .</p> <p>FR (Comments): La délégation pourra souhaiter que cet article soit davantage développé, d'autant plus au vu de la référence faite nouvellement à l'article 15. Cet article devrait donner des indications plus précises d'appels spécifiques pour les SMEs.</p> <p>Quel est le montant indicatif associé à cet article ?</p>
<p>4. Each window shall support dedicated, sector-specific actions targeting start-ups, SMEs and small mid-cap companies startups or calls for SMEs in strategic sectors with a view to fostering innovation, business acceleration, commercialisation and scaling-up.</p>	<p>BG (Comments):</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>We fully support the amendments in art.29. Thus the scope is focused only on SMEs and start-ups. This ensures that calls for proposals are targeted exclusively at SMEs.</p> <p>LV (Drafting suggestions):</p> <p>Each window shall support dedicated, sector-specific actions targeting start-ups, SMEs and small mid-cap companies or calls for SMEs in strategic sectors with a view to fostering innovation, business acceleration, commercialisation and scaling-up, including tailored eligibility criteria and minimum allocation thresholds for SMEs and small mid-cap companies to ensure measurable participation and impact.</p> <p>LV (Comments):</p> <p>As an example, we would like to draw your attention to the fact that if a company has more than 250 employees, for example 260, then it is no longer a small company and will not be able to receive financing.</p> <p>The proposed addition introduces tailored eligibility criteria and minimum allocation thresholds for SMEs, which help ensure that SMEs are not only eligible but actively included and supported. This strengthens the effectiveness of ECF in reaching its SME-related objectives and allows for measurable tracking of SME participation.</p> <p>PL (Drafting suggestions):</p> <p>Each window The ECF shall support dedicated, sector-specific and horizontal actions, aimed at broadening participation across the Union, targeting startups or calls for</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>SMEs in strategic sectors and horizontal work programmes with a view to fostering innovation, business acceleration, commercialisation and scaling-up as well as strengthening the capacity of project promoters and beneficiaries to access and effectively use ECF instruments.</p> <p>PL (Comments):</p> <p>PL (Drafting proposals): The proposed additions aim to explicitly reinforce the objective of widening participation under the ECF. By specifying that sector-specific and horizontal actions should be “aimed at broadening participation across the Union” and at “strengthening the capacity of project promoters and beneficiaries to access ECF instruments,” the amendment clarifies that the Fund should not only support innovation, acceleration, commercialisation, and scaling-up, but also contribute to enabling eligible entities to effectively engage with ECF instruments.</p> <p>BE (Drafting suggestions): Each window shall support and promote dedicated, sector-specific actions targeting start-ups, SMEs and small mid-cap companies startups or calls for SMEs in strategic sectors with a view to fostering innovation, business acceleration, commercialisation and scaling-up.</p> <p>BE (Comments): Cf. previous arguments. SMEs should be able to know where opportunities lie.</p> <p>EL (Comments): We would like to clarify if scale-ups are excluded from these actions.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>We propose to also include the definition of start-ups in Article 2-Definitions, in order to ensure clarity, and define accurately the scope of the provision.</p> <p>We support the introduction of a dedicated SME section. It should address barriers faced by SMEs in less developed, transition and insular regions and provide simplified procedures</p> <p>FR (Drafting suggestions):</p> <p>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.</p> <p>FR (Comments):</p> <p>La délégation regrettera le retrait des start-ups et des SMC. Les études de la BEI indiquent que cette catégorie malgré sa contribution importante à l'innovation et la résilience en Europe souffre de difficultés de financement spécifiques, qu'il est nécessaire de traiter dans le cadre du fonds de compétitivité : https://www.eib.org/en/press/all/2024-004-new-report-finds-mid-caps-untapped-potential-is-vector-for-european-growth-and-digital-and-economic-transition</p>
	<p>CZ (Drafting suggestions):</p> <p><u>2. All actions under the ECF shall allow the participation of SMEs and be designed accordingly. Dedicated actions or calls as referred to in</u></p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p><u>paragraph 1 shall not limit the participation of innovative enterprises in non-dedicated actions.</u></p> <p>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.</p> <p>ES (Drafting suggestions): <u>2. An amount of EUR [X] of the amount referred to in the paragraph 1 of Article 4 shall be allocated for SMEs.</u></p> <p>ES (Comments): The Regulation should be clearer and more specific on the support granted to SMEs, including by ringfencing a specific amount for this purpose (ideally, differentiated for each window).</p> <p>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></p> <p>PT</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p><u>2) Support instruments shall ensure equal and effective access for SMEs located in outermost regions, taking into account permanent geographic and logistic constraints.</u></p> <p>PT (Comments):</p> <p>The improved reference to SMEs is welcomed; however, support tools must be accessible to SMEs and start-ups located in outermost regions, recognising structural additional costs.</p>
<p><i>Article 30</i> Support for skills development</p>	<p>IT (Comments):</p> <p>EU for business network should integrate these policy actions into its objectives.</p> <p>FR (Comments):</p> <p>La délégation pourra indiquer que les dépenses visées à cet article peuvent recouvrir un champ important, sans réel possibilité de suivi budgétaire pour le Conseil. A défaut, d'un encadrement plus étroit dans le règlement, la nomenclature budgétaire devra être adaptée de manière à ce que l'autorité budgétaire puisse disposer d'une visibilité sur ces dépenses et leur évolution.</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
<p>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 skills intelligence, upskilling and reskilling of the workforce and Vocational Education and Training (VET) partnerships to strengthen cooperation between VET providers and businesses, especially SMEs and connecting them with regional industrial ecosystems.</p>	<p>BG (Comments): We welcome the promotion of Vocational Education and Training (VET) through the EFC and the participation of businesses in the training of young people and the improvement of employees qualifications.</p> <p>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 transitions in favour of strategic growth sectors or occupations across the labour market through skills intelligence, upskilling and reskilling of the workforce and Vocational Education and Training (VET) partnerships to strengthen cooperation between VET providers and businesses, especially SMEs and connecting them with regional industrial ecosystems, <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></p> <p>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</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>proposed measures could include not only reskilling and upskilling, but also skills intelligence, mobility and exchanges, as well as technical assistance to Member States.</p> <p>RO (Drafting suggestions):</p> <p>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 skills intelligence, upskilling and reskilling of the workforce and Vocational Education and Training (VET) partnerships to strengthen cooperation between VET providers and businesses, especially SMEs and connecting them with regional industrial ecosystems, including through the development of training pathways and curricula, joint programmes, apprenticeships and work-based learning, in support of the deployment of strategic technologies.</p> <p>RO (Comments):</p> <p>RO welcomes the structure and intent of Article 30 and considers that skills development is instrumental for enabling the deployment, adoption and scale-up of technologies associated with the twin transitions. However, the current wording focuses predominantly on cooperation and intelligence and does not explicitly address <i>training pathways, curricula development, joint programmes, apprenticeships and work-based learning</i>, which are essential for ensuring a demand-driven, industry-relevant and rapid response to evolving labour market needs. Moreover, the article does not explicitly reference the role of the Net-Zero Industry Academies introduced under</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>Regulation (EU) 2024/1735 (NZIA), nor the ability of the ECF to support the establishment and operation of such structures.</p> <p>This modification aligns with existing Union initiatives and does not expand the scope of the Article, but enhances its operational clarity and relevance for labour market needs across strategic sectors.</p> <p>SI (Drafting suggestions):</p> <p>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>existing Erasmus+ and other mechanisms aimed at skills development</u> to support value chain 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>such as through Centres of Vocational Excellence, Pact for Skills and European University Alliances</u>.</p> <p>SI (Comments):</p> <p>EU needs to be future-oriented also when supporting skills development. SI suggests deleting the reference to "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 mentioning the existing initiatives, for instance Pact for Skills, Centres of Vocational Excellence, also European University Alliances etc.</p> <p>DE</p>

Presidency text (doc. 15348/25)	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>- 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 be done primarily as a part of a broader ECF activity. Complementarities with the European Social Fund shall be ensured. This shall include support for a European Skills Guarantee to support value chain transitions in favour of strategic growth sectors or occupations across the labour market through skills intelligence, upskilling and reskilling of the workforce and Vocational Education and Training (VET) partnerships to strengthen cooperation between VET providers and businesses, especially SMEs and connecting them with regional industrial ecosystems.</p> <p>DE</p> <p>(Comments):</p> <p>The responsibility of MS for education laid down in Articles 165 and 166 TFEU must not be affected by the activities set out in Article 30. The European added value must be more clearly defined in the article. ECF skills measures should primarily be considered as part of projects. However, the current wording also allows for skills promotion per se; in this context, it is important to explore the potential and future needs and to ensure European added value. In addition, it should be explicitly stated that complementarity with ESF measures must be ensured – duplication must be ruled out. Additionally, we would like to know why “Skills intelligence” was added? Skills intelligence is only usable if one invests in human skills first</p> <p>BE</p> <p>(Comments):</p> <p>Nous souhaitons que cet article soit laissé en l’état car il défend le <i>Vocational Education and Training</i> (VET) lequel couvre l’ensemble des programmes</p>

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	<p>d'enseignement et de formation qui permettent de transmettre des compétences pratiques et directement utilisables dans le monde du travail.</p> <p>EE (Drafting suggestions):</p> <p>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 to support value chain transitions in favour of strategic growth sectors or occupations across the labour market through skills intelligence, upskilling and reskilling of the workforce and Vocational Education and Training (VET) partnerships to strengthen cooperation between VET providers and businesses, especially SMEs and connecting them with regional industrial ecosystems, <u>such as through Centres of Vocational Excellence and European University Alliances.</u></p> <p>EE (Comments):</p> <p>We believe that future technologies should be highlighted, as they emphasize the need to steer skills development towards areas that shape the future of the European economy and its strategic autonomy. This also supports cooperation between education, research, and business to accelerate innovation and enhance competitiveness.</p> <p>European Skills Guarantee - if this refers to a pilot project mentioned in the <i>Union of Skills</i> communication, it would not be reasonable to include anything in the regulation that lacks clarity at the moment or Council approval. We would like to delete it.</p> <p>Centres of Vocational Excellence and European University Alliances are examples of existing EU initiatives that support skills development and</p>

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	<p>cooperation between education and business. They have proven their effectiveness and deserve to be highlighted.</p> <p>EL (Comments): Skills actions should explicitly address gaps in less developed, transition and insular regions, where shortages are acute.</p> <p>FR (Drafting suggestions): The ECF shall finance activities in support of skills development, in particular in the strategic sectors, sectors for EU competitiveness and sovereignty, building strong links between higher education, vocational education and training providers, applied-research and businesses for an agile, innovative, sustainable, resilient and competitive economy. This shall include support for a European Skills Guarantee to support value chain transitions in favour of strategic growth sectors or occupations across the labour market through skills intelligence, upskilling and reskilling of the workforce and Vocational Education and Training (VET) partnerships to strengthen cooperation between VET providers and businesses, especially SMEs and connecting them with regional industrial ecosystems <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></p> <p>FR (Comments): Les alliances d'universités européennes, financées par Erasmus+, sont des acteurs clés de la compétitivité mondiale et contribuent activement à leurs écosystèmes d'innovation. Le FEC devrait également contribuer à leur</p>

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	financement, car elles constituent un levier pour les écosystèmes d'innovation européens intégrés à travers l'Europe
<p>SECTION 3 BENEFICIARY SERVICE DESK</p>	
<p><i>Article 31</i> Access to Union funding</p>	<p>FR (Comments):</p> <p>La délégation pourra indiquer que les dépenses visées à cet article peuvent recouvrir un champ important, sans réel possibilité de suivi budgétaire pour le Conseil. A défaut, d'un encadrement plus étroit dans le règlement, la nomenclature budgétaire devra être adaptée de manière à ce que l'autorité budgétaire puisse disposer d'une visibilité sur ces dépenses et leur évolution.</p>
<p>1. [In accordance with Article 150 of Regulation (EU, Euratom) 2024/2509, the ECF shall contribute to the maintenance and extension of the single electronic data interchange area for participants to ensure simplified access to Union funding. That contribution shall be irrespective of the mode or instrument of budget implementation and including advisory and business acceleration services and support to a single gateway for access to Union support in accordance with Regulation (EU) [XXX] [Performance Regulation].]</p>	

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<p>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.</p>	<p>RO (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, promoting balanced access and enhancing competitiveness across all Member States, regions and the Union as a whole.</p> <p>RO (Comments): This amendment clarifies the objective of ensuring balanced access to financing opportunities under Union instruments and supports competitiveness at regional, national and Union level. It reinforces the contribution of the ECF to a fair and efficient access to resources, technologies and innovation, in line with Union cohesion and competitiveness objectives, preventing the concentration of opportunities and enabling all Member States and regions to benefit from and contribute to the Union’s strategic priorities and competitiveness.</p> <p>IT (Drafting suggestions): 2. The ECF may support additional activities to facilitate and accelerate access to Union funding, as well as other funding sources, investments, and resources. Furthermore, it will aim to ensure the valorization 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>The establishment of a One Stop Shop and an EU web portal may be envisaged.</u></p>

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	<p>IT (Comments):</p> <p>In this context, it is essential to foresee the establishment of a "One Stop Shop" and an EU-style web portal that centralizes information and services, simplifying access to resources and streamlining processes for beneficiaries.</p> <p>BE (Comments):</p> <p>This provision is important to ensure that all kind of actors beyond companies (covered in previous articles) can be supported in their application process from awareness on calls to drafting application.</p> <p>How will other beneficiaries referred to in recital 5 be accompanied? Could National Contact Points be nominated and NCP networks be supported as it is the case in many current programmes integrated in ECF (LIFE and Digital Europe for instance)</p>
	<p>EL (Drafting suggestions):</p> <p><u>2 a. In particular, the possibility for a simplified selection procedure for operations that have been attributed a Seal of Excellence should be extended to the NRPP Fund.</u></p> <p>EL (Comments):</p> <p>Complementarity between the ECF and the National and Regional Partnership Plans (NRPPs) should be ensured.</p> <p>Projects awarded a Competitiveness Seal should remain eligible for NRPP support without re-evaluation.</p>

Proposal for a Regulation establishing the European Competitiveness Fund (doc. 15348/25) (Chap. I-III)

Deadline: 5 December 2025 cob

From: BG, CZ, LT, LV, MT, NL, SE, SK, RO, SI, AT, DE, ES, FI, HR, IE, IT, LU, LU, PL, PT, BE, EE, EL, FR

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