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General Secretariat

PUBLIC

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LIMITE

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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. 14282/25) - comments from AT, BE, BG, CZ, DE, ES, FI, FR, HR, HU, IE, IT, LU, LV, MT, NL, PL, PT, RO, SE, SI, EE, EL

Proposal for a Regulation establishing the European Competitiveness Fund (doc. 14282/25) Deadline: ***11 November 2025***
From: AT, BE, BG, CZ, DE, ES, FI, FR, HR, HU, IE, IT, LU, LV, MT, NL, PL, PT, RO, SE, SI, EE, EL **Updated: 13/11/2025**

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Guidelines to be followed

Please kindly provide your contributions in the table below.

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

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

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

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

Thank you for your cooperation!

Presidency text (doc.14282/25)	Drafting suggestions and Comments
General Comments	AT (Drafting suggestions): We propose to add a general definition of market failures, suboptimal investment situations, additionality and excluded activities in the regulation, e.g. under Art 2 “definitions” referring to an Annex comparable to Annex V of InvestEU; Although the Financial Regulation refers to market failure, suboptimal investment situations, or additionality, it does not define these terms. AT (Comments): We should better define market failures, suboptimal investment situations, additionality and excluded activities so to enable smooth implementation of the ECF.

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	DE (Comments): We welcome the improvements made in the second DK PCY text so far. These clearly point to the right direction in the areas of governance and assessment of proposals. In order to improve the text further, we would like to ask the PCY to include our following text proposals. In general, we reserve the right to make further suggestions and comments in the negotiating process. LU (Comments): LU comments: Luxembourg supports a stronger public-health spine within the Health window: prioritising disease prevention, population health, and capacity-building across Member States to lift competitiveness via a healthier, more productive workforce. Work programmes for the Health window should use the examination procedure and ensure structured involvement of national health authorities and EU health agencies (ECDC, EMA, HERA). We support continuity with EU4Health to avoid loss of momentum in prevention and health-system resilience, alongside explicit support for MS administrative capacity and frontline civil-society implementers. PL (Drafting suggestions): **While promoting geographical balance in the implementation of the Fund ensures that all Member States can contribute to and benefit from strategic tehcnological and**

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	industrial projects, thus supporitng the Union's resilience, competetiveness, innovation capacity, and cohesion PL (Comments): We would like to emphasize that the growing geopolitical tensions on NATO's eastern flank necessitate the undertaking of defence measures. Poland and the Baltic States are at the center of deployment operations, and their role as a logistical corridor requires not only adequate transport infrastructure (roads, railways, airports) but, above all, a continuous supply of fuel. Poland and the Baltic States are not fully integrated into the NATO Pipeline System (CEPS), which limits their ability to receive and distribute fuel in times of crisis. Road and rail transport cannot provide supplies on the required scale, which poses the risk of operational paralysis. Pipelines enable a steady supply to bases and storage facilities and are resilient to fluctuations in demand. Therefore, the construction of pipelines serving military purposes—particularly those ensuring connections with the NATO fuel pipeline system—as well as the construction of fuel storage facilities for the needs of Allied armed forces, should be eligible under the EDF for the years 2028–2034. The provisions of the EDF Regulation should adequately reflect this. Detailed proposals regarding the recital and the specific article of the Regulation will be submitted in the next drafting round. The ECF regulation should not overlook the national and EU-level potential established prior to the proposal, particularly with regard to National Coordination Centers and Network activities. Any new developments must take existing potential into account in order to best utilise these funded and well established mechanisms. SE (Comments):

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Presidency text (doc.14282/25)	Drafting suggestions and Comments
	SE has not been able to review the recitals in detail and maintains a scrutiny reservation regarding this part of the proposal. SE finds it difficult to take a final position on parts of the proposal that relate to Horizon Europe, given that the question of the programming of the competitiveness part of pillar II in Horizon is bracketed and dealt with in the horizontal MFF track. Certain aspects of the non-bracketed parts will depend on what this eventually looks like and how it is designed. SE has a scrutiny reservation regarding this link, and the proposed amendments below should be viewed in light of this.
	MT (Comments): **Active Role of Member States** Malta is advocating for a very active role of Member States in the strategic direction and governance of the ECF. Malta is calling for the usage of the examination related to the work programmes for all the policy windows. We do understand that there might be some sensitivities in relation to security and defence. **All EU Member States benefit from the ECF** The importance that all Member States benefit from ECF by broadening European manufacturing excellency. **Small and Medium Sized Enterprises** Malta is of the belief that there is a need to strengthen the focus on SMEs in Chapters I, II and III of the ECF proposal because they are crucial for the EU's economic growth and climate goals, yet face significant challenges from inflation, energy prices, and a lack of tailored support. This strengthening should be done by ensuring simplified access to funding, providing integrated business advice for sustainability, and promoting inclusive policies.

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

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	EUR 10 billion to EUR 20 billion. MT is also calling for a review to take place in the middle of the programming period to reassess this 75%. Since financial instruments involve long-term planning and need to involve stakeholder investment legal certainty, it is important that they are excluded from the annual work programme through ad hoc delegated act. Questions related to InvestEU and financial instruments: (a) With the loss of the SME Window under the current InvestEU window, is the access to finance for SMEs going to be less as this is going to be spread over four windows? (b) Some small EU Member States do not have export credit guarantee facilities, through the ECF InvestEU is it possible to create such a pan European Instrument? We are aware that under the current InvestEU a pilot was created concerning Ukraine. This was a real success being oversubscribed but only benefitted those Member States that already had an export credit agency in place. **It would be necessary to ensure that where EU funding is used by export credit agencies, the support provided by such export credit agencies should be open to exporters from across the EU.**
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]	AT (Comments): 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 mention health as a key objective**. In addition, AT requests clarification on the interplay between UCPM+ and the ECF. According to information provided by the European Commission, the budget for health priorities (which is currently part of EU4Health) as

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	well as health emergency preparedness and response measures will be included in the UCPM+ while the governance of this budget will be included in the ECF. Further information is therefore needed on the interplay between the health budget in the UCPM+ and the budget allocated to health in the policy window of the ECF. IE (Drafting suggestions): Art 3(2)(d)(2) For support to EU defence industry. the specific objectives of promoting defence industrial readiness of the Union and its Member States through the strengthening of the competitiveness, responsiveness and ability of the European Defence Technological and Industrial Base (EDTIB), including support to start-ups, scale-ups and SMEs, fostering an innovative EU defence ecosystem; Collaborative research and development of defence **and dual-use** products and technologies, including disruptive technologies for defence; Cooperation throughout the life-cycle of defence equipment, in particular in defence procurement and for the development of European defence projects of common interest; Adjustment of industry to structural changes." Art 4(c) EUR 20 393 000 000 for the specific objectives referred to in Article 3(2), point (b); **May also support analytical and monitoring activities related to the identification and reduction of high-risk strategic dependencies** Art 10(1) The ECF support shall target development manufacturing and exploitation in the Union of strategic technologies and sectors, in line with Union law and international commitments. The award

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	procedures may apply any of the conditions set out in paragraph 2 to protect Union's strategic and economic security interests, as well as security and critical assets and the services they provide. **When applying the conditions in paragraph 2, the Commission and implementing bodies shall ensure that the measures are in line with the objective in Article 3(b) to reduce and prevent high-risk strategic dependencies.** IE (Comments): General Comments: IE welcomes the a stronger role for MS within the ECF with the introduction of the examination procedure for all work programmes IE also welcomes the text in Article 15 - work programmes - describing how they support SMEs and ensure their needs are addressed. IE however, still 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. IE also would like to emphasise the importance of including productivity growth (as key element of competitiveness) in the overarching objective of the ECF. Specific Comments:

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	IE - Art 3(2)(d)(2) Consideration should be given to inserting the words "and dual-use". Such an addition of "dual use" would 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. IE -Art 4(c) and 10(1) IE would like to propose the text across on high risk dependencies, in line with our intervention at WP. IT (Drafting suggestions): Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on establishing the European Competitiveness Fund ('ECF'), including the specific programme for defence research and innovation activities, repealing Regulations (EU) 2021/522, (EU) 2021/694, (EU) 2021/697, ~~**(EU) 2021/783**~~, and amending Regulations (EU) 2021/696, (EU) 2023/588, (EU) [EDIP] IT (Comments): **Italy advocates for the continuation of LIFE as a stand-alone programme with its own independent budget and Regulation. The proposed structure of the next MFF fails to adequately protect all objectives, priority areas of intervention, projects and beneficiaries of the existing LIFE Programme.**

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	PT (Comments): PT welcomes the direction of the Presidency text and calls for the integration of explicit territorial cohesion safeguards and Outermost Region participation mechanisms throughout Articles 3–15. The ORs should benefit from reinforced eligibility conditions and decentralised implementation, with additional support to offset ultraperipheral costs. It is further suggested that the Outermost Regions be represented in the Strategic Council, and that regional health projects be acknowledged under the "Competitiveness Seal". These measures would ensure the effective participation of the Outermost Regions in strengthening Europe's competitiveness in the health sector. RO (Comments): **Romania reiterates its support for the following elements:** • **An inclusive and territorially balanced approach**, ensuring that all Member States and regions can fully benefit from opportunities related to competitiveness, innovation, and technological progress. • **The valorisation of higher education partnerships**, such as the *European University Alliances*, as well as the **strengthening of the link with the "Skills Union" initiative** and the **enhanced involvement of SMEs in skills partnerships**, as key drivers for developing advanced competences, fostering innovation, and supporting industrial transformation. • **The central role of SMEs as core beneficiaries of the European Competitiveness Fund (ECF)**. Romania underlines the importance of

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	ensuring equitable access for SMEs from all Member States and regions, which is essential for reinforcing European value chains and preventing unequal development that could result from the concentration of resources and technologies in a limited number of Member States. Romania welcomes the explicit inclusion of a dedicated SME section in the ECF work programmes. • **A balanced approach between excellence-based criteria and those promoting spread of excellence across all EU regions and Member States**, in order to foster convergence and inclusive competitiveness. • **Enhanced coordination between the ECF and national initiatives supporting competitiveness**, to maximize synergies and policy coherence (eg. NRPP and other national programmes for research, innovation and competitiveness). • **Clarification of the definition of applied research**, ensuring its alignment with the concepts of industrial research and experimental development, in order to strengthen consistency and predictability in implementation.
THE EUROPEAN PARLIAMENT AND THE COUNCIL OF THE EUROPEAN UNION,	
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,	FR (Drafting suggestions): 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(**1**), Article 183 in conjunction with Article 188, second paragraph,

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	Article 189(2), Article 192(1), Article 194(2), Article 212(2) and Article 322(1), point (a), thereof, FR (Comments): Cette base juridique prévoit une procédure législative spéciale, incompatible avec les autres bases juridiques prévoyant la PLO (au titre de la *jurisprudence dioxyde de titane*). L'article 182-1 TFUE prévoit bien la PLO.
Having regard to the proposal from the European Commission,	
After transmission of the draft legislative act to the national parliaments,	
Having regard to the opinion of the European Economic and Social Committee,[1]	
Having regard to the opinion of the Committee of the Regions,[2]	
Having regard to the opinion of the Court of Auditors,	
Acting in accordance with the ordinary legislative procedure, Whereas:	
	ES (Comments): Study reserve in all recitals as many of them depend on the ongoing negotiations at the ECF and Horizon Europe programs. PT

[1] OJ C , , p. .
[2] OJ C , , p. .

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	(Comments): PT reserves the possibility of issuing further comments to the recitals in future iterations. At this stage those referred to down below are still preliminary.
(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 Competitiveness[3] presented a new vision to reignite sustainable growth in Europe. The Letta report[4] outlined that Europe must leverage its Single Market to achieve a leadership position in the global competition. The Commission communication on the Competitiveness Compass[5] provided a roadmap for boosting competitiveness, building on the recommendations of these reports. The Commission communication on the Clean Industrial Deal[6] 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	BE (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 Competitiveness[10] presented a new vision to reignite sustainable growth in Europe. The Letta report[11] outlined that Europe must leverage its Single Market to achieve a leadership position in the global competition. The Commission communication on the Competitiveness Compass[12] provided a **joint** roadmap for boosting competitiveness **and decarbonisation**, building on the recommendations of these reports. The

3 The future of European competitiveness: Report by Mario Draghi, September 2024, https://commission.europa.eu/topics/eu-competitiveness/draghi-report_en
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.
5 Competitiveness compass - European Commission
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.
10 The future of European competitiveness: Report by Mario Draghi, September 2024, https://commission.europa.eu/topics/eu-competitiveness/draghi-report_en
11 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.
12 Competitiveness compass - European Commission

Presidency text (doc.14282/25)	Drafting suggestions and Comments
industry. The State of the Digital decade 2025[7] 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 Readiness[8] 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.	Commission communication on the Clean Industrial Deal[13] 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 2025[14] 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 Readiness[15] 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

7 COM(2025) 290 final State of the Digital Decade 2025: Keep building the EU's sovereignty and digital future.
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.
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.
13 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.
14 COM(2025) 290 final State of the Digital Decade 2025: Keep building the EU's sovereignty and digital future.
15 Joint Communication to the European Parliament, the European Council and the Council on 'European Economic Security Strategy', JOIN(2023) 20 final, 20.6.2023.

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	Commission Communication on the Road to the next MFF,[16] 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. ES (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 Competitiveness[17] presented a new vision to reignite sustainable growth in Europe. The Letta report[18] outlined that Europe must leverage its Single Market to achieve a leadership position in the global competition. The Commission communication on the Competitiveness Compass[19] provided a roadmap for boosting competitiveness, building on the recommendations of these reports. The Commission communication on the Clean Industrial Deal[20] 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

16 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.

17 The future of European competitiveness: Report by Mario Draghi, September 2024, https://commission.europa.eu/topics/eu-competitiveness/draghi-report_en

18 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.

19 Competitiveness compass - European Commission

20 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.

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	industry. The State of the Digital decade 2025[21] 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 Readiness[22] 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,[23] 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. **The pharmaceutical, biotechnology and life sciences sectors are central to Europe's innovation-driven competitiveness. They generate world-class research and development, create high-value jobs, and drive breakthrough technologies. The Draghi Report identifies these sectors as strategic for closing the gap with global competitors and achieving Europe's strategic autonomy. Strengthening Europe's life sciences ecosystem is therefore essential to foster growth, enhance resilience, and secure technological leadership.** ES (Comments):

21 COM(2025) 290 final State of the Digital Decade 2025: Keep building the EU's sovereignty and digital future.

22 Joint Communication to the European Parliament, the European Council and the Council on 'European Economic Security Strategy', JOIN(2023) 20 final, 20.6.2023.

23 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.

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	Specific mentions to pharma, biotech or health sciences are missing in the text. IE (Drafting suggestions): Text addition ….. **The State of the Digital decade 2025[24] highlights the urgent need to foster cooperation and increase public and private investments to achieve the digital transition needed for strengthening the Union's digital leadership, sovereignty and inclusiveness.** IE (Comments): **IE suggested text addition to the article.** The Draghi report and then the competitiveness compass published in January 2025 recognise that digital transformation is a key enabler for the EU to close the innovation gap. This additional language is suggested to underline that achieving the digital transition is key to the EU's competitiveness, which can then enable digital leadership and long-term sovereignty. SE (Drafting suggestions): The Letta report[25] outlined that Europe must leverage its Single Market to achieve a leadership position in the global competition. The Commission communication on the Competitiveness Compass provided a roadmap for

[24] COM(2025) 290 final State of the Digital Decade 2025: Keep building the EU's sovereignty and digital future.
[25] 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.

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	boosting competitiveness, building on the recommendations of these reports. **The Commission communication EU Action Plan on Cable Security emphasized the need for security and resilience of submarine cable infrastructures.** The Commission communication on the Clean Industrial Deal outlined the need to accelerate decarbonisation, reindustrialisation and innovation (…) SE (Comments): 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. EE (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 Competitiveness[26] presented a new vision to reignite sustainable growth in Europe. The Letta report[27] outlined that Europe must leverage its Single Market to achieve a leadership position in the global competition. The Commission communication on the Competitiveness Compass[28] provided a roadmap for boosting competitiveness, building on the recommendations of these reports. The Commission communication on the

[26] The future of European competitiveness: Report by Mario Draghi, September 2024, https://commission.europa.eu/topics/eu-competitiveness/draghi-report_en

[27] 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.

[28] Competitiveness compass - European Commission

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	Clean Industrial Deal[29] 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 2025[30] 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 Readiness[31] 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,[32] the next Union long-term budget needs to be more focused, simpler, more flexible, and predictable and better deliver on the Union **and national** priorities, including bolstering the Union competitiveness. EE

[29] 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.

[30] COM(2025) 290 final State of the Digital Decade 2025: Keep building the EU's sovereignty and digital future.

[31] Joint Communication to the European Parliament, the European Council and the Council on 'European Economic Security Strategy', JOIN(2023) 20 final, 20.6.2023.

[32] 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.

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	(Comments): Alongside the priorities of the European Union, it is also necessary to take into account the strategic priorities and development needs of the Member States in areas that require consideration of their specific characteristics (such as cybersecurity and digitalization) as well as their long-term strategic development needs.
	AT (Drafting suggestions): (2bis) The general objective of the ECF is to strengthen the Union's competitiveness **by addressing market failures and sub-optimal investment situation while ensuring European added value and promoting innovation, productivity and long-term economic growth**, notably in strategic sectors and technologies along the investment journey
(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. 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, 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	AT (Drafting suggestions): (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. 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, 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**, ensuring additionality,** 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

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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.	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. DE (Drafting suggestions): (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. 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 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 DE (Comments): Furthering circular economy is an essential pillar for securing supply of critical raw materials, this should be recognized here. IE (Drafting suggestions): (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

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	with significant economic potential. 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, 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. **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 accelerating the digital transition** IE (Comments): **IE suggested text addition to the article** This additional language is aligned with Recital 27 below. It is suggested to take into account the acknowledgement, in the 2025 State of the digital decade report, that the EU as a whole is not on track to meet the 2030 digital decade targets, with the CION urging for renewed action (2025 State of the

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	Digital Decade report urges renewed action on digital transformation, security and technological sovereignty | Shaping Europe's digital future)
(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-up, 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.	RO (Drafting suggestions): This requires that Union funding offers support to businesses and projects along the entire investment journey, **ensuring at the same time an inclusive and territorially balanced approach to promoting competitiveness**. 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-up, 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. RO (Comments): RO supports maintaining an inclusive and territorially balanced approach to promoting competitiveness, ensuring that all EU Member States and regions can fully harness their potential and have access to innovation and technologies, thereby contributing to strengthening the value chains that underpin European competitiveness.
(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	CZ (Comments):

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individual innovation and industrial ecosystems, innovation potential stays unexploited.	**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). 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** ~~institutions~~, infrastructure providers, investors as well as public authorities. Without such collaborations within and between individual innovation and industrial ecosystems, **research and** innovation potential stays unexploited. FR (Comments): Ce langage a été agréé dans les recommandations du Conseil
(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.	IE (Drafting suggestions): (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. **The purpose being to accelerate the development and uptake of digital technologies that will deliver on the digital transition enabling the Union to reach its 2030 digital targets.**

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	IE (Comments): **IE suggested text addition to the article** This additional sentence is suggested to underline to objective of developing digital connectivity and infrastructure in a context where the EU as a whole in not on track to meet the digital decade targets, aligned with below Recital.27. SE (Drafting suggestions): Digital connectivity **that is robust, resilient and redundant** is crucial to foster collaboration within the ecosystem, (…). 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.
(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.	
	IT (Drafting suggestions): **6) In delivering Union support through the Fund, a principle of technological neutrality should apply. The Fund should refrain from**

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	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. IT (Comments): 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. It also guarantees coherence with the Leaders' guidance, as affirmed in the Oct. 2025 European Council Conclusions.
(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.	RO (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 are effectively connected to EU value chains, the Union as a whole will be better positioned to compete globally, **ensuring that all EU Member States and regions can develop their potential and have access to innovation and technologies, contributing together European competitiveness.**
(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,	

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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.	
(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][33] of the European Parliament and of the Council [Horizon Europe Framework programme for Research and Innovation][34] in accordance with the committee procedure set out in this Regulation. Besides, the ECF shall ensure coherence with the types of actions planned to be implemented under the Innovation Fund, notably when developing work programmes.	ES (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 include a dedicated Work Programme dedicated to Research and Innovation for each of the policy windows included in the** ~~integrate in a specific and dedicated part and ensure coherence with~~ 'Competitiveness' component, Part II 'Competitiveness and Society' of the Regulation (EU) [XXX][35] of the European Parliament and of the Council [Horizon Europe Framework programme for Research and Innovation][36] in accordance with the committee procedure set out in this Regulation. Besides, the ECF shall ensure coherence with the types of actions planned to be implemented under the Innovation Fund, notably when developing work programmes. ES (Comments): Collaborative R&I activities should be included in an independent work programme.

[33] OJ L.., p
[34] COM(2025) 543
[35] OJ L.., p
[36] COM(2025) 543

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	FR (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][37] of the European Parliament and of the Council [Horizon Europe Framework programme for Research and Innovation][38] in accordance with the committee procedure set out in this Regulation. 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 programme.** FR (Comments): Les autres programmes de la rubrique 2 ayant trait à la compétitivité devrait être mentionnés. EE (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

[37] OJ L.., p
[38] COM(2025) 543

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	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~~ **ensure a dedicated Work Programme dedicated to Research and Innovation for each of the policy widows included in** the 'Competitiveness' component, Part II 'Competitiveness and Society' of the Regulation (EU) [XXX][1] of the European Parliament and of the Council [Horizon Europe Framework programme for Research and Innovation][2] in accordance with the committee procedure set out in this Regulation. Besides, the ECF shall ensure coherence with the types of actions planned to be implemented under the Innovation Fund, notably when developing work programmes. [1] OJ L.., p [2] COM(2025) 543 EE (Comments): We deem it necessary that the work programmes for Research and Innovation be separate, and that their design and adoption be handled by a programme committee composed of delegates with relevant competence. Since R&I are primarily financed by the Horizon Europe programme, development of the relevant documents (including the relevant Work Programmes) and control over the use of these funds should be performed by a body/bodies competent in research and innovation.
(11) In order to foster synergies between actions under the ECF and the Innovation Fund, the work programmes of the ECF should ensure coherence with the priorities and types of actions that could be funded under the	BE (Drafting suggestions):

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Innovation Fund. Together, the ECF, Horizon Europe, and the Innovation Fund will provide coherent support to the Union competitiveness.	(11) In order to foster synergies between actions under the ECF and the Innovation Fund, the work programmes of the ECF should ensure coherence 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 **while preserving the autonomy of the Innovation Fund to ensure transparency in the use of ETS revenues and the autonomy of the Framework Programme**.. EE (Drafting suggestions): In order to foster synergies between actions under the ECF and the Innovation Fund, the work programmes of the ECF should ensure coherence 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 **be aligned to** provide coherent support to the Union competitiveness. EE (Comments): The Innovation Fund, although related to the EU Member States, is outside the EU budget. Consequently, it is justified to mention the **aligning** the use of those funds/programmes.
(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.	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.~~

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	AT (Comments): As long as we have no information on the CCT, it should not be part of a regulation. ES (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.~~ ES (Comments): Study reserve: we do not know what the CCT entails. FR (Comments): La Commission pourrait-elle apporter davantage de précisions sur ce futur outil ? SE (Comments): The connection with the CCT would need to be clarified and discussed.
(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	ES (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. Therefore**,** it should be possible to implement parts of the ECF budget through public-private partnerships together with other

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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.	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,~~ **T**he number of joint undertakings should be as limited as possible. ES (Comments): We do not support the centralised management of national funding or contributions.
(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.	EE (Drafting suggestions): … In this regard, the use of financial instruments that crowd in private investors should be the **preferred** option wherever possible. EE (Comments): Proposal to refer to preference (rather than the notion of awarding privileges)
(15) The Draghi report calls for more investment support to close the investment gap and recognises InvestEU as the key risk-sharing instrument to	

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use. **[**The ECF InvestEU Instrument should set up a single budgetary guarantee and deliver financial instruments to support EU competitiveness.**]**	
(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.**]**	
(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, including those established under the upcoming 28th regime, at the centre of the design of Union funding instruments.	RO (Drafting suggestions): The ECF should facilitate access to funding from Union programmes through user-centric, fast, simpler, and harmonised procedures, while improving coherence among Union instruments and with Member States' investments. **SMEs should be placed at the heart of the ECF's design and implementation**, ensuring that beneficiaries of Union funding — notably industry, start-ups and scale-ups, including those established under the upcoming 28th regime — are effectively supported in accessing and utilising Union funding instruments. **The ECF should facilitate inclusiveness and spread of excellence.** RO (Comments): RO supports maintaining SMEs as key beneficiaries of the European Competitiveness Fund (ECF). Ensuring fair access for SMEs from all Member States and regions of the Union through simplified procedures and digital tools is essential for fostering convergence, innovation, and competitiveness. The fund allocation criteria should combine excellence with its wider diffusion

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	across all EU regions, avoiding the concentration of resources in a limited number of Member States, compagnies, regions, etc.
(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.	EE (Drafting suggestions): (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**, as well as the improvement of protection and resilience of the critical infrastructure**. 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. EE (Comments): Considering the recent numerous incidents of malicious damage to critical infrastructure, it is important to include reference to the need of improving the protection and resilience of the critical infrastructure.

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(20) Furthermore, Trans-European digital networks are essential to interconnect national and international telecommunication networks, 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'.	
(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 Skills[39]by 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,	HR (Drafting suggestions): HR suggest two additions: *The ECF should support skills intelligence, upskilling and reskilling,* ***and develop forward-looking skills-anticipation mechanisms to align training with emerging industrial needs****, as well as 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,* ***while promoting the mutual recognition and portability of skills and qualifications across Member States.*** HR

[39] 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.

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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, also in cooperation with employers, to improve their delivery on innovation and the development of skills and talent.	(Comments): The text focuses on *supply* (training, reskilling). Perhaps it could be strengthened by adding a short clause about skills foresight, anticipation mechanisms, and alignment with labour-market intelligence. These are recurring phrases in Commission communications (notably *Skills for Industry Strategy*, *Pact for Skills*, and *European Skills Agenda*). Also, as one of the Union's key skills objectives is to facilitate **cross-border mobility of skills** and **recognition of qualifications, which** connects directly with competitiveness and the single market we suggest adding the link to *Union of Skills.* MT (Comments): Malta supports the recognition that addressing tackling skills shortages is a horizontal key enabler of competitiveness and welcomes the efforts to align the Skills Guarantee with national and sectoral transition strategies. However, Malta underlines **the importance of ensuring clear demarcation and complementarity with ESF+ funding**, which already provides extensive support for upskilling, reskilling, and lifelong learning. The ECF should therefore focus its interventions on skills directly linked to strategic industrial value chains supported under the Fund, as well as those identified at national level in line with Member States' industrial transition priorities avoiding overlap or duplication with ESF+ measures in the education and employment domains. Coordination mechanisms between both instruments should be clearly defined to ensure coherence, efficiency, and added value in the use of Union resources, avoiding overlap or duplication.

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(22) The ECF should contribute to the objectives of decarbonising the European industry by promoting the development and deployment of clean technologies. The ECF will support the implementation of the Clean Industrial Deal, turning the clean transition and decarbonisation into a driver of growth and competitiveness for European industries. To this end, the ECF will support decarbonisation with a technology neutral approach, while recognising a contribution of different technologies to grid balancing and sector coupling, to align in particular with the investment needs of energy intensive sectors. Furthermore, it should advance the implementation of the Affordable Energy Action plan, ensuring secure, affordable, efficient and clean energy for all Europeans. The ECF will contribute to the shift towards a decarbonised, circular, resource-efficient, climate-neutral, water resilient and bio-based economy. It will also support sustainable, nature-positive and resilient industrial production in energy-intensive industries in the Union, in line with the objectives of the forthcoming proposal for the Industrial Decarbonisation Accelerator Act. It should also support the objectives of the Regulation (EU) 2024/1724[40] of the European Parliament and of the Council (Net-Zero Industry Act), boosting the manufacturing capacity of net-zero technologies and the ramp up of production capacities and investing in related infrastructure. To decarbonise the transport sector, amongst others the ECF will also invest in sustainable fuels, the related infrastructure and mobile assets as well as in the modernisation and digitisation of transport.	SE (Comments): Important to include the principle of supporting decarbonisation with a technology neutral approach in the legal text, e.g. in article 3.2a.
(23) The ECF will also contribute to protect, restore and improve the quality of the environment, including water, coast, sea and soil, to reduce pollution, to halt and reverse biodiversity loss and tackle the degradation of terrestrial and marine ecosystems, while enhancing climate and water	BE (Comments): Important recital to keep, see ENVI Council Conclusions June 2024 para 53

[40] Regulation (EU) 2024/1735 of the European Parliament and of the Council of 13 June 2024 on establishing a framework of measures for strengthening Europe's net-zero technology manufacturing ecosystem and amending Regulation (EU) 2018/1724 (OJ L, 2024/1735, 28.6.2024, ELI: http://data.europa.eu/eli/reg/2024/1735/oj).

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resilience. The ECF Clean Transition and Decarbonisation window should finance projects that contribute to these objectives.	
(24) Projects and activities under the Clean Transition and Industrial Decarbonisation window shall promote energy efficiency, integrated renewable energy, new energies, energy renovations, and innovative heating and cooling solutions.	CZ (Drafting suggestions): (24) Projects and activities under the Clean Transition and Industrial Decarbonisation window shall promote energy efficiency, integrated renewable energy, **low-carbon and clean energy solutions including hydrogen production and nuclear technologies**, energy renovations, and innovative heating and cooling solutions, **in line with the Union's technology-neutral approach and its objectives for industrial decarbonisation and energy security.** CZ (Comments): The proposed amendment ensures consistency with the Union's technology-neutral approach as supported in the REPower EU Plan, the Net-Zero Industry Act, Clean Industrial Deal, or Action Plan for Affordable Energy and recent Council Conclusions, allowing Member States to pursue the most effective low-carbon pathways in line with their national energy mixes. Including hydrogen production and nuclear technologies under the Clean Transition and Industrial Decarbonisation window strengthens support for industrial decarbonisation, competitiveness, and energy security. This approach also aligns with the Czech Republic's State Energy Policy and updated National Energy and Climate Plan, which identify nuclear and hydrogen, together with renewable energy, as key enablers of a secure, low-carbon economy. Ensuring equal access to funding for all low-carbon solutions will therefore enhance the effectiveness, resilience, and strategic autonomy of the Union's clean transition.
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	(Drafting suggestions): TECH NEUTRALITY PL (Drafting suggestions): **25) In the field of energy, the Programme aims to contribute to the development of projects of common interest and projects of mutual interest, with a view to promoting energy market integration and interoperability of energy networks across borders ensuring fuel capabilities for dual - use purposes. Furthermore, the Programme aims to facilitate decarbonisation, promoting energy efficiency and ensuring security of supply, and facilitating cross-border cooperation in the field of energy including renewable energy generation, as well as storage facilities that are not fulfilling the eligibility criteria of Regulation (EU) 2022/869. In doing so the interests of all stakeholders liable to be affected should be taken into account.**
(25) Union manufacturing productivity also depends on resource efficiency, with materials input representing a signification portion of production costs. Circular approaches to products and manufacturing boost resource productivity, whilst value retention activities such as remanufacturing, refurbishment and repair provide significant job opportunities. The ECF should contribute to the bioeconomy, circular economy and access to materials including biomaterials.	
(26) The Union can become a global leader in digital technologies, such as artificial intelligence, digital identity, semiconductors, robotics, quantum technologies, space technologies and others by harnessing the untapped potential of our researchers and industries. The ECF should promote the development and deployment of digital solutions and infrastructures and capacities across the Union for the benefit of the European society and economy.	IE (Drafting suggestions): (26) The Union can become a global leader in digital technologies, such as artificial intelligence, digital identity, semiconductors, robotics, quantum technologies, space technologies and others by harnessing the untapped potential of our researchers and industries. The ECF should promote the development and deployment of digital solutions and infrastructures and capacities across the Union for the benefit of the European society and economy ~~.~~ **through significant investments aimed at accelerating the**

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	digital transition, enabling the Union to reach the 2030 Digital Decade targets. IE (Comments): **IE suggested text addition to the text** Suggested addition to clarify that promoting development and deployment of digital solutions can only be effective through significant investments.
(27) Chronic underinvestment in the European tech sector is one of the main reasons for the lack of competitiveness of the Union, as compared to our global competitors. Moreover, European sovereignty in digital technologies and infrastructures has become key for our resilience, security and for democracy, as highlighted in the 2025 State of the Digital decade report which also underlined the remaining significant gaps to reach Union's 2030 goals, notably for the development of Artificial Intelligence (AI) and space technologies, semiconductors, 5G and digital skills.	IE (Drafting suggestions): 27) Chronic underinvestment in the European tech sector is one of the main reasons for the lack of competitiveness of the Union, as compared to our global competitors. Moreover, **reinforcing** European sovereignty in digital technologies and infrastructures **while reaping the benefits of collaboration with global partners when possible,** has become key for our resilience, security and for democracy, as highlighted in the 2025 State of the Digital decade report which also underlined the remaining significant gaps to reach Union's 2030 **digital targets ~~goals~~**, notably for the development **and adoption** of Artificial Intelligence (AI) **and the rollout of connectivity infrastructure such as ~~and~~** space technologies, semiconductors, 5G and **and the need to accelerate the development of** digital skills **and supply of ICT Specialists**. IE (Comments): **IE suggested text addition/amendment to the text**

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	This additional language is suggested to recognise the benefits and even the critical need for openness and international collaboration on digital technology given the strong existing interdependencies.
(28) While Europe's digital transformation is accelerating, the many critical dependencies on non-Union suppliers (from raw materials, advanced semiconductors, and AI chips to systems, infrastructures and services) require European alternatives that anchor the digital transformation in Europe's economy, with our shared values as the essential differentiator, including by leveraging the power of open-source technologies. Support for digital leadership is driven by regulatory and non-regulatory Union policy initiatives in the digital area such as the AI Act, AI Continent and AI Action Plan, the Apply AI Strategy, the Cloud and AI Development Act, the Data Union Strategy, the Digital Networks Act, the EU Quantum Strategy and the Quantum Act, the Cyber-Solidarity Act, the Cyber-Resilience Act and the Cybersecurity Act, the White Paper for European Defence-Readiness 2030, and the revision of the EU Chips Act, and by future policy initiatives. The digital areas to invest in include a number of critical frontier technologies such as Artificial Intelligence (AI) and AI-powered digital twins, robotics, semiconductors, autonomous or quantum technologies. They also include key infrastructures such as digital identity, cloud, high performance and quantum computing, communication, advanced underwater observation infrastructure, and sensing infrastructures, digital connectivity networks, including submarine cables, as well as cybersecurity, defence or space capacities. Fostering their uptake across private and public sectors makes our entire economy more competitive, secure, sovereign, and sustainable, fortifying societal resilience and preparedness. Moreover, interoperable digital technologies are driving the modernisation of the public sector, serving for the integration of the single market, which is our most valuable stepping stone for European digital start-ups to become globally competitive.	BE (Drafting suggestions): (28) While Europe's digital transformation is accelerating, the many critical dependencies on non-Union suppliers (from raw materials, advanced semiconductors, and AI chips to systems, infrastructures and services) require European alternatives that anchor the digital transformation in Europe's economy, with our shared values as the essential differentiator, including by leveraging the power of open-source technologies. Support for digital leadership is driven by regulatory and non-regulatory Union policy initiatives in the digital area such as the AI Act, AI Continent and AI Action Plan, the Apply AI Strategy, the Cloud and AI Development Act, the Data Union Strategy, the Digital Networks Act, the EU Quantum Strategy and the Quantum Act, the Cyber-Solidarity Act, the Cyber-Resilience Act and the Cybersecurity Act, the White Paper for European Defence-Readiness 2030, and the revision of the EU Chips Act, and by future policy initiatives. The digital areas to invest in include a number of critical frontier technologies such as Artificial Intelligence (AI) and AI-powered digital twins, robotics, semiconductors, autonomous or quantum technologies. They also include key infrastructures such as digital identity, cloud, high performance and quantum computing, communication, advanced underwater observation infrastructure, and sensing infrastructures, digital connectivity networks, including submarine cables, as well as cybersecurity, defence or space capacities. Fostering their uptake across private and public sectors makes our entire

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Technological progress and innovation in every economic sector, and thus their productivity and competitiveness, are essentially driven by the integration of sector-specific digital developments and use of digital solutions that should be supported across the ECF.	economy more competitive, secure, sovereign, and sustainable, fortifying societal resilience and preparedness. **Furthermore, as recommended by the OECD,**[41] **reducing the environmental footprint of digital technologies should be pursued through innovation, energy efficiency and environmentally sustainable by design approach.** Moreover, interoperable digital technologies are driving the modernisation of the public sector, serving for the integration of the single market, which is our most valuable stepping stone for European digital start-ups to become globally competitive. Technological progress and innovation in every economic sector, and thus their productivity and competitiveness, are essentially driven by the integration of sector-specific digital developments and use of digital solutions that should be supported across the ECF. DE (Drafting suggestions): (28) While Europe's digital transformation is accelerating, the many critical dependencies on non-Union suppliers (from raw materials, advanced semiconductors, and AI chips to systems, infrastructures and services) require European alternatives that anchor the digital transformation in Europe's economy, with our shared values as the essential differentiator, including by leveraging the power of open-source technologies. Support for digital leadership is driven by regulatory and non-regulatory Union policy initiatives in the digital area such as the AI Act, AI Continent and AI Action Plan, the Apply AI Strategy, the Cloud and AI Development Act, the Data Union Strategy, the Digital Networks Act, the EU Quantum Strategy and the Quantum Act, the Cyber-Solidarity Act, the Cyber-Resilience Act and the

[41] ***OECD Council recommendation on Digital Technologies and the Environment, revised on 4th June 2025https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0380***

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	Cybersecurity Act, ~~**the White Paper for European Defence Readiness 2030,**~~ and the revision of the EU Chips Act, and by future policy initiatives. The digital areas to invest in include a number of critical frontier technologies such as Artificial Intelligence (AI) and AI-powered digital twins, robotics, semiconductors, autonomous or quantum technologies. They also include key infrastructures such as digital identity, cloud, high performance and quantum computing, communication, advanced underwater observation infrastructure, and sensing infrastructures, digital connectivity networks, including submarine cables, as well as cybersecurity, defence or space capacities. Fostering their uptake across private and public sectors makes our entire economy more competitive, secure, sovereign, and sustainable, fortifying societal resilience and preparedness. Moreover, interoperable digital technologies are driving the modernisation of the public sector, serving for the integration of the single market, which is our most valuable stepping stone for European digital start-ups to become globally competitive. Technological progress and innovation in every economic sector, and thus their productivity and competitiveness, are essentially driven by the integration of sector-specific digital developments and use of digital solutions that should be supported across the ECF. DE (Comments): We would prefer to not mention the White Paper here again.
(29) Technological progress and innovation in every economic sector, and thus their productivity and competitiveness are essentially driven by the integration of sector-specific digital developments and use of digital solutions that should be supported across the Fund in the context of the activities developed in the different policy windows of the EDependency on high-risk suppliers in critical sectors can pose a strategic risk of foreign interference and jeopardise the Union's security, resilience and sovereignty. The NIS Cooperation Group, in cooperation with the Commission and the	FR (Drafting suggestions): (29) Technological progress and innovation in every economic sector, and thus their productivity and competitiveness are essentially driven by the integration of sector-specific digital developments and use of digital solutions that should be supported across the Fund in the context of the activities developed in the different policy windows of the **ECF**. Dependency

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European Union Agency for Cybersecurity (ENISA), plays a key role in carrying out EU Coordinated security risk assessments of critical supply chains, taking into account technical and, where relevant, non-technical risk factors in accordance with Article 22 of Directive (EU) 2022/2555.[42]	on **third countries** high-risk suppliers in critical sectors can pose a strategic risk of foreign interference and jeopardise the Union's security, resilience and sovereignty. FR (Comments): La France souhaite préciser que les risques proviennent des dépendances à l'égard des risques tiers.
(30) Europe must protect its security interest against suppliers which could represent a persistent security risk due to the potential interference from third countries as well as their security, notably cybersecurity. It is therefore necessary to reduce the risk of persisting dependency on high-risk suppliers in the internal market, including in the ICT supply chain, as they could have potentially serious negative impacts on security for users and companies across the Union and the Union's critical infrastructure in terms of the integrity of data and services as well as the availability of service. This restriction should be based on a proportionate risk assessment and associated mitigation measures as defined in the Union policies and laws.	
(31) A successful deployment of interoperability across borders and sectors has a substantial, untapped potential, especially for the competitiveness of European businesses. Therefore, it is imperative to invest in the development of pan-European digital public infrastructures encompassing interoperable, secure and sovereign digital networks, solutions and services to address the fragmented interoperability landscape across the Union, notably to transform the Member States' public sector into an	IE (Drafting suggestions): (31) A successful deployment of interoperability across borders and sectors has a substantial untapped potential, especially for the competitiveness of European businesses **reducing their administrative burden through the adoption of digital tools and ensuring they can truly**

[42] Directive (EU) 2022/2555 of the European Parliament and of the Council of 14 December 2022 on measures for a high common level of cybersecurity across the Union, amending Regulation (EU) No 910/2014 and Directive (EU) 2018/1972, and repealing Directive (EU) 2016/1148; Text with EEA relevance, ELI: http://data.europa.eu/eli/dir/2022/2555/2022-12-27.

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interconnected, frictionless, and agile digital ecosystem. The implementation of interoperability by European public administrations at all levels is a precondition for a resilient and innovation-driven public sector which contributes to the Union's goals of competitiveness, technological sovereignty and security.	**benefit from a digital single market.** Therefore, it is imperative to invest in the development of pan-European digital public infrastructures encompassing interoperable, secure and sovereign digital networks, solutions and services to address the fragmented interoperability landscape across the Union, notably to transform the Member States' public sector into an interconnected, frictionless, and agile digital ecosystem. The implementation of interoperability by European public administrations at all levels is a precondition for a resilient and innovation-driven public sector which contributes to the Union's goals of competitiveness, technological sovereignty and security. IE (Comments): **IE suggested text addition to the text** This additional language is suggested to link this to a specific need identified, especially for SMEs and businesses but also for regulators, to ensure more effective implementation of the digital rulebook by enabling more uniformised reporting mechanisms and risk assessments through the use of digital tools.
	ES (Drafting suggestions): **(31) bis. Europe holds unique potential to lead globally in health, combining world-class research institutions, strong public health systems, and a longstanding commitment to universal access as a core European value. A healthy population is not only a social priority but a foundation for productivity, inclusion and social cohesion. Building on its scientific excellence, regulatory credibility and ethical leadership, the EU can turn health innovation into a strategic driver of economic growth, quality jobs and global competitiveness. By investing in cutting-**

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	edge research, industrial capacity and resilient healthcare systems, Europe can position health as both a pillar of citizens' wellbeing and a key engine of sustainable economic leadership. ES (Comments): The health sector should be recognized as one of Europe's key strengths.
(32) To improve public health and strengthen the competitiveness of the Union, it is crucial to tackle the rise of communicable and non-communicable diseases through targeted health promotion and disease prevention strategies and continued investments, including into the pharmaceutical and medical devices sectors. Such action, coupled with fostering effective, accessible, and resilient health systems, can significantly boost workforce productivity by improving population health and alleviating labour shortages, while also supporting health systems that drive innovation. Leveraging health data is essential in those efforts, enabling informed decision-making. Moreover, fostering innovation by solidifying the evidence-based path from medical breakthroughs to marketable solutions is key to enhancing Union competitiveness and also beneficial to reinforcing supply security.	AT (Drafting suggestions): (32) To improve public health and strengthen the competitiveness of the Union, it is crucial to tackle the rise ***and reduce the burden*** of communicable and non-communicable diseases through targeted health promotion and disease prevention strategies and continued investments, including into the pharmaceutical and medical devices sectors. ***Following the One Health Approach, actions shall contribute to strengthening health systems, promoting healthy lifestyles, reducing health inequalities, strengthening the health workforce, and improving the availability, accessibility and affordability of medicines, medical devices and crisis-relevant products in the Union***. Such action, coupled with fostering effective, accessible, and resilient health systems, can significantly boost workforce productivity by improving population health and alleviating labour shortages, while also supporting health systems that drive innovation. Leveraging health data is essential in those efforts, enabling informed decision-making. Moreover, fostering innovation by solidifying the evidence-based path from medical breakthroughs to marketable solutions is key to enhancing Union competitiveness and also beneficial to reinforcing supply security. AT (Comments):

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	Recitals concerning health in the ECF should include references to the following: • One Health Approach; • equitable access to health care; • reduction of health inequalities; • promoting healthy lifestyles; • strengthening the health workforce; • availability, accessibility and affordability of medicines, medical devices and crisis-relevant products in the Union. ES (Drafting suggestions): (32) To improve public health and strengthen the competitiveness of the Union, it is crucial to tackle the rise of communicable and non-communicable diseases through targeted health promotion and disease prevention strategies and continued investments, including into the pharmaceutical and medical devices sectors. Such action, coupled with fostering effective, accessible, and resilient health systems, can significantly boost workforce productivity by improving population health and alleviating labour shortages, while also supporting health systems that drive innovation. Leveraging health data is essential in those efforts, enabling informed decision-making. Moreover, fostering innovation by solidifying **and streamlining** the evidence-based path from medical breakthroughs to marketable solutions is key to enhancing Union competitiveness and also beneficial to reinforcing supply security. HU (Comments): The point clarifies that the EU4Health Programme is not intended to operate as a standalone instrument—an aspect that we continue to consider of fundamental importance—but rather to contribute, in an integrated manner, to the Union's overarching political and economic objectives in the fields of

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	public health, innovation, industrial development, and supply security. It is an established fact that, in certain domains, the interlinkages are undeniable and interoperability is indispensable. Nevertheless, investments in healthcare, the promotion of health-conscious and healthier societies, as well as investments in public and community health, should be designated as priority objectives, serving as indispensable preconditions for the long-term sustainability of the Union. An interdisciplinary approach encompassing healthcare, the agricultural sector, biotechnology, environmental awareness, the health impacts of climate change, and the bioeconomy may generate significant synergies and added value. However, the respective economic significance, functions, and outcomes of these sectors differ considerably. While a healthy population and society are often perceived as natural and self-evident, it must be underscored that they constitute a necessary and indispensable foundation for all forms of progress—be it economic, scientific, or technological. LU (Drafting suggestions): (32) To improve public health and strengthen the competitiveness of the Union, it is crucial to tackle the rise of communicable and non-communicable diseases through targeted health promotion and disease prevention strategies and continued investments, including into the pharmaceutical and medical devices sectors. Such action, coupled with fostering effective, accessible, and resilient health systems, can significantly boost workforce productivity by improving population health and alleviating labour shortages, while also supporting health systems that drive innovation. Leveraging health data is essential in those efforts, enabling informed decision-making. Moreover, fostering innovation by solidifying the evidence-based path from medical breakthroughs to marketable solutions is key to enhancing Union competitiveness and also beneficial to reinforcing supply security. **To ensure convergence and mutual learning across the Union, the Fund should also support cross-border public-health**

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	cooperation and capacity-building between Member States (including twinning, joint training and exercises), and enable community-based prevention through non-governmental organisations and civil-society actors. SE (Comments): SE asks for an overview of how measures within the existing programs that are in part to be included in the ECF, e.g., EU4Health, are dispersed over the various pillars of the new MFF structure. The legal text is currently formulated in general terms in these sections, and it is not entirely clear how the ECF's objectives are compatible with some of the measures that have previously received funding. How would for example efforts within the health area, e.g. collaboration between authorities, within specialised care, support to digital infrastructure, access to medical products and preparedness, be adequately addressed in the ECF?
(33) The bioeconomy is a growth engine that allows Europe to make a success of the green transition, strengthen its competitiveness and strategic autonomy. Although Europe's bioeconomy is already reshaping industrial ecosystems, reinforcing strategic autonomy, and unlocking value across strategic sectors, it is crucial to strengthen investments, initiatives and strategies at Union and Member State level to bring it from niche to norm across Union sectors and regions to realise its potential, and in particular for key industries. There is a need to foster the competitiveness, sustainability, resilience and fairness of the agricultural, fisheries, aquaculture and forestry sectors, of rural and coastal areas and to contribute to long-term food security in the Union.	

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(34) Investments, initiatives and strategies are needed to close the innovation gap and accelerate the discovery, development, derisking, demonstration, scale-up of bioeconomy innovations, to support their market uptake, to provide finance along the innovation journey for start-ups and for scaling up high growth companies, to maximise resource efficiency and to secure sustainably sourced biomass supply. The bioeconomy contributes to decarbonisation, by providing sustainable alternatives to fossil-based products and processes, but also to circularity, the clean transition, carbon farming, biodiversity, ecosystem services, and nature restoration.	BE (Drafting suggestions): .. Investments, initiatives and strategies are needed to close the innovation gap and accelerate the discovery, development, derisking, demonstration, scale-up of bioeconomy innovations, to support their market uptake, to provide finance along the innovation journey for start-ups and for scaling up high growth companies, to maximise resource efficiency ~~and~~ to secure sustainably sourced biomass supply **and to implement the principle of cascading use of biomass**. The bioeconomy ~~**contributes**~~ **can contribute** to decarbonisation, by providing sustainable alternatives to fossil-based products and processes, but also to circularity, the clean transition, carbon farming, biodiversity, ecosystem services, and nature restoration BE (Comments): 'Can contribute': whether is being contributed to decarbonisation depends on the sustainability preconditions of the biomass used. DE (Drafting suggestions): (34) Investments, initiatives and strategies are needed to close the innovation gap and accelerate the discovery, development, derisking, demonstration, scale-up of **sustainable** bioeconomy innovations, to support their market uptake, to provide finance along the innovation journey for start-ups and for scaling up high growth companies, to maximise resource efficiency and to secure sustainably sourced biomass supply. The bioeconomy contributes to decarbonisation, by providing sustainable alternatives to fossil-based products and processes, but also to circularity, the

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	clean transition, carbon farming, biodiversity, ecosystem services, and nature restoration. DE (Comments): Supported bioeconomy approaches and measures should be sustainable in order to avoid overuse or adverse effects towards environment and biodiversity.
(35) Fostering the resilience of the European industry is essential for the Union to remain competitive even in times of crisis and is essential for Union's security. To ensure its resilience, the ECF should support actions aimed to reduce dependencies and diversify supply in strategic sectors such as the raw materials sector, thus reinforcing the Union capacities for a secure supply of sustainable critical raw materials along the whole value chain in line with the objectives of the Regulation (EU) 2024/1252 of the European Parliament and of the Council (Critical Raw Materials Act)[43] and the chemicals industry, underpinning almost all industry sectors. Pursuing an ambitious and mutually beneficial trade agenda is essential for the Union's ability to diversify its supply chains and effectively reduce dependencies.	BE (Drafting suggestions): (35) Fostering the resilience of the European industry is essential for the Union to remain competitive even in times of crisis and is essential for Union's security. To ensure its resilience, the ECF should support actions aimed to reduce dependencies and diversify supply in strategic sectors such as the raw materials sector, thus reinforcing the Union capacities for a secure supply of sustainable critical raw materials along the whole value chain in line with the objectives of the Regulation (EU) 2024/1252 of the European Parliament and of the Council (Critical Raw Materials Act) and the chemicals industry, underpinning almost all industry sectors. Pursuing an ambitious and mutually beneficial **and rules-based** trade agenda is essential for the Union's ability to diversify its supply chains and effectively reduce dependencies **and ensuring a global level playing field.** BE (Comments):

[43] Regulation (EU) 2024/1252 of the European Parliament and of the Council of 11 April 2024 establishing a framework for ensuring a secure and sustainable supply of critical raw materials and amending Regulations (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1724 and (EU) 2019/1020 (Text with EEA relevance), OJ L, 2024/1252, 3.5.2024, ELI: http://data.europa.eu/eli/reg/2024/1252/oj

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	Trade policy should be ambitious but still rules-based. Mutually beneficial is not enough by itself to achieve a global level playing field. ES (Drafting suggestions): (35) Fostering the resilience of the European industry is essential for the Union to remain competitive even in times of crisis and is essential for Union's security. To ensure its resilience, the ECF should support actions aimed to reduce dependencies and diversify supply in strategic sectors such as the raw **and critical** materials sector, thus reinforcing the Union capacities for a secure supply of sustainable critical raw materials along the whole value chain in line with the objectives of the Regulation (EU) 2024/1252 of the European Parliament and of the Council (Critical Raw Materials Act)[44] and the chemicals industry, underpinning almost all industry sectors. Pursuing an ambitious and mutually beneficial trade agenda is essential for the Union's ability to diversify its supply chains and effectively reduce dependencies EE (Drafting suggestions): (35) Fostering the resilience of the European industry **as well as of Europe's critical infrastructure** is essential for the Union to remain competitive even in times of crisis and is essential for Union's security. To ensure its resilience, the ECF should support actions aimed to reduce dependencies and diversify supply in strategic sectors such as the raw materials sector, thus reinforcing the Union capacities for a secure supply of sustainable critical raw materials along the whole value chain in line with the

[44] Regulation (EU) 2024/1252 of the European Parliament and of the Council of 11 April 2024 establishing a framework for ensuring a secure and sustainable supply of critical raw materials and amending Regulations (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1724 and (EU) 2019/1020 (Text with EEA relevance), OJ L, 2024/1252, 3.5.2024, ELI: http://data.europa.eu/eli/reg/2024/1252/oj

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	objectives of the Regulation (EU) 2024/1252 of the European Parliament and of the Council (Critical Raw Materials Act)[45] and the chemicals industry, underpinning almost all industry sectors. Pursuing an ambitious and mutually beneficial trade agenda is essential for the Union's ability to diversify its supply chains and effectively reduce dependencies. EE (Comments): The competitiveness of industry depends inter alia on the resilience of critical infrastructure.
(36) In addition, the geopolitical context, in particular Russia's war of aggression against Ukraine, has exposed the Union and its Member States to a high risk of materialisation of conventional military threats, in particularly to the ones bordering Russia, Belarus and Ukraine. Considering this, together with the threats on the rest of the EU borders,increased investment in defence is deemed a priority, including for projects such as the Baltic Defence Line and Eastern Border Shield. Defence industry and space are key ecosystems to ensure the European Union's resilience and strategic autonomy and increase the Union's readiness and preparedness in line with the White Paper for European Defence – Readiness 2030.[46] It also supports the Union's focus on sustainability, competitiveness, resilience and security and the Union position in the world. A strong European Defence Technological and Industrial Base (EDTIB) is an indispensable prerequisite of defence readiness and credible deterrence. It is also essential for the protection of European citizens, ensuring the Union's ability to respond to emerging security challenges, to support Ukraine, and to uphold Europe's position as a global actor. The	DE (Drafting suggestions): (36) In addition, the geopolitical context, in particular Russia's war of aggression against Ukraine, has exposed the Union and its Member States to a high risk of materialisation of conventional military threats, in particularly to the ones bordering Russia, Belarus and Ukraine. Considering this, together with the threats on the rest of the EU borders, increased investment in defence is deemed a priority**.,** ~~**including for projects such as the Baltic Defence Line and Eastern Border Shield**~~. Defence industry and space are key ecosystems to ensure the European Union's resilience and strategic autonomy and increase the Union's readiness and preparedness. ~~**in line with the White Paper for European Defence – Readiness 2030**~~. It also supports the Union's focus on sustainability, competitiveness, resilience and security and the Union position in the world. A strong European Defence Technological and Industrial Base (EDTIB) is an indispensable prerequisite

[45] Regulation (EU) 2024/1252 of the European Parliament and of the Council of 11 April 2024 establishing a framework for ensuring a secure and sustainable supply of critical raw materials and amending Regulations (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1724 and (EU) 2019/1020 (Text with EEA relevance), OJ L, 2024/1252, 3.5.2024, ELI: http://data.europa.eu/eli/reg/2024/1252/oj

[46] Commission, the High Representative have present, White Paper for European Defence – Readiness 2030, 19.03.2025.

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EDTIB is recognised as a strategic asset, contributing to the Union's economic resilience and security, innovation, technological leadership and strategic autonomy. Across the Union and its Member States, the defence sector is evolving rapidly, with cutting-edge technologies and new actors playing an increasingly important role. Innovation cycles are also accelerating, with growing emphasis on rapid prototyping, testing and validation, including in real operational environments. To improve military mobility, investments in new civilian-military assets, including mobile assets and dual use infrastructure need to be developed. Coordinated and sustained support to the EDTIB is therefore key to reinforce the collective security of the Union and its Member States, the development of Union-wide defence projects of common interest, and Europe's defence readiness. **[**In relation to this, actions supporting the reinforcement of the Ukrainian defence technological and industrial base should be also financed, as its industry will be essential to support European increased defence needs.**]** To this end, the ECF shall be implemented taking into account the objectives of the Strategic Compass for Security and Defence and shall be consistent with the defence capability priorities commonly agreed by Member States within the framework of the Common Foreign and Security Policy (CFSP).	of defence readiness and credible deterrence. It is also essential for the protection of European citizens, ensuring the Union's ability to respond to emerging security challenges, to support Ukraine, and to uphold Europe's position as a global actor. The EDTIB is recognised as a strategic asset, contributing to the Union's economic resilience and security, innovation, technological leadership and strategic autonomy. Across the Union and its Member States, the defence sector is evolving rapidly, with cutting-edge technologies and new actors playing an increasingly important role. Innovation cycles are also accelerating, with growing emphasis on rapid prototyping, testing and validation, including in real operational environments. To improve military mobility, investments in new civilian-military assets, including mobile assets and dual use infrastructure need to be developed. Coordinated and sustained support to the EDTIB is therefore key to reinforce the collective security of the Union and its Member States, the development of Union-wide defence projects of common interest, and Europe's defence readiness. [In relation to this, actions supporting the reinforcement of the Ukrainian defence technological and industrial base should be also financed, as its industry will be essential to support European increased defence needs.] To this end, the ECF shall be implemented taking into account the objectives of the Strategic Compass for Security and Defence and shall be consistent with the defence capability priorities commonly agreed by Member States within the framework of the Common Foreign and Security Policy (CFSP). DE (Comments): Particular Projects should not be mentioned in a regulation. The goal formulated here stands for itself, we see no need for a reference on the White Paper at this place. FR (Drafting suggestions):

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	In addition, the geopolitical context, in particular Russia's war of aggression against Ukraine, has exposed the Union and its Member States to a high risk of materialisation of conventional military threats, in particularly to the ones bordering Russia, Belarus and Ukraine. Considering this, together with the threats on the rest of the EU borders, increased investment in defence is deemed a priority, **~~including for projects such as the Baltic Defence Line and Eastern Border Shield~~**. Defence industry and space are key ecosystems to ensure the European Union's resilience and strategic autonomy and increase the Union's readiness and preparedness in line with the White Paper for European Defence – Readiness 2030. (….) To this end, the ECF shall be implemented taking into account the objectives of the Strategic Compass for Security and Defence and shall be consistent with the defence capability priorities commonly agreed by Member States within the framework of the Common Foreign and Security Policy (CFSP) **and in compliance with regulations applicable to the defence-related products and products specifically designed for defence.** FR (Comments): Le Livre blanc sur l'avenir de la défense européenne définit sept domaines capacitaires prioritaires depuis lesquels doivent dériver des projets définis par les Etats membres. La France souhaite que soit supprimée la mention à des projets/domaines spécifiques, ou que l'ensemble des sept domaines prioritaires soient mentionnés. L'objectif de l'ajout en fin de paragraphe est de souligner les caractéristiques spécifiques du secteur de la défense, en particulier son cadre légal spécifique qui gouverne toutes les activités, depuis la recherche jusqu'à la production, y compris la vente, le stockage, la possession, l'utilisation ou la revente, le prêt ou le transfert. HU (Drafting suggestions):

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	~~In relation to this, actions supporting the reinforcement of the Ukrainian defence technological and industrial base should be also financed, as its industry will be essential to support European increased defence needs~~ In relation to this, coordinated action in support of Ukraine's defence technological and industrial base may be considered where appropriate, within frameworks specifically designed for third-country support under the EU's external action instruments.
(37) Union Space technology, data and services have become indispensable in the daily lives of Europeans and play an essential role in preserving strategic interests. Space contributes to all sectors of the economy from agriculture to banking. It is a critical enabler for security and defence, and for the well-functioning and competitiveness of the economy for example by providing accurate position-services for a broad spectrum of sectors and users, ranging from aviation to maritime, and thereby playing a key role for Europe and European citizens' independence and sovereignty. Space is crucial for the achievement of EU's priorities and its strategic goals, including for economic prosperity and economic security, decarbonisation, green and digital transition. Space contributes to the economic security of the Union and its Member States. It also drives scientific research and technological innovation, with spill-over effects in a wide range of sectors. Finally, space offers a platform for international cooperation and space diplomacy to underpin the Union's position as a reliable partner on the global scene.	IE (Drafting suggestions): 37) Union Space technology, data and services have become indispensable in the daily lives of Europeans and play an essential role in preserving strategic interests. Space contributes to all sectors of the economy from agriculture to banking. It is a critical enabler for security and defence, and for the well-functioning and competitiveness of the economy for example by providing accurate position-services for a broad spectrum of sectors and users, ranging from aviation to maritime, and thereby playing a key role for Europe and European citizens' independence and sovereignty. Space is crucial for the achievement of EU's priorities and its strategic goals, including for economic prosperity and economic security, decarbonisation, **and accelerating the** green and digital transition. Space contributes to the economic security of the Union and its Member States. It also drives scientific research and technological innovation, with spill-over effects in a wide range of sectors. Finally, space offers a platform for international cooperation and space diplomacy to underpin the Union's position as a reliable partner on the global scene. IE

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	(Comments): **IE suggested text addition to the text** This suggested addition added to underline the need to accelerate the digital transition for the Union to remain competitive as explained in the Draghi report. PT (Comments): PT supports the inclusion of Space as a strategic enabler and requests explicit recognition of the maritime and Atlantic dimension, aligning with the European Ocean Pact and Portugal's geostrategic position. PT proposes a reference to the maritime and Atlantic dimension of Space applications, notably for surveillance, security, and connectivity in outermost and coastal regions.
(38) Space components under the ECF are sensitive. Their services must be robust and completely reliable. The continuity of their services and a high-level of security must be ensured, even in the most serious crisis situations. The consequences of infringing those conditions could potentially have dramatic consequences for the security of the Union and its Member States. To that end, specific provisions for specific circumstances should apply.	AT (Drafting suggestions): (38) Space components under the ECF are sensitive. Their services must be robust and completely reliable. The continuity of their services and a high-level of security must be ensured, even in the most serious crisis situations. The consequences of infringing those conditions could potentially have dramatic consequences for the security of the Union and its Member States. To that end, ~~specific provisions for specific circumstances should apply.~~ **a holistic and coordinated approach is required to ensure the resilience and security of space services as well as the effective recovery in the event of disruptions.**

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	AT (Comments): The security of space services is a very important point and must be ensured ex ante and ex post. DE (Drafting suggestions): (38) Space components under the ECF are sensitive. Their services must be robust and completely reliable. The continuity of their services and a high-level of security must be ensured, even in the most serious crisis situations. The consequences of infringing those conditions could potentially have dramatic consequences for the security of the Union and its Member States. To that end, specific provisions for specific circumstances should apply. **For the same reason, decisions linked to the governance, architecture, services and security of the space components under the ECF must be aligned with Member States' interests and guidance.** DE (Comments): We suggest to highlight the importance of close alignment with Member States for all decisions related to the space components of the ECF, given their link to national security matters. FR (Drafting suggestions): (38) Space components under the ECF are sensitive. Their services must be robust and completely reliable. The **full operationalization**, continuity **and achievement of all security requirements** of their services ~~**and a high-level of security**~~ must be ensured, even in the most serious crisis situations. The consequences of infringing those conditions could potentially have dramatic consequences for the security of the Union, ~~**and**~~ its Member States **and their**

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	citizens. To that end, specific provisions for ~~**specific**~~ **especially sensitive services** ~~**circumstances**~~ should apply. PT (Comments): Specific provisions should ensure that security accreditation and governance models for space infrastructures respect Member States' national security prerogatives. Portugal could accept this recital with this clarification, to safeguard national security responsibilities over sensitive space infrastructures:
(39) The ECF should also support the policy goals of a safer, more secure Europe that is better prepared against security threats, in particular by enhancing European industry competitiveness and strategic autonomy, including maritime and customs security, critical energy and transport infrastructure and civil preparedness. To address increasing security and hybrid threats like terrorism, organised crime, cybercrime, climate disasters and attacks on critical infrastructure, the ECF should support Europe's efforts to increase its threat awareness, build resilience and boost security investments, and promote preparedness by design across relevant sectors.	FR (Drafting suggestions): (39) The ECF should also support the policy goals of a safer, more secure Europe that is better prepared against security threats, in particular by enhancing European industry competitiveness and strategic autonomy, including maritime and customs security, **critical infrastructure** and civil preparedness. To address increasing **security and hybrid** threats like terrorism, organised crime, cybercrime, climate disasters and attacks on critical infrastructure, the ECF should support Europe's efforts to increase its threat awareness, build resilience and boost security investments, and promote preparedness by design across relevant sectors. FR (Comments): Nous demandons le rajout de la mention d'infrastructures critiques. PT (Comments):

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	PT strongly supports broadening the security scope to include maritime and underwater domains, consistent with EU-NATO priorities and national maritime interests. PT proposes to include maritime security, underwater domain awareness, and critical seabed infrastructure protection as eligible areas under this recital.
(40) Increasingly, we see the same technologies used for market and defence applications, often driven by startups innovators. It is therefore imperative to seek measures to better exploit the potential civil-defence synergies and of dual-use technologies. Dual-use technologies, materials, knowledge, or products that can be used for both civilian and military purposes may be supported across the ECF, to ensure a better connection of the Union's technological industry to its defence industrial base as well as to the technological innovation capital of Europe.	PT (Comments): PT supports the promotion of dual-use technologies but recalls that military end-use should remain within the remit of the EDF and CFSP instruments.
(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 infrastructures, cybersecurity, semiconductors quantum, AI and high-	ES (Drafting suggestions): (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**, economic security needs** and emerging priorities throughout the duration of the Multiannual Financial Framework.**]** To this extent, it should be ensured that a ~~certain~~ **adequate** 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

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performance computing or critical infrastructure, and defence or space projects of common interest.	ecosystem, and enable the setup of important Union infrastructures, such as for hydrogen and industrial carbon management, 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. PT (Comments): PT supports the predictability objective but calls for transparent governance and Member State involvement in setting indicative budgets for defence and space activities. PT proposes that indicative budget allocations under the Defence, Security and Space window be discussed with Member States through a structured consultation mechanism.
(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,[47] Council Regulation (EC, Euratom) No 2988/95,[48] Council Regulation	

[47] 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).

[48] 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).

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(Euratom, EC) No 2185/96[49] and Council Regulation (EU) 2017/1939,[50] 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, 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.[51] 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.	
(44) To promote the Union's competitiveness, in addition to its budget, wherever possible the ECF should attract and generate additional assigned	PT (Comments):

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[49] 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).

[50] 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).

[51] 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).

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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.	PT supports openness to trusted partners but insists that association of third countries to defence-related activities must require Council-level approval and reciprocity safeguards.
(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.	PT (Comments): PT supports reinforcing the Union preference principle for strategic sectors, ensuring that ECF resources contribute directly to strengthening the European industrial base. PT proposes that the Union preference principle explicitly applies to defence and space procurement funded under ECF. EE (Drafting suggestions): To promote the resilience of the Union economy, notably by reducing strategic dependencies, the ECF should enable **to use the** Union preference **approach in relevant cases** 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, **while also taking into account the considerations of technological development, efficiency, and cooperation with allies.** 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.

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	EE (Comments): It is important that while considering the setting of the European preference criteria, their relevance is considered based on both the need for supporting EU producers and also on the need of the Member States to rapidly increase their defence capabilities, the need to meet the time constraints arising from the security situation, the need to ensure cost-effectiveness of solutions, as well as the consideration of cooperation with our the NATO allies.
(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 contributions and benefits of the third countries and ensure the protection of the financial and, where relevant, security interest of the Union.	FR (Drafting suggestions): (46) ECF activities should be open for cooperation with third countries where this is in the interest of the Union**, while bearing in mind specificities of third countries association regarding activities in support of defence and space**. 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. FR (Comments): La France s'interroge sur la définition de circonstances « dans l'intérêt de l'Union » ; la Commission pourrait-elle préciser dans quel contexte une telle coopération pourrait être nécessaire ? La France demande par ailleurs à tenir compte de la spécificité des actions relatives à la défense et à l'espace en ce qui concerne l'association d'Etats tiers.

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(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 to 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.	RO (Comments): It is necessary to provide clarification on the practical application of cumulative financing, including in relation to the performance framework, indicator reporting, and the prevention of double funding. It should also be clarified whether this mechanism applies exclusively to directly or indirectly managed programmes (e.g., Horizon Europe, LIFE, InvestEU, CEF) or whether it also extends to funds under Heading 1 of the MFF, while ensuring consistency in cost methodologies and safeguarding the effective contribution to climate and environmental objectives. Romania supports enhancing coordination between the ECF and national competitiveness initiatives to ensure coherent, transparent, and complementary implementation, as well as meaningful SME participation across all Member States. Please also see the elements outlined below regarding the “Competitiveness Seal”. SE (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 and CMA and other strategic projects identified in Union legislation**. SE (Comments): SE can accept the proposed amendment to the recital. EL (Drafting suggestions): , including to strategic projects under CRMA, NZIA, Chips Act, and CMA and other strategic projects identified in Union legislation.

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	EL (Comments): 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. 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".
(48) Union support should focus on the achievement of policy objectives. 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.	ES (Drafting suggestions): (48) Union support should focus on the achievement of policy objectives. 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. **Monitoring should focus on uptake and time-to-funding rather than procedural compliance.** ES (Comments): We reserve the right to propose similar wording in a relevant article beyond the recitals.

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(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. Work programmes are also the appropriate place to allocate budget in accordance with evolving policy priorities, and they should set out contributions, specific conditions and expected results.	FR (Comments): Les critères d'éligibilité et de sélection doivent en premier lieu être définis dans le Règlement FEC. Seuls des critères additionnels (et cumulatifs) doivent pouvoir être décidés dans le programme de travail. RO (Drafting suggestions): 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~~ **shall** 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. (…) RO (Comments): It is important to have a stronger provision in order to really ensure predictability. EE (Drafting suggestions): 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, **as well as for the purpose of laying out the preliminary distribution of the priorities over the calls planned for the coming years,** with a view to provide predictability to implementing partners. The designated mode of implementation reflects the identified needs for directionality, flexibility,

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	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. Work programmes are also the appropriate place to allocate budget in accordance with evolving **EU and national level** policy priorities, and they should set out contributions, specific conditions and expected results. EE (Comments): It is important to set out in Multiannual Work Programmes the overview of the planned preliminary distribution of the priorities over the calls planned for the coming years, in order for the (Member States,) potential applicants and the other potential co-financing parties to be able to plan preparatory activities necessary for preparing and submitting high quality applications to the relevant calls (e.g. form consortia including the most relevant partners; seek for sources to cover the required own contribution, etc.) Within the framework of these Multiannual Work Programmes, the more detailed content can be developed in the Annual Work Programmes. Alongside the priorities of the European Union, it is also necessary to take into account the strategic priorities and development needs of the Member States in areas that require consideration of their specific characteristics (such as cybersecurity and digitalization) as well as their long-term strategic development needs.

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(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 additionality and incentivise crowding in private and public investment 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.**]**	AT (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 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 ~~private and public investment~~ **especially private capital and institutional investors as well as crowding in public 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.] AT (Comments): Private and public capital should not be treated equally. We would suggest to adapt the wording in accordance with Art. 3.1.c. FR

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	(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 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 private and public investment 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. **Investment guidelines as regards strategic investment in the field of defence should be should be approved by the Defence Industry committee** FR (Comments): 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**.**
(52) Deep-tech scale-up financing under the Scaleup Europe Fund announced in the Startup Scaleup Strategy, existing at the time of the entry into force of the present Regulation, should be carried out under the terms agreed in the MFF 2021-2027. All scaleup financing under the MFF 2028-2034 should take place under the ECF.	

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(54) 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 crowding in of additional public and private capital to integrate suppliers, manufacturers, and innovators from different Member States and diversify sources of supply.	AT (Drafting suggestions): (54) 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 ~~crowding in of additional public and private capital~~ **and especially crowding in 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. AT (Comments): Private and public capital should not be treated equally. We would suggest to adapt the wording in accordance with Art. 3.1.c.
(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.	
(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	AT (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 **indirect or quasi**-equity. The

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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 the most appropriate funding tool to be used for its specific actions, depending on, inter alia, the development stage, the specific industry needs and underlying market failures.	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). 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. RO (Comments): We find the final sentence of this recital unclear: how and whom is the ECF, the fund as such, to provide with advice on the most appropriate funding tool? Please help clarify the intention and the wording.
(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 project promoters, with the aim to ensure that feedback from stakeholder communities is reflected in the design of work programmes.	

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(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), TFEU[52]. 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.**]**	DE (Comments): When will the text passages in square brackets be discussed?
(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).	

[52] 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).

Presidency text (doc.14282/25)	Drafting suggestions and Comments
(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.	
(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 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.	FR (Drafting suggestions): [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.] FR (Comments): Ce considérant devrait être entre crochet au vu de la mise entre crochet de l'article 20.

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Presidency text (doc.14282/25)	Drafting suggestions and Comments
(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 are considered to be of public interest or presumed to be of overriding public interest may be identified in separate existing or future legislation.	
(64) Where necessary and duly justified, the ECF should incentivise start-ups 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-ups 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.	

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Presidency text (doc.14282/25)	Drafting suggestions and Comments
(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 only afterwards based on the requirements and merits of the individual project.	FR (Drafting suggestions): 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 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 only afterwards based on the requirements and merits of the individual project. FR (Comments): La France soutient l'intégration claire du principe d'excellence.
(66) Where necessary and duly justified, the ECF should also simplify and accelerate the implementation of Union support for certain important projects.	
(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.	

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(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. The open architecture 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.	
(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.	RO (Drafting suggestions): 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. **Without prejudice to the selection of implementing partners under this Regulation,** 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. RO (Comments):

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	While acknowledging and supporting a swift transition from InvestEU and reduced admin burden for implementing partners, it is important to ensure that new Implementing Partners will not be negatively impacted. In this regard, such a statement in a recital ensures predictability and no prejudice to the selection of partners procedure.
(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.	
(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.	

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(72) 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.	AT (Comments): Many thanks for having organised the technical seminar on 29 October and the technical note. • 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. • Also, we believe establishing rules for guarantee agreements in the respective legislative acts does not necessarily lead to inconsistency between the rules. FR (Drafting suggestions): 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. **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.** FR (Comments):

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	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.
(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 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.	RO (Drafting suggestions): 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 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. **The provisioning rate for contributions to the budgetary guarantee under the Member State compartment should be set following similar assessment considerations with the aim to ensure additionality of ECF InvestEU financing.** RO (Comments): Under current InvestEU programme, provisioning rate for MS compartment was not comparable to the EU compartment, even though financial products were the same (top-up to the EU compartment products). This is rather discouraging additionality of interventions and favouring substitution of InvestEU EU compartment financing. EE (Drafting suggestions):

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	To comply with the requirements of Regulation (EU, Euratom) 2024/2509, this Regulation **shall** set out a maximum amount of the budgetary guarantee under the ECF InvestEU Instrument, a provisioning rate 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. EE (Comments): Since the obligation is related to requirements of an existing regulation, it is appropriate to use "shall".
(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, 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.	RO (Drafting suggestions): 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, 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, **including, where possible, under the Member State compartment**, are State aid consistent within the meaning of Article 212(2) of Regulation (Union, Euratom) 2024/2509 to ensure their swift deployment.

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(76) Whereas European innovative start-ups and scale-ups 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-up 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-ups 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.	
(77) A 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	

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existing community of the InvestEU Programme pillar assessed advisory partners.	
(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.	
(79) However, access to finance is an important barrier for SMEs, especially for start-ups and scale-ups, 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.	
(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	BE (Drafting suggestions): 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

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Cluster Collaboration Platform (ECCP) and other networks, to simplify and streamline advisory and partnership services.	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. **In particular, the 'EU for Business Network' should build on the Sustainability advisory services already developed by the Enterprise Europe Network since 2021 to support the transition of SMEs to sustainable business models.**
(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 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.	FR (Drafting suggestions): 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. FR (Comments): La mise en place de « bonus systems » pour encourager la participation des PME aux appels à propositions du ECF est une initiative positive, notamment pour soutenir l'innovation, l'accélération des projets et la commercialisation dans des secteurs stratégiques. En revanche, 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. PT (Comments):

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	"Bonus systems" concern which measures in specific? Clarification here is welcome.
(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.	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, **taking into account necessity for specific security of information guarantees regarding defence industry policies** FR (Comments): La France a des interrogations concernant la sécurité de l'information, en particulier concernant les activités liées à l'industrie de défense.
(84) In a rapidly changing economic, social and geopolitical environment, recent experience has shown the need for a more flexible multiannual financial framework and Union programmes. **[**To that effect, and in line with the objectives of the ECF, the funding should duly consider the evolving policy needs as identified in relevant documents published by the Commission, in Council conclusions and European Parliament resolutions, while ensuring sufficient predictability for the budget implementation.**]**	

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(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 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.[53] 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.	AT (Comments): What does this recital, with regard to space policy, refer to?
(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. Those powers should be exercised in accordance with Regulation (EU) No 182/2011 of the European Parliament and of the Council.[54]	DE (Comments): There is a need to clarify which "certain measures in support of space policy" are meant here, given that the space components of the ECF are closely linked to national security matters. FR (Drafting suggestions): (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

[53] OJ L 123, 12.5.2016, p. 1, ELI: http://data.europa.eu/eli/agree_interinstit/2016/512/oj.

[54] 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.

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	space policy (**bearing in mind related security and defence stakes)**, 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. FR (Comments): Demande d'ajout prenant en compte le caractère dual des activités spatiales.
(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 Regulation (EU) No 182/2011, the advisory 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 the area of resilience and security, defence industry support and space, the examination procedure should be used for the adoption of work programmes in these areas.	AT (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 Regulation (EU) No 182/2011, the ~~advisory~~ **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 the area of resilience and security, defence industry support and space, the examination procedure should be used for the adoption of work programmes in these areas. BE (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

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	fall within the scope of implementing acts referred to in Regulation (EU) No 182/2011, the ~~**advisory**~~ **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 the area of resilience and security, defence industry support and space, the examination procedure should be used for the adoption of work programmes in these areas DE (Comments): There is a need to clarify which "certain measures in support of space policy" are meant here, given that the space components of the ECF are closely linked to national security matters. ES (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 Regulation (EU) No 182/2011, the ~~advisory~~ **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**, food production** 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

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	coordination with Member States in the area of resilience and security, defence industry support and space, the examination procedure should be used for the adoption of work programmes in these areas. FR (Drafting suggestions): 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 Regulation (EU) No 182/2011, **the examination** ~~the advisory~~ 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 the area of resilience and security, defence industry support and space, the examination procedure should be used for the adoption of work programmes in these areas. FR (Comments): En ligne avec la proposition de compromis.
(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	AT (Comments): The potential of a late adoption of a work programme should not suffice as a ground for the Commission to adopt an implementing act. Experiences from the EU4Health work programme adoption processes have shown that there is already a lack of communication between the Commission and the Member

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exceptional and duly substantiated emergencies, imperative grounds of urgency so require.	States. This year, the Commission only presented a draft work programme for 2025 in June of this year. An inability of the Commission to provide the documents that are necessary for Member States to partake in the adoption of a work programme cannot be ground for a unilateral implementing act by the Commission. ES (Drafting suggestions): (88) The Commission should adopt immediately applicable implementing acts **using the examination procedure** 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. FR (Drafting suggestions): ~~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.~~ FR (Comments): Demande de suppression du considérant en cohérence avec suppression à l'article 15 des dispositions afférentes

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(89) The ECF replaces the programmes established by Regulations (EU) 2021/522,[55] (EU) 2021/694,[56] (EU) 2021/696,[57] (EU) 2021/697,[58] (EU) 2021/783,[59] (EU) 2023/588,[60] , repeals provisions of Regulations (EU) 2021/696, (EU) 2023/588 and (EU) [EDIP].	HU (Comments): Previously self-standing policies and programs contributing to the competitiveness of the Union should be maintained. Hungary does not support the integration of the programs into one single Fund. The ECF shall be well-designed and targeted to added value at European level beyond existing instruments IT (Drafting suggestions): (89) The ECF replaces the programmes established by Regulations (EU) 2021/522,[25](EU) 2021/694,[26] (EU) 2021/696,[27](EU) 2021/697,[28] (~~EU~~)

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55 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).

56 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).

57 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).

58 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) .

59 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).

60 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).

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	~~2021/783,~~[29] (EU) 2023/588,[30], repeals provisions of Regulations (EU) 2021/696, (EU) 2023/588 and (EU) [EDIP].
HAVE ADOPTED THIS REGULATION:	
Chapter I	BG (Drafting suggestions): There is no clear mechanism for distribution by Member State or category of company (SMEs and mid-caps), nor a specific instrument to ensure equality between them. There are detailed financial rules and mechanisms for blending, but there is no explicit mention of fair geographical and company distribution. 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 SI (Drafting suggestions): **Transfers of funds between the specific pillars of this fund shall not be permitted**.
	SI (Drafting suggestions):

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	'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. SI (Comments): SI would like to add a new definition under Article 2, once the text will be opened to negotiations. 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

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Article 3 **Objectives**	AT (Comments): AT reiterates the importance of including the promotion of health and well being, the equitable access to healthcare, reducing inequalities in health, and the strengthening of healthcare systems in the Objectives of the ECF Regulation. Since there will be no stand-alone regulation for health policy, the ECF, as one of the regulations in the MFF that is not only providing funding in the area of health but is also including the governance of the budget dedicated to health in the UCPM+, must have health priorities as part of its general objectives. AT is concerned that in the proposal by the European Commission as well as in the second presidency proposal, health objectives remain subsumed under the objective of competitiveness. AT wishes to highlight that competitiveness objectives should not undermine important health principles such as affordability, accessibility, equity, gender equality and inclusion. AT therefore recalls its comments made for the first compromise proposal. BE (Comments): There is a lack of consideration for the regional dimension and the territorial anchoring of innovation ecosystems. There is no mention of S3, even though it is essential for the territorial anchoring of innovation (and industrial) policies. The S3 strategy is relevant for a competitiveness program as it identifies the areas in which companies are the most competitive taking into account the specificities of thier territory and economy (also stressing the complementarity between innovation ecosystems throughout Europe). DE (Comments): The definition of objectives is strongly connected to the assessment of proposals to be funded by the ECF. Thus, they have to be framed in a way to

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	guarantee that funding will focus on support for actual key strategic technologies and activities. In general, funding should provide a clear EU-added value and contribute to addressing market failures. This requires clear priorities which areas contribute most effectively to the EU's competitiveness, security and/or resilience. 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. (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). We reiterate the importance of harmonising terminology and structure across chapters, ensuring consistency and readability. The articulation between competitiveness and sustainability should be further strengthened, particularly in Article 3 (general objectives). EL (Comments): ECF to be Simple, flexible, but also with **inclusivity- balance** **Maintaining fairness and balance in the distribution of ECF resources**: caution should be exercised regarding

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	the potential concentration of resources to the disadvantage of smaller MS and less developed regions and the consequent broadening of the innovation gap. ECF to be Simple, flexible, but also with **inclusivity- balance** The implementation of the Fund shall ensure a balanced geographical distribution of investments across the Union. Member States; ensure the participation of less developed regions and SMEs in the Union's competitiveness agenda. The work programmes may set **minimum thresholds** for investments by **SMEs** indicatively quota ≥ 50 % and a **mínimum allocation** for **regions lagging behind** to be determined by a suitable calibrated formula.
	LV (Drafting suggestions): Article 3 Article 3 (1) For support to health, the specific objectives of fostering innovation and competitiveness of the health sector while ensuring supply security and the industrial capacity and capability to manage future serious cross-border threats to health; improving and protecting public and population health, by prioritising health promotion and disease prevention across the life span through a health-in-all and One Health ~~policies~~ approach, and by strengthening innovation and resilience of health systems.

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	LV (Comments): Article 3 Article 3, para. 2. (b) (1) Please confirm that point 1(b) of Article 3 also includes animal health, zoonoses and antimicrobial resistance (AMR)! We have concers wheather reference to One Health refers to the policies or it just simply the One Health approach. Maintaining strong animal health systems and One Health cooperation is not only a matter of public health — it is a foundation of Europe's competitiveness, safety and global credibility. Article 3 para. 2. (b) (3) Latvia considers that support mechanisms should be available not only for large and international projects, but also for smaller-scale initiatives and regional programmes. There are currently concerns about securing geographical balance. In order to promote fairer access to funding and to encourage the involvement of representatives of the agricultural and fisheries sector, it would be useful to consider reduced co-financing requirements and simplified support mechanisms specifically designed for regional and smaller-scale projects. It is essential to include water management, land improvement and flood risk reduction as eligible activities, especially given the increasing risks of flooding and heavy rainfalls in Europe.

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	It is also important to ensure simplified conditions and reduced administrative burdens, as well as the possibility of flexibly combining different sources of funding to ensure that projects can more easily attract the necessary resources. Article 3 para. 2. (b) (4) The Ministry of Agriculture invites Commission to present the proposals for the ECF Regulation, in particular Chapter V, to representatives of the Special Committee of Agriculture and experts of the F.3 Working Party on Horizontal Agricultural Questions, as well as Working Party on Fisheries Policy thereby ensuring greater involvement and better understanding of this ECF Regulation proposal among experts in the agricultural, forestry and fisheries sectors.
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:	AT (Drafting suggestions): The general objective of the ECF is to strengthen the Union's competitiveness **by addressing market failures and sub-optimal investment situation while ensuring European added value and promoting innovation, productivity and long-term economic growth**, notably in strategic sectors and technologies along the investment journey by: AT (Comments): We are still in favour of adding a sub-paragraph in reference to health. As mentioned above, health should not be subsumed under the objective of competitiveness. Health should stand as an objective of its own that is also contributing to the competitiveness of the Union in various aspects. BE (Drafting suggestions): 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**

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	fostering industrial uptake and deployment of strategic technologies and **by supporting** technologies along the investment journey by: BE (Comments): The general objective of the ECF needs to be defined more clearly. CZ (Drafting suggestions): 1. The general objective of the ECF is to ~~i~~strengthen the Union's competitiveness, **resilience and security**, notably in strategic sectors and technologies along the investment journey by: 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" DE (Comments): Q to PCY/COM: Do all of the elements of the list have to be met at the same time? "Market failures" is, for example, a horizontal objective, while "promoting quality jobs" represents a specific objective. ES (Drafting suggestions): 1. The general objective of the ECF is to ~~increase European~~ **strengthen the Union's** competitiveness, notably in strategic **and priority** sectors and technologies along the investment journey by:

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	ES (Comments): We support the proposed change, as "strengthen" is more appropriate. However, we are concerned that the reference to strategic sectors and technologies may exclude certain priority R&I activities. FI (Drafting suggestions): The general objective of the ECF is to strengthen the Union's **global** competitiveness **by addressing market failures while ensuring European added value and promoting innovation and productivity growth,** notably in strategic sectors and technologies along the investment journey by: FI (Comments): FI: Promoting innovation and productivity growth are key elements of strengthening Union's global competitiveness and should be anchored in the overarching objective of the ECF. FR (Drafting suggestions): The general objective of the ECF is to strengthen the Union's competitiveness **defined as the EU's capacity to raise productivity growth, high living standards and strategic autonomy in a rapidly evolving global landscape**, notably in strategic sectors, **including in terms of sovereignty, innovation** and technologies, **resilience and industrial strength** along the investment journey by: FR

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	(Comments): Cet article devrait inclure une définition de la compétitivité. La France soutient l'intégration de la mention d'autonomie stratégique, de souveraineté dans cet article. L'article 1 (*subject matter*) du FEC fait référence à l'innovation, plus large et plus pertinent pour plusieurs des fenêtres FEC que "technologies". IE (Drafting suggestions): The general objective of the ECF is to ~~increase European~~**strengthen the Union's** competitiveness **by addressing market failures while ensuring European added value and promoting innovation, productivity growth and long-term economic growth,** notably in strategic sectors and technologies along the investment journey by**:** IE (Comments): IE suggest text across to provide further clarity on the objectives and ensure a focus on addressing market failures. IT (Drafting suggestions): 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: IT

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	(Comments): We deem it important to frame the ECF along the priorities set forth by the Oct. 2025 European Council Conclusions. NL (Drafting suggestions): The general objective of the ECF is to strengthen the Union's competitiveness **by addressing market failures while ensuring European added value and promoting innovation and productivity growth,** notably in strategic sectors and technologies along the investment journey by: NL (Comments): Promoting innovation and productivity growth are key elements of strengthening competitiveness and should be anchored in the overarching objective of the ECF. The Draghi report strongly focusses on these key elements as well. Furthermore, important that the ECF focuses on market failures (including transition failures). PL (Drafting suggestions): The general objective of the ECF is to strengthen the Union's **long-term strategic resilience and** competitiveness**, by mobilising the innovative and productive potential of all Member States** and notably in strategic sectors and technologies along the investemnt journey by: PL (Comments): The amendment highlights the need for a long-term, integrated approach to strengthening the Union's competitiveness. It emphasizes that the Union's strategic resilience requires the full utilization of the potential of all 27 Member States, their diversity, competences, and

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	innovative capacities. In this way, the provision better reflects the objectives of the ECF as an instrument aimed not only at supporting strategic technologies but also at building lasting economic and industrial resilience across the Union. SE (Drafting suggestions): The general objective of the ECF is to ~~increase European~~**strengthen the Union's** competitiveness **by addressing market failures while ensuring European added value and promoting innovation, productivity and long-term economic growth**, notably in strategic sectors and technologies along the investment journey by: 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. SI (Drafting suggestions): 1. The general objective of the ECF is to ~~increase European~~**strengthen the Union's** competitiveness, notably in strategic sectors, **defined by the policy windows in knowledge production** and **in** technologies along the investment journey by: SI (Comments): We suggest adding a clarification of strategic sectors and strategic technologies the ECF is dedicated to.

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	If the investment journey is defined to include fundamental science it is not clear why only technologies are exemplifed here.
	LV (Drafting suggestions): **a[1]) 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;** 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.
(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 **raising productivity and** developing and accelerating their manufacturing and industrial **and market** deployment;	AT (Drafting suggestions): (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 productivity and** developing and accelerating their manufacturing and industrial **and market** deployment; 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

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	new technologies on citizens, or the societal consequences of conflicts and crisis. BE (Drafting suggestions): (a) delivering technological, economic**,** social and environmental impact from the Union's investments, including by developing **excellent** disruptive and incremental innovation, and emerging, cutting-edge, dual-use, and strategic technologies with significant economic potential, including by raising productivity and developing and accelerating their manufacturing and industrial and market deployment; BE (Comments): It is important to emphasise that ECF also uses excellence as a criterion for innovations. CZ (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 technologies with significant economic potential, including **by collaborative research** and **raising productivity and** developing and accelerating their manufacturing and industrial **and market** deployment; 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

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	by adding the reference to the principle of collaborative research as another important and integral element supporting competitiveness. DE (Drafting suggestions): 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; DE (Comments): Societal is the better suited expresion covering the broader aspects of a society as a whole 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 **production,** manufacturing, ~~and~~ industrial **and market** deployment; FR (Comments): Reprise des éléments des considérants.

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	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 LV (Drafting suggestions): delivering technological, economic and environmental impact from the Union's investments, including by developing disruptive and incremental innovation, and emerging, cutting-edge, dual-use, and strategic technologies with significant economic potential, including by developing and accelerating their manufacturing and industrial deployment**, and by promoting innovative nature-based solutions, ecosystem restoration, and actions to halt and reverse biodiversity loss, in line with the Union's climate and nature objectives;** LV (Comments): Ensures continuity of LIFE Programme priorities and alignment with EU biodiversity and climate objectives. 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 technologies with significant economic potential, including by **raising productivity and** developing**,** ~~and~~ accelerating **and broadening** their manufacturing and industrial **and market** deployment; MT (Comments): Malta would like to insert the concept of broadening of manufacturing excellency and technology. The concept of broadening dovetails the

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	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. SE (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 **and commercialisation.** SE (Comments): SE welcomes the stronger emphasis on productivity but questions the need to introduce market deployment in this article. The ECF should focus on support to innovative projects in the early stages of the investment process, as well as commercialisation of European innovations. SI (Drafting suggestions): (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

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	manufacturing and industrial **and market** deployment **without crowding out private investors and initiatives**; SI (Comments): Need to mention climate impact too. Without long-term support to research and cutting-edge knowledge there can be no disruptive innovation or technological breakthroughs ECF must only act in cases of market failure and avoid replacement effects of its interventions on private investments. It is not enough to state under (c) that ECF should address market failures, as it is only one of the (additional) objectives and not an integral part of the ECF intervention logic. EL (Drafting suggestions): **(a1) engaging and connecting the full competitiveness capacity across EU by promoting pan-European collaboration** EL (Comments): New paragraph to stress the need for synergies
	SI (Drafting suggestions): **(a1) engaging and connecting the full competitiveness pool across the Union by promoting pan-European collaboration**
(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, support to ramp up of	DE (Drafting suggestions):

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~~European~~**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**;	(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, **strengthening and establishing circular economy solutions and markets for secondary raw materials** support to ramp up of ~~European~~**the Union's** production of strategic technologies and creating, strengthening and ~~protecting~~**safeguarding** critical Union value chains and infrastructure**, including from hybrid and cyber threats**; DE (Comments): Progress in circular economy is a key factor for the independence and resilience ES (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, support to ramp up of ~~European~~ **the Union's** production of strategic technologies**, strengthening industrial capabilities and supporting the adoption of technologies or solutions for supply crises of critical resources,** and creating, strengthening and ~~protecting~~ **safeguarding** critical Union value chains and infrastructure**, including from hybrid and cyber threats**; ES (Comments): It would be advisable to strengthen the reference to industrial capabilities, explicitly linking it to industrial resilience and critical production capacities, in order to better reflect the objective of reinforcing the Union's strategic autonomy and preparedness. FI

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	(Comments): FI welcomes the objective to address strategic dependencies with the ECF in order to strengthen the EU's resilience and economic security. FR (Drafting suggestions): reducing or preventing the Union's strategic dependencies, and reinforcing the Union's resilience**, sustainability**, **sovereignty** and economic security, including through **focusing on European actors to develop the Union industrial base,** diversifying sources and markets, support to ramp up of ~~European~~**the Union's** production of strategic technologies and creating, strengthening and ~~protecting~~**safeguarding** critical Union value chains and infrastructure**, including from hybrid and cyber threats**; FR (Comments): 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 La France souhaite par ailleurs intégrer la notion de préférence européenne dans les objectifs généraux. IE (Drafting suggestions): (b) reducing or preventing the Union's **high risk** strategic dependencies and ~~**reinforcing strengthening**~~ **t**he Union's resilience, **sovereignty in an open manner,** and economic security, ~~including~~ **inter alia** through diversifying sources and ~~and markets~~**circular use of resources and markets, ~~support to ramp off European production of strategic technologies~~ and by supporting**

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	the Union's **European market for and ramp up production of strategic technologies**, that create, strengthen and safeguard critical Union value chains and **vital** 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.** IE (Comments): IE welcomes the inclusion of strengthening and safeguarding the Union from hybrid and cyber threats **IE Suggested Text Amendment** Ireland would like to add in a reference to high-risk strategic dependencies. It is important the dependencies are defined more clearly and must be underpinned by a strong, objective evidence base that demonstrates a critical,

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	EU-wide vulnerability, in particular due to unbalanced trade relationships. The question of resilience should be paired with the concept of openness. There should be a focus on a resilient supply chain and on diversification to reduce to vulnerabilities. LV (Drafting suggestions): reducing or preventing the Union's strategic dependencies, and reinforcing the Union's resilience, sovereignty and economic security, including through diversifying sources and markets, support to ramp up of ~~European~~the Union's production of strategic technologies and creating, strengthening and 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;** 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. 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, support to ramp up of ~~European~~**the Union's** production of strategic technologies and creating, **expanding,** strengthening and ~~protecting~~**safeguarding** critical Union value chains and infrastructure**, including from hybrid and cyber threats**; MT

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	(Comments): Besides creating new, and strengthening and safeguarding existing value chains. Existing value chains should also be expanded to build greater resilience through diversification of sources (internal and external) NL (Drafting suggestions): 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~~ **inter alia** through ~~diversifying~~ **diversification** ~~sources~~ and **circular use of resources and** markets, **and by** support**ing** a European market for and ~~to ramp up of the Union's~~ production of strategic technologies **that create** and ~~creating,~~ ~~strengthening and~~ safeguard~~ing~~ critical Union value chains and **vital** 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.**

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	NL (Comments): NL welcomes the objective to address strategic dependencies with the ECF in order to strengthen the EU's resilience and economic security. However, for the ECF to be most effective for this objective, more specification on the type of strategic dependencies is needed. Those dependencies that are 1) essential for the Union's security and resilience while also 2) having a high vulnerability for being instrumentalized whilst simultaneously having limited substitutability options and a high degree of market concentration. This combination leads us to identify and steer towards the strategic dependencies with the highest risk, i.e. HRSDs. To this end, NL suggests following the approach put forward by the European Commission in a study identifying this category of dependencies. As dependencies may evolve in their nature and risks, and new high-risk strategic dependencies may arise, the Commission should update the identification of these HRSDs. PL (Drafting suggestions): (b) reducing or preventing the Union's strategic dependencies, and reinforcing the Union's resilience, sovereignty and economic security (**including food and medical security**) including through diversifying sources and markets, support to ramp up **and geographically balanced development** of the Union's production of strategic technologies, **building technological and industrial capacities in strategic sectors,** and creating, strengthening and safeguarding critical Union value chains and infrastructure, including from hybrid and cyber threats; PL (Comments):

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	The proposed modification aims to reflect the dual objective of the European Competitiveness Fund to both increase production capacity (ramp-up) and ensure the balanced development of the Union's industrial and technological base. By explicitly referring to balanced development, the text recognises the need to avoid excessive geographical concentration of strategic technologies and to foster the participation of all Member States in building Europe's long-term industrial resilience and competitiveness. Poland emphasizes the need to support food security as the strategic base for economic security, including strenthening and reducing dependency of supply chains in agri-food sector. Poland recommends to add provisions regarding medicines safety. Critical Medicines Act (CMA) is mentioned in The Competitiveness Compass for the EU as an element of legislation aimed at strengthening the supply of critical medicines and their ingredients, thus reducing dependence on third countries. SE (Drafting suggestions): reducing or preventing the Union's strategic dependencies, and reinforcing the Union's resilience, ~~**sovereignty**~~ and economic security including through diversifying sources and markets, support to ramp up of ~~European~~**the Union's** production of strategic technologies and creating, strengthening and ~~protecting~~**safeguarding** critical Union value chains and infrastructure**, including from hybrid and cyber threats**; SE (Comments): SE can partly accept the proposed amendments. Suggest deleting "sovereignty" as this, particularly without qualifiers such as "digital etc" contradicts a necessary open approach. SI (Drafting suggestions): (b) reducing or preventing the Union's strategic dependencies, and reinforcing the Union's resilience, **sovereignty,** food security and economic

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	security, including through diversifying sources and markets, support to ramp up of ~~European~~**the Union's** production of strategic technologies and creating, strengthening and ~~protecting~~**safeguarding** critical Union value chains and infrastructure, **including from hybrid and cyber threats**; SI (Comments): Mention food security, not only economic security. 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, support to ramp up of ~~European~~**the Union's** production of strategic technologies and creating, strengthening and ~~protecting~~**safeguarding** critical Union value chains and infrastructure**, particularly from physical and cyber threats**; EE (Comments): We would like to highlight the importance of protection from physical and cyber threats.
(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 avoiding duplication and without crowding out private investors; serving as an integrated platform for delivering targeted financial support to companies across all development phases ~~start-ups, scale-ups, and strategic companies~~,	AT (Drafting suggestions): addressing market failures and suboptimal investment situations, especially by crowding in private capital and institutional investors as well as crowding in public funding in a proportionate manner, while avoiding duplication and without crowding out private **or other public** investors; serving as an

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including those actively pursuing manufacturing, industrial and market deployment;	integrated platform for delivering targeted financial support to companies across all development phases, including those actively pursuing manufacturing, industrial and market deployment; AT (Comments): We appreciate the redraft putting special emphasis on the mobilization of private capital. At the same time, we would also like to avoid crowding out of other public investors so to ensure additionality. See also Financial Regulation, Art 212c. DE (Comments): We would like to ask DK PCY to explain the changes made here. Market failure might take different forms – are they all addressed here? Crowding in of private capital and institutional investors could maybe be an objective of its own. ES (Comments): Mechanisms should be established to measure investment levels and their impacts. At present, there is no effective capacity to do so. For instance, in co-programmed partnerships or Joint Undertakings—intended as instruments to stimulate private investment—available data are limited or disputed, as they often rely on estimates provided by the partnerships themselves. FI (Drafting suggestions): addressing market failures and suboptimal investment situations, especially by crowding in private capital and institutional investors as well as crowding in public funding in a proportionate manner, **ensuring additionality** while

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	avoiding duplication and without crowding out private **or <u>other public</u>** investors; serving as an integrated platform for delivering targeted financial support to companies across all development phases, including those actively pursuing manufacturing, industrial and market deployment FR (Drafting suggestions): (c) addressing market failures and suboptimal investment situations, **especially** by crowding in private capital and institutional investors as well as **crowding in** public funding in a proportionate manner, while avoiding duplication and without crowding out private investors; serving as an integrated platform for delivering targeted financial support to companies across all development phases including those actively pursuing ~~manufacturing, industrial~~ **<u>production</u>** and market deployment; FR (Comments): 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. La France souhaite obtenir davantage de précisions sur ce que recouvre la notion de « financement public de manière proportionnée ». Concernant le « soutien financier aux entreprises à toutes les phases de développement », nous soutenons l’accompagnement à toutes les étapes de développement des projets, y compris les phases en aval d’industrialisation et de commercialisation. IE (Drafting suggestions):

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	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, **ensuring additionality**, while avoiding duplication and without crowding out private **or other public** investors; serving as an integrated platform for delivering targeted financial support to companies across all development phases**,** including those actively pursuing manufacturing, industrial and market deployment IE (Comments): IE proposed text changes to highlight critical role for private investment. MT (Drafting suggestions): (c) addressing market failures and suboptimal investment situations, ~~including~~**especially** by crowding in private capital and institutional investors as well as **where necessary leveraging on** ~~**crowding in**~~ public funding in a proportionate manner, while avoiding duplication and without crowding out private investors; serving as an integrated platform for delivering targeted financial support to companies across all development phases ~~start-ups, scale-ups, and strategic companies~~, including those actively pursuing manufacturing, industrial and market deployment MT (Comments): 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

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	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. NL (Drafting suggestions): addressing market failures and suboptimal investment situations, especially by crowding in private capital and institutional investors as well as crowding in public funding in a proportionate manner, **ensuring additionality** while avoiding duplication and without crowding out private **or other public** investors; serving as an integrated platform for delivering targeted financial support to companies across all development phases, including those actively pursuing manufacturing, industrial and market deployment PL (Drafting suggestions): „(c) addressing market failures and suboptimal investment situations, especially by crowding in private capital and institutional investors as well as crowding in public funding in a proportionate manner, while avoiding duplication and without crowding out private investors; serving as an integrated platform for delivering targeted financial support to companies across all development phases including those actively pursuing manufacturing (**including agri-food processing)**, industrial and market deployment". PT (Drafting suggestions): (c) addressing market failures, **less developed capital markets** and suboptimal investment situations, ~~including~~**especially** by crowding in private

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	capital and institutional investors as well as **crowding in** public funding in a proportionate manner, while avoiding duplication and without crowding out private investors; serving as an integrated platform for delivering targeted financial support to companies across all development phases ~~start-ups, scale-ups, and strategic companies~~, including those actively pursuing manufacturing, industrial and market deployment; PT (Comments): As in the first compromise text, PT would suggest adding a specific reference to less developed capital markets. SE (Drafting suggestions): (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 avoiding duplication and without crowding out private investors; serving as an integrated platform **with the possibility to** ~~**for**~~ deliver**~~ing~~** 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;**~~ **primarily supporting projects in early development phases with strong potential to increase productivity.** SE (Comments): 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

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	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. SE sees that the most value from the fund comes from projects in early development phases. SI (Drafting suggestions): (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 **preventing** ~~avoiding~~ duplication and without crowding out private investors; serving as an integrated platform for delivering targeted financial support to companies across all development phases ~~start-ups, scale-ups, and strategic companies~~, including those actively pursuing manufacturing, industrial and market deployment **with Union added value**; SI (Comments): It is not enough to try and avoid duplication. Duplication needs to be prevented. What will be the main driver for funding decisions under ECF that will ensure EAV, like pan-European collaboration is for FP? Is it crowding in public and private funding? EL (Drafting suggestions): (c) addressing market failures and suboptimal investment situations **across EU**, ... EL

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	(Comments): Add "across EU"
(d) furthering the integration of Union capital markets in ~~alignment~~**line** with the objective of delivering **the** Savings and ~~Investment~~**Investments** Union, including ~~solutions~~**tools** 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;	DE (Drafting suggestions): (IE (Drafting suggestions): furthering the integration of Union capital markets in ~~alignment~~ **line** with the objective of delivering **the** Savings and ~~Investment~~**Investments** Union, including ~~solutions~~ **tools** to address the fragmentation of Union capital market, **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; IE (Comments): IE suggest text across, which align with Draghi report findings on the need to improve access to finance 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

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	enterprises in all the Member States, including those with less developed capital markets; IT (Comments): The term "tools" isn't broad enough to encompass all policy measures. MT (Drafting suggestions): (d) furthering the integration of Union capital markets in ~~alignment~~**line** with the objective of delivering **the** Savings and ~~Investment~~**Investments** Union, including ~~solutions~~**tools** **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 MT (Comments): 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

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	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. NL (Drafting suggestions): 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, **stimulate and improve access to finance in the market**, 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; NL (Comments): As stimulating and improving access to finance in the market is a key element in delivering the SIU. SE (Comments): SE can accept the proposed changes.
(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;	DE (Drafting suggestions): e) aligning research, innovation and industrial policy support to translate Union's research excellence into Union industrial strength on global markets and securing **productivity growth and** the future of manufacturing in Europe; DE (Comments):

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	Research cannot and should not be reduced to supporting industrial strength alone, but also to supporting productivity growth in general. ES (Drafting suggestions): (e) aligning research, innovation and industrial policy support to translate Union's research excellence into Union industrial strength on global markets and securing the future of manufacturing in Europe **while encouraging research and technological development activities of high quality and considering the European Research Area and their regulations**; ES (Comments): Addition from arts. 179.1 and 179.2 TFUE to ensure non-oriented excellent research. FR (Drafting suggestions): 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 ; FR (Comments): 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

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	"industrie"), ainsi qu'avec les chapitres du FEC sur ses fenêtres, qui ne singularisent pas l'industrie et la production manufacturière. IT (Drafting suggestions): (e) aligning research, innovation and industrial policy support to translate Union's research excellence into Union industrial strength on global markets and securing the future of manufacturing in Europe, **in synergy with Horizon Europe, through complementarity between research and industrial deployment**. IT (Comments): 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. LV (Drafting suggestions): (e) aligning research, innovation and industrial policy support to translate Union's ~~research~~ excellence into Union industrial strength on global markets and securing the future of manufacturing in Europe; LV (Comments):

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	Please explain how the development of innovations is planned to ensure "securing the future of manufacturing in Europe". To avoid the interpretation that "research excellence" only means research excellence, please clarify the wording, allowing for other types of excellence to be supported. PL (Drafting suggestions): aligning research, innovation and industrial policy support to translate the Union's research excellence into Union industrial strength on global markets, **fostering cohesion of the Single Market, building strategic industrial value chains while shortening supply chains** and securing the future of manufacturing in Europe. PL (Comments): It's crucial for ensuring the ECF addresses the economic disparities within the Union like the EU's innovation divide and strengthens building value chains and shortens supply chains, which is important for building the resillient economy. RO (Drafting suggestions): (e) aligning research, innovation and industrial policy support to translate Union's research excellence into Union industrial strength on global markets and securing the future of manufacturing in Europe **and exploiting the potential of higher education partnerships, including European University Alliances;** RO (Comments): Romania supports strengthening the alignment of research, innovation, and industrial policies, with the aim of transforming the Union's scientific excellence into a competitive industrial advantage on global markets and ensuring the future of European production. In this context, Romania

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	underscores the importance of harnessing the potential of higher education partnerships, including the European University Alliances, as key platforms for developing advanced skills, facilitating knowledge transfer, and fostering innovation, thereby contributing to the consolidation of the European competitiveness ecosystem and to the integration of education with research and the real economy. SE (Drafting suggestions): ~~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; SE (Comments): Aligning research, innovation and industrial policy is not a general objective in itself, but rather to promote research excellence to foster innovation and productivity. SI (Drafting suggestions): (e) **combining and** aligning research, innovation and industrial policy support to ~~translate~~ **support** 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 as **well as supporting resilience and a just transition to a sustainable decarbonised and digital economy**; SI (Comments): R&I and industrial policies should not only align but also combing their strengths.

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	We should support research excellence and thereby enable its translation into concrete results that have global impact. The goal should be to strengthen the entire innovation-to-market ecosystem, not just manufacturing. EE (Drafting suggestions): (e) aligning research, innovation and industrial policy support to translate Union's research excellence into Union industrial strength on global markets and securing the future of manufacturing in Europe **encouraging research and technological development activities of high quality and considering the European Research Area and its regulations**; EE (Comments): Not all R&I activities linked to Horizon Europe are linked to industry and manufacturing. We support ES suggestion to reword this provision.
	CZ (Drafting suggestions): **(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;** CZ (Comments):

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	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. 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.
(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~~**and** social infrastructure**,** and related data and services;	ES (Drafting suggestions): (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, biotech and** social infrastructure**,** and related data and services; ES (Comments): Health (or supply chain in general) should be mentioned in relation to resilience. FR (Drafting suggestions): (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 social infrastructure, and related data and services;~~ FR

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	(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. La France s'interroge sur cette formulation qui semble établir une priorisation entre les fenêtres du FEC, qui n'est pas en ligne avec la stratégie sur les infrastructures de recherche et technologiques récemment publiée par la Commission, qui ne met pas en exergue des secteurs spécifiques. . IE (Drafting suggestions): (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~~**and** social infrastructure**,** **as well as shared research infrastructures,** and related data and services IE (Comments): IE suggest addition to the text, this point could benefit from an explicit reference to shared research infrastructure IE query if there will be regulation and funding to support the development of these services? Data will also require standards to be set to allow interoperability and quality

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	LU (Drafting suggestions): (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~~**and** social infrastructure **and cross-border public-health and health-data infrastructures (including EHDS-related services),** ~~and related data and services~~; LV (Drafting suggestions): developing Union cross-border and critical infrastructure and materials essential for the Union's competitiveness and strategic independence in particular for energy and transport, digital and security, defence and space infrastructure as well as social infrastructure, and related data and services, including green infrastructure and ecosystem-based solutions contributing to climate adaptation and biodiversity protection; developing Union cross-border and critical infrastructure essential for the Union's competitiveness and strategic independence in particular for energy and transport, digital and security, defence and space infrastructure as well as social infrastructure, and related data and services, **including green infrastructure and ecosystem-based solutions contributing to climate adaptation and biodiversity protection**; LV (Comments):

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	Strengthens the objective by integrating nature-based and ecosystem-based approaches essential for climate adaptation and biodiversity, in line with LIFE Programme priorities. Strengthens the objective by integrating nature-based and ecosystem-based approaches essential for climate adaptation and biodiversity, in line with LIFE Programme priorities. In addition to all the above information, we still do not see the other previous LIFE program directions reflected in the ECF regulation - nature and biodiversity, climate and environment. We do not understand why these directions are not linked to increasing competitiveness at the Union level, since these issues directly address the availability of sustainable resources, resilience to various climate change challenges, as well as are important aspects in attracting investors and improving the quality of the living environment in general, which promotes economic activity. Please also add critical materials that do not pass under critical infrastructure. MT (Drafting suggestions): (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~~**,** **water,** transport, digital and**,** security, defence ~~and, space infrastructure as well as~~**and** social infrastructure**,** and related data and services MT (Comments):

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	Malta would like to insert water because it is critical for European industrial competitiveness. With climate change and geopolitical tensions pan European water infrastructure is essential for competitiveness in terms of economic resilience and security of supply. PL (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 and social infrastructure, **water infrastructure,** and related data and services; PL (Comments): Water infrastructure is an important element of critical infrastructure and is becoming increasingly important in the face of recurring water shortages and droughts. SE (Comments): SE can accept the proposed amendments SI (Drafting suggestions): (f) developing **and strengthening** Union cross-border and critical infrastructure ~~key to~~**essential for** the Union's **research excellence** competitiveness, ~~and~~ strategic independence **and resilience** in particular **for climate, water,** energy ~~and~~**,** transport, digital ~~and~~**,** security, defence ~~and~~**,** space ~~infrastructure as well as~~**and** social infrastructure**,** and related data and services; SI (Comments): Climate and water resilience are also key.

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	EE (Drafting suggestions): (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~~**and** social infrastructure**,** and related data and services **including through deployment of enhanced physical protection, preparedness and cybersecurity measures, with a view to ensuring the Union's security, the continuity of supply chains, and enhancing the ability to prevent, withstand and recover from disruptions and threats, including those of a hybrid nature;** EE (Comments): EE would like to highlight the urgent need to be prepared to withstand threats for critical energy security. Assets like production facilities, pipelines, interconnections and substations are now strategic targets, requiring urgent protection to ensure energy security and EU competitiveness.
	EE (Drafting suggestions): **NEW**) Art 3(1)(fa): **Investing into capabilities for the protection and monitoring of critical undersea infrastructure**. EE (Comments): Estonia supports that the ECF invests into the protection and monitoring of the critical undersea infrastructure. We believe that the specific capabilities to that end need to be eligible for ECF support. Currently, specific capabilities such as multifunctional vessels are not covered. We believe that the

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	eligibility for ECF support of such capabilities is important, since the critical undersea infrastructure is vulnerably exposed and is a backbone of the resilience and the competitiveness of the Member States as well as the EU's economy.
(g) strengthening the competitiveness of SMEs and small mid-cap companies established in the Union and their ability to grow and scale up, in particular by improving their access to finance, including private investment, micro-finance and support to social enterprises as **well as** facilitating access to Union funding, through faster, simplified and harmonised procedures~~;~~ **and** reducing and ensuring a proportionate reporting burden;	AT (Comments): SME matters are a horizontal subject. In every work programme, a specific dedicated part should show, how each work programme under this Regulation aims to support SMEs and contributes to mainstreaming SME's needs into Union's work. Horizontal activities referred to in Chapter III pertain to SME matters. AT appreciates the reference added in Art. 15 Para 4. This reference ensures EC to adopt the corresponding work programme via implementing acts. Moreover, it ensures MS involvement in examination procedure. ECF proposal no longer provides for a separate comitology committee for SME matters (cf. Article 83 of the ECF proposal). A dedicated Committee configuration in a new letter (aa) in Para 1 on SME matters is to be set up, i.e. "ECF SME and small mid-caps Horizontal Committee". Only an SME Comitology Committee makes it possible to continue to have a formal say in the future – for example, in the context of the annual programmes that should be approved in the "no opinion, no action" (NONA) examination procedure. AT suggests setting up a new committee on SME matters. See AT wording suggestion for a new Article 83(1) letter (aa): "**Article 83/1 lit (aa): ECF SME and small mid-caps Horizontal Committee, for matters concerning the general objective set out in Article 3(1) point (g) and for specific objectives with an SME and small mid-caps component;"**

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	➔ *On Para 1 of Article 83, AT wants a Committee for SME and small mid-caps, and suggests amending Para 1 of Article 83 with a letter (aa) to this effect.* **Article 83/3:** Where reference is made to this paragraph, Article 5 of Regulation (EU) No 182/2011 shall apply and the opinion shall be requested from the configuration of the committee most concerned**, whereas on the work programme implementing the horizontal activities referred to in Chapter III, the opinion shall be requested from the configuration set out in Article 83(1) letter (aa).** **Where the committee delivers no opinion, the Commission shall not adopt the draft implementing act, and Article 5(4) letter b of Regulation (EU) 182/2011 shall apply.** ➔ *On Para 3, AT wants Para 3 to be amended so as to clarify that an opinion on the work programme implementing the horizontal activities referred to in Chapter III shall be requested from a Committee configuration for SME and small mid-caps.* ➔ *On Para 4, AT wants Para 4 on urgency procedure to be deleted.* **Article 83/6:** The Committees in points ~~b)~~**aa)** through h) of paragraph 1 may convene in different configurations or sub-committees aligned with the specific components of the policy windows. **Article 83/7:** In accordance with international agreements concluded by the Union, representatives of third countries, international organisations or other European Union institutions, bodies and agencies may be invited as observers in the meetings of the committee configurations under the conditions laid down in their rules of procedure, taking into account security

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	and public order interests of the Union. Representatives of third countries or international organisations shall not be present in deliberations on matters related to eligibility, including deliberations related to Articles 9 ~~and~~ , 10 **and 15 (Work Programmes)** of this Regulation. *On Para 7, AT wants to add a reference to Article 15 (Work Programmes). This new reference should ensure that representatives of third countries or international organisations are not present during comitology committee deliberations on Work programmes. Work programmes should be discussed exclusively among EC and Member States.* BG (Drafting suggestions): (g) strengthening the competitiveness of SMEs established in the Union, improving their access to finance, in particular to micro-finance, and supporting social enterprises, as well as facilitating access to Union funding; (ga) providing opportunities for growth and scaling up of ~~the~~ SMEs ~~and small 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; BG (Comments): In order to ensure broad accessibility for SMEs, it is necessary to establish a separate general objective related to access to finance and support for SME competitiveness, as well as the inclusion of specific measures within the Fund's specific objectives. The definition of a small mid-cap enterprise should refer to Regulation 651/2014 in order to ensure legal certainty and compliance with State aid rules

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	FI (Drafting suggestions): strengthening the competitiveness of SMEs and small mid-cap companies established in the Union and **especially** 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; FR (Drafting suggestions): (g) strengthening the competitiveness of SMEs and small mid-cap companies **defined as XX,** 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; FR (Comments): Les autorités françaises sont favorables à un soutien des PME et des entreprises de taille intermédiaires par la Fonds européen de compétitivité. Il convient par ailleurs de modifier la définition d'une ETI mentionnée à l'article 2(18) afin de ne plus faire référence à la recommendation de la Commisison 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. IE (Drafting suggestions):

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	(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** IE (Comments): IE recommends the inclusion within the article of a "Once-only principle" focusing on reducing administrative burden for individuals and businesses. Suggested text amendment. LV (Drafting suggestions): **(g)** strengthening the competitiveness of SMEs and small mid-cap companies established in the Union and their ability to grow and scale up, in particular by 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; LV (Comments):

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	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. NL (Drafting suggestions): strengthening the competitiveness of SMEs and small mid-cap companies established in the Union and **especially** 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; NL (Comments): The scale up phase is where the greatest need is. PL (Drafting suggestions): „(g) strengthening the competitiveness of SMEs **as a priority (also understood as farmers in the agri-food sector) and also including** ~~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;" PL (Comments): Poland emphasizes that farmers should also benefit from the proposed instruments. Furthermore, it is worth noting that, in accordance with the "Think Small First" principle set

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	out in the SBA, the specific needs of SMEs should be duly taken into account. Given the particular characteristics of SMEs — especially their structural limitations in terms of human and financial resources, which may hinder their access to funds from the ECF — it is proposed to amend the relevant provisions so that they explicitly reflect the need to grant SMEs preferential treatment compared to other categories of enterprises, such as SMCs SE (Comments): SE can accept the proposed amendments. 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; SI (Comments): 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. EL (Drafting suggestions): (g) strengthening the competitiveness of SMEs and small mid-cap companies established ~~in~~ **across** the Union and their ability to to **survive and continue operations in the EU,** grow and scale up, in particular by

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	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; **Set minimum thresholds** for investments by **SMEs** indicatively quota ≥ 50 % **and** a **mínimum allocation for regions lagging behind to be determined by a suitable calibrated formula.** **(g)(a) strengthening the competitiveness of small mid-cap companies 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;** EL (Comments): 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

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	The work programmes may set **minimum thresholds** for investments by **SME**s indicatively quota ≥ 50 % and a **mínimum allocation for regions lagging behind to be determined by a suitable calibrated formula.** We propose to include a specific objective to small mid-cap companies discrete from SMEs, due to their different needs.
(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~~;	DE (Comments): We welcome the reinstatement of the last half sentence ("and by pursuing to accompany investments with skills investment") and would like to know why the other half of the sentence is still deleted ~~("and indicate when it is included")~~? Skills related measures should primarily be considered as part of projects. However, the current wording, in conjunction with Article 30, also allows for funding pure skills related projects; We would like to discuss the potential and future needs in this area and how to ensure EU added value. FR (Drafting suggestions): (h) **promoting quality jobs and** addressing shortages of skills critical to all kinds of ~~quality jobs~~**employment** 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 emerging technologies, and by pursuing to accompany investments with skills investment **and skills to address climate and environmental transitions** ~~and indicate when it is included~~;

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	FR (Comments): Ajout de la notion de souveraineté et d'autonomie stratégique. 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 IE (Comments): IE welcome changes, which align well with the Competitiveness Compass, in terms of promoting quality jobs as a horizontal enabler. PT (Comments): As expressed before, we welcome the inclusion of the reference to skills. RO (Drafting suggestions): **promoting quality jobs and** addressing shortages of skills critical ~~to~~ for all to ~~kinds of~~ quality jobs in strategic sectors for EU competitiveness, through both horizontal and sector-specific skills investment, contributing to the availability of skills in future emerging technologies, **and aiming to ensure that** ~~by pursuing to accompany~~ investments **are accompanied by** ~~with~~ **coresponding** skills **development** ~~investment~~, **in line with the Union of Skills initiative.** RO (Comments):

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	Romania supports strengthening the link with the "Skills Union" initiative at the level of objectives and ensuring its cross-sectoral integration into strategic areas, emphasizing that fostering digital, scientific, and numerical skills is essential for access to quality jobs and for ensuring the Union's sustainable competitiveness at the global level. SE (Comments): SE can accept the proposed amendments. SI (Drafting suggestions): (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~~; SI (Comments): We need to address not only current shortages but also foresee and address future trends and skills shortages. We also propose a definition of skills. "'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;" EE (Drafting suggestions):

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	(h) ~~**promoting quality jobs and**~~ addressing shortages of skills critical to all kinds of ~~quality job~~**semployment** in strategic sectors for EU competitiveness, through both horizontal and specific skills investment, contributing to the availability of skills in future emerging technologies **and promoting quality jobs**, and by pursuing to accompany investments with skills investment ~~and indicate when it is included~~; EE (Comments): We agree with ES suggestion to reword this provision slightly
(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;	FR (Drafting suggestions): (i) ensuring the integration of the Single Market, including by supporting initiatives at any stage of the investment journey with positive spill-over effects for the Single Market and resilience of its value chains**, in compliance with regulations applicable to the specific sectors** FR (Comments): 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. IT (Drafting suggestions):

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	(i) ensuring the integration of the Single Market, including by supporting initiatives at any stage of the investment **cycle** ~~journey~~ with positive spill-over effects for the Single Market and resilience of its value chains; IT (Comments): It aligns the terminology with standard EU legal usage, ensuring consistency with other regulations and official documents SE (Drafting suggestions): ensuring the **further** integration of the Single Market, including by supporting **innovative** initiatives at any stage of the investment journey with positive spill-over effects for the Single Market, **with potential to increase productivity and** resilience of its value chains.
	SI (Drafting suggestions): **(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.** SI (Comments): Recital 23 should be reflected in the legal text, to ensure its applicability.
(j) ~~supporting actions for the development, implementation, and monitoring of relevant Union legislation and policy;~~	
(k) ensuring a just transition to a sustainable, decarbonised and digital economy that is fair and ~~supporting~~**supportive of** workers and communities~~.~~**;**	AT (Drafting suggestions):

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	(k) ensuring ~~a just~~ **the twin** transition to a sustainable, decarbonised and digital economy that is fair and supportive of workers and communities~~.~~**;** DE (Drafting suggestions): ~~-~~ensuring a just transition to a sustainable, decarbonised and digital economy that is fair and **supporting** ~~**supportive of**~~ workers and communities.**;** DE (Comments): We would like to get back to the original wording. FI (Drafting suggestions): ensuring a ~~just~~ **twin** transition to a sustainable, decarbonised and digital economy that is fair and supportive of workers and communities~~.~~**;** FR (Drafting suggestions): (k) ensuring a just transition to a sustainable, **resilient,** decarbonised and digital **and nature-positive** economy that is fair and ~~supporting~~**supportive of** workers and communities, **including in the context of the restructuration of firms or sectors;** FR (Comments): Ajout de la notion de résilience Suggestion rédactionnelle pour un alignement de l'objectif (k) avec le contenu du considérant 21 "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."

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	IE (Drafting suggestions): (**k) ~~ensuring a just transition to a sustainable, decarbonised and digital economy that is fair and supportingsupportive of workers and communities;~~ Ensuring proactive measures are taken to enhance the twin transition for a suitainable decarbonised and digital economy. For such a fundamental transformation to succeed, it must be fair and just, safeguarding job quality and supportivve and protective of workers and communities, pragmatic, cost-effective and socially balanced, ~~and supportive of workers and communities~~** IE (Comments): **IE Suggested text amendment** **IE** - 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. IT (Drafting suggestions): (k) ensuring a just transition to a sustainable, decarbonised and digital economy that is fair and ~~supporting~~ **supportive of** workers and communities~~.~~**, in particular in traditional industries;**

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	IT (Comments): 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 (along with the specific industries mentioned in the Conclusions, which should be acknowledged across the specific objectives). LV (Drafting suggestions): 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;** LV (Comments): Preserves the partnership model established under LIFE programme, ensuring multi-stakeholder participation in implementation. NL (Drafting suggestions): ensuring a ~~just~~ **twin** transition to a sustainable, decarbonised and digital economy that is fair and supportive of workers and communities~~.~~**;** NL (Comments): We suggest to focus on the twin transitions, which is more fitting with the ECF's goal and windows. The MFF as a whole has broader goals, but the ECF's role is to make sure the EU can compete globally and to boost our competitiveness and economic progress.

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	PL (Drafting suggestions): (k) ensuring a just transition to a sustainable, **low-emission~~, decarbonised~~** and digital economy that is fair and supportive of workers and communities, **including in particular rural communities and communities in crisis;** PL (Comments): Transforming the economy towards a more sustainable one does not necessarily mean a decarbonized economy. The EU should seek improved methods and techniques for producing and processing fossil fuels to achieve a low- or zero-emission economy. SE (Comments): SE supports the amendment.
	CZ (Drafting suggestions): **(kb) enhancing environmental quality contributing to promoting biodiversity protection and nature restoration** CZ (Comments): We propose to add environmental protection as a standalone objective. Given the support declared under Clean transition and industrial decarbonisation window, it is appropriate that environmental protection is explicitly reflected in the scope. The current proposal focuses primarily on technological solutions, overlooking their potential to contribute to environmental protection.
(ka) supporting actions for the development, implementation, and monitoring of relevant Union legislation and policy.	DE (Drafting suggestions):

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	(ka) supporting actions for the development, implementation, and monitoring of relevant Union legislation and policy, **not including administrative expenditures of Union institutions that shall be financed exclusively under heading 4 of the MFF 2028-2034.** DE (Comments): We are still wondering what kind of actions that are not financed under heading 4 are to be funded under this objective.-We see the funding of administrative expenditures under heading 4 and not in the ECF FI (Comments): If this objective concerns administrative actions of the Commission, this should be reflected in the administrative expenditures in heading 4 of the MFF. NL (Comments): If this objective concerns administrative actions of the Commission, this should be reflected in the administrative expenditures in heading 4 of the MFF. SE (Comments): SE supports the amendment. SI (Drafting suggestions): ~~(ka) supporting actions for the development, implementation, and monitoring of relevant Union legislation and policy.~~

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	SI (Comments): These actions should be financed from other sources of EC budget and not from ECF. EL (Drafting suggestions): **(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.**
	AT (Drafting suggestions): ***New (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 in keeping with the One Health approach, where applicable: (i) improving and promoting health in the Union in order to reduce the burden of communicable and non-communicable diseases by supporting health promotion and disease prevention, reducing health inequalities, promoting healthy lifestyles and access to healthcare; (ii) Protecting people in the Union from serious cross-border health threats and strengthening the responsiveness of health systems and coordination between Member States to deal with serious cross-border health threats; (iii) improving the availability, accessibility and affordability of medicines, medical devices and crisis-relevant products in the Union and promoting innovation in such products; (iv) strengthening health systems by improving their resilience and resource efficiency.*** AT (Comments):

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	See comment for Art 3 (1) BE (Drafting suggestions): **(Kb) Ensuring a rules-based market access, preventing trade distortions, unfair trading practices and promoting a global level playing field;** 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. CZ (Drafting suggestions): **(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** CZ (Comments): CZ - Although CZ recognize the importance of supporting excellence within the ECF, we believe that no Member State can be left behind. Moreover, further widening of disparities between Member States must be avoided. Ensuring geographically balanced participation and fostering integration of stakeholders from all Member States into wider European industrial and innovation value chains, whilst ensuring fair and effective access to support

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	mechanisms within the ECF is therefore a fundamental prerequisite for strengthening the overall competitiveness and resilience of the EU. Thus, we propose to add new par. (l). HU (Drafting suggestions): **(kb)** securing competitiveness of the European automotive industry and maintaining a strong European production base. HU (Comments): In line with the Commission's Communication on Industrial Action Plan for the European automotive sector, the automotive industry is a core engine of European prosperity and competitiveness. Supporting the European automotive industry should be one of the ECF's key objectives and/or policy windows. Accelerating the spread of electromobility is key to improving the EU's competitiveness, strategic autonomy and economic security, and would significantly contribute to European Clean Transition and Industrial Decarbonisation. IE (Drafting suggestions): **(kb) increasing productivity growth of the EU as the core element of EU competitiveness, through capital deepening and improving product factor allocation.** IE (Comments): IE propose reference to increasing productivity growth as a key driver of competitiveness. IT

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	(Drafting suggestions): **l) protecting, restoring and improving the quality of the environment, including water, coast, sea and soil, reducing pollution, halting and reversing biodiversity loss and tackling the degradation of terrestrial and marine ecosystems.** LU (Drafting suggestions): **(XX) improving population health through prevention and preparedness, which are key enablers of productivity and labour participation.** LV (Drafting suggestions): (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.* LV (Comments): 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 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. NL (Drafting suggestions):

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	(kb) increasing productivity growth of the EU as the core element of EU competitiveness, through capital deepening and improving product factor allocation. PL (Drafting suggestions): To add kb) "**Support for water-smart, nature-positive economy, including advanced wastewater treatment (e.g. fourth-stage purification) and water reuse technologies, in line with Directive (EU) 2024/3019 and Regulation (EU) 2020/741"** To add l) "**safeguarding a balanced distribution of opportunities and inclusive approach that reflects the diversity and varying innovation levels across each Member State's economies, democratising excellence unlocking the full high-value potential of all regions, fostering cooperation, and promoting integration into sustainable and resilient Union value chains** PL (Comments): This addition reflects the need to support Member States in implementing legally binding EU water legislation and to finance from the EU budget innovative, capital-intensive infrastructure projects in the water sector. It is essential to ensure that the implementation of the ECF does not lead to a concentration of resources and industrial capacities in a limited number of advanced Member States or regions. Such an outcome would risk undermining one of the Union's core principles — economic, social and territorial cohesion — and could weaken the resilience of the EU's single market as a whole PT (Drafting suggestions): **(Kaa) supporting actions that contribute to the structural issues identified in the framework of the European Semester.**

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	kb) "ensuring fair access and balanced territorial participation across all Member States and regions, including the Outermost Regions pursuant to Article 349 of the Treaty on the Functioning of the European Union." PT (Comments): Structural issues identified within the European Semester should also be considered. The European Semester identifies socio-economic challenges and provides guidance on the policy action needed also with the aim to improve the EU's competitiveness. Since 2020, the priorities outlined by the ASGS are structured around the four dimensions of the EU's competitive sustainability agenda. We suggest that the objectives explicitly reference the Union's obligation to ensure territorial cohesion and balanced participation of all regions, including the Outermost Regions pursuant to Article 349 TFEU. Moreover, in the context of the Health and Biotechnology policy window, competitiveness should be interpreted not only in economic terms but also through public health outcomes - universal access, resilience, and innovation in healthcare delivery. SI (Drafting suggestions): **(l) promoting public health, strengthening health systems and enhancing health security;** SI (Comments):

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	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. Refer to non-paper. EE (Drafting suggestions): Art 3(1)(kb) **(NEW): Investing into development of European defence projects of common interest.** EE (Comments): Since the projects of common European interest in defence include multiple Member States, require cross-border cooperation and address critical capability caps of those Member States, we believe that investments into EDPCI's should be stand-alone investment objective under the fund. Due to the importance of multi-Member-State defence sector projects, we believe that investments into EDPCI's should be continued in a framework similar to the one under the EDIP Regulation and the possibility to support the EDPCIs from EU budget programmes should be continued also in 2028-2034. We highlight that the European Defence Readiness Roadmap 2030 has been approved which outlines the following: the European Drone Defence Initiative, the Eastern Flank Watch, the European Air Shield and the Defence Space Shield. The European Defence Readiness Roadmap 2030 should be treated as an important basis for the implementation of the ECF Defence and Space window.

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SECTION 2 **SINGLE RULEBOOK**	FI (Comments): FI suggests new article on General award criteria and procedure "ECF funding shall be based on open competition and the main award criteria should refer to excellence, impact and quality as well as highest relevance for European competitiveness." As an alternative, the new Article 9a can be further developed as proposed later in the document. It is imperative to strengthen the clarity of the award criteria in ECF by adding and strengthening clauses on excellence, addressing market failures and ensuring non-distortion on the single market. This approach is pivotal for EU to enhance its global competitiveness and is now practically non-visible throughout the regulation proposal. Finland also highlights the importance of leveraging private financing, implementing funding through open competition and that the MS role needs to be strengthened in the governance and design of the Work Programmes. Structure-wise the contents of the policy windows and the instruments provided by the proposal are not matching/coordinated and it is impossible to assess the budget implications of them. More clarity also in that respect is necessary. Clarity is also needed on how RDI activities in a seamless investment journey can be co-supported by ECF in order not to create a disruption in the journey between HE regulation and ECF regulation. These critical aspects cannot be left to be designed at the Work Programme level.

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Article 5 **Additional resources**	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 que celles transmises aujourd'hui devraient être fournies à l'autorité budgétaire dans le projet de budget.** HR (Comments): 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. HR question: 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? IT (Comments):

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	With regard to Articles 5 to 8, the possibile relationship between the Competitiveness Fund and the National and Regional Partnership Plans should ideally be guided by a logic of reciprocity. MT (Comments): Malta stresses the need for proportionality and avoidance of excessive administrative burdens, given limited administrative capacity. Important to ensure grants remain available alongside financial instruments, as Malta's market size and underdeveloped capital markets limit access to equity/venture funding. SI (Comments): SI Scrutiny Reservation Reservation on the appropriateness of (non-) allocation of policy windows. Projects receiving support from any policy window under this Fund should demonstrate compliance with the strategic priorities of smart specialisation adopted in the Member State or region where the project is implemented. Projects involving several regions or Member States must demonstrate compliance with at least one smart specialisation strategy in each location involved and contribute to interregional cooperation within the S3 platform. Explanation: The ECF will be more effective if projects are embedded in real regional ecosystems. Without the S3 condition, there is a risk of a "one size fits all" approach, which reduces the effectiveness of spending. The requirement for S3 compliance ensures that projects are not random but part of a broader strategy already adopted by the region/country. By requiring all regions to use S3, smaller countries have the same opportunities as larger ones.

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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.	BE (Drafting suggestions): 1. Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or other third parties, may make additional financial or non-financial contributions available to the ECF, or to any of its specific activities or objectives referred to in Article 3(2), including specific contributions to the ECF InvestEU Instrument budgetary guarantee and financial instruments as referred to in [Article 21] **or to advisory support in Chapter III**. Additional financial contributions shall constitute external assigned revenue within the meaning of Article 21(2), points (a), (d), or (e) or Article 21(5) of Regulation (EU, Euratom) 2024/2509. BE (Comments): To enable financial support for consulting activities that are essential for projects, particularly in the pre-feasibility/feasibility financing phase of projects, to be taken into account. ES (Drafting suggestions): 1. Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or other third parties, may make additional financial or non-financial contributions available to the ECF, or **to** any of its specific activities or objectives referred to in Article 3(2), including specific contributions to the ECF InvestEU Instrument budgetary guarantee and financial instruments as referred to in Article 21, **subject to transparent reporting and safeguards**. 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.

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	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. HR (Drafting suggestions): HR: HR suggest additional amendment: *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,* ***ensuring that such contributions do not undermine the balanced functioning of the Fund across all Member States****. Additional financial contributions shall constitute external assigned revenue within the meaning of Article 21(2), points (a), (d), or (e) or Article 21(5) of Regulation (EU, Euratom) 2024/2509.* HR (Comments): HR proposes this addition to safeguard against the risk that voluntary contributions could distort the Fund in favour of more advanced Member States, ensuring fair access for all. MT (Drafting suggestions):

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	1. Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or other third parties, may make additional financial or non-financial contributions available to the ECF, or **to** any of its specific activities or objectives referred to in Article 3(2), including specific contributions to the ECF InvestEU Instrument budgetary guarantee and financial instruments as referred to in [Article 21] **or to advisory support in Chapter III**. Additional financial contributions shall constitute external assigned revenue within the meaning of Article 21(2), points (a), (d), or (e) or Article 21(5) of Regulation (EU, Euratom) 2024/2509. MT (Comments): Malta supports the provision of advisory services related to access to finance. PL (Drafting suggestions): Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or other third parties, may make additional financial or non-financial contributions available to the ECF, or to any of its specific activities or objectives referred to in Article 3(2), including specific contributions to the ECF InvestEU Instrument budgetary guarantee and financial instruments as referred to in Article 21. Additional financial contributions shall constitute external assigned revenue within the meaning of Article 21(2), points (a), (d), or (e) or Article 21(5) of Regulation (EU, Euratom) 2024/2509, **encouraging active participation of all Member States in line with the objective of leveraging the Union's full innovative and industrial potential** SE (Comments):

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	Before accepting these paragraphs, SE would need further clarification that any national contributions to the ECF or the budgetary guarantee would be considered state aid and be tried as such under the state aid rules. EL (Comments): We would like to see in the text of the regulation provisions regarding the interplay of the ECF and the functioning of state aid rules. We are concerned that the risk of geographical concentration in ECF funding may be further amplified by differences in availability of national fiscal space. Such amplification could further distort the level playing field, result into fragmentation and undermine the single market. Therefore we believe that state aid support from **national funding** provided for investments financed by the ECF, should be a **function of the degree of geographical national concentration in funds allocation through the ECF.**
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. ~~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.	BE (Drafting suggestions): ….. **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** Where the Commission has not entered into a legal commitment under direct or indirect management for additional amounts thus made available to the ECF, the corresponding uncommitted amounts may, at the request of the Member State concerned, be transferred back to one or more respective chapters of the Plan or their successors BE (Comments):

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	Having a single rule book was achieved during the InvestEU omnibus review, primarily in order to simplify ad hoc requirements. This single rule book provides greater clarity for market participants. DE (Drafting suggestions): 2. Resources allocated to Member States under shared management may, at their request, in accordance with Article X of Regulation (EU) [XXX][NRPF regulation], be made available to the ECF. The Commission shall implement those resources directly or indirectly in accordance with Article 62(1), point (a) or (c) of Regulation, (EU, Euratom) 2024/2509. 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~~**. DE (Comments): MFF from 2035 onwards must not be prejudiced. ES (Drafting suggestions): 2. Resources allocated to Member States under shared management may, at their request, in accordance **with** Article X of Regulation (EU) [XXX][NRPF regulation], be made available to the ECF. The Commission shall implement those resources directly or indirectly in accordance with Article 62(1), point (a) or (c) of Regulation, (EU, Euratom) 2024/2509. ~~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

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	concerned, **consistent with the general objectives of the ECF. Their use shall avoid fragmentation and may include bridging and continuity mechanisms to sustain ongoing industrial transformations initiated under NextGenerationEU instruments**. 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~~. ES (Comments): "or their successors" should be deleted for the sake of consistency with Horizon Europe. FI (Drafting suggestions): 2. Resources allocated to Member States under shared management may, at their request, in accordance with Article X of Regulation (EU) [XXX][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. 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.**The additional resources referred to in paragraph 1 and 2 should not have any impact on the allocation of EFC funding.** FI

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	(Comments): We see that the additional resources may be significant and thus could start to play a significant role in the programming of the ECF money. When the sources and dynamics of these additional resources are still unknown, we have to safeguard the independent status of ECF award procedures and programming. 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][*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. ~~They~~ **Those resources** shall be additional to the amount referred to in Article 4~~.~~ ~~Those resources~~ **and** shall be used for the benefit of the Member State concerned. Where the Commission has not entered into a legal commitment under direct or indirect management for additional amounts thus made available to the ECF, the corresponding uncommitted amounts may, at the request of the Member State concerned, be transferred back to one or more respective chapters of the Plan ~~**or their successors**~~ FR (Comments): Formulation plus claire pour éviter les retards dans le transfert vers les programmes sources. MT (Drafting suggestions): (2) Resources allocated to Member States under shared management may, at their request, in accordance with Article X of Regulation (EU) [XXX][NRPF

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	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. **Where implemented through the ECF InvestEU Instrument those resources shall be subject to the corresponding rules of the ECF InvestEU Instrument, which shall replace the relevant NRPP provisions.** 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. MT (Comments): Malta considers that the current text is ambiguous and requires amendment to clearly define the circumstances in which either scenario, the application of the relevant Union programme's rules to the corresponding contribution, or the application of a single set of rules to all contributions, would be used. PL (Drafting suggestions): „ (...)Those resources shall be additional to the amount referred to in Article and shall be used for the benefit of the Member State concerned, **meaning that they shall be obligatorily allocated to projects implemented on the territory of that Member State or to projects in which it has a significant participation"** PL (Comments): It is necessary to clarify the principle of "for the benefit of the Member State concerned" ("These measures should be used for the benefit of the Member State concerned") — meaning

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	the mandatory allocation of these funds to projects implemented within the territory of that Member State or with its substantial participation. This provision undermines the distinct objectives, assumptions, and logic of various EU programmes. Different management systems still exist for centrally managed programmes and funds under shared management. Moreover, the process of transferring funds is complex, time-consuming, and currently unpopular. We understand the need for flexibility in managing the EU budget; however, the Commission should at the same time justify and maintain the logic of individual programmes and provide tools that are easy to implement. PT (Comments): 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. 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. ~~They~~**Those resources** shall be additional to the amount referred to in Article 4~~. Those resources~~ **and <u>while respecting the Rule of Law conditionality and state aid rules.</u> <u>Those resources</u>** 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

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	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>** 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.

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Article 6 **Alternative, combined and cumulative funding**	FI (Comments): Are the Union programmes referred here meaning only directly managed programmes? Is the single set of rules referring to the single rulebook or some case by case set of rules, or some MFF-level set of rules? What is the single legal commitment referring to? HR (Comments): 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." HR asks: 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? IT (Comments): Article 11 of COM(2025) 565 (Additional resources and use of resources) provides both for the possibility that the Single Fund may also be financed with additional resources coming from EU institutions (para. 1), and for the possibility that National Plans may transfer resources to EU directly managed programmes (para. 2).

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	Article 64, para. 5 provides that the European Commission and the Member States shall ensure coordination, coherence and synergies between the Single Fund and other Union programmes and instruments. To this end, operations may receive support from other Union programmes and instruments, provided that such support does not cover the same costs. The text should refer explicitly to the principle of reciprocity and clarify this bidirectional flow of resources in order to maximise the territorial impact of EU funding. The possibility that resources from the Competitiveness Fund may be transferred to National Plans or used to finance national projects in overbooking could be explicitly provided for either in Article 6 or in Article 7. EL (Comments): 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.
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	AT (Drafting suggestions): . The ECF shall be implemented in synergy with other Union programmes. An action that has received a Union contribution from another programme may also receive another contribution under the ECF. ~~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

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pro-rata basis in accordance with the documents setting out the conditions for support.	not exceed the total eligible costs of the action and may be calculated on a pro-rata basis in accordance with the documents setting out the conditions for support. AT (Comments): Shouldn't ECF rules apply, once an ECF contribution is made? BE (Comments): The possibilities for synergies and cumulation are positive, but rules must be harmonised and real administrative simplification ensured for beneficiaries. There is a risk of increased complexity if cumulative rules are not sufficiently clear and harmonised, especially for small actors. DE (Drafting suggestions): 1. The ECF shall be implemented in synergy with other Union programmes. An action that has received a Union contribution from another programme may also receive another contribution under the ECF. The rules of the relevant Union programme shall apply to the corresponding contribution or a single set of rules may be applied to all contributions and a single legal commitment may be concluded. **As a general principle and in particular for the defense section, this single set of rules shall be the one of the ECF.** 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. DE (Comments):

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	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. ES (Drafting suggestions): The ECF shall be implemented in synergy with other Union programmes. An action that has received a Union contribution from another programme may also receive another contribution under the ECF. The rules of the relevant Union programme shall apply to the corresponding contribution**. Only where the objectives of the action cannot be achieved otherwise,** ~~or~~ a single set of rules may be applied to all contributions and a single legal commitment may be concluded. **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.** ~~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. ES (Comments): This article is under negotiation. It is important to ensure that in case of synergies with FP10, R&I actions are supported with the same (better) conditions that in FP10. In line with our proposal for Horizon Europe (Single Rulebook). Explanations: - 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.

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	- Possibility of using different types of support. Clear and transparent information is essential. When multiple programmes contribute to a single action, it should be clearly specified how this coordination will be implemented, how the applicability of common rules will be determined, and which programme and body will be responsible for funding decisions. Moreover, this information should be made available to participants before the proposal submission stage. FR (Drafting suggestions): The ECF shall be implemented in synergy with other Union programmes. An action that has received a Union contribution from another programme may also receive another contribution under the ECF, **provided that the contributions do not cover the same costs**. 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**, 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**. 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. **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.**

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	FR (Comments): Un ensemble unique de règles peut simplifier la soumission et la gestion des propositions, mais des orientations spécifiques doivent être élaborées. Par exemple, le modèle d'accord annoté pour Horizon Europe a donné lieu à de nombreuses erreurs et malentendus, les bénéficiaires ne faisant pas la distinction entre les caractéristiques spécifiques de leur programme et leur instrument de financement. Pour garantir une véritable simplification grâce à un ensemble unique de règles, il est essentiel que celles-ci soient appliquées de manière uniforme dans les différentes DG et agences qui mettront en œuvre tous les programmes couverts par ce règlement unique. Toute contribution de l'Union provenant d'un autre programme et complétant le financement accordé au titre de l'action visée à l'article 44 paragraphe 1 devra remplir des conditions spécifiques liées aux actions de l'industrie de défense (prévues aux articles 50 et 51 du FEC). HR (Comments): HR wonders whether action that has received funding from another Union programme can also receive funding under the ECF, consider as double financing. 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?

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	MT (Comments): Malta argues that the text *"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"* is ambiguous and needs to be amended to clarify the circumstances under which either scenario (the rules of the relevant Union programme applying to the corresponding contribution or a single set of rules applying to all contributions) would be applied. SI (Comments): The synergies between ECF and NRPP should be clearer and the current wording does not reflect that. EE (Drafting suggestions): 1. The ECF shall be implemented in synergy with other Union programmes. An action that has received a Union contribution from another programme may also receive another contribution under the ECF. The rules of the relevant Union programme shall apply to the corresponding contribution**. Only where the objectives of the action cannot be achieved otherwise** ~~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,~~ **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.** T~~t~~he cumulative support from the Union budget shall not exceed the total eligible costs of the action and

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	may be calculated on a pro-rata basis in accordance with the documents setting out the conditions for support. EE (Comments): We agree with ES; it is important to ensure that in case of synergies with FP10, R&I actions are supported with the same or better conditions that in FP10. Horizon Europe funds must be used exclusively for R&I activities and it must be possible to monitor them adequately. Also, 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.
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 members of the evaluation committee referred to in Article 153(3) of Regulation (EU, Euratom) 2024/2509.	BE (Drafting suggestions): Award procedures under the ECF may be jointly conducted under direct or indirect management with Member States, Union institutions, their departments, bodies and agencies, **the EIB Group**, third countries international organisations, international financial institutions, or other third parties, provided the protection of the financial interests of the Union as well as of the security and defence interests of the Union and its Member States is ensured. Such procedures shall be subject to a single set of rules and lead to the conclusion of single legal commitments. For that purpose, the partners may make resources available to the ECF in accordance with Article 5 of this Regulation, or the partners may be entrusted with the implementation of the award procedure, where applicable**,** in accordance with Article 62(1), point (c), of Regulation (EU, Euratom) 2024/2509. In joint award procedures **carried out by the Union institutions, their departments, bodies and**

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	agencies, representatives of the partners to the joint award procedure may also be members of the evaluation committee referred to in Article 153(3) of Regulation (EU, Euratom) 2024/2509. BE (Comments): The EIB is, under the EU Treaties, an institution with a special status that must be legally reflected in the legislative proposal. ES (Drafting suggestions): 2. Award procedures under the ECF may be jointly conducted under direct or, **in exceptional and duly justified cases**, 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. **While following the general evaluation conditions,** 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. **In sensitive areas linked to security, defence and critical infrastructure, Member States shall retain a right of scrutiny.** ES (Comments):

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	Indirect management should be limited and agreed with the Programme Committee. Joint award procedures should follow general rules (as per Art. 25). The participation of other partners, providing resources or funding, should not influence the assessment, which should be based on objectivity and equal opportunities. FI (Drafting suggestions): Award procedures under the ECF may be jointly conducted under direct or indirect management with Member States, Union institutions, their departments, bodies and agencies, third countries international organisations, international financial institutions, **including the EIB Group**, 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. FR (Drafting suggestions): Award procedures under the ECF may be jointly conducted under direct or indirect management with Member States, Union institutions, their departments, bodies and agencies, third countries international organisations, international financial institutions, or other third parties, provided the

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	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. **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.** Such procedures shall be subject to a single set of rules and lead to the conclusion of single legal commitments**, 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**. 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. FR (Comments): Afin de garantir la sécurité économique de l'Union, les États membres devraient disposer d'un droit de veto concernant les candidats établis sur leur territoire et susceptibles de participer à des procédures d'attribution conjointes. Cette disposition reflète le règlement EuroHPC. Les règles de ce fond devrait s'appliquer dans tous les cas à une contribution de ce fonds à une action. Quel type d'"institutions financières internationales" ou de "tiers" pourrait être chargé des procédures d'attribution ? Quel type d'appels pourrait être financé au moyen de procédures d'attribution conjointes ? Comment l'autonomie stratégique serait-elle garantie dans de tels cas – au-delà de la seule protection des intérêts financiers ou des questions liées à la sécurité ?

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	IE (Drafting suggestions): 2. Award procedures under the ECF may be jointly conducted under direct or indirect management with Member States, Union institutions, their departments, bodies and agencies, third countries international organisations, international financial institutions, **including the EIB Group**, 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) 2024/250 IE (Comments): IE suggests text across to highlight EIB role LU (Drafting suggestions): 2. Award procedures under the ECF may be jointly conducted under direct or indirect management with Member States, Union institutions, their departments, bodies and agencies, **the EIB Group**, third countries international organisations, international financial institutions, or other third parties, provided the protection of the financial interests of the Union as well

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	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. LU (Comments): LU comments: Given its role under the treaties and the experience of the EIB Group under InvestEU, but also generally, as an EU institution intervening in all 27 member states, we believe it is important to highlight the special role of the EU Bank. This includes mentioning the EIB Group specifically as a preferred implementing partner in the most relevant articles of the underlying regulation. Award procedures being an important step in the implementation of any financial instrument, we would like to mention the EIB Group specifically here, as the EIB Group is not any international financial institution or a third party, but the EU Bank that serves EU policies, which necessarily goes by implementing EU financing instruments. We also see no legal objection that would exclude specifically mentioning the EIB Group here. LV (Comments):

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	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". MT (Drafting suggestions): 2. Award procedures under the ECF may be jointly conducted under direct or indirect management with Member States, Union institutions, their departments, bodies and agencies third countries international organisations, international financial institutions, or other third parties, provided the protection of the financial interests of the Union as well as of the security and defence interests of the Union and its Member States is ensured. Such procedures shall be subject to a single set of rules and lead to the conclusion of single legal commitments. For that purpose, the partners may make resources available to the ECF in accordance with Article 5 of this Regulation, or the partners may be entrusted with the implementation of the award procedure, where applicable in accordance with Article 62(1), point (c), of Regulation (EU, Euratom) 2024/2509. In joint award procedures **carried out by the Union institutions, their departments, bodies and agencies,** representatives of the partners to the joint award procedure may also be members of the evaluation committee referred to in Article 153(3) of Regulation (EU, Euratom) 2024/2509. MT (Comments): Malta is proposing these changes to enhance the precision and clarity of the text.

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	NL (Drafting suggestions): Award procedures under the ECF may be jointly conducted under direct or indirect management with Member States, Union institutions, their departments, bodies and agencies, third countries international organisations, international financial institutions, **including the EIB Group**, 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. PT (Comments): 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. SI (Drafting suggestions): 2. Award procedures under the ECF may be jointly conducted under direct or indirect management with Member States, Union institutions, their departments, bodies and agencies, third countries international organisations, international financial institutions, or other third parties, provided the

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	protection of the financial interests of the Union **and its values as enshrined in the Treaties respected,** as well as of the security and defence interests of the Union and its Member States is ensured. Such procedures 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. EE (Drafting suggestions): 2. Award procedures under the ECF may be jointly conducted under direct or**, in exceptional and duly justified cases,** 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 **without considering the contribution of resources during the evaluation, that should follow the general conditions of the Programme**.

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	EE (Comments): We agree with ES position that indirect management should be limited and agreed with the Programme Committee. Furthermore, joint award procedures should follow general rules. The participation of other partners, providing resources or funding, should not influence the assessment, which should be based on objectivity and equal opportunities.
	PT (Drafting suggestions): Add a new paragraph: **The Comission 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,** **2a) "Specific conditions may apply to entities established in Outermost Regions, in order to take into account structural constraints, higher operational costs, and limited economies of scale."** PT (Comments): Taking into account the lessons learnt through STEP Seal, namely in what concerns the challenges providing alternative or combined funding to transnational projects, it is proposed that the Commission actively coordinates the national funding calls, taking into account the Eureka network experience, in which the secreatariat ensures the synchronisation and alignment of national supporting instruments and the funding of those projects.

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	PT supports the clarity provided on the forms of Union support. Nevertheless, we propose including a proportionality clause allowing the adjustment of eligibility and co-financing requirements for entities established in Outermost Regions. SI (Drafting suggestions): **Article 6a (new)** **"European Partnerships"** **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.** **2. European Partnerships shall be based on a Memorandum of Understanding, agreed and signed between the partners, stipulating:** **a) the results to be delivered, which shall be clear, measurable, time-bound;** **b) reporting requirements** **c) the related commitments from all partners;** **d) governance arrangements with a mechanism for partners to discuss and agree on the partnerships' programming and activities.** **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.** **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**

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	that purpose, Joint Undertakings shall be established through a single establishing act ensuring harmonised rules. **5. European Partnerships shall:** **a) be established only in cases where Union action alone or other forms of support under the Programme cannot achieve the desired objectives.** **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.** **c) align with and assist in the implementation of major Union policies and policy initiatives.** **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.** **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.** **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.** **6. Contributions from Partners other than the Union shall take the following forms:** **a) financial contributions to the operational budget of the initiative;** **b) co-financing by the Partners of their own participation, or that of their members, in projects funded through the initiative.** **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. SI

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	(Comments): European partnerships should be an important instrument for implementation of ECF's objectives, so we suggest mirroring their provisions to FP10 regulation.

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Article 7 **Coordination**	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.** 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. PT

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	(Comments): We do not see any reference to the need to ensure coordination with the future Competitiveness Coordination Tool.
	MT (Comments): Malta calls on the European Commission to publish the Communication on the Competitiveness Coordination Tool (CCT) as soon as possible, to fully understand the mechanisms to align industrial and research policies and investments and the interplay between the Horizon Europe and the European Competitiveness Fund.
1. The Commission shall ensure the consistent implementation of the European Competitiveness Fund, the Framework Programme for Research and Innovation and the Innovation Fund.	AT (Drafting suggestions): 1. The Commission shall ensure the **strategic coherence and** consistent implementation of the European Competitiveness Fund, the Framework Programme for Research and Innovation and the Innovation Fund. AT (Comments): 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. 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. CZ

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	(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. ES (Drafting suggestions): 1. The Commission shall ensure the consistent implementation of the European Competitiveness Fund, the Framework Programme for Research and Innovation and the Innovation Fund**, and shall facilitate bridging from NextGenerationEU instruments**. HR (Drafting suggestions): HR: HR suggests additional amendment. *1. The Commission **and Member States** shall ensure the consistent implementation of the European Competitiveness Fund, the Framework Programme for Research and Innovation and the Innovation Fund.* HR (Comments): Clear reference to the inclusion of MS in this coordination would be highly appreciated. 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. **Overlaps between Competitiveness**

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	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. 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. NL (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. **Collaborative research and innovation parts of the ECF are implemented through the rules of Horizon Europe.** NL (Comments): We support a consistent implementation of the ECF with Horizon Europe. It should be very clear that the collaborative research and innovation parts are implemented through the rules of Horizon Europe, like the other parts of Horizon Europe. We appreciate the clear addition in art. 9a(2) that Horizon

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	Europe award criteria apply for collaborative R&I, but it would be good to have a more general statement in article 7. PT (Comments): We see no explicit reference to the alignment between ECF and the Competitiveness component of Pillar II in HE. SI (Drafting suggestions): 1. The Commission shall ensure the consistent implementation of the European Competitiveness Fund, the Framework Programme for Research and Innovation and the Innovation Fund **in close cooperation with Member States to align national and EU-level efforts**.
	DE (Drafting suggestions): **1a. For the collaborative research and innovation actions of the policy windows, with the exception of the specific programme for defence research and innovation, the rules set out in Article 7, 8, 11, 15 (2), 21, 22 23-33 and [placeholder]xxx of regulation XXX(EU)[Horizon Europe regulation] should apply.** DE (Comments): Since the ECF Regulation is supposed to apply to collaborative research actions as well, we suggest to add a reference to specific Horizon Europe Rules here. See also comment to Art 15 (4a)

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	SI (Drafting suggestions): **1a. Complementary to Horizon Europe the ECF shall provide support to R&I activities beyond TRL 7, including support for Technology Infrastructures and EU Missions.** SI (Comments): SI believes that EU Missions and TIs should receive support from the ECF.
2. The Commission and Member States shall, in a manner commensurate ~~to~~**with** their respective responsibilities, facilitate coordination and coherence between **the** European Competitiveness Fund and national and regional partnership plans on common competitiveness priorities in selected key areas and projects deemed of strategic importance and of common European interest.	ES (Drafting suggestions): 2. The Commission and Member States shall, in a manner commensurate ~~to~~ **with** their respective responsibilities, facilitate coordination and coherence between **the** European Competitiveness Fund and national and regional partnership plans on common competitiveness priorities in selected key areas and projects deemed of strategic importance and of common European interest**, ensuring the full involvement of Member States in defining such priorities**. FR (Comments): Quel serait l'association du Strategic stakeholder board à cet égard ? Et quelle serait celle du nouveau ECF General Committee ? HR (Drafting suggestions): HR: HR suggest additonal amendment.

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	The Commission and Member States shall, in a manner commensurate to their respective responsibilities, facilitate coordination and coherence between European Competitiveness Fund and national and regional partnership plans on common competitiveness priorities in selected key areas and projects deemed of strategic importance and of common European interest, ***with particular attention to ensuring balanced benefits for all regions and Member States.*** HR (Comments): HR proposes this addition to strengthen the alignment between EU and national strategies, while ensuring that benefits are not concentrated in already advanced hubs. IE (Drafting suggestions): 2. The Commission and Member States shall, in a manner commensurate ~~to~~**with** their respective responsibilities, facilitate coordination and coherence between **the** European Competitiveness Fund and national and regional partnership plans on common competitiveness priorities in selected key areas and projects deemed of strategic importance and of common European interest. **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.** IE (Comments): IE -This suggested additional text is intended to link with IE suggested additional text in Chapter III, Section 2, Article 27 EU for Business Network.

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	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.** PT (Comments): The article refers to the coordination between the Commission and the Member States but does not define how this coordination will be carried out, nor does it ensure the participation of regional and sectoral authorities. We would appreciate clarifications regarding how the foreseen coordination between ECF and NRPP will be implemented. 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 ~~to~~**with** their respective responsibilities, facilitate coordination and coherence between **the** European Competitiveness Fund and national and regional partnership plans on common competitiveness priorities in selected key areas and projects deemed of strategic importance and of common European interest. SI

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	(Comments): It is crucial to explain that MS should cooperate on a voluntary basis and only in areas with EU added value.
	IT (Drafting suggestions): **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.**
3. The ECF ~~will~~**shall** be implemented in synergy with other Union funds, including the Global Europe Fund~~, in particular~~ to support global competitiveness, ensure diversified supply sources, and strengthen export potential and opportunities of European companies**, as well as the Connecting Europe Facility, Erasmus+ and AgoraEU**.	BE (Drafting suggestions): The ECF ~~will~~**shall** be implemented in **coherent manner** ~~**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 National & Regional Partnership Fund and in particular the EU Facility,the Connecting Europe Facility, Erasmus+ and AgoraEU**. BE (Comments): Synergy should not be compulsory, but consistency and complementarity should be encouraged between programmes that have different but sometimes complementary objectives. Avoid financial arrangements involving different programme funding sources that ultimately finance the same project.

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	"in particular" should be kept because the scope of the ECF is broader than these aspects especially when the list of programmes is expanded. Another option (possibly lighter linguistically) could be to delete this enumeration and just refer to the objectives of the programme. Adding a reference to the National & Regional Partnership Fund, and in particular to the EU facility of the NRPF, is necessary to ensure the continuity of the LIFE programme which has been split between the ECF and the NRPF, the EU Facility being the part managed by the European Commission who can then ensure the synergies. In addition, synergy with the broader National and Regional Partnership should be added. DE (Comments): What is the reasoning behind explicitly mentioning Connecting Europe Facility, Erasmus+ and AgoraEU. Should this be interpreted as conclusive recital? FI (Comments): It is important to ensure synergies between the Global Europe and ECF committees and work programmes and prevent compartmentalized discussions. FR (Drafting suggestions): The ECF ~~will~~ **shall** be implemented in synergy **and complementarity** with other Union funds, including the Global Europe Fund, in particular to support global competitiveness **and reducing dependencies**, ensure diversified supply sources, and strengthen export potential and opportunities of European companies ; **as well as the Connecting Europe Facility and the**

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	Single Market Program. It should also ensure synergies with AgoraEU, 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. FR (Comments): Quel serait l'association du Strategic stakeholder board à cet égard ? Et quelle serait celle du ECF General Committee ? Elle pourra également demander l'inclusion d'une référence au programme Marché Unique. NL (Comments): NL underlines the importance of access to critical raw materials, which are important to strengthen our resilience but might not always be available within the Union or only from a limited number of outside sources. Therefore, important to ensure synergies between the Global Europe and ECF committees and work programmes, and prevent compartmentalized discussions. SE (Comments): SE can support the proposed amendments. SI (Drafting suggestions): The ECF ~~will~~**shall** be implemented in synergy with other Union funds, including the Global Europe Fund, ~~in particular~~ to support global competitiveness, ensure diversified supply sources, and strengthen export

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	potential and opportunities of European companies, **as well as the Connecting Europe Facility, Erasmus+ and AgoraEU**. **ECF shall offer additional opportunities for its activities through other programmes, such as the Connecting Europe Facility, Erasmus+, and AgoraEU.** 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.
	DE (Drafting suggestions): **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.** DE (Comments): This can ensure that there are no delays in the implementation and no increase of complexity in procedures. SI (Drafting suggestions): **Article 7a (new)** **"Collaborative research and innovation"** **In supporting collaborative research and innovation, the programme shall:**

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	1. support the entire value chain, balancing both ends of the TRLs scale, while paying particular attention on strengthening the middle TRL range. **2. Implement measures to ensure a balanced geographical coverage through scientific excellence, brain circulation, and new collaborations, supported by complimentary efforts by Member States.** **3. integrate SSH disciplines across all policy windows, with specific calls for SSH topics where appropriate.** **4. streamline administrative procedures and use a two-stage submission and evaluation procedure to reduce the burden for applicants and beneficiaries.** EE (Drafting suggestions): **Proposal to add Ukraine Reserve to the list in paragraph 3** EE (Comments): In relevant cases, the synergy between the ECF and Ukraine Reserve should be sought.

Article 8 **Competitiveness Seal**	HR (Comments): Horizon Europe regulation states that « in addition to the conditions set out in Article 8(1) and (2) of Regulation (EU) XXX [European Competitiveness Fund], a Competitiveness Seal shall be awarded only to high-quality actions that have not been financed under the Programme due to budgetary constraints. » This would then exclude any other parts of Horizon Europe programme that have not been assessed in an award procedure under the ECF : from Excellent Science to Innovation. This sets a precedent compared to the practice of Seal of Excellence awarding in previous and current FP IE (Comments): IE welcome the clarification about a singular seal indicating quality. 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 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. LV (Drafting suggestions): *Article 8* **Seal of Excellence**

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	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. NL (Comments): NL generally welcomes the changes made by the presidency to improve readability and clarify the Article, but still has concerns about the added value of the Seal. PT (Comments): PT is still analysing this article. There is an ongoing discussion regarding Seals in the WG on Research. This article must be clarified and made consistent with the discussion that is taking place at the WG on Research We recommend that the Seal include a territorial excellence component, recognising projects implemented in ORs and facilitating access to subsequent ECF, InvestEU, and Horizon Europe funding streams. SI (Comments): Why should the Competitiveness Seal be awarded also to funded projects, since Targeted actions already provide for option of complementing funded projects if necessary. Why 2 instruments with the same purpose?
	CZ

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	(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.
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:	PT (Comments): Taking into consideration the STEP Seal experience so far, namely the bottlenecks identified by its interim evaluation, we would appreciate how the Competitiveness Seal will overcome those implementation challenges, namely in what concerns the support to multi-country projects by NRPP or other national funds, the distinct eligibility criteria, application procedures, co-financing rates, timelines or the lack of specific State aid treatment for Competitiveness Seal Projects. RO (Drafting suggestions): **Where the work programme provides for the possibility to directly 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: RO (Comments): The provisions of this article regarding the “Competitiveness Seal” should be clarified so that it effectively facilitates access to financing for qualified projects. Projects that obtain this seal should benefit from priority funding, including from other Union programmes or national sources, capitalizing on the assessment already carried out. SE

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	(Comments): SE welcomes the amendments.
(a) they have been assessed in an award procedure under the ECF;	ES (Comments): A reference to Horizon Europe may be necessary if the Competitiveness Seal is to be used under that programme. FR (Drafting suggestions): a) they have been assessed in an award procedure under the ECF;
(b) they comply with the minimum quality requirements of that award procedure;	BE (Drafting suggestions): (b) they comply with the **high** ~~**minimum**~~ quality requirements of that award procedure; BE (Comments): If an award is granted, the elements that make up that award must be of high quality in order to differentiate it from other projects. This implies, in particular, conducting an objective analysis of the risks, the financial viability of the project, and compliance with all legislation, including EU sanctions, AMLA, non-cooperative jurisdictions, etc. FI

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	(Drafting suggestions): they ~~comply with the minimum quality requirements~~ **achieve at least [XX]% of the total evaluation score** of that award procedure; FI (Comments): The Seal should signal excellence and should therefore have a higher bar then 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. NL (Drafting suggestions): they ~~comply with the minimum quality requirements~~ **achieve at least [XX]% of the total evaluation score** of that award procedure; NL (Comments): The Seal should signal excellence and should therefore have a higher bar then 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. PT (Comments): We believe clarification is needed regarding “mininum quality requirements"”.

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(ba) they comply with any additional conditions that may be set out in the work programme or the documents related to the award procedure.	BE (Comments): Need to be precise with wich kind of additional conditions are envisaged. ES (Comments): We support the change. FR (Comments): La délégation pourra indiquer une réserve d'examen sur ce point. IE (Comments): IE welcomes this clarification IT (Drafting suggestions): . **they comply with any additional conditions that may be set out in the work programme or the documents related to the award procedure. 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.** IT (Comments): This facilitates continuity and recognition for Horizon Europe projects transitioning into ECF support SE (Comments): SE can accept the amendments.

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	PL (Drafting suggestions): To add „**c)Member States shall establish national registries of sealed projects to facilitate visibility, matchmaking, and funding opportunities**." PL (Comments): There is no mechanism for tracking or promoting approved projects at the national level that would help Poland identify and support high-potential projects meeting EU standards but lacking funding, as well as improve transparency and coordination. In Poland, publicly available statistics on approved (as well as submitted) project proposals under the Horizon Europe Programme are collected and monitored: https://www.kpk.gov.pl/analizy-i-statystyki SE (Drafting suggestions): **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.** SE (Comments): SE believes that there is merit in keeping the excellence seal for collaborative research activities (Seal of Excellence) as this is a well-established and highly valued procedure that protects the core values of research and innovation policies. One way to ensure this would be to add an additional sub-paragraph. SI (Drafting suggestions):

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	(c) they achieve at least 80% of the maximum score across the evaluation criteria of the award procedure SI (Comments): A clear and uniform threshold should be agreed and defined in advance.
2. ~~The work programme or the documents related to the award procedure may set out additional conditions.~~	
	ES (Drafting suggestions): **The Competitiveness Seal shall not create any automatic entitlement to Union funding but shall facilitate complementary support by Member States, while preserving a balanced distribution of projects.** ES (Comments): Clarifies that the seal is not an automatic right and prevents concentration among a few beneficiaries.
3. Member States may support projects which have been awarded a seal, or may provide support through the ECF by making additional resources available to the ECF in accordance with Article 5(1) or (2).	BE (Drafting suggestions): 3. Member States**, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or other third parties** may support projects which have been awarded a seal, or may provide support through the ECF by making additional resources available to the ECF in accordance with Article 5(1) or (2). BE (Comments):

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	Not only Member States can support projects with a seal, other players can do so as well. The amendment clarifies this ES (Comments): The reference to the seal is not clear. If it is a Competitiveness Seal the word must be in capital letters. FI (Drafting suggestions): **Without prejudice to the State aid rules,** Member States may support projects which have been awarded a seal, or may provide support through the ECF by making additional resources available to the ECF in accordance with Article 5(1) or (2). FI (Comments): FI has concerns to which extent the possibility for MS to support projects with a Seal, either directly or via a contribution to the ECF, interact with the State aid rules. Important to add that article 8(3) is "without prejudice to the State aid rules". We consider the explanation by the Commission that there is already a reference to state aid in recital 3 not sufficient. HR (Drafting suggestions): HR: HR suggest additional amendment. *Member States may support projects which have been awarded a seal, or may provide support through the ECF by making additional resources available to the ECF in accordance with Article 5(1) or (2).* ***Particular attention should be given to SMEs and projects in less advanced regions.***

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	IE (Drafting suggestions): **3 .Without prejudice to the State aid rules,** Member States may support projects which have been awarded a seal, or may provide support through the ECF by making additional resources available to the ECF in accordance with Article 5(1) or (2). IE (Comments): **IE General Comment** Ireland strongly supports a deepening of the Single Market and sees it as an essential tool for achievement of economic growth, and resilience. In order to maintain a level playing field, flexibility in State Aid rules must be limited to what is strictly necessary. To foster innovation in a competitive market, State Aid should be limited to areas of market failure or temporary crisis supports. NL (Drafting suggestions): **Without prejudice to the State aid rules,** Member States may support projects which have been awarded a seal, or may provide support through the ECF by making additional resources available to the ECF in accordance with Article 5(1) or (2). NL (Comments): NL still has concerns to which extent the possibly for MS to support projects with a Seal, either directly or via a contribution to the ECF, interact with the

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	State aid rules. Good to add that article 8(3) is "without prejudice to the State aid rules". We consider the explanation by the Commission that there is already a reference to state aid in recital 3 not sufficient. PL (Drafting suggestions): To add „**a) Member States may receive preferential co-financing rates or technical assistance when supporting sealed projects. Member States may prioritize sealed projects in national aid programmes and benefit from streamlined notification procedures"** PL (Comments): We propose adding the following sub-point to paragraph 3 SE (Comments): SE actions/projects are used interchangeably in the text, should be consistent. SI (Drafting suggestions): 3. Member States may support projects which have been awarded a seal, or may provide support through the ECF by making additional resources available to the ECF in accordance with Article 5(1) or (2)**, 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.**
4. ~~Strategic projects under CRMA, NZIA, CMA and other~~ Strategic projects identified in Union legislation that fulfil the conditions in	ES (Drafting suggestions):

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paragraph 1, ~~will be directly~~**points (a) and (b), shall be** granted the Competitiveness Seal.	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. FR (Drafting suggestions): **<u>Strategic projects under CRMA, NZIA, CMA and other</u>** identified in Union legislation that fulfil the conditions in paragraph 1, points (a) and (b), shall be granted the Competitiveness Seal. FR (Comments): **Une mention non exhaustive des législations concernées par ces « projets stratégiques » devrait être préservée afin que le fonds européen de compétitivité soit bâti sur les bases des précédents acquis communautaires et tout particulièrement le règlement NZIA qui devrait trouver un prolongement dans le FEC.** PL (Drafting suggestions): To add „**a) Strategic projects shall be listed in a publicly accessible EU registry and monitored for impact, with regular updates shared and approved by the Member States."** PL (Comments): Lack of clarity regarding the identification and monitoring of strategic projects. It is necessary to improve accountability and enable Poland to align national funding with the EU's strategic priorities. There is no link to State aid exemptions or accelerated procedures. The proposal enhances Poland's access to EU strategic instruments and reduces regulatory uncertainty for high-impact projects. We propose the following wording for an additional sub-point under paragraph 4.

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	RO (Comments): We consider that the Competitiveness Seal should be granted automatically or through a simplified procedure for projects under the CRMA, NZIA, and CMA, given their strategic importance. However, the compromise text raises uncertainties regarding the reference to "other strategic projects identified in Union legislation," as the legislator does not clarify which projects are targeted, making them impossible to identify concretely. SE (Comments): SE can accept the amendments. SI (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) and (ba), shall be** granted the Competitiveness Seal. SI (Comments): Why can these projects be awarded a Seal without additional conditions from the WP? EL (Comments): We believe that there should be a specific reference to CRMA, NZIA, Chips Act.

Presidency text (doc.14282/25)	Drafting suggestions and Comments
Article 9 **Eligibility**	DE (Comments): Please see comment to Article 15 (4a) HR (Comments): 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.“ HR question: 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?
	ES (Comments): Greater consistency should be ensured with Horizon Europe. Consideration should therefore be given to allowing any legal entity, regardless of its place of establishment and including legal entities from non-associated third countries or international organisations, to 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. Moreover, eligibility criteria should be general to ensure predictability. MT (Comments):

Presidency text (doc.14282/25)	Drafting suggestions and 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 EE (Drafting suggestions): **0. 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.** EE (Comments): We support seeking the coherence with FP10 here.
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.	FI (Drafting suggestions): 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**, except for the dedicated research and innovation parts funded under the Framework Programme for Research and Innovation where Article 21 of Regulation (EU) [XXX] [Horizon Europe] applies.** FR (Drafting suggestions):

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	1. Eligibility criteria shall be set **with early involvement of Member States** to support achievement of the general and specific objectives referred to in Article 3 of this Regulation, in accordance with Regulation (EU, Euratom) 2024/2509 and apply to all award procedures under the ECF. FR (Comments): La France réitérera qu'il est nécessaire de renforcer la position des États membres dans la définition des critères d'éligibilité. La Commission pourrait-elle indiquer si elle envisage d'utiliser la notion de *technology readiness level* comme critère d'éligibilité dans les programmes de travail? NL (Drafting suggestions): 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**, except for the dedicated research and innovation parts funded under the Framework Programme for Research and Innovation where Article 21 of Regulation (EU) [XXX] [Horizon Europe] applies.** NL (Comments): Since the Commission explained that the Horizon Europe rules will apply for the collaborative research part under the ECF, it is important to explicitly clarify this. SI (Drafting suggestions): 1. Eligibility criteria shall be set to support achievement of the general and specific objectives referred to in Article 3 of this Regulation, in

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	accordance with Regulation (EU, Euratom) 2024/2509 and apply to all award procedures under the ECF, **except for the rules for collaborative research and innovation activities, which are set out in the regulation establishing Horizon Europe.**
	EE (Drafting suggestions): Art 5(1)(a)**(NEW): For the European Defence Industrial Sector eligibility criteria will be adjusted according to the conditions set in the European Defence Industrial Programme (EDIP) and SAFE Loan Instrument Regulations.** EE (Comments): Since the eligibility criteria are subtle subjects in the overall context, it is paramount to adjust the criteria in the **the European Defence Industrial Sector** to the ones already agreed and stipulated in the relevant existing R~~r~~egulations, such as EDIP and SAFE. 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.
2. Provided any specific condition laid down within each policy window or component are met, one or more of the following categories of legal entities may be eligible to receive Union support in award procedures under direct and indirect management:	FR (Drafting suggestions): **Without prejudice to** ~~Provided~~ any specific condition laid down within each policy window or component ~~are met~~, one or more of the following categories of legal entities may be eligible to receive Union support in award procedures under direct and indirect management FR

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	(Comments): **Proposition de reformulation afin d'assurer une cohérence de compréhension entre les critères d'éligibilité généraux prévus à l'article 9 et les critères d'éligibilité complémentaires prévus à l'article 51 (industrie de la défense).**
(a) entities established in a Member State or in Overseas Countries and Territories;	FR (Drafting suggestions): a) entities established in a Member State**, including the 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 apparâit nécessaire de les mentionner explicitement. IE (Drafting suggestions): entities established in a Member State or in Overseas Countries and Territories, **including the European Investment Bank Group**. IE (Comments): IE – in line with previous comments on the role for the EIB NL (Drafting suggestions): entities established in a Member State or in Overseas Countries and Territories, **including the European Investment Bank Group**.

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(b) entities established in an associated ~~third~~ country;	ES (Comments): We support the change, in line with HE. SE (Comments): SE can accept the amendments.
(c) international organisations;	BE (Drafting suggestions): (MT (Drafting suggestions): (c) **the EIB Group and** international organisations;
(d) other entities established in non-associated third countries where the funding of such entities is essential for implementing the action and contributes to the objectives set out in Article 3.	FR (Comments): Des exemples peuvent-ils être fournis de cas dans lesquels un tel financement serait nécessaire et sur les acteurs visés ici ? Comment la cohérence de cet article avec les enjeux de souveraineté et de préférence européenne sera assurée ? La France a de fortes réserves sur cet article et ses conséquences. IE (Comments):

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Presidency text (doc.14282/25)	Drafting suggestions and Comments
	IE welcomes this text allowing for support for entities in non-associated third countries, as part of an overall strategy to improve resilience. NL (Comments): 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.
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.	LU (Drafting suggestions): 3. In addition to Article 168(2) and (3) of Regulation (EU, Euratom) 2024/2509, associated third countries referred to in Article 11(1) of this Regulation, **the EIB Group** and international organisations may, where relevant, participate in and benefit from any procurement mechanisms set Article 168(2) and (3) of Regulation (EU, Euratom) 2024/2509. Rules applicable to Member States pursuant to Article 168 of Regulation (EU, Euratom) 2024/2509 shall be applied, mutatis mutandis, to participating associated third countries, **the EIB Group** and international organisations. LU (Comments): LU comments: We would welcome if the EIB could be mentioned here, given its specific role under the treaties, granting legal personality to the EIB.

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	MT (Drafting suggestions): 3. In addition to Article 168(2) and (3) of Regulation (EU, Euratom) 2024/2509, associated third countries referred to in Article 11(1) of this Regulation, **the EIB Group** and international organisations may, where relevant, participate in and benefit from any procurement mechanisms set out in Article 168(2) and (3) of Regulation (EU, Euratom) 2024/2509. Rules applicable to Member States pursuant to Article 168 of Regulation (EU, Euratom) 2024/2509 shall be applied, mutatis mutandis, to participating associated third countries**, the EIB Group** and international organisations.
4. In award procedures, the following activities shall not be eligible for support:	
(a) activities that are prohibited by Union law, applicable international law, or by national law in all Member States;	
(b) activities that are already fully financed from other public or private sources~~,~~**.**	
	NL (Drafting suggestions): **c) activities that raise discriminatory, unjustified of disproportionate obstacles and undermine the implementation and enforcement of Union law in the areas of the internal market for goods and services** NL

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	(Comments): Activities supported from the European Competitiveness Fund should effectively strengthen competitiveness and not undermine competitiveness by raising new barriers in the Single Market (because of for example inadequate implementation and enforcement)
~~(c)~~**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.	ES (Comments): We support the change. FR (Drafting suggestions): ~~(c)~~**4a.** In accordance with Article 136 of the Financial Regulation, **additional** ~~eligibility restrictions~~ **specific conditions** shall apply to high-risk suppliers in line with EU law, for security reasons. FR (Comments): Nous souhaiterions que la Commission précise à quelles entités s'appliquerait cette disposition. Il nous semble qu'il s'agira d'ajouter des critères d'éligibilité additionnels en plus de ceux déjà existants qui s'appliquent toujours. Nous faisons une proposition de modification en ce sens. Nous proposons également de reprendre le langage agréé dans le règlement financier qui évoque des « conditions spécifiques » applicables aux procédures d'attribution et non pas des « restrictions d'éligibilité ». SE

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	(Comments): SE wonders what constitutes a high-risk supplier in this context. Does not recognise this as an established term.
5. The work programme or the documents related to the award procedure may further specify the eligibility criteria set out in this Regulation ~~or set out additional eligibility criteria for specific actions~~.	BE (Drafting suggestions): 5. The work programme or the documents related to the award procedure may further specify the eligibility criteria set out in this Regulation ~~or set out additional eligibility criteria for specific actions.~~ **or set out additional eligibility criteria for specific actions, provided that such additional eligibility criteria are duly substantiated.** BE (Comments): BE doesn't see the need to remove the part that states that additional eligibility criteria can be set out in the work programme. Therefore BE would like to reintroduce this part of the sentence and add 'provided that such additional eligibility criteria are duly substantiated'. ES (Comments): We support the change. FR (Drafting suggestions): **5. Where appropriate and duly justified, and after consultation of Member States,** the work programme or the documents related to the award procedure may further specify the eligibility criteria set out in this Regulation.

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	FR (Comments): L'intégration de critères d'éligibilité supplémentaires devrait rester exceptionnelle, les porteurs de projets ayant besoin d'une stabilité des règles de participation. Les critères d'éligibilité devraient dès lors être définis dans le règlement et non au niveau des programmes de travail. 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. RO (Drafting suggestions): The work programme or the documents related to the award procedure may further specify the eligibility criteria set out in this Regulation and, **if the case, specific conditions or criteria for defence and space investments** ~~or set out additional eligibility criteria for specific actions~~. RO (Comments): Further analysis of Art. 9 (5) is necessary, because in accordance with security requirements and relevant legislation for the defence and space sectors additional specific conditions or criteria might be necessary.

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	SE (Comments): SE welcomes the amendment.
6. Representatives of third countries or international organisations shall not be present in deliberations on ~~eligibility/award~~**eligibility** criteria.	SE (Comments): SE can accept the amendments.

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Article 9a **Award criteria**	BE (Comments): We are in favor of keeping an article on award criteria in the text. ES (Comments): We support setting general award criteria. FI (Comments): .This is an important and necessary addition, pleased to see it. Some finetuning here under. We would still support excellence in the text, but high quality, defined as here under proposed, is ok IE (Comments): IE welcome this new Article. PT (Comments): We consider that the criteria outlined are vague and open to interpretation. We propose adding references to *excellence, sustainability, and balanced territorial impact*, in line with the ECF's overarching objective of sustainable competitiveness. RO (Comments): We request clarification on the award criteria in the work programmes for the ECF, InvestEU, and the investment guidelines, specifically regarding the objective of each measure, their interrelationship, their hierarchy, and the ways in which they are intended to complement each other.

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Presidency text (doc.14282/25)	Drafting suggestions and Comments
	SI (Comments): SI welcomes the new article on award criteria and that it takes into account the specific nature of R&I activities under HE. We acknowledge that 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. Horizon Europe supports are awarded as grants, prizes, procurement, non-financial donations, and financial instruments. It is logical that procurement follows procurement rules (price, quality, innovation, societal value, etc) for prizes prize rules for each competition etc., but the award criteria are the same for the entire programme. EL (Drafting suggestions): - **assessment of participation of partners from less developed regions in large consortia** EL (Comments): Welcome the insertion of prerequisites regarding the formulation of award criteria that should apply with no exemptions. Add - assessment of participation of partners from less developed regions in large consortia / - premiums for schemes that establish research/production activities in these regions.

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Presidency text (doc.14282/25)	Drafting suggestions and Comments
1. Where applicable, award criteria shall be laid down in the work programmes referred to in Article 15, taking into account, to the extent applicable, the following elements:	AT (Drafting suggestions): 1. **<u>To ensure that the projects with highest value-added are supported</u>** ~~Where applicable,~~ award criteria shall be laid down in the work programmes referred to in Article 15, taking into account~~, to the extent applicable,~~ the following elements: AT (Comments): Award criteria should be better specified in the regulation. Q: according to the Legal Council, it is not possible to "set out additional eligibility criteria for specific actions" (see deletion of last sentence of art 9.5. Is it, however, legally sound to specify award criteria in the work programmes only? DE (Drafting suggestions): 1. ~~Where applicable,~~ **<u>The</u>** award criteria **<u>shall take into account at least</u>** ~~be laid down in the work programmes referred to in Article 15, taking into account, to the extent applicable,~~ the following elements: DE (Comments): We strongly welcome the insertion of a new article on award criteria, as provisions on fundamental criteria must be included in the Regulation itself. Award criteria for competitive selection processes must be defined in the Regulation, while their application or further specification is to be set out in the work programmes. To this end, the text should be further specified towards merit-based award procedures and made more binding and phrases such as 'where applicable' should be deleted.

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Presidency text (doc.14282/25)	Drafting suggestions and Comments
	FI (Drafting suggestions): ~~Where applicable,~~ award criteria shall be laid down in the work programmes referred to in Article 15, taking into account~~, to the extent applicable,~~ the following elements: FR (Drafting suggestions): **1. Where applicable, and without prejudice to any specific condition laid down within each policy window or component, award criteria shall be laid down in the work programmes referred to in Article 15, taking into account, ~~to the extent applicable~~, the following elements in accordance with excellence-oriented award criteria:** FR (Comments): Les autorités françaises souhaitent assurer que les dispositions générales des premiers chapitres ne préjugent des précisions portées dans les chapitres spécifiques du FEC Qu'est-il sous-entendu par la mention de « where applicable » ? **La délégation pourra souhaiter un renforcement du langage et notamment la suppression de la mention « to the extent applicable » qui laisse une incertitude quant à la prise en compte de ces critères dans les programmes de travail.** **La délégation pourra également demander l'inscription d'un principe d'excellence clair à la manière de l'article 53, paragraphe 1 dans l'en tête de ce paragraphe.**

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	IE (Drafting suggestions): **~~Where applicable,~~ To ensure that the best projects are supported on the basis of open and competitive procedures, award criteria shall be laid down in the work programmes referred to in Article 15, taking into account~~, to the extent applicable,~~ the following elements:** IE (Comments): IE is broadly supportive of this article in terms of the application of quality criteria on the non-Horizon elements of the ECF. However, we would welcome further text to clarify the open and competitive nature of the process. NL (Drafting suggestions): ~~Where applicable,~~ award criteria shall be laid down in the work programmes referred to in Article 15, taking into account~~, to the extent applicable,~~ the following elements: NL (Comments): NL considers these formulations too open. SE (Drafting suggestions): **1. ~~Where applicable~~ To ensure that the best projects are supported on the basis of open and competitive procedures, award criteria shall be**

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	laid down in the work programmes referred to in Article 15, taking into account, ~~to the extent applicable~~, the following elements: SE (Comments): SE considers the reference to article 3 to be far too wide and think that the common award criteria should be well-defined and clearly address the main purpose of the fund, which should be to provide support only where there is a clear market failure, and where such support can be expected to contribute to improve the Unions economic growth. EE (Drafting suggestions): **1. Where applicable, award criteria shall be laid down in the work programmes referred to in Article 15, taking into account~~, to the extent applicable,~~ the following elements:** EE (Comments): "Where applicable" already sets the conditionality to this provision therefore we suggest deleting the "to the extent applicable"
(a) an assessment of the quality of the proposals submitted in the light of the objectives set out in Article 3;	AT (Drafting suggestions): (a) an assessment of the quality of the proposals submitted in the light of the objectives set out in Article 3, **with quality referring to 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.** AT (Comments):

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	It should be considered to specify that the quality of a proposal must be evaluated in line with objectives that are specific to the proposal. An evaluation of a proposal focussing on public health according to competitiveness objectives may not be appropriate. BE (Comments): We support the reference to the objectives of article 3 to substantiate the evaluation of the quality of the proposals. DE (Comments): Criteria for the "quality of the proposal" should be further specified, at least in a recital (i.e. soundness of the implementation plan etc.) ES (Drafting suggestions): **(a) ~~an assessment of the~~ quality of the proposals ~~submitted in the light of the objectives set out in Article 3~~;** ES (Comments): Quality should be assessed as such. The objectives of the Programme shall be considered to define priorities in work programmes (and for calls for proposals). FI (Drafting suggestions): an assessment of the quality of the proposals submitted ~~in the light of the objectives set out in Article 3;~~ FI

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	(Comments): This should be about the quality of the proposal itself, before considering what it aims to achieve. FR (Comments): **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.** IE (Drafting suggestions): **(a) an assessment of the quality of the proposals submitted ~~in the light of the objectives set out in Article 3;~~** IE (Comments): IE proposes the following wording to ensure focus is on the quality of the proposals. NL (Drafting suggestions): an assessment of the quality of the proposals submitted ~~in the light of the objectives set out in Article 3;~~

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	NL (Comments): This should be about the quality of the proposal itself, before considering what it aims to achieve. PT (Comments): Quality has different understandings and layers. For instance, it can encompass matters of approach to a problem, measures to create impact or implementation plans. PT believes that further discussion and clarification of what each aspect covers is needed. SE (Drafting suggestions): **(a) an assessment of the quality of the proposals ~~submitted in the light of the objectives set out in Article 3;~~** SI (Drafting suggestions): **(a) an assessment of the quality of the proposals submitted in the light of the objectives set out in Article 3 and in the work programme or the documents related to the award procedure;** EE (Drafting suggestions): **(a) ~~an assessment of the~~ quality of the proposals ~~submitted in the light of the objectives set out in Article 3~~;** EE (Comments):

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Presidency text (doc.14282/25)	Drafting suggestions and Comments
	We suggest listing the elements as criteria. The objectives set the guidance to the work programmes and should not be mentioned here, in the criteria not to create to possibility for misinterpretations. EL (Drafting suggestions): **(a) an assessment of the quality of the proposals submitted in the light of the objectives set out in Article 3;** **The work programme shall lay down rules for deling with ex aequo propels, which should include geographical diversity.** EL (Comments): Introduces geographical diversity as a tie-breaking element for ex aequo proposals, ensuring that high-quality projects from less represented regions also benefit from ECF support. Promotes inclusiveness and balanced territorial impact across the Union.
(b) an assessment of the expected results of the proposals and their impact on achieving the objectives set out in Article 3;	AT (Drafting suggestions): b) an assessment of the expected results of the proposals and their impact on achieving the objectives set out in Article 3; **with impact referring to the expected effectiveness of a proposed action in delivering measurable improvements to the Union's competitiveness, in particular by its contribution raising productivity growth.** AT (Comments): See comment above. BE

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	(Comments): We support the reference to the objectives of article 3 to substantiate the evaluation of the impact of the proposals. ES (Drafting suggestions): **(b) ~~an assessment of the~~ expected results of the proposals and their impact ~~on achieving the objectives set out in Article 3~~;** FI (Drafting suggestions): an assessment of the expected results of the proposals and their impact on achieving the objectives set out in Article 3**.1**; FI (Comments): To specify that this refers to the general objective of the ECF (9a.1c already refers to the specific objectives) FR (Drafting suggestions): **an assessment of the expected results of the proposals and their impact on achieving the objectives set out in Article 3 in particular trough 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** FR (Comments):

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	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. IE (Drafting suggestions): **(b) an assessment of the expected results of the proposals and their impact ~~on achieving the objectives set out in Article 3~~** IE (Comments): IE – as above MT (Drafting suggestions): **(b) an assessment of the expected results of the proposals and their** relative **impact on achieving the objectives set out in Article 3;** MT (Comments): The inclusion of the word relative is meant to provide certainty that measuring impact does not exclude applicants requesting smaller amounts, such as SMEs. NL (Drafting suggestions):

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Presidency text (doc.14282/25)	Drafting suggestions and Comments
	an assessment of the expected results of the proposals and their impact on achieving the objectives set out in Article 3**.1**; NL (Comments): To specify that this refers to the general objective of the ECF (9a.1c already refers to the specific objectives) PT (Comments): 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. SE (Drafting suggestions): **(b) an assessment of the expected results of the proposals and their impact on achieving the objectives set out in ~~in the light of the objectives set out~~ in Article 3.1;** SI (Drafting suggestions): **(b) an assessment of the expected results of the proposals and their impact on achieving the objectives set out in Article 3 and in the work programme or the documents related to the award procedure;** EE (Drafting suggestions): **(b) ~~an assessment of the~~ expected results of the proposals and their impact ~~on achieving the objectives set out in Article 3~~;** EL

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	(Comments): With focus on SMEs & regions lagging behind
	DE (Drafting suggestions): (**ba) ~~a~~ an assessment of the trans-European added value of the proposal;** **bb) an assessment of the additionality of financing in the context of market failure addressed by the proposal~~;~~** **bc) an assessment of the innovation potential of the proposal** DE (Comments): See our general comment on Art. 3 SI (Drafting suggestions): **(d) the pan-European coverage of the action.**
(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.	DE (Drafting suggestions): (c) **where applicable**, 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. DE (Comments): Some horizontal instrument might not be directly related to one of the policy windows. ES

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	(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.**~~ ES (Comments): This criterion is not objective. FR (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.** FR (Comments): Les activités spatiales devraient bénéficier de critères d'attribution distincts. EE (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,~~ correspondance to the market failures considering the nature of the activities.**
	DE (Drafting suggestions): **1a. The award criteria shall be further specified in the work programmes and in the calls for proposals, including any weighting to be applied.** DE

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	(Comments): s. comment above FI (Drafting suggestions): **1d. For the purpose of this Regulation, the following definitions apply:** **'quality' means the characterisation of a proposed action as state-of-the-art, considering its innovation merit and cutting-edge technologies as well as the pertinence and credibility of its design.** **'impact' means the highest relevance and European added value as well as 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.** FI (Comments): Important to differentiate article 9a1a and 9a1b in what is meant exactly. IE (Drafting suggestions): 1 LV (Drafting suggestions): (d) intends to cover a wider geographical coverage. LV

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	(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. NL (Drafting suggestions): **1d. For the purpose of this Regulation, the following definitions apply:** **'quality' means the characterisation of a proposed action as state-of-the-art, considering the pertinence and credibility of its design, as well as its innovative and technical merit.** **'impact' means 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.** NL (Comments): Important to differentiate article 9a1a and 9a1b in what is meant exactly. The first one should look at the strength of the design of the proposed action itself. The other one on results and impact should assess the contribution to the overarching ECF objective of strengthening EU competitiveness. In this context, lasting refers to the expected effects that extend beyond the duration of the action itself. PT (Drafting suggestions):

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	(d) "the project's contribution to territorial cohesion, balanced regional development, and participation of entities established in Outermost Regions." PT (Comments): PT proposes that the award criteria explicitly include a horizontal dimension of territorial and social impact, enabling projects implemented in Outermost Regions to receive additional weighting. SE (Drafting suggestions): **2. For the purposes of this Regulation, the following definitions apply:** **'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.** **'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.** SI (Drafting suggestions): **1a. The work programme shall lay down rules for dealing with ex aequo proposals, which shall include geographical diversity.** EL (Drafting suggestions): **(d) the pan-European coverage of action**

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2. Actions in the specific dedicated part of 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].	AT (Comments): Very important to keep this new paragraph (2). DE (Comments): DE supports this new paragraph. This should, however, not only apply for the award criteria but also for a number of other rules and provisions that are specific to R&I. Therefore, we included drafting for Art. 7 (1a) (see above). ES (Drafting suggestions): **2. Actions in the specific ~~dedicated part of~~ 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].** IE (Comments): **IE** - Horizon funding should remain subject to the criterion of excellence. LV (Comments): The current version states that "Actions in the specific dedicated part of 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].", which indicates that research and innovation criteria will be set horizontally within the

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	framework of Horizon Europe. Therefore, please clarify, do we understand correctly that the criteria for activities related to research and innovation will be applicable only within the framework of Horizon Europe? MT (Drafting suggestions): **2. Actions in the specific ~~dedicated part of~~ 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].** 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. PT (Comments): PT welcomes this proposal, as it secures a coherent and transversal evaluation to all collaborative R&I actions under FP10, regardless of their relationship with ECF policy windows. RO (Comments): Also, to ensure coherence with proposals for the Horizon Europe Programme, we support the following aspects for the evaluation procedure: two-stage evaluation where appropriate, the use of blind evaluation, as well as ex. aequo criteria for proposals that are tied after evaluation (similar to FP9).

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	SE (Comments): SE welcomes this addition. SI (Drafting suggestions): 2. Actions in ~~the specific dedicated part of~~ work programmes on collaborative research and innovation activities as referred to in Article 415(2) of theis Regulation **Council decision [XXX] [Horizon Europe Specific Programme**] shall be assessed by the award criteria set out in Article [X] of Regulation [XXX] [Horizon Europe]. SI (Comments): SI is suggesting that the ECF and HE work programmes (including collaborative R&I) are developed and adopted within their own governance structures and procedures, as two work programmes, taking into account the priorities of the ECF Policy windows
3. Representatives of third countries or international organisations shall not be present in deliberations on award criteria.	SE (Comments): SE supports the amendment.
4. This article shall not apply to work programmes adopted to implement the activities under Chapter VII, Section 2.	DE (Drafting suggestions): 4. ~~**This article shall not apply to work programmes adopted to implement the activities under Chapter VII, Section 2.**~~ DE (Comments):

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	This article should apply to the whole regulation. We would like to anchor this exception in chapter VII, Section 2. FR (Drafting suggestions): **4. This article shall not apply to work programmes adopted to implement the activities under Chapter VII, Section 2 <u>and 3.</u>** FR (Comments): Les activités spatiales devraient bénéficier de critères d'attribution distincts. SE (Comments): SE supports the amendment.

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Article 11 **Association of third countries to activities under the ECF**	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. Nous avons besoin de conditions spécifiques pour les articles du chapitre VII section 2 (défense). HR (Comments): A clearer text on how this association would be at play having in mind the regulation of the same association in Horizon Europe would be very much welcomed (does one exlude or include the other and/or the inlusion of third countries in the commitology will defer depending on the programme). Additionally, will the additional conditions be set for third country participation in defence related policy window. "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." HR question: 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? LV

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	(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.
	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. ES (Comments): There should be clarity on how this regulation would be applicable to Associated Countries to Horizon Europe. If a given third country is associated to HE pillar II (competitiveness policy windows), would it be necessary to associate to the ECF to have access and being invited to the R&I Programme Committees? EE (Comments): We support the MS' who wish to get more clarity on how this regulation would be applicable to Associated Countries to Horizon Europe. If a given third country is associated to HE pillar II (competitiveness policy windows), would it be necessary to associate to the ECF to have access and being invited to the R&I Programme Committees?
1. The ECF may be opened to the participation of the following third countries through full or partial association, in accordance with the objectives	BE (Comments):

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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:	This opening can enhance the Fund's attractiveness, but it is important to guarantee the protection of the EU's strategic interests and reciprocity in access conditions. FI (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 with the relevant international agreements or any decisions adopted under the framework of those agreements and applicable to: FI (Comments): 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. FR (Drafting suggestions): **Without prejudice to** ~~Provided~~ **any specific condition laid down within each policy window or component,** ~~T~~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

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	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 et 51 (industrie de la défense).** IE (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 with the relevant international agreements or any decisions adopted under the framework of those agreements and applicable to: ntation from across the Member States.icle 3 and in accordance with the relevant international agreements or any decisions adopted under the framework of those agreements and applicable to: IE (Comments): IE propose an addition to the text, in recognition of the benefits and critical need for openness and international collaboration, as set out also in Recital 27. NL (Drafting suggestions):

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	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 with the relevant international agreements or any decisions adopted under the framework of those agreements and applicable to: NL (Comments): 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.
(a) members of the European Free Trade Association which are members of the European Economic Area, as well as Andorra, Monaco and San Marino;	DE (Comments): In our reading, the list of country groups in paragraph 1(a) to (d) does not constitute a ranking.
(b) acceding countries, candidate countries and potential candidates;	
(c) European Neighbourhood Policy countries;	
(d) other third countries.	PL (Drafting suggestions):

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	other third countries **on a full or partial association basis, subject to specific security, strategic and financial conditions"** PL (Comments): Poland's new proposed wording for this provision ensures flexibility in engaging global partners while safeguarding the EU's strategic interests.
	DE (Drafting suggestions): **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.** DE (Comments): The interaction between the ECF and Horizon Europe association agreements should be clarified by stipulating that both associations can 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.
2. Provided any possible specific conditions laid down within each policy window or component are met by the interested third country, the Association Agreements for programme participation in the ECF shall:	FR (Comments): La Commission pourrait-elle préciser quels critères encadreraient la participation de ces "autres pays tiers" ?
(a) ensure a fair balance ~~as regards~~**between** the contributions and benefits of the third country participating in the ECF;	ES (Comments):

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	We support the change.
(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;	DE (Drafting suggestions): (b) **in consultation with member states** 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; DE (Comments): Member States need to be consulted for the conditions of the Association Agreements. Given that cooperation with third countries will be important in many innovative, technological projets of the ECF, Member States should play a role for setting up the AA.
(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.	FR (Drafting suggestions): e) ensure the protection of strategic **economic, industrial**, security, defence and public order interests of the Union and its Member States. FR

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	(Comments): Les intérêts industriels de l'UE doivent être pris en compte prioritairement dans l'accès des acteurs de des pays-tiers au programme. 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? PL (Drafting suggestions): „They shall ensure protection of strategic, security, defence and public order interests of the Union and its Member States, **requiring adherence to EU export control and sensitive technology protection rules"** PL (Comments): The proposed new provision minimizes the risk of unauthorized transfer of key technologies and protects the EU's strategic assets SI (Drafting suggestions): (e) ensure the protection of strategic, security, defence ~~and public order interests of~~ the Union and its Member States. SI (Comments): How and who defines public order interests?
	BE (Drafting suggestions):

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	(f) ensure that the participation of third countries does not hamper a free and fair market; 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). HU (Drafting suggestions): (f) feasibility and reasonableness of full or partial association shall be examined separately for each category of countries, taking into account the objectives of the relevant programme. HU (Comments): The feasibility and reasonableness of full or partial association must be examined separately for each category of countries, taking into account the objectives of the policy proposal in question, i.e., what is the scope of the participation offer, will the scope of the association be determined during the negotiations, will the principle of equal treatment be violated during the negotiations, and what are the consequences for grant management, i.e., implementation? It cannot be ruled out that, for certain policy issues, partial association may be preferable to full association, but the justification for this must be examined on a case-by-case basis. SI (Drafting suggestions): f) **condition association to the respect of human rights and international law.**

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	SI (Comments): SI suggests an additional element to the association agreements, namely the respect of the associated country of human rights and international law.
3. For the purposes of point (d), the third country shall grant the necessary rights and access required under Regulations (EU, Euratom) 2024/2509 and (EU, Euratom) No 883/2013, and guarantee that enforcement decisions imposing a pecuniary obligation on the basis of Article 299 TFEU, 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.	
	SE (Drafting suggestions): 4. **Association or partial association with other third countries shall only be possible if they fulfil all the following criteria: (a) commitment to a rules-based open market economy, including fair and equitable dealing with intellectual property rights, respect of human rights as well as the Union's fundamental values, backed by democratic institutions; (b) active promotion of policies to improve the economic and social well-being of citizen** SE (Comments): SE is of the opinion that this paragraph needs to be added if Horizon activities are to be implemented under the ECF, for the sake of protecting IPR rights and European values of involved European actors.

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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.	FR (Drafting suggestions): 4. ~~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. FR (Comments): Certaines composantes dans des secteurs tels que la défense et l'espace 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 FEC au titre du paragraphe 1, des accords spécifiques dédiés aux composantes plus sensibles devront être signés si l'Etat tiers souhaite pouvoir y participer. Ces accords spécifiques contiendront des dispositions adaptées aux enjeux portés par ces composantes. 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 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**

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	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?
	DE (Drafting suggestions): **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.** DE (Comments): See comment above FI (Drafting suggestions): **5. For the dedicated research and innovation parts of the ECF funded under the Framework Programme for Research and Innovation, the provisions as stated in Article 9 of Regulation (EU) [XXX] [Horizon Europe] apply.** FI (Comments): Since the Commission explained that the Horizon Europe rules will apply for the collaborative research part under the ECF, it would be good to clarify this. NL (Drafting suggestions):

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	5. For the dedicated research and innovation parts of the ECF funded under the Framework Programme for Research and Innovation, the provisions as stated in Article 9 of Regulation (EU) [XXX] [Horizon Europe] apply. NL (Comments): Since the Commission explained that the Horizon Europe rules will apply for the collaborative research part under the ECF, it would be good to clarify this.
Article 12 **Implementation and forms of Union support**	BG (Comments): With a view to ensuring balanced development across the Union, an appropriate share of the resources under the ECF shall be allocated for entities established in Member State or region where GDP per capita is below the EU average. 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 The introduction of the examination procedure for work programmes strengthens Member State involvement.
	SI (Drafting suggestions): **1a. The content of the calls for proposals for all actions shall be included in the work programme.**

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	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.
1. The ECF ~~is to~~**shall** be implemented through work programmes in accordance with Article 110 of Regulation (EU, Euratom) 2024/2509.	BE (Drafting suggestions): 1. The ECF, **with the exception of the ECF InvestEU instrument,** ~~is to~~**shall** be implemented through work programmes in accordance with Article 110 of Regulation (EU, Euratom) 2024/2509. BE (Comments): 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. We therefore do not want to subject the working of InvestEU to the comitology procedure. ES (Comments): We support the change. MT (Drafting suggestions): The ECF shall be implemented ~~through work programmes~~ in accordance with Article 110 of Regulation (EU, Euratom) 2024/2509.

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	NL (Comments): We still wonder how this would work for InvestEU; financial instruments require more predictability/long-term financial planning than grants. Can we exclude InvestEU here? SE (Comments): SE can accept the amendment.
	DE (Drafting suggestions): **1a. In respect of the ECF InvestEU Instrument Paragraph 1 shall not apply to the minimum amount referred to in paragraph 4 of article 21.** DE (Comments): Necessary clarification. In our understanding, the minimum amount according to Article 21 para 4 will not be implemented by means of work programmes MT (Drafting suggestions): **2a. The conditions of the ECF InvestEU Instrument implementation will be specified through investment guidelines, as described in Chapter II, Section 2.**
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.	ES (Drafting suggestions): 2. The ECF shall be implemented in accordance with Regulation (EU, Euratom) 2024/2509, under direct management or**, in duly justified cases,**

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	under indirect management with entities referred to in Article 62(1), point (c) of that Regulation, **and shall include outcome-based milestones linking support to industrial deployment in the Union**. ES (Comments): Indirect management shall be limited and used only in duly justified cases. IT (Drafting suggestions): 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. **Appropriate regard shall be accorded to the principle of technological neutrality, thereby guaranteeing that the provision of support does not privilege any particular technologies or solutions.** IT (Comments): With regard to the implementation, the principle of technological neutrality should be duly emphasized, as also stated in the conclusions of the European Council of 23 October 2025. MT (Drafting suggestions): **2b. The EIB Group shall implement the ECF InvestEU Instrument on an enhanced reliance basis in line with the objectives of simplification, flexibility and predictability.**

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	MT (Comments): ECF InvestEU Instrument should build on existing agreements, templates for legal and contractual arrangements, as well as established monitoring and reporting tools**, together with enhanced reliance on the EIB's rules, policies and procedures reflecting their unique governance and role as EU treaty bodies**. This improves the impact of Union support.....” PT (Comments): 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.
3. Award procedures implemented under the ECF, shall comply with the general provisions of the ECF as set out in Chapters I and II of this Regulation, which, in case of conflict, shall prevail over any other rules pertaining to the activities or subsequent implementing acts.	ES (Comments): It is not clear whether this point applies to R&I collaboration activities of the policy windows. FI (Drafting suggestions): 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. HR (Drafting suggestions):

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	HR: HR suggest insertion of 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 Member States whose GNI per capita (in 2023) remains below the EU27 average, including additional safeguards for Member States with shorter EU membership status*** HR (Comments): HR considers that pre-defined allocation should be focused on MS's whose GNI per capita remains below the EU 27 average (data from 2023). Further safeguards for MS with lower GNI per capita and a shorter EU membership status in this group are need. IE (Drafting suggestions): 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. IE (Comments): IE would like to include the following text, to encourage open and competitive calls 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

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	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. IT (Comments): A reference to the award criteria set by the new Art. 9a should be added. NL (Drafting suggestions): 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. NL (Comments): Important to anchor open and competitive calls. PL (Drafting suggestions): 3. Award procedures implemented under the ECF, shall comply with the general provisions of the ECF as set out in Chapters I and II of this Regulation, which, in case of conflict, shall prevail over any other rules pertaining to the activities or subsequent implementing acts. **The award procedures shall be designed to ensure a broad and inclusive participation and distribution of funds across all Member States. Particular priority shall be given to Member States with lower innovation, investment and absorption capacity, measured as a Gross National Income (GNI) per capita below the Union average.** PL (Comments):

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	Justification in General comments SI (Drafting suggestions): 3. Award procedures implemented under the ECF, **shall be primarily based on open, competitive calls for proposals** 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. **For research and innovation actions the rules of the Horizon Europe regulation apply.**
	BE (Drafting suggestions): **3.a The award procedure shall be conducted in such a manner as to ensure that project selection is based on merit.** BE (Comments): 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. PT (Comments): PT is aware that the issue of geographical balance is under the scope of the AHWPMFF. Nevertheless, we would like to reiterate PT support to the drafting suggested by PL and others in the 21st October GAC: "The participation and the innovation gap will be addressed by various measures

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	and initiatives such as incentives for consortia contributing to closing this gap. [An amount of EUR [X] million will be reserved within the ECF for dedicated calls for proposals targeting Member States with a GNI per capita below the EU average, in order to enhance their participation and strengthen convergence in innovation performance.] Particular attention will be paid to SMEs and small midcaps." SI (Drafting suggestions): **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.** SI (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. We invite the DK PRES to follow its own example in Article 21 where it introduced a provision regarding the share of the EU guarantee to be granted to EIB, which relates to issue in the negobox.
4. Where award procedures concern more than one specific objective laid down in Article 3(2), the work programme may specify that the award procedure is implemented under a single set of rules by applying directly Regulation (EU, Euratom) 2024/2509, complemented by the general rules set out in Chapter I and II, or by applying the rules of one of the concerned specific objectives.	ES (Drafting suggestions): 4. Where award procedures concern more than one specific objective laid down in Article 3(2), the work programme**s** may specify that the award procedure is implemented under a single set of rules by applying directly Regulation (EU, Euratom) 2024/2509, complemented by the general rules set

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	out in Chapter I and II, or by applying the rules of one of the concerned specific objectives. ES (Comments): Work programmes should be in plural. FI (Comments): Connection with the Competitiveness Coordination Tool is still unclear. The mechanisms and processes by which the tool will operate are not defined yet. More details are needed, e.g. composition, decision-making, responsibilities, etc., to understand how the ECF and HE are linked and complementary. FR (Drafting suggestions): Where award procedures concern more than one specific objective laid down in Article 3(2), the work programme **shall** specify that the award procedure is implemented under a single set of rules by applying directly Regulation (EU, Euratom) 2024/2509, complemented by the general rules set out in Chapter I and II, **and** by applying the rules of one of the concerned specific objectives. **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.** FR (Comments): 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). HR

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	(Drafting suggestions): HR: HR suggest adding a new paragraph 4 to Art. 12 with a wording: ***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:*** ***(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;*** ***(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.*** ***The Commission shall regularly involve Member States in the design and monitoring of such measures.*** IT (Drafting suggestions): 4. Where award procedures concern more than one specific objective laid down in Article 3(2), the work programme may specify that the award procedure is implemented under a single set of rules **through, alternatively: a)** ~~by applying directly~~ **direct application of the** Regulation (EU, Euratom) 2024/2509, complemented by the general rules set out in Chapter I and II~~,~~**; b)** ~~or by applying~~ **application of** the rules of one of the concerned specific objectives. IT (Comments):

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	The alternative choice should be clearer. LV (Comments): 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.
	CZ (Drafting suggestions): **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:** **(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;** **(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.** **The Commission shall regularly involve Member States in the design and monitoring of such measures.** CZ (Comments): CZ -The Czech Republic also proposes that the ECF includes measures to facilitate the participation of first-time applicants. Specifically, it calls for the

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	introduction of more favorable and simpler conditions for entities participating in the program for the first time, for example through simplified administrative requirements, appropriate financial guarantees, and targeted support tools, including training and a clear definition of the minimum scope of consulting services for first-time applicants. Such an adjustment would reduce barriers to entry, increase the diversity of participants, and contribute to expanding the fund's impact across the EU. PT (Drafting suggestions): Add a new paragraph: **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, supporting the integration of entities from different Member States into Single Market value chains.** 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. SI (Drafting suggestions): **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**

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	participation trends and access barriers. To that effect, the Commission shall take specific measures, in particular: **(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;** **(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.** **c) he Commission shall regularly involve Member States in the design and monitoring of such measures.** **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** SI (Comments): To make European projects truly European there is a need for more balanced distribution of funding across the Member States. Otherwise, we risk that many entities from certain Member States – especially those with relatively limited experience with Union-level instruments - will not be able to participate in collaborative efforts. We therefore advocate for the introduction of measures that would better safeguard such balance within ECF.
5. ~~In certain duly substantiated circumstances, Union funding may be granted without a call for proposals in accordance with~~**As referred to in**	ES

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Article ~~198~~**192** 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).	(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 ~~198~~**192** 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). **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 work programmes.** ES (Comments): Grants should be the main form of support in Horizon Europe, following open, competitive calls for proposals. NL (Comments): This procedure should be used with great caution SE (Comments): SE welcomes the amendments. EE (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 ~~198~~**192** of Regulation (EU, Euratom) 2024/2509, **grants shall be awarded following a publication of calls for proposals, except in the**

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	cases referred to in Article 198 of that Regulation, including with point (e). **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 work programmes.** EE (Comments): Since grants are the main forms of support in FP10, it should be explicitly mentioned here to be harmonised with the FP10 regulation.
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.	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. **Priority should be given to budgetary guarantees and financial instruments.** SE (Comments): SE thinks it should be spelled out more clearly that support though the ECF InvestEU-instrument is to be a favoured means of implementation under the ECF.
	LV (Comments): Latvia proposes that the Regulation explicitly require the Commission to regularly analyse the geographical spread of ECF participation across the

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	Single Market to prevent overconcentration of funding in specific country or region.
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 .	PT (Comments): We would like to ensure that national promotional/development banks are included in the list of entity types – established in Title X of Regulation (EU, Euratom) 2024/2509 – that may design/implement the financial instruments to be envisaged.
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 necessary to enable other sources of funding, including financing from Member States.	ES (Drafting suggestions): 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~~ **may** 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 necessary to enable other sources of funding, including financing from Member States. ES (Comments): Funding not linked to costs shall be an option, not the general rule, especially for collaborative R&I actions under HE included in the four policy windows. 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.

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	IT (Drafting suggestions): Where Union funding is provided in the form of a grant, including when combined in blending operations with other forms of repayable support not supported by the Union budget, funding shall be provided in accordance with Title VIII of Regulation (EU, Euratom) 2024/2509 and in the form of financing not linked to costs in accordance with Article 125(1), point (a), of that Regulation (EU, Euratom) 2024/2509, or, where necessary, and in accordance with the same regulation, simplified cost options **(lump sums, unit costs or flat-rate financing)**. 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. PT (Comments): We would like to ensure that national promotional/development banks may perform the role of implementing partner. SE (Comments): SE can accept the proposed amendments.
	SE (Comments): .
9. In accordance with Article 153(3) of Regulation (EU, Euratom) 2024/2509, for actions implementing research and innovation activities, the evaluation committee may be composed partially or fully of independent external experts.	AT (Drafting suggestions): 9. In accordance with Article 153(3) of Regulation (EU, Euratom) 2024/2509, for actions implementing research and innovation activities, the

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	evaluation committee ~~may~~ **shall** be composed ~~partially or fully~~ of independent external experts. AT (Comments): Conflicts of interest have to be avoided in evaluations. BE (Drafting suggestions): In accordance with Article 153(3) of Regulation (EU, Euratom) 2024/2509, for actions implementing research and innovation activities, the evaluation committee ~~**may**~~ **shall** be composed partially or fully of independent external experts **of different disciplines where relevant** BE (Comments): Especially for R&I activities, evaluation should rely on scientific excellence and take an interdisciplinary perspective. ES (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. **In duly justified cases, internal experts may also be incorporated.** ES (Comments):

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	The specific characteristic of Horizon Europe should be respected: the participation of external independent experts is a must. FI (Drafting suggestions): In accordance with Article 153(3) of Regulation (EU, Euratom) 2024/2509, for actions implementing research and innovation activities, the evaluation committee ~~may~~ **shall** be composed ~~partially or fully~~ of independent external experts FR (Comments): La France souhaiterait disposer d'éléments de clarifications concernant la composition du comité d'évaluation : comment les Etats membres seraient impliqués dans ou associés à ces organes, et sur leur articulation avec Horizon Europe ? IE (Drafting suggestions): In accordance with Article 153(3) of Regulation (EU, Euratom) 2024/2509, for actions implementing research and innovation activities, the evaluation committee ~~may~~ **shall** be composed ~~partially or fully~~ of independent external experts IE (Comments): IE considers the text should provide for participation by independent experts. MT (Drafting suggestions):

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	In accordance with Article 153(3) of Regulation (EU, Euratom) 2024/2509, for actions implementing research and innovation activities, the evaluation committee ~~**may**~~ **shall** be composed ~~**partially or fully**~~ of independent external experts. MT (Comments): Malta calls for all members of the evaluation committee to be independent and external. This is is line with current practice under Horizon Europe 2021-2027. We see no need for a change. NL (Drafting suggestions): In accordance with Article 153(3) of Regulation (EU, Euratom) 2024/2509, for actions implementing research and innovation activities, the evaluation committee ~~may~~ **shall** be composed ~~partially or fully~~ of independent external experts NL (Comments): Use of independent external experts is more appropriate. No need to be ambiguous about this. PL (Drafting suggestions): „9. In accordance with Article 153(3) of Regulation (EU, Euratom) 2024/2509, for actions implementing research and innovation activities, the evaluation committee may be composed partially or fully of independent external experts **and should ensure representation from all Member States** PL (Comments):

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	Representation from all Member States in evaluation committees ensures that assessments reflect the diversity of national priorities and conditions, leading to more balanced and context-aware evaluations across the Union SE (Drafting suggestions): In accordance with Article 153(3) of Regulation (EU, Euratom) 2024/2509, ~~for actions implementing research and innovation activities,~~ the evaluation committee ~~may~~shall be composed partially or fully of independent external experts. SE (Comments): SE thinks that independent experts should be present in all evaluation committees. SI (Drafting suggestions): 9. In accordance with Article 153(3) of Regulation (EU, Euratom) 2024/2509, for actions implementing research and innovation activities, the evaluation committee **shall** ~~may~~ be composed ~~partially or fully~~ of independent external experts, **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.** SI (Comments): We would like to make the expert-based evaluation default. EE (Drafting suggestions):

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	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. **In duly justified cases, internal experts may be incorporated.** EE (Comments): There are differences between DEP, LIFE and other programmes and HE. The specific characteristic of Horizon Europe should be respected, the participation of external independent experts is a must.
	CZ (Drafting suggestions): **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.** 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. 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,

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	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. SI (Drafting suggestions): **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.** EL (Drafting suggestions): **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** EL (Comments): 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.
10. Contributions to a mutual insurance mechanism set out in Article 30 of the Framework Programme for Research and Innovation may cover the risk associated with the recovery of sums due by recipients and shall be considered as a sufficient guarantee under Article 155 of Regulation (EU, Euratom) 2024/2509. No additional guarantee or security shall be accepted from beneficiaries or imposed upon them.	
11. Where necessary to achieve the objectives set out in Article 3, parts of the ECF may be implemented through Public-Private or Public-public Partnerships established under the Framework Programme for Research and	CZ (Drafting suggestions):

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

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	11. **In duly justified cases, w**here 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 © of Regulation (EU, Euratom) 2024/2509, to joint undertakings established pursuant to **Articles 185 and** 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**, subject to KPIs on strengthening technological and manufacturing capacities in the Union**. For that purpose, joint undertakings shall be established through a single establishing act ~~ensuring centralised administrative functions~~. ES (Comments): Article 185 partnerships should also be considered for inclusion in the support provided by the ECF. Currently, there are two Article 185 initiatives — one dedicated to Metrology and another focused on the Mediterranean region — both of which are closely aligned with the objectives of the ECF. The centralised management of national funds is not clearly explained, either here or in Horizon Europe. Transferring national funds to an entity established in a third country may lead to significant administrative complexity, increased red tape, and uncertainty regarding the outcome of such transactions. FI (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

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	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. FI (Comments): Could the Commission give more information on the interplay and how to avoid possible overlap between Horizon Europe and the ECF: how will be determined what will be funded through the ECF and what apart through Horizon Europe? What is meant by "Support from the ECF shall be conditional upon efficient use of Union financing"? Next to financial contributions, in-kind contributions should remain possible and taken into account. FR (Drafting suggestions): 11. Where necessary to achieve the objectives set out in Article 3, ~~parts of~~ the ECF ~~may be implemented through~~ **can allocate additional funding to** Public-Private or Public-public Partnerships **including Joint Undertakings** established under the Framework Programme for Research and Innovation **pursuant to article 187 TFEU,** ~~in particular by entrusting budget implementation tasks, in accordance with Article 62(1), point (c) of~~

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	~~Regulation (EU, Euratom) 2024/2509, to joint undertakings established pursuant to 187 TFEU. Support from the ECF shall be conditional upon efficient use of Union financing, a proportionate financial~~ ~~**or in-kind**~~ ~~contribution from other partners at least matching the Union contribution and voting rights for the Union in the governing bodies ensuring protection of the interests of the Union in the partnership. For that purpose, joint undertakings shall be established through a single establishing act ensuring centralised administrative functions.~~ FR (Comments): La contribution des autres partenaires ne devrait pas être uniquement financière, afin de tenir compte des contributions en nature (par exemple, EuroHPC). Dans quelle mesure cet article, y compris la “proportionate financial contribution from other partners” s’applique-t-elle à la participation d’acteurs privés aux partenariats et activités de recherche dans le cadre d’Horizon Europe ? Comme mentionné au considérant 13, les Partenariats tels que les Entreprises Communes sont établis dans le cadre du programme-cadre de recherche et d’innovation. Leurs règles de fonctionnement ne peuvent donc être détaillées dans ce règlement. Il semble également complexe d’envisager que le FEC puisse être directement mis en œuvre par des instruments établis dans le cadre d’un autre programme. En revanche, il est possible d’imaginer un modèle de financement hybride, sur le modèle d’EuroHPC qui est actuellement co-financé par Horizon Europe et Europe Numérique. MT (Drafting suggestions):

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	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. **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.** 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. MT (Comments): Malta argues that due to high administrative and financial burdens, it is important to avoid having too many partnerships unless proven absolotely necessary. NL (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

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	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. NL (Comments): Could the Commission give more information on the interplay and how to avoid possible overlap between Horizon Europe and the ECF: how will be determined determined what will be funded through the ECF and what apart through Horizon Europe? Since also public-public partnerships are mentioned, what is meant by 'in particular by (…) joint undertakings etablished pursuant to 187 TFEU', as these are public-private by definition? What is meant by "Support from the ECF shall be conditional upon efficient use of Union financing"? How is this determined? And is this not a prerequiste for the establishment of a partnership in the first place? Why does this article refer to the establishing act, while the partnerships will be established under the Framework Programme for Research and Innovation, which' legislation already sets out the requirements for the establisment of Joint Undertakings? Next to financial contributions, in-kind contributions should remain possible and taken into account. PL (Drafting suggestions): „Where necessary to achieve Article 3 objectives, parts of the ECF may be implemented through public-private or public-public partnerships established under the in particular by entrusting budget implementation tasks, in accordance with Article Article 62(1), point (c) of

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	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. **Participation shall require efficient use of Union funds, matching contributions from national/regional partners and Union voting rights in governance.** PL (Comments): It supports public–private partnerships (PPPs) and public–public partnerships (PPPubs) with Polish and macro-regional partners, while safeguarding the EU's interests. PT (Comments): We 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. SI (Drafting suggestions): 11. Where ~~necessary to achieve~~ the objectives set out in Article 3 **cannot be achieved by other means**, parts of the ECF may be implemented through Public-Private or Public-public Partnerships ~~established under the Framework Programme for Research and Innovation~~, in particular by entrusting budget implementation tasks, in accordance with Article 62(1), point (c) of Regulation (EU, Euratom) 2024/2509, to joint undertakings established pursuant to 187 TFEU. Support from the ECF shall be conditional upon efficient use of Union financing, a proportionate financial contribution from other partners at least matching the Union contribution and

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	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. EE (Drafting suggestions): 11. **In duly justified cases,** ~~W~~**w**here 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 **and 185** 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. EE (Comments): In coherence with the FP10 regulation, the Public-Private Partnerships could be set up only in duly justified cases. Also the art 185 TFEU partnerships should be added here since there are two institutionalised partnerships under this article currently in Horizon Europe and excluding these would be pre-empting the negotiations of FP10.
	EL (Comments): t

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12. In addition to the grounds set out in Article 132 of Regulation (EU, Euratom) 2024/2509, award procedures and resulting legal commitments shall allow for termination where the objectives of the action are unlikely to be achieved at all or within the set timelines, or the action has lost its policy relevance	BE (Drafting suggestions): 12. In addition to the grounds set out in Article 132 of Regulation (EU, Euratom) 2024/2509, award procedures and resulting legal commitments shall allow for termination where the objectives of the action are unlikely to be achieved at all or within the set timelines, **~~or the action has lost its policy relevance~~** BE (Comments): 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. DE (Drafting suggestions): 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 DE (Comments): 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 ES

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	(Drafting suggestions): 12. In addition to the grounds set out in Article 132 of Regulation (EU, Euratom) 2024/2509, award procedures and resulting legal commitments shall allow for termination where the objectives of the action are unlikely to be achieved at all or within the set timelines~~, or the action has lost its policy relevance~~. IT (Comments): It is crucial to provide a mechanism to protect economic operators, otherwise participation will be discouraged, and legal actions may be taken. It is recommended attempting to renegotiate the terms of the contract, based on emerging needs. 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 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. EE (Drafting suggestions):

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	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~~ EE (Comments): We are hesitant in allowing the termination of action on the grounds that it has lost its political relevance. To be fair and transparent to the beneficiaries, the criteria of terminating an action should be elaborated in more detail (who decides according to which procedure and which criteria, etc).

PUBLIC

SECTION 2A **GOVERNANCE**	DE (Comments): As things stand, the proposed ECF governance is unclear. Could COM please provide an organigramme, clarifying which body is proposed to do what, which body is responsible to whom (hierarchical order) and where and how MS involvement is foreseen? For this section as well as draft Art. 83(1)? FR (Comments): **La délégation pourra remercier la Présidence pour la clarification du rôle de ce comité général qui permettrait aux Etats membres d'avoir une vue transversale du fonds de compétitivité et d'orienter son action.** A ce stade la France souhaite néanmoins porter une réserve d'examen et fournira des propositions complémentaires quant à la gouvernance proposée. IT (Comments): Further information (e.g. composition, decision making, responsibilities) is needed regarding the Competitiveness Coordination Tool in order to define a complete position. The mechanisms and processes involved are not defined yet. SI (Comments): SI welcomes the new section that introduces clearer structure and the text regarding the ECF General Committee. We particularly welcome the proposed advisory formation of the ECF General Committee, giving Member States the channel to provide the EC an early strategic advice.

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	We take note that the stakeholder board shall advise on: • the overall direction for the ECF, • long-term research and competitiveness trends, • areas of market failures and suboptimal investment situations • the identification of strategic portfolios of projects. We request more clarity regarding the relationships between the General Committee, Strategic Stakeholders Board, InvestEU Committee and others.

PUBLIC

Article 13a **Advisory role of the ECF General Committee**	AT (Comments): The relationship between the ECF General Committee, Strategic Stakeholder Board and the Committees for the policy windows needs clarification. It should be clarified how much influence the ECF General Committee and the Strategic Stakeholder Board have on the work of the Steering Committees of the policy windows. DE (Comments): We welcome the new article and regard this as a step in the right direction. However, we need to further discuss the role of MS involvement, especially with regard to setting and adjusting priorities across the ECF. IE (Comments): IE - More information is needed on the role of the General Committee and Strategic Stakeholder Board . 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 Members 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 (Drafting suggestions):

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	Article 13a **Advisory role of the ECF ~~General~~ Strategic Committee** PT (Comments): PT welcomes the inclusion of this article as it represents a step to address the reservations the MS have on the overall governance structure of ECF, and what role is to be given to MS. Nonetheless, clarification is needed on how this provision will ensure an adequate role of MS in the governance and design of the Work Programmes. PT notes that MS input to priority-setting remains rather limited, while the strategic recommendations on project portfolios remain with ECF Strategic Stakeholders Board. As an alternative, PT suggests that the reference to this Committee should be Strategic instead of General due to its role to guarantee coherence, provide advice on the overall strategic direction of ECF, including the necessary articulation and coherence with collaborative R&I developed under FP10. This is articulation is crucial to streamline the different approaches and materialise 'the investment journey' vision. the same proposal will be made in regard to the HE regulation and we would incentivise a dialogue between both committees". Additionally, if both ECF General Committee and the ECF Strategic Stakeholders Board will advise the Commission, are they expected to interact? Will it be expected for the ECF General Committee to have SSB members taking part in meetings? RO (Comments):

PUBLIC

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	We welcome this new article and would be interested in adding clarifications on the frequency of meetings and the integration of ECF General Committee - ECF Strategic Stakeholders Board views on similar issues: e.g. *long-term competitiveness trends, on areas of market failures and on suboptimal investment situations*. Coordination with the ECF Investment Committee should also be ensured. It is important to clarify the way in which the General Committee's recommendations are integrated into decisions on the ECF, the frequency of the Committee's meetings and the obligation to ensure their transparency. SE (Comments): SE welcomes the addition of this article. EE (Drafting suggestions): **Article 13a** ~~**Advisory role of the**~~ **ECF General Committee** EE (Comments): To make this article coherent with the next one we suggest to use same style EL (Comments): M-S participation is essential for providing the strategic direction of ECF. We have argued that the participation of MS in the strategic stakeholders board would be essential.

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	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.
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:	AT (Drafting suggestions): **(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 b<u>uilding on the work of the Strategic Stakeholders Board established in Article 14</u>** by: 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. ES (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~~ <u>formulate strategic guidance, which</u> the Commission <u>shall duly take into account in the preparation and implementation of the work programmes</u>, and provide recommendations by:**

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	ES (Comments): The change ensures that the Committee has real strategic impact. The current wording ("advise") is too weak and risks turning the Committee into a purely declaratory forum. Strengthening the formulation gives Member States a more effective role in guiding priorities and shaping the work programmes. FR (Comments): 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 ? Quelle articulation avec le Strategic stakeholders board ? IE (Comments): . 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 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. PT

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	(Drafting suggestions): **The ECF ~~General~~ Strategic Committee** 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. RO (Comments): It is needed to clarify the interaction of the ECF General Committee with the ECF Strategic Stakeholders Board (art. 14.4), to ensure the coherence of stakeholder consultation and ECF implementation and governance mechanisms. EE (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:**
(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;	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**

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	by the General configuration of the committee assisting the Commission *[reference to Horizon Europe]*; 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. 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. ES (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, including, where appropriate, formulating guidance on thematic priorities**; ES (Comments): This addition strengthens the Committee's role by allowing it to shape thematic priorities directly, ensuring that Member States' strategic input influences the direction of the ECF rather than remaining purely advisory. FR (Comments): **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**

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	Strategic Stakeholder Board dans une configuration ou ce dernier serait maintenu. IE (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;** MT (Drafting suggestions): **(a) providing advice on the overall direction for the ECF, on long-term competitiveness trends, on areas of market failures,** broadening of excellence, access to finance **and on suboptimal investment situations;** 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. PT (Drafting suggestions): **(a) providing advice on the overall strategic direction…** RO (Drafting suggestions): **providing advice on the overall direction for the ECF, on long-term competitiveness trends, on areas of market failures, spreading excellence, access to finance and on suboptimal investment situations;** RO

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	(Comments): Spreading excellence and access to finance are key for a successful implementation of ECF. EE (Drafting suggestions): **(a) providing strategic advice on the overall direction for the ECF, on long-term competitiveness trends, on areas of market failures and on suboptimal investment situations;** EE (Comments): It is important, that the MS' have a strategic role in the development of ECF and design of work programmes.
(b) providing advice on potential actions to support SMEs and startups;	AT (Comments): At first glance, the General ECF Committee, which has an SME focus, is also to be welcomed. However, it is not clear which/how many MS representatives will be sent there to guarantee high-quality expertise. And in the current proposal it has a purely advisory role, We therefore continue demanding an ECF SME and small mid-caps Horizontal Committee, to address the general objectives in Article 3(1) point (g). FR (Drafting suggestions): **(b) providing advice on potential actions to support SMEs, small mid-caps and startups;** FR (Comments):

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	X IE (Comments): IE – more information is needed on how the General Committee will support SMEs and start ups. LV (Drafting suggestions): **(b) providing advice on potential actions to support ~~SMEs and startups~~ companies;** 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. EE (Drafting suggestions): **(b) providing strategic advice on potential actions to support SMEs and startups;** EE (Comments): See the previous comment
	PT (Drafting suggestions): **(ba) overlooking and supporting a coherent articulation between ECF and collaborative research and innovation under Horizon Europe, in the policy windows.**

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	PT (Comments): PT suggest the addition of a new paragraph, that clarifies the specific role played by this committee in overlooking and supporting the coherence and articulation of ECF and collaborative R&I under the policy windows.
(c) facilitating cooperation among Member States and exchange of information on issues related to this Regulation.	ES (Drafting suggestions): **(c) <u>acting as a platform for strategic coordination</u> ~~facilitating cooperation~~ among Member States and exchange of information on issues related to this Regulation.** ES (Comments): This change clarifies that the Committee should not only exchange information but also provide strategic coordination among Member States, reinforcing its governance role and ensuring more coherent implementation of the ECF. FR (Comments): Qu'est-il sous-entendu par cet article ? RO (Drafting suggestions): **(c) integrating the opinion of Member States and facilitating cooperation among them ~~Member States~~, while exchanging ~~and exchange~~ ~~of~~ information on issues related to this Regulation.** RO (Comments):

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	It is very important to ensure that the proposals coming from the ECF General Committee are reviewed and taken on board; a response mechanism outlining how these proposals are integrated is necessary.
	AT (Drafting suggestions): **(1) 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].*** **3. The Commission will follow-up to the recommendations by the ECF General Committee or explain deviations in writing to the Committee.** AT (Comments): 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. DE (Drafting suggestions): **The ECF General Committee shall regularly convene with the general configuration of the Horizon Europe programme committee (article 8 (2) council decision 2025/544) to ensure effective coordination and coherence across the integrated work programmes. The modalities and**

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	frequency of these interactions shall be defined in the committee's rules for procedure DE (Comments): We would like to make sure that there is a regular exchange between the General Committees of the ECF and FP10 in order to align the integrated work programmes of the four policy windows. The exchange shall support the alignment of strategic priorities, facilitate the flow of information and promote consistency in the planning, implementation, and evaluation of activities. FR (Drafting suggestions): . PT (Drafting suggestions): **(d) "The Committee shall, when providing advice on the overall direction of the Fund, take into account the participation and specific needs of entities located in Outermost Regions."** PT (Comments): We propose that the Committee's mandate include a systematic assessment of SME and ORs inclusion, ensuring that the needs of Outermost Regions are explicitly reflected in the strategic direction of the Fund.

PUBLIC

Article 14 **~~Governance and Advisory Boards~~ECF Strategic Stakeholders Board**	AT (Comments): The relationship between the ECF General Committee, Strategic Stakeholder Board and the Committees for the policy windows needs clarification. It should be clarified how much influence the ECF General Committee and the Strategic Stakeholder Board have on the work of the Steering Committees of the policy windows. Currently, Member States' representatives are able to amend and comment on the draft proposals of the annual work programmes for EU4Health. The Strategic Stakeholder Board should not have undue influence on this process in the future policy window steering committees. ES (Comments): We support the change in the title. FR (Comments): la France souhaite porter une réserve d'examen et fournira des propositions complémentaires quant aux modalités de gouvernance proposée IT (Comments): **Italy keeps a general reservation on this article and each of its sections. Increased flexibility should be underpinned by robust governance and involvement of the Council in relevant configurations, in the planning of activities, the adjustment of priorities as well as the implementation of the budget.** In this section, it is also necessary to provide a link with the Competitiveness Coordination Tool (from Competitiveness Compass, COM(2025) 30 final)

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	LV (Comments): 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. SI (Comments): Scrutiny reservation on entire Article.
1. ~~A~~**An ECF** Strategic Stakeholders Board is established.	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. LV (Comments):

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	In Article 14 (governance and advisory councils), we want to reduce the number of different governance formats, favouring comitology with strong Member State involvement.
2. The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, following an open call for nominations or for expressions of interest, or both, whichever the Commission finds more appropriate, and taking into account the need for balance in sector, organisation type, including private investors, and size, expertise, gender, age and geographical distribution. The term of members the Board shall be limited to four years, renewable once. Members of the Board ~~should~~**shall** act with integrity and probity.	AT (Drafting suggestions): The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, following an open call for nominations or for expressions of interest, or both, whichever the Commission finds more appropriate, and taking into account the need for balance in sector, organisation type, including private investors, and size, expertise, gender, age and geographical distribution. The term of members the Board shall be limited to four years, renewable once. Members of the Board shall act with **independence,** integrity and probity. BE (Drafting suggestions): The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, following an open call for nominations or for expressions of interest, or both, whichever the Commission finds more appropriate, and taking into account the need for balance in sector, organisation type, including private investors, and size, expertise, gender, age and geographical distribution. The term of members the Board shall be limited to four years and **not renewable** ~~**renewable once**~~. Members of the Board should act with integrity and probity 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

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	considered that at least one seat – or, depending on the size of the Board, a proportionate number of seats – for representatives of research organizations (e.g. universities or public research institutes) could be included among the provisions ensuring balanced representation. DE (Drafting suggestions): 2. The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, following an open call for nominations or for expressions of interest, or both, whichever the Commission finds more appropriate, and taking into account the need for balance in sector, organisation type, including private investors, **civil society and academia/ R&I experts**, and size, expertise, gender, age and geographical distribution. The term of members the Board shall be limited to four years, renewable once. Members of the Board ~~should~~**shall** act with integrity and probity. DE (Comments): 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. 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 FR (Drafting suggestions): The members of the ECF Strategic Stakeholders Board shall be appointed by the ~~Commission~~ **Council based on a recommendation from the**

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	Commission following an open call for nominations or for expressions of interest, or both, whichever the Commission, **jointly with the Council**, finds more appropriate, and taking into account the need for balance in sector, organisation type, including private investors, and size, expertise, gender, age and geographical distribution **and with due balance between the specific objectives listed in article 3.2**. The term of members the Board shall be limited to four years, renewable once. Members of the Board may act with integrity and probity. FR (Comments): La Commission devrait associer le Conseil à la définition de la composition du Conseil stratégique des parties prenantes, afin de garantir la participation des États membres aux instances de gouvernance du fonds. La délégation pourra également rappeler que les partenaires financiers font partie des parties prenantes de ce fonds et que leur présence devrait être inscrite dans ce comité compte tenu de leur expertise. Il est essentiel que les structures de pilotage stratégique des composantes de défense du FEC tiennent compte des structures existantes et de la représentation des États membres de l'Union européenne. Comment l'équilibre entre les secteurs sera-t-il assuré afin que tous les acteurs stratégiques des domaines couverts par le FEC soient correctement représentés ?

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	IE (Drafting suggestions): 2. The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, **after consultation of the Council** following an **transparent process and** open call for nominations or for expressions of interest, or both, whichever the Commission finds more appropriate, and taking into account the need for balance in sector**,** organisation type, including private investors, and size, expertise, gender, age and geographical distribution. The term of members **of** the Board shall be limited to four years~~,~~ ~~renewable once~~. Members of the Board ~~should~~ **shall** act with integrity and probity IE (Comments): IE suggest a stronger role for the Council in the Board and to strengthen the independent nature of the Board LU (Drafting suggestions): 2. The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, following an open call for nominations or for expressions of interest, or both, whichever the Commission finds more appropriate, and taking into account the need for balance in sector, organisation type, including private investors, and size, expertise, gender, age and geographical distribution. **The EIB Group shall be duly represented in the ECF Startegic Stakeholders Board.** The term of members the Board shall be limited to four years, renewable once. Members of the Board shall act with integrity and probity. LU

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	(Comments): LU comments: Given its knowledge of the economy situation of Member States due to its unique situation as EU Bank, intervening in all 27 Member States, we believe that the expertise of the EIB belongs to any Strategic Stakeholder Board. Even more so given that the EIB will be a preferred implementing partner of the ECF InvestEU Instrument. LV (Drafting suggestions): The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, following an open call for nominations or for expressions of interest, or both, whichever the Commission finds more appropriate, and taking into account the need for balance in sector, organisation type, including private investors, and size, expertise, gender, age and geographical distribution. **Member States shall be invited to nominate candidates in response to the open call**.The term of members the Board shall be limited to four years, renewable once. Members of the Board **shall** act with integrity and probity. LV (Comments): 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.

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	MT (Drafting suggestions): 2. The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, following an open call for nominations or for expressions of interest, or both, whichever the Commission finds more appropriate, and taking into account the need for balance in sector, organisation type, including private investors, and size, expertise, gender, age and geographical distribution. The term of members the Board shall be limited to four years, renewable once. Members of the Board should act with integrity and probity. **The EIB Group shall have a permanent representative.** NL (Drafting suggestions): The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, **after consultation of the Council**, following an **transparant process and** open call for nominations or for expressions of interest, or both, whichever the Commission finds more appropriate, and taking into account the need for balance in sector **with particular attention to strategic sectors,** organisation type, including private investors **and academia**, and size, 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 shall act with integrity and probity NL (Comments): Important to anchor appropriate role Council, involve academia and have non-renewable terms to strengthen independence. A more independent

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	functioning of this body would strengthen its role and increase its added value in the broader ECF governance structure. PT (Comments): PT stresses, once again, the need to secure representativeness from diverse innovation ecossystems. MS can assure this by appointing experts for this group. Additionally, and considering the SSB contribution to the definition of Work Programmes in the different policy windows, which, under the current proposal, include na R&I dimension, it is crucial that the members' choice duly consider this aspect, not to undercut SSB ability to contribute to the different components of ECF actions. 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. RO (Drafting suggestions): The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, following an open call for nominations or for expressions of interest, or both, whichever the Commission finds more appropriate, and taking into account the need for balance in sector, organisation type, including private investors, and size, expertise, gender, age and geographical distribution. The term of **the Board** members **mandate**~~the Board~~ shall be limited to four years, renewable once. Members of the Board ~~should~~ **shall** act with integrity and probity.

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	RO (Comments): For the clarity of the provision. SE (Drafting suggestions): 2. The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, following an open call for nominations or for expressions of interest, or both, whichever the Commission finds more appropriate, and taking into account the need for balance in sector, organisation type, including private investors **and representatives from the industry**, and size, expertise, gender, age and geographical distribution. The term of members the Board shall be limited to four years, renewable once. Members of the Board ~~should~~**shall** act with integrity and probity. SE (Comments): SE emphasizes the importance of close dialogue with various stakeholders, including the industry, to ensure market adaptation.
	DE (Drafting suggestions): **2a. Notwithstanding Paragraph 2, the EIB Group shall have two permanent representatives in the ECF Strategic Stakeholders Board**. DE (Comments): 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.

PUBLIC

Presidency text (doc.14282/25)	Drafting suggestions and Comments
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.	AT (Drafting suggestions): The Commission shall establish the detailed rules on selection and composition, remuneration, ~~rules of procedure~~, conflicts of interest and confidentiality for the ECF Strategic Stakeholders Board. Members of the Board shall be bound by these terms. **3 (bis) On proposal by the Commission, the ECF Stakeholder Board shall adopt its rules of procedure upon consitution** AT (Comments): 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. DE (Drafting suggestions): The Commission shall establish the detailed rules on selection and composition, remuneration~~**, rules of procedure,**~~ conflicts of interest and confidentiality for the ECF StakeholderStrategic Stakeholders Board. Members of the Board shall be bound by these terms DE (Comments): 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. 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

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	FI (Drafting suggestions): . FR (Drafting suggestions): 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~~ **Strategic Stakeholders** Board**.** Members of the Board shall be bound by these terms. FR (Comments): Les règles applicables à ces importants organes du fonds devraient être adoptées par le Conseil. NL (Drafting suggestions): The Commission shall establish the detailed rules on selection and composition, remuneration, ~~rules of procedure,~~ conflicts of interest and confidentiality for the ECF Strategic Stakeholders Board. Members of the Board shall be bound by these terms. NL (Comments): Important to keep the Board fully independent, the ECF Stakeholder Board should therefore decide on its own rules of procedure.

Presidency text (doc.14282/25)	Drafting suggestions and Comments
4. The ECF Strategic ~~Stakeholder~~**Stakeholders** 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.	ES (Drafting suggestions): 4. The ECF Strategic ~~Stakeholder~~ **Stakeholders** 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 **to be defined in coordination with the ECF General Committee**. FR (Drafting suggestions): The ECF Strategic ~~Stakeholder~~**Stakeholders** Board, informed by an observatory on emerging technologies, shall **advise the General Committee** 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. 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 pourra soumettre l'idée que le Strategic Stakeholder Board conseille le General committee ou tout autre organe de pilotage stratégique qui pourrait être envisagé. IE (Drafting suggestions):

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	The ECF Strategic Stakeholders 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. **It shall take into consideration SMEs, start-ups and scale-ups .** IE (Comments): IE suggest text across to strengthen focus on SMEs. IT (Drafting suggestions): 4. The ECF Strategic ~~Stakeholder~~**Stakeholders** Board, informed by an observatory on emerging technologies, shall advise on the overall direction for the ECF, advise **the Commission by:** **(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, **advise on shortages of skills contributing to the availability of skills in investment in strategic sectors for EU competitiveness (b) providing advice** ~~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. IT (Comments):

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	This amendment contributes to align the structure to Art.13a; more details are needed on the "observatory on emerging technologies". NL (Drafting suggestions): The ECF Strategic Stakeholders-Board, informed by an observatory on emerging technologies, shall advise **the Commission and Council** 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. **It shall explicitly take the perspective of SMEs, start-ups and scale-ups into account, given their importance in EU value chains and building the economy of tomorrow. It shall also advise the Commission on the identification, analysis and mitigation options of high-risk strategic dependencies as referred to in Article 3(b), and on ensuring coherence of ECF actions with the EU's economic security and resilience goals.** NL (Comments): For the ECF to be most effective at fulfilling its objective at strengthening resilience and economic security through prevention and mitigation of HRSDs, the ECF Strategic Stakeholder Board should be empowered to advise the Commission on the high-risk strategic dependencies on which to focus.

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	PT (Comments): The role and implication of the observatory on emerging technologies needs to be clarified. SI (Drafting suggestions): 4. The ECF Strategic ~~Stakeholder~~**Stakeholders** Board, informed by an observatory on emerging technologies, shall advise on the overall direction for the ECF, advise 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, 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. EE (Drafting suggestions): 4. The ECF Strategic ~~Stakeholder~~**Stakeholders** 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 **to be defined in coordination with the ECF General Committee**. EE (Comments): We support giving a stronger, strategical role to the Member States.
	BE

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	(Drafting suggestions): **The Strategic Board shall consult regularly with the ERC Scientific Council and the EIC Board.** BE (Comments): It is important that there is sufficient consultation between the ERC Scientific Council and the EIC Board, which also sets out strategic guidelines for the ERC and the EIC respectively, which are important programmes for ensuring this seamless investment journey.
~~11~~**4a**. 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.	AT (Drafting suggestions): ~~11~~**4a**. 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, **and the results of these consultations communicated to the other Committees established under ECF**. CZ (Drafting suggestions): The Commission shall ensure that stakeholders, **including research organizations, and Member States** are consulted in the development of the work programmes, with the creation of one or several thematic platforms per window. 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 poin should be**

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	clarified, including the consultation process and, importandly, the weight such consultations would carry in shaping the work programme, if these were general stakeholders. Should these be general stakeholders, e.g., Member States and research organizations shall be mentioned involver either. ES (Drafting suggestions): ~~11~~**4a**. 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 **to be defined in coordination with the Programme Committee**. FR (Drafting suggestions): 11. The Commission shall ensure that stakeholders **and General Committe** are **associated to** ~~consulted in~~ the development of the work programmes, with the creation of one or several thematic platforms per window, **and per specific objectives as listed in article 3.2., except for work programmes implementing actions referred to in Articles 44(1)**. FR (Comments): Que signifie le terme « plateforme thématique » ? Les parties prenantes sont représentées dans le Stakeholder Board. Pour ce qui est des programmes de travail, il est important que les Etats membres soient associés à leur développemen a minima via le nouveau comité proposé.

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	La France demande à ce que l'adoption des programmes de travail en soutien à la BITDE suive une gouvernance et une comitologie spécifiques, qui doivent respecter le rôle central des États membres en matière de défense. Comment garantir l'équilibre entre les secteurs afin que l'ensemble des acteurs stratégiques des domaines couverts par le FEC soit dûment représenté ? IE (Drafting suggestions): ~~11~~**4a**. 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. PT (Comments): How is this 'consultation' expected to be implemented? How will these SSB platforms per window interact with the committee configurations foreseen in article 83º, where work programmes will be discussed? What role will these platforms have for areas where the examination procedure will be implemented in the committee? Also, will these platforms interact with existing technological or industrial platforms? 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.

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	Thus, Competitiveness Clusters and similar collaborative structures shall be consulted and involved as relevant stakeholders. Thus, this dimension should be added or clarified. EE (Drafting suggestions): ~~1~~**4a**. 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 **to be defined in coordination with the General Committee**.
	ES (Drafting suggestions): **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.** NL (Drafting suggestions): **4b. 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.** **4c. The Strategic Stakeholder Board shall establish its own Rules of Procedure**

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	4d. Where possible and with regard to the (economic) security interests of the Union and its Member States, the advise and reports of the Board shall be made public as much as possible NL (Comments): Important to better anchor the independence of the Board. EE (Drafting suggestions): **4b. The Commission shall ensure that the General Committee is duly and timely informed of the recommendations of the observatory on emerging technologies, the Strategic Stakeholders Board and the thematic platforms.**
Article 14a **ECF InvestEU Instrument governance**	FR (Comments): **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.** **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.**

PUBLIC

Presidency text (doc.14282/25)	Drafting suggestions and Comments
5. An independent Investment Committee shall be established under the ECF InvestEU Instrument (the 'Investment Committee').	FR (Drafting suggestions): **An independent Investment Committee shall be established under the ECF InvestEU Instrument (the 'Investment Committee'). It shall be constituted in 4 different configurations replicating the windows of the ECF.** **Each configuration of the Investment Committee shall be composed of six remunerated external experts. The experts shall be selected and shall be appointed by the Commission, after the approval of the Strategic Steering Board. The experts shall be appointed for a term of up to four years, renewable once. They shall be remunerated by the Union. The Commission, at the recommendation of the Strategic Steering Board, may decide to renew the term of office of an incumbent member of the Investment Committee without following the procedure laid down in this paragraph** **The experts shall have a high level of relevant market experience in project structuring and financing or financing of SMEs or corporates. When participating in the activities of the Investment Committee, its members shall perform their duties impartially and in the sole interest of the ECF Fund. They shall not seek or take instructions from the implementing partners, the institutions of the Union, the Member States, or any other public or private body.** FR (Comments): Disposition inspirée du réglement actuel InvestEU. L'instrument InvestEU ne devrait pas être implémenté par des programmes de travail. La délégation soutiendra 4 configurations du comité d'investissement InvestEU, répliquant les fenêtres thématiques.

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	Proposition sur la composition des comités d'investissement, organe majeur dans l'attribution des financements dont il faudrait cadrer dès le règlement les qualités requises des experts amenés à siéger. IE (Drafting suggestions): 5. An independent Investment Committee shall be established under the ECF InvestEU Instrument (the 'Investment Committee') PL (Drafting suggestions): „An independent Investment Committee shall be established under the ECF InvestEU instrument **to examine financing and investment operations proposed by implementing partners for coverage under the Union guarantee"** PL (Comments): It clarifies the role of the Commission in reviewing and approving operations backed by a guarantee.
6. The composition of the Investment Committee shall ensure that it has a wide knowledge of the sectors covered by the ECF and a wide knowledge of the geographic markets in the Union, and shall ensure that the Investment Committee as a whole is gender-balanced.	AT (Drafting suggestions): 6. The composition of the Investment Committee shall ensure that it has a wide knowledge of the sectors covered by the ECF and a wide knowledge of the geographic markets in the Union, and shall ensure that the Investment Committee **is acting independently and** as a whole is gender-balanced. AT (Comments): The composition of the Investment Committee has to be governed by a high degree of independence – what should be enshrined in the regulation.

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	BE (Drafting suggestions): **The Commission shall establish the detailed rules on selection and composition, rules of procedure, conflicts of interest and confidentiality for the ECF the Investment Committee.** The composition of the Investment Committee shall ensure that it has a wide knowledge of the sectors covered by the ECF and a wide knowledge of the geographic markets in the Union, and shall ensure that the Investment Committee as a whole is gender-balanced. BE (Comments): Same treatment as for the ECF advisory committee FI (Drafting suggestions): The composition of the Investment Committee shall ensure that it has a wide knowledge of the sectors covered by the ECF and a wide knowledge of the geographic markets in the Union **and the global value chains,** and shall ensure that the Investment Committee as a whole is gender-balanced. FR (Drafting suggestions): **The composition of the Investment Committee shall depend on its thematic configuration and ensure that it has a wide knowledge of the sectors covered by the thematic window of the ECF and a wide knowledge of the geographic markets in the Union, and shall ensure that the Investment Committee as a whole is gender-balanced.** **The Investment Committee shall (a) examine the proposals for financing and investment operations submitted by implementing partners for**

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	coverage under the Union guarantee and verify the compliance with the applicable rules of the proposals for financing under the ECF InvestEU Instrument. (b) verify the compliance of the proposals with this Regulation and the relevant investment guidelines; (c) control any potential overlapping with the ECI accelerator or any other funds implemented and (d) check whether the financing and investment operations that would benefit from the support under the EU guarantee comply with all relevant requirements. FR (Comments): Disposition inspiré du réglement actuel. L'instrument InvestEU ne devrait pas être implémenté par des programmes de travail. La délégation soutiendra 4 configurations du comité d'investissement InvestEU, répliquant les fenêtres thématiques. IE (Drafting suggestions): The composition of the Investment Committee shall ensure that it has a wide knowledge of the sectors covered by the ECF and a wide knowledge of the geographic markets in the Union **and of global value chains**, and shall ensure that the Investment Committee as a whole is gender-balanced. IE (Comments): IE – it is important also that the Committee have a knowledge of global value chains IT (Drafting suggestions):

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	The composition of the Investment Committee shall ensure that it has a wide knowledge of the sectors covered by the ECF and a wide knowledge of the geographic markets in the Union, **skills gap** and shall ensure that the Investment Committee as a whole is gender-balanced NL (Drafting suggestions): The composition of the Investment Committee shall ensure that it has a wide knowledge of the sectors covered by the ECF and a wide knowledge of the geographic markets in the Union **and the global value chains,** and shall ensure that the Investment Committee as a whole is gender-balanced. PL (Drafting suggestions): „The composition of the Investment Committee shall ensure that it has a wide knowledge of the sectors covered by the ECF and a wide knowledge of the geographic markets in the Union, and shall ensure that the Investment Committee **includes representation from all Member States and reflects gender diversity** ~~as a whole is gender-balanced.~~ PL (Comments): Ensuring geographical balance in the composition of the Investment Committee is consistent with the principles concerning the EFC Strategic Stakeholder Board and constitutes a prerequisite for possessing "broad knowledge of geographic markets within the Union." SE (Drafting suggestions): The composition of the Investment Committee shall ensure that it has a wide knowledge of **the technologies** and of the sectors covered by the ECF, and a wide knowledge of the geographic markets in the Union and shall ensure that the Investment Committee as a whole is gender-balanced.

Presidency text (doc.14282/25)	Drafting suggestions and Comments
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.	BE (Drafting suggestions): The Investment Committee shall examine the proposals for financing and investment operations, **including framework 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. FR (Drafting suggestions): The Investment Committee shall (a) examine the proposals for financing and investment operations submitted by implementing partners for coverage under the Union guarantee and verify the compliance with the applicable rules of the proposals for financing under the ECF InvestEU Instrument**. (b) verify the compliance of the proposals with this Regulation and the relevant investment guidelines; (c) control any potential overlapping with the ECI accelerator or any other funds implemented and (d) check whether the financing and investment operations that would benefit from the support under the EU guarantee comply with all relevant requirements.** FR (Comments): 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. MT (Drafting suggestions): The Investment Committee shall examine the proposals for financing and investment operations, **including framework operations,** submitted by

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	implementing partners for coverage under the Union guarantee and verify the compliance with the applicable rules of the proposals for financing under the ECF InvestEU Instrument. SE (Drafting suggestions): The Investment Committee shall examine the proposals for financing and investment operations submitted by implementing partners for coverage under the Union guarantee and verify the compliance with the applicable rules of the proposals for financing under the ECF InvestEU Instrument. **The Investment Committee should inform the Advisory Board on ECF InvestEU on its decisions and main deliberations**.
	FR (Drafting suggestions): **7.a.A scoreboard of indicators (the 'Scoreboard') shall be established to ensure that the Investment Committee is able to carry out an independent, transparent and harmonised assessment of requests for the use of the EU guarantee for financing and investment operations proposed by implementing partners** **Implementing partners shall fill out the Scoreboard for their proposals for financing and investment operations** **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.**

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	The Investment Committee shall use the Scoreboard in its assessment and verification of the proposed financial and investment operations. **Conclusions of the Investment Committee shall be adopted by simple majority of all members, Conclusions of the Investment Committee approving the coverage of the EU guarantee for a financing or investment operation shall be publicly accessible and shall include the rationale for the approval and information on the operation, in particular its description, the identity of the promoters or financial intermediaries, and the objectives of the operation. The conclusions shall also refer to the global assessment stemming from the Scoreboard** FR (Comments): Outil de monitoring présent dans le règlement InvestEU qu'il serait important de reprendre ici ou à défaut dans le règlement performance.
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.	BE (Drafting suggestions): **The Advisory Board on ECF InvestEU Instrument shall be composed of two representatives of each Member State (effective/alternate) and of two representatives of each implementing partner (effective/altenate) The EIB Group shall be duly represented in the Advisory Board.** 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 **and shall meet in a two formats: (1) a restrictive format "MS only" to have Strategic Exchange and to finalise**

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	their positions and decisions. (2) an open format MS plus Implementing partners. **MS and Implementing partners could be replaced by an alternate.** BE (Comments): Specific status granted to the EIB Group by the Treaties. We need to maintain the two meeting formats as we currently have under InvestEU. The geopolitical reality requires caution and the full and effective exercise of Member States' sovereignty in sensitive areas without the presence of non-European international bodies. Having a full member and an alternate member ensures continuity of work and the possibility of having representatives from different ministries. 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 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 DE (Drafting suggestions): The Advisory Board on ECF InvestEU Instrument shall be composed of one representative of each implementing partner and one representative of each

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	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.** DE (Comments): Addition in line with current Article 20 Paragraph 3 InvestEU Regulation ES (Drafting suggestions): 8. The Advisory Board on ECF InvestEU Instrument shall be composed of one representative of each implementing partner and one representative of each Member State. The Advisory Board on ECF InvestEU Instrument shall, provide advice on the design of financial products and on the strategic and operational direction in its area of competence. It shall also provide advice on the coordination with the EIC to ensure complementarity with other Union funding or private investments. The Advisory Board shall be chaired by a representative of the Commission. **Meetings of representatives of the Member States in a separate format shall also be organised at least twice a year**. ES (Comments): We understand that the more detailed provisions will be defined in the implementing documents and rules of procedure established by the Commission. However, we do not have a capacity to influence these implementing documents and this is important for us. FI

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	(Drafting suggestions): 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.** FR (Drafting suggestions): The ~~Advisory~~ **Steering** Board on ECF InvestEU Instrument shall be composed of one representative of each implementing partner and one representative of each Member State. ~~t~~**T**he ~~Advisory~~ **Steering** Board on ECF InvestEU Instrument shall, **annually review and complete the investment guidelines**, **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 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.** **It shall also oversee the coordination with the EIC funds in order to guarantee a continuity of the investment journey.** 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

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

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	en cas de tour de table plus important (seuil à définir) ; (ii) que les startups n'ayant pas obtenu de financements par l'EIC dans le cadre d'Horizon Europe puissent en obtenir dans le cadre du FEC via l'instrument InvestEU. Le steering board d'InvestEU doit pouvoir se doter d'éléments d'analyse des failles de marché nécessitant des investissements financiers ciblés et arbitrer sur les modalités de mise en œuvre de stratégies de développement de marchés et de mobilisation des financements privés. IE (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 Group shall be the vice-chair.** IE (Comments): IE wish to include EIB here also MT (Drafting suggestions): 8. The Advisory Board on ECF InvestEU Instrument shall be composed of one representative of each implementing partner and one representative of each Member State. the Advisory Board on ECF InvestEU Instrument shall, provide advice on the design of financial products and on the strategic and operational direction in its area of competence. It shall also provide advice on

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	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 EIB Group shall be duly represented in the Advisory Board.** NL (Drafting suggestions): 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.** NL (Comments): Add EIB as this is standard practice.
9. The Commission shall establish the detailed rules on selection and composition, remuneration, rules of procedure, conflicts of interest and confidentiality for the Investment Committee and the Advisory Board on ECF InvestEU Instrument.	AT (Drafting suggestions): 9. The Commission shall establish the detailed rules on selection and composition, remuneration, ~~rules of procedure,~~ conflicts of interest and confidentiality for the Investment Committee and the Advisory Board on ECF InvestEU Instrument.

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	9 (bis). On proposal by the Commission, the Investment Committee and the Advisory Board shall adopt their respective rules of procedure upon constitution. AT (Comments): 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. DE (Drafting suggestions): 9. The Commission shall establish the detailed rules on selection and composition, remuneration, **~~rules of procedure~~**, conflicts of interest and confidentiality for the Investment Committee and the Advisory Board on ECF InvestEU Instrument. DE (Comments): 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. 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 ES (Drafting suggestions): 9. The Commission shall establish the detailed rules on selection, composition and remuneration **for the Investment Committee. In addition, the**

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	Commission shall establish detailed rules on the rules of procedure, conflicts of interest and confidentiality for the Investment Committee and the Advisory Board on ECF InvestEU Instrument. ES (Comments): Since the Member States and Implementing Partners choose their representatives to the Advisory Board, it does not make sense that there are detailed rules on the selection or composition by the Commission. FI (Drafting suggestions): The Commission**, in cooperation with the EIB Group,** shall establish the detailed rules on selection and composition, remuneration, rules of procedure, conflicts of interest and confidentiality for the Investment Committee and the Advisory Board on ECF InvestEU Instrument. FI (Comments): Important to have a role for the EIB here as well. FR (Drafting suggestions): 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. **Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 83(3).**

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	FR (Comments): Le Conseil devrait être associé à la définition de la composition du Comité et du Conseil d'administration ainsi qu'aux dispositions y afférentes, notamment en garantissant une procédure de réexamen pour l'adoption de l'ensemble de ces dispositions. IE (Drafting suggestions): 9. The Commission, **in cooperation with the EIB Group**, shall establish the detailed rules on selection and composition, remuneration, rules of , rules of procedure, conflicts of interest and confidentiality for the Investment Committee and the Advisory Board on ECF InvestEU Instrument. IE (Comments): IE wish to include EIB here also NL (Drafting suggestions): The Commission**, in cooperation with the EIB Group,** shall establish the detailed rules on selection and composition, remuneration, rules of procedure, conflicts of interest and confidentiality for the Investment Committee and the Advisory Board on ECF InvestEU Instrument. NL (Comments): Important to have a role for the EIB here as well. SE (Drafting suggestions):

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	The Commission shall, **after consulting the Member States**, establish the detailed rules on selection and composition, remuneration, rules of procedure, conflicts of interest and confidentiality for the Investment Committee and the Advisory Board on ECF InvestEU Instrument.
10. The Commission and Implementing partners shall establish regular Policy Review Dialogues to discuss progress with the implementation of the financial products and engage on relevant policy developments.	BE (Drafting suggestions): 10. The Commission and Implementing partners shall establish regular Policy Review Dialogues to discuss progress with the implementation of the financial products and engage on relevant policy developments **The Commission shall inform twice a year the Advisory Board on policy review dialogues**. 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. FR (Drafting suggestions): 10. The Commission and Implementing partners shall establish semi-annual ~~regular~~ Policy Review Dialogues to discuss progress with the implementation of the financial products and engage on relevant policy developments. FR (Comments): Quelle serait la fréquence de ces dialogues ? IE (Drafting suggestions):

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	The Commission and Implementing partners shall establish regular Policy Review Dialogues, **including a mid-term policy review**, to discuss progress with the implementation of the financial products and engage on relevant policy developments IE (Comments): IE suggest to add a provision for mid-term policy review within the governance framework to ensure adaptability MT (Drafting suggestions): 10. The Commission and Implementing partners shall establish regular Policy Review Dialogues to discuss progress with the implementation of the financial products and engage on relevant policy developments. **Regular Policy Review Dialogues between the Commission and advisory partners shall take place to facilitate exchange on areas of market failure and suboptimal investment situations where Project advisory and business support is particularly needed.** RO (Drafting suggestions): The Commission**,** ~~and~~ Implementing partners **and Advisory partners** shall establish regular Policy Review Dialogues to discuss progress with the implementation of the financial products**, facilitate exchange on areas of market failure and suboptimal investment situations** and engage on relevant policy developments. **For the purposes of the Member State compartment under the ECF InvestEU Instrument and / or Project Advisory, contributing Member States shall be invited to participate to the corresponding part of the Policy Review Dialogues.** RO (Comments):

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	Under current InvestEU programme, contributing MS are invited to the regular monitoring dialogue of the MS-Compartment part only of the guarantee agreements concluded by the COM with each implementing partner.
Chapter II **ECF TOOLBOX**	LU (Comments): LU Comments: In general, we have observed that SMEs are frequently grouped together with SMCs, startups, and scale-ups, or referenced within the broader context of "strategic sectors." From our perspective, it is essential to distinguish clearly between traditional SMEs and more innovation-driven enterprises. This differentiation is critical to ensure that there is no unintended cannibalization between these categories, particularly in relation to the allocation of funding and support mechanisms. For instance, it must be avoided that resources earmarked for SMEs are redirected disproportionately towards SMCs. A balanced and targeted approach is necessary to preserve the integrity and specific needs of each group.

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Presidency text (doc.14282/25)	Drafting suggestions and Comments
SECTION 1 **GRANTS, PROCUREMENT AND INDUSTRIAL POLICY COORDINATION TOOLS**	FI (Drafting suggestions): Award criteria and selection 1. A proposal shall be evaluated on the basis of the following award criteria: (a) excellence; (b) impact; (c) quality and efficiency of the implementation. The work programme shall specify details on how these award criteria are to be applied. FI (Comments): FI: There needs to be a separate article on the award criteria and selection IT (Comments): Further clarification is needed. The nature and functioning of the coordination tools must be better laid out. We ask the Commission to further explain the relationship between the governance of the ECF, as governed by the ECF Regulation [COM(2025) 555 final] (Stategic Stakeholders Board, Advisory Board on ECF InvestEU Instrument and Investment Committee) and the Competitiveness Coordination Tool envisaged by the Competitiveness Compass [COM(2025) 30 final], but not yet defined in its functioning (Coordination procedure? Representative body? Which council branches will be involved?)

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Article 15 **Work Programmes**	AT (Drafting suggestions): ***Annual* Work Programmes** AT (Comments): SME matters are a horizontal subject. In every work programme, a specific dedicated part should show, how each work programme under this Regulation aims to support SMEs and contributes to mainstreaming SME's needs into Union's work. Horizontal activities referred to in Chapter III pertain to SME matters. AT appreciates the reference added in Para 4. This reference ensures EC to adopt the corresponding work programme via implementing acts. Moreover, it ensures MS involvement in examination procedure. The decision on an **annual** work program with the participation of member states is essential. AT suggests setting up a new committee on SME matters. (*See AT wording suggestion for a new Article 83(1) letter (aa) at the comment section concerning Article 3(1) point (g).)* This new committee on SME matters should be responsible for adopting the work programme on horizontal activities referred to in Chapter III. *See AT wording suggestion to amend Article 83(3) first subpara to this effect at the comment section concerning Article 3(1) point (g).* FR (Comments): **La délégation pourra soutenir que les dispositions de cet article prennent en compte les spécificités de la défense et du spatial. 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.**

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Presidency text (doc.14282/25)	Drafting suggestions and Comments
	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). IE (Comments): IE welcome new text, with focus on SMEs, in this Article 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. PL (Comments): PL supports ensuring in this article a stronger role for Member States in shaping work programmes and evaluation criteria. Pl believes it could increase transparency and aligns the Fund with the Union's objectives regarding cohesion and employment. PL also would like to support the extension of the examination committee procedure to all work programmes of the policy windows. PT (Comments): We consider that the ECF shall ensure a balanced geographical coverage and promote equal access of stakeholders from all Member States. Clarification is still needed on work programmes: Is it envisaged one work programme per policy window? Will they be multiannual or annual?

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	What role is reserved for Member States in the design and adoption of the work programmes?
	FR (Drafting suggestions): The work programmes may set out **for the entire budget period with a year breakdown:** MT (Comments): Malta strongly supports the extension of the examination committee procedure to all work programmes under the ECF.
1. The work programmes ~~may~~**shall** set out:	MT (Comments): Malta would like to thank the DK Presidency for taking on board the word 'shall', allowing for greater certainty on what to expect in a Work Programme. We ask for it to be retained. NL (Drafting suggestions): **Taking into account that the ECF should ensure long-term stability and predictability for investments,** the work programmes shall set out: NL (Comments): In general, it is important the ECF regulation is sufficiently detailed and worked out and that the ECF primarily serves as a long-term investment fund that safeguards stability. The ECF is not suited as a crisis instrument. PT

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Presidency text (doc.14282/25)	Drafting suggestions and Comments
	(Comments): We welcome the change from "may" to "shall", which makes the clear definition of work programmes mandatory.
(a) actions and associated budget from ECF as well as actions set out in the specific dedicated part of the work programmes indicated in paragraph 2;	DE (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; **the work programmes shall set clear priorities on which areas contribute most effectively to the Union's competitiveness as well as security and resilience and shall strive for maximum coherence among each other. A particular focus shall be put on strategic technologies and activitiescontributing to the Union's open strategic autonomy.** DE (Comments): 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. ES (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; ES

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	(Comments): The work programmes for collaborative R&I activities shall be independent. HR (Drafting suggestions): HR: HR suggest additonal amendment: *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*** HR (Comments): HR proposes adding a reference to SMEs' balanced participation to avoid concentration of resources in more advanced regions. MT (Drafting suggestions): (a) actions and associated budget from ECF as well as **collaborative research and innovation activities and their dedicated budget set out in separate work programmes;** ~~actions set out in the specific dedicated part of the work programmes indicated in paragraph 2;~~ 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. SE

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Presidency text (doc.14282/25)	Drafting suggestions and Comments
	(Comments): Please see the general comment above on the link between HE and ECF.
(b) instruments and form of funding;	FR (Drafting suggestions): instruments and form of funding; **when it comes to financial instruments it shall be decided by the investment committee of the instrument** FR (Comments): Le comité d'investissement InvestEU devrait participer à cette décision et décider de sa mobilisation. Étant donné que les programmes de travail déterminent également les contributions additionnelles des volets thématiques à l'instrument InvestEU, la délégation pourra soutenir de la même manière une association de la comitologie et de la gouvernance de l'instrument à ces décisions. L'instrument InvestEU ne devrait pas être implémenté par des programmes de travail.
(c) eligibility and**, where applicable,** award criteria;	DE (Drafting suggestions): (c) eligibility and**, ~~where applicable,~~** award criteria **as set out in Articles 9, 9a, 11, 12, 17, 20 and 53 of this regulation**; DE (Comments): To provide more clarity on framing award criteria in the work programmes. We have already included the limitation "where applicable" in our proposal on art. 9a (1)(c).

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	FR (Drafting suggestions): ~~(c) eligibility and, **where applicable,** award criteria;~~ FR (Comments): 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 travail. 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. SE (Drafting suggestions): eligibility and**, ~~where applicable,~~** award criteria; SE (Comments): SE considers that award criteria should always be applicable, or that this article should explicitly spell out any areas where a derogation might be motivated. SE sees no reason why the proposed award criteria cannot be applicable for InvestEU as COM stated in AHWP. Does the Council Legal Service see any legal reason that the award criteria cannot be used in the first step of implementation, i.e. when COM is awarding a part of the guarantee/financial instruments to different IPs after a call? SI

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	(Comments): If possible, reformulate to make an exception only for Space and InvestEU.
(d) a single co-financing rate per action for actual cost grants;	ES (Drafting suggestions): (d) a single ~~co~~-financing rate per action for actual cost grants; FI (Comments): How does the Commission foresee to execute these rates in a consistent manner if this would be decided at the level of a work programme? Shouldn't there be some general guidance in the legal text? HR (Comments): 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?

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Presidency text (doc.14282/25)	Drafting suggestions and Comments
	NL (Comments): How does the Commission foresee to execute these rates in a consistent manner when this is decided on the level of a work programme. Shouldn't there be some general guidance in the legal text? Which could be choosen from in a work programme? SI (Drafting suggestions): (d) a single co-financing rate per action ~~for actual cost grants;~~ SI (Comments): A single co-financing rate should be the norm. Introduce exceptions, if necessary.
(e) actions to which the Mutual Insurance Mechanism under Regulation (EU) [XXX] [Horizon Europe] applies;	
(f) rules applicable to actions concerning more than one specific objective;	FR (Drafting suggestions): rules applicable to actions concerning more than one specific objective **without prejudice to any specific condition laid down within each policy window or component**. FR (Comments):

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	La délégation pourra soutenir un encadrement de ce point pour les activités de défense et du spatial
(g) actions to which specific rules apply, in particular on ownership, exploitation and dissemination, transfer and licensing as well as access rights to results;	FR (Drafting suggestions): actions to which specific rules apply, in particular on ownership, exploitation and dissemination, transfer and licensing as well as access rights to results **without prejudice to any specific condition laid down within each policy window or component**, FR (Comments): 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. La délégation pour souligner que la définition des droits d'accès aux résultats dans le cadre du programme de travail ne peut pas s'appliquer dans le cadre des actions soutenant l'industrie de défense. Ces conditions spécifiques doivent être définies dans le cadre du règlement FEC.
(h) actions which benefit from the mechanisms set out in Article 20;	CZ (Drafting suggestions): (h) actions which benefit from the mechanisms set out in Article 20, **and, in order to foster flexibility, responsiveness and the optimization of Europe's potential in addressing emerging needs and opportunities,**

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	actions that allow for the possibility of the inclusion of additional beneficiaries during the course of their implementation CZ (Comments): 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.
	PT (Drafting suggestions): Add a new paragraph: **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.** 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

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	relatively limited experience with Union-level instruments -will not be able to participate in collaborative efforts.
(ha) where applicable, the possibility to award a Competitiveness Seal as referred to in Article 8, and additional conditions if any.	IE (Comments): IE welcome this clarification SE (Comments): As mentioned above, SE considers that the original excellence seal in the HE regulation should apply if research and innovation activities are to be programmed through the ECF.
	IT (Drafting suggestions): **i) Skills gap analyses** PL (Drafting suggestions): To add: "(i) **Work programmes shall include dedicated funding envelopes for water and wastewater infrastructure projects, including monitoring of PFAS and microplastics, and support for energy-neutral technologies in wastewater treatment".** PL (Comments): Ensures that ECF work programmes address critical infrastructure needs related to water and wastewater, in line with environmental and climate goals, and supports Member States in meeting legal obligations.
2. The work programmes under this Regulation shall integrate in a specific dedicated part collaborative research and innovation activities and their dedicated budget.	DE (Drafting suggestions): . The work programmes under this Regulation shall integrate in a specific dedicated part collaborative research and innovation activities and their dedicated budget. **For the discussion and adoption of this part,**

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	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.** DE (Comments): Separate subconfigurations are required for decisions 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 at least sub-configurations of the thematic programme committees on R&I. 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 Challengens shall be developed by the responsible mechanisms / committees of Horizon Europe / EIC but take the priorities of the Policy Windows into account. FI (Drafting suggestions): The work programmes under this Regulation shall integrate in a specific dedicated part collaborative research and innovation activities **funded under the Framework Programme for Research and Innovation** and their dedicated budget**, in line with Regulation (EU) [XXX] [Horizon Europe].** FI (Comments): How will alignment between the different WP parts be designed so that R&I as well as scaling up and deployment activities are recognized as equal contributors to the overarching goal of streghtening long term

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	competitiveness, while recognizing their own value and specific requirements? FR (Drafting suggestions): The work programmes under this Regulation shall integrate in a specific dedicated part **and window by window** collaborative research and innovation activities and their dedicated budget. **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.** FR (Comments): 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. **En lien avec l'article 15(2), la Commission pourrait-elle préciser le champ d'application du programme de travail, notamment au vu des implications pour les activités de recherche et d'innovation collaboratives ?** Les spécificités de la R&I doivent être prises en compte lors de la rédaction des appels à projets de recherche collaborative. Il est également important de préciser les règles et critères applicables à ces appels. Sur quel Budget la Commission a-t-elle prévu de financer la recherche collaborative et les activités d'innovation pour chaque programme de travail?

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	Quelle sera l'interaction entre les comitologies du FEC et d'Horizon Europe ? Comment ce lien sera-t-il concrètement mis en œuvre dans les deux programmes ? MT (Drafting suggestions): 2. ~~The work programmes under this Regulation shall integrate in a specific dedicated part c~~**C**ollaborative research and innovation activities and their dedicated budget **shall be included in separate work programmes focused solely on R&I activities**. 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. NL (Drafting suggestions): The work programmes under this Regulation shall integrate in a specific dedicated part collaborative research and innovation activities **funded under the Framework Programme for Research and Innovation** and their dedicated budget**, in line with Regulation (EU) [XXX] [Horizon Europe].** NL (Comments): In addition: it is important the programming, priority setting and governance of the R&I parts in relation to the other parts of the ECF WP duly reflect the self-standing and important role of R&I in the investment journey. How will alignment between the different WP parts be designed so that R&I as well as

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Presidency text (doc.14282/25)	Drafting suggestions and Comments
	deployment activities are recognized as equal contributors to the overarching goal of streghtening long term competitiveness, while recognizing their own value and specific requirements? PL (Drafting suggestions): 2. The work programmes under this Regulation shall integrate in a specific dedicated part collaborative research and innovation activities and their dedicated budget, **with the purpose of linking excellence with emerging innovation potential across the Union and supporting projects that contribute to Europe's technological and production sovereignty** PL (Comments): Justification of proposal is in General comments PT (Drafting suggestions): There **shall be** work programmes under this Regulation ~~shall integrate in a specific~~ dedicated ~~part~~ to collaborative research and innovation activities **referred to under the policy windows described in Chapters IV to VII** and their dedicated budget. PT (Comments): PT maintains its position in what concerns the definition of Work Programmes based on co-creation processes, with the involvement of MS R&I representatives. PT supports ES suggestion. SI (Drafting suggestions):

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	~~2. The work programmes under this Regulation shall integrate in a specific dedicated part collaborative research and innovation activities and their dedicated budget.~~ SI (Comments): SI is suggesting that collaborative R&I activities are set and adopted under the HE work programme.
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.	AT (Comments): AT welcomes this insertion. Each work programme under this Regulation should describe in a specific dedicated part how it aims to support SMEs, including taking into account Article 29. LU (Comments): LU Comments: Luxembourg welcomes the proposed addition requiring each Work Programme to explicitly outline how SMEs are supported, as it reflects the vital role SMEs play in driving economic growth and resilience. To further reinforce this provision, we recommend integrating the principles of "Think Small First" and "Once-Only." These principles are instrumental in ensuring that SMEs are not only acknowledged but systematically prioritized in the design and implementation of support measures. In this context, we propose the inclusion of an additional clause mandating that Work Programmes also detail how administrative procedures will be simplified in line with these principles. This would be consistent with the

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	overarching objective of administrative simplification, which is rightly emphasized as a key priority within the framework. MT (Drafting suggestions): **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. Independent of the Budget allocation for InvestEU, X% of the ECF Budget needs to be allocated for SMEs.** MT (Comments): Malta thanks the DK Presidency for slightly enhancing the reference to SMEs but it firmly believes that more ambition is needed. Malta believes that there needs to be a dedicated ring-fenced account solely for SMEs. This percentage needs to be set in the core of the legislation, and it would be independent of the budget allocation for InvestEU. This would ensure that all MSs SMEs would be able to tap into the opportunities that the ECF has to offer. This would also be a safeguard that would ensure that not all the funding would go to the larger enterprises. MT is proposing the following wording '**Independent of the Budget allocation for InvestEU, X% of the ECF Budget needs to be allocated for SMEs.'.** PL (Drafting suggestions): The work programmes under this Regulation shall include a dedicated section describing how they aim to support SMEs, taking into account Article 29, **and shall ensure that a minimum of X% of the ECF Budget is allocated to SMEs, separate from any allocations under InvestEU.** PL (Comments): PL believes SMEs are the backbone of the EU's economy and the primary source of disruptive innovation. Without dedicated support, Europe risks losing its most promising

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	startups to global competitors or seeing them fail due to a lack of growth capital. PL proposes including a mandatory, ring-fenced budget allocation for SMEs within the ECF as a strategic imperative for achieving the Regulation's core objectives. It ensures direct access to risk capital for Europe's most innovative companies, corrects systemic market failures, and guarantees that the ECF's benefits are not diluted or bypassed for the SME segment. The separation from InvestEU is critical to prevent double-counting and ensure additionality. A mandatory minimum allocation (X%) provides predictability for fund managers and the SME ecosystem. It signals the EU's unwavering commitment, encouraging fund managers to build specialized expertise in the SME segment and motivating SMEs to apply. Without a target, support for SMEs risks becoming a vague intention rather than a measurable outcome. PT (Comments): The requirement that the work programmes include a dedicated section on SME support represents a relevant development, but questions if such dedicated part will contain support actions available to SMEs only. We suggest explicitly stating that the participation of SMEs and start-ups should include simplified access mechanisms and accelerated evaluation procedures, in order to guarantee territorial balance and inclusion of outermost regions, in accordance with Article 349 TFEU. RO (Drafting suggestions): **2a.**The work programmes under this Regulation shall ~~**describe in**~~ **include** ~~**in**~~ a specific dedicated part **explaining** how they aim to support SMEs **as main beneficiaries,** taking into account the provisions of Article 29. **A dedicated indicative budget allocation of x should be ensured**. RO (Comments): RO supports the explicit inclusion of a dedicated SME section within the work programmes and supports differentiated measures to assist them, either

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	through the establishment of dedicated funding ceilings or by ensuring SMEs have fair and easy access to financing. Eligibility criteria should be adapted to reflect the innovation potential of SMEs, and a proportionality mechanism should be put in place to prevent the disproportionate concentration of resources. Please analyse the possibility of strengthening support for SMEs, through a dedicated allocation or through mechanisms that would favour their more active participation in strategic sectors, including by stimulating innovation, business acceleration, commercialisation and scaling, for example through eligibility criteria or prioritisation for projects that demonstrate high potential for innovation and economic impact. SE (Drafting suggestions): **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.~~** SE (Comments): SE can support provisions to increase SME participation in general but are sceptical of the need for dedicated calls in accordance with article 29, as this undermines the principle of open and competitive calls for proposals and of choosing proposals based on excellence/merit. EE (Comments): Support for the new para 2a. EL (Comments): Welcome the new provision

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	DE (Drafting suggestions): **<u>2b. Duration of the work programmes shall be limited 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>** DE (Comments): Work programmes should be limited in time, at a maximum to the duration of the MFF; as concerning ~~research and~~ space activities, the work programmes should have a maximum duration of two years. 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 PT (Drafting suggestions): **2aa): "Each work programme shall include a section describing how it ensures participation of SMEs and entities established in Outermost Regions, including through dedicated calls"** PT (Comments): The ECF work programmes should establish dedicated lots or pilot actions in ORs, especially in sectors such as health, biotechnology, and digital resilience
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.~~	ES (Comments): We support the deletion of this point.

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~~Those implementing acts shall be adopted in accordance with the advisory procedure referred to in Article 83(2).~~	MT (Comments): Malta strongly supports the extension of the examination committee procedure to all work programmes under the ECF. SE (Comments): SE welcomes the shift to examination procedure for all policy windows.
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)~~ **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).	AT (Comments): AT welcomes the insertion of a reference to „horizontal activities referred to in Chapter III“. AT deems this reference helpful to further support the interests of SMEs at Union level. AT wants the reference in Para 4 to „examination procedure referred to in Article 83(3)“ to pertain to the more stringent „no opinion, no action“ (NONA) examination procedure. *See corresponding AT drafting suggestion for a new subpara 2 in Article 83(3)at the comment section concerning Article 3(1) point (g).* Art. 15/4: 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) 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). ➔ *On Para 4, AT wants Para 4 on urgency procedure to be deleted.*

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	DE (Comments): These changes are highly welcome. In order to increase transparency, accountability and ownership, we will, however, propose further comments on Art. 83 specifying the examination procedure for the adoption of work programmes. ES (Drafting suggestions): 4. The Commission shall, by means of implementing acts, adopt **specific** ~~the~~ work programmes implementing the specific objectives referred to in Article 3(2)~~, point (d) (2), (3) and (4)~~ **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). FR (Drafting suggestions): 4. The Commission shall, by means of implementing acts, adopt the work programmes implementing the specific objectives referred to in Article 3(2)~~, point (d) (2), (3) and (4)~~ **and the horizontal activities referred to in Chapter III excluded from the InvestEu instrument which shall be implemented separately**. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 83(3). **A second sentence must be added to this article 83(3): "*Where the committee delivers no opinion, the Commission shall not adopt the draft implementing act and the third subparagraph of Article 5(4) of Regulation (EU) No 182/2011 shall apply*".** FR

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	(Comments): L'instrument InvestEU ne devrait pas être implémenté par des programmes de travail. Demande d'ajout de la clause de non-opinion. IE (Comments): IE welcomes the examination procedure for all policy windows. MT (Comments): Malta strongly supports the extension of the examination committee procedure to all work programmes under the ECF. PT (Comments): We welcome the inclusion of the examination procedure. RO (Comments): RO welcomes the amendment for strengthening the role of Member States in the strategic orientation and governance of the ECF, namely the introduction of the examination procedure for all work programmes (Art. 15(4)) and the strategic role of the ECF General Committee in providing the European Commission with advice and recommendations on the overall direction of the ECF. EL (Comments): Welcome, very positive

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	SI (Drafting suggestions): **4a. In the case of the implementing acts to be adopted under Article 15(4) 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.**
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.~~	ES (Comments): We support the change. MT (Comments): We are pleased to see that our proposal to remove triggering the urgency clause in case of a missed deadline was accepted by the Presidency. SE (Comments): SE supports this proposal.
	DE (Drafting suggestions): **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.** DE (Comments): The Member States must be involved in the review process for research with human embryonic stem cells (heS) in a co-responsible manner; the

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	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
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).	AT (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 pro cedure referred to in Article 83(4).“~~ AT (Comments): AT wants this Para to be deleted. AT is not convinced by how EC argues the need of an urgency procedure in Para 6. DE (Drafting suggestions): 6. On duly justified imperative grounds of urgency relating to the need for an immediate reaction to a crisis or other similar exceptional and duly substantiated emergencies, the Commission may adopt a work programme by means of immediately applicable implementing acts in accordance with the procedure referred to in Article 83(4).**The examination procedure shall apply according to Article 8 (4) of Regulation (EU) No 182/2011.** DE (Comments): There should at least be an effective retrospectice control by MS.

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	ES (Drafting suggestions): 6. On duly justified imperative grounds of urgency relating to the need for an immediate reaction to a crisis or ~~other similar~~ exceptional and duly substantiated emergencies, **such as public health emergencies, natural disasters or severe economic security disturbances,** 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). **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.** ES (Comments): The amendment clarifies that the urgency procedure should be used only in clearly defined exceptional situations, which are also listed, and introduces basic safeguards—a written justification, prior consultation of the committee chair, and a budgetary limit—to ensure accountability and proportionality while preserving Member States' oversight. FI (Comments): Can the EC clarify the purpose of this Article and in what kind of situations the Commission might use it? FR (Drafting suggestions):

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	~~On duly justified imperative grounds of urgency relating to the need for an immediate reaction to a crisis or other similar exceptional and duly substantiated emergencies, the Commission may adopt a work programme by means of immediately applicable implementing acts in accordance with the procedure referred to in Article 83(4).~~ FR (Comments): La Commission peut-elle justifier le besoin de prévoir de telles dispositions ? Quel serait un exemple de nécessité de réaction immédiate à une crise ou situation d'urgence, pour laquelle une procédure d'examen classique ne serait pas adaptée? IE (Comments): IE is cautious about the inclusion of this text and would welcome clarification as to what might constitute a duly substantiated emergency. 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. NL (Comments): NL is not yet convinced of the neccesity 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

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	clarify the purpose of this Article and in what kind of situations the Commission might use it? SI (Drafting suggestions): ~~6. On duly justified imperative grounds of urgency relating to the need for an immediate reaction to a crisis or other similar exceptional and duly substantiated emergencies, the Commission may adopt a work programme by means of immediately applicable implementing acts in accordance with the procedure referred to in Article 83(4).~~ SI (Comments): Scrutiny reservation. 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.
	FR (Drafting suggestions): **Article 15a** **Committee procedure** **1. The Commission shall be assisted by a committee. That committee shall be a committee within the meaning of Regulation (EU) No 182/2011.**

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	2. The committee may convene in configurations reflecting the different policy windows of the ECF. **3. Each configuration should have a sub-group in charge of collaborative research to take into account R&I specificities, including one or two representatives of the general configuration. Reversely, one of the representatives of the sub-group should take part to the general configuration.** **4. Where the opinion of the committee is to be obtained by written procedure, that procedure shall be terminated without result when, within the time-limit for delivery of the opinion, the chair of the committee so decides or a simple majority of committee members so request.** **5. In accordance with international agreements concluded by the Union, representatives of third countries or international organisations may be invited as observers in the meetings of the Specific Programme committee under the conditions laid down in its rules of procedure, taking into account security and public order of the Union or its Member States.** **6. Each policy window committee should include representatives from financial partners (the EIB Group and other implementing partners) to provide financial expertise and recommendations on the most appropriate instruments to be deployed, with the aim of supporting and maximising the implementation and financial capacity of the work programme.** FR (Comments):

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	Étant donné que les comités de programme ne sont pas mentionnés dans le règlement, nous suggérons de reproduire cet article de la proposition Horizon Europe (article 18 du programme spécifique) et de l'adapter aux fenêtres politiques. Il est essentiel que les États membres discutent et adoptent des programmes de travail dans le cadre des configurations les plus appropriées, en particulier par le biais de sous-groupes ou de configurations dédiés à la recherche collaborative. PL (Drafting suggestions): „7.**When adopting the work programmes referred to in paragraphs 3 to 6, the Commission shall ensure the effective participation of the Member States in the decision-making process. The Commission shall conduct prior consultations with the Member States and take due account of their positions so as to guarantee that the Fund's actions reflect the diverse needs and potential of the Union's national economies".** **"8.The ECF shall maintain sufficient flexibility to support projects and work programmes based on smart specialisations relevant to all countries and regions. Specific mechanisms, including thematic reserves, simplified procedures, application support, and widening measures, shall be established to enable participation of entities from less developed countries and regions"** PL (Comments): Many key issues to be addressed by the European Commission within the programmes should be discussed with the participation of Member States. Ensuring greater influence of Member States in the decision-making process is essential both for transparency and to guarantee that the Fund's activities reflect the diverse needs and potential of individual national economies. Therefore, it is important to maintain adequate flexibility in the ECF to enable the implementation of projects and work programmes based on smart specialisations, relevant to all countries and regions, with particular emphasis on capacity building in sectors with high, long-term growth potential, making full use of local resources and absorptive capacities.

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	Similar to the Horizon Europe programme, the ECF should also incorporate a "widening" approach among its objectives and mechanisms, allowing entities from low-performing countries to participate in projects and develop their potential. In this context, consideration should be given to introducing corrective mechanisms or thematic reserves aimed at less developed countries, procedural simplifications, application support, and monitoring of territorial and sectoral balance in the Fund's implementation. For Poland, it is crucial to ensure that Member States have the possibility to supervise work programmes through an appropriate procedure, enabling them to effectively monitor and influence their content, rather than merely serving in an advisory capacity.

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Article 16 **Single Market value chains builder**	CZ (Comments): *CZ strongly believes that significant changes to this chapter are much needed.* · *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.* · *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.* PT (Comments): In line with previous comments, PT would like to see this article a bit more densified. Which conditions will be considered in the decision of including these calls in the work programmes? Will these result from suggestions by the Strategic Stakeholders Board? What role is foreseen for Committees in this process? Will these calls create a CSA? RO (Comments): Art 16-20 - In the context of current geopolitical and economic disruptions, it is necessary to reduce the vulnerability of strategic sectors affected by external dependencies by providing additional support for production capacities and guaranteeing access to secure and sustainable supply chains for the EU's green and digital future, particularly for regions directly impacted or at high risk due

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	to their proximity to conflict areas, so that the EU can maintain its industrial autonomy and long-term competitive advantage. Romania supports dedicated calls within the work programmes aimed at strengthening and expanding value chains, ensuring geographical balance and the diffusion of excellence across all EU Member States, thereby contributing to the long-term consolidation of European value chains. SE (Comments): SE is generally sceptical 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
	FR (Comments): Les autorités françaises remercieraient la Commission de préciser le champs compris comme « value chains building » qui pourraient bénéficier d'appels à projets spécifiques. 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 .
1. In order to foster resilient Union value chains, the work programmes may include dedicated value-chains scale up calls which shall support both project preparation and crowding in of additional public and private capital to	AT (Drafting suggestions):

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integrate suppliers, manufacturers, and innovators from different Member States and diversify sources of supply.	In order to foster resilient Union value chains, the work programmes may include dedicated value-chains scale up calls which shall support both project preparation and crowding in of additional, **especially** ~~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. 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? 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 which shall support both project preparation and crowding in of additional public and private capital to integrate suppliers, manufacturers, and innovators from different Member States and diversify sources of supply **without disturbing competition in the single market**.**These calls shall be limited to cases with a clear market failure**. DE (Comments): We are still very sceptical towards the funding approach behind this Article. Where is the term "value chain builder" defined legally? Who should be supported for which projects and when? The funding purpose and award criteria must be regulated in sufficient detail in the Regulation

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	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 price differences between different suppliers or regions of suppliers do not constitute a market failure on their own. ES (Drafting suggestions): 1. In order to foster resilient Union value chains, the work programmes may include dedicated value-chains scale up calls which shall support both project preparation and crowding in of additional public and private capital to integrate suppliers, manufacturers, and innovators from different Member States and diversify sources of supply. **Each work programme shall specify the operational criteria and governance arrangements for the Industrial Policy Tools, prioritising projects that reinforce European manufacturing capacity, technological scale-up and resilience of strategic value chains.** ES (Comments): It adds clarity and focus to the Industrial Policy Tools section by steering the instruments towards concrete industrial and manufacturing projects. This approach also strengthens consistency with Spain's positions set out in Articles 3, 7 and 9a. FI (Drafting suggestions): In order to foster resilient Union value chains, the work programmes may include dedicated value-chains scale up calls which shall support both project preparation and crowding in of additional public and private capital to integrate suppliers, manufacturers, and innovators from different Member States and diversify sources of supply. **The Single Market value chains builder may not lead to distortions on the Single Market.** FR

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	(Drafting suggestions): In order to foster resilient Union value chains, the work programmes may include dedicated value-chains scale up calls which shall support both project preparation and crowding in of additional public and private capital to integrate suppliers, manufacturers, and innovators from different Member States and diversify sources of supply. **Dedicated measures may therefore be envisaged to support the modernisation of stakeholders capabilities so as to strengthen their capacity to participate in Union value chains.** FR (Comments): Dans le cas où cette initiative inclut du mixage, comment la gouvernance de l'instrument InvestEU sera-t-elle mobilisée ? HU (Drafting suggestions): 1. In order to foster resilient Union value chains, the work programmes may include dedicated value-chains scale up calls which shall support both project preparation and crowding in of additional public and private capital to integrate suppliers, manufacturers, and innovators from different Member States and diversify sources of supply, **with a particular emphasis on SMEs.** HU (Comments): We propose to include the importance of supporting and strengthening European SMEs in order for them to become key suppliers (and move up the value chain ladder), ensuring an increase in the share of local content, and broadening the involvement of SMEs in such activities. Furthermore, geographical balance must be ensured also in this context.

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	IE (Drafting suggestions): In order to foster resilient Union value chains, the work programmes may include dedicated value-chains scale up calls which shall support both project preparation and crowding in of additional public and private capital to integrate suppliers, manufacturers, and innovators from different Member States and diversify sources of supply. **The Single Market value chains builder may not lead to distortions of the Single Market** **These calls may include, where appropriate, Support for strategic clean technologies identified under Chapter IV and associated value chains** IE (Comments): IE wishes to add text to highlight need to avoid distortions of the Single Market. IE: While Chapter IV will be a more appropriate place to suggest amendments on specific Clean Transition and Industrial Decarbonisation technologies, IE recommends a certain specificity even at this point in the text, to underline the importance of certain technologies. This suggested addition ensures alignment with existing EU policy frameworks – including the *Wind Power Package*, *Industrial Accelerator Act*, and *Clean Industrial Deal* – to avoid fragmentation and reinforce coherence across EU strategic industrial instruments. NL (Drafting suggestions): In order to foster resilient Union value chains, the work programmes may include dedicated value-chains scale up calls which shall support both project preparation and crowding in of additional public and private capital to

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	integrate suppliers, manufacturers, and innovators from different Member States and diversify sources of supply. **The Single Market value chains builder may not lead to distortions on the Single Market.** PT (Comments): This article deserves further explanation/clarification. What is the meaning of "value chain builders"? Who will be supported? and which projects? Are these calls mentioned here different from the remaining calls in each window? What will be the role of MS? SE (Drafting suggestions): In order to foster resilient Union value chains, the work programmes may include dedicated value-chains scale up calls which shall support both project preparation and crowding in of additional public and private capital to integrate suppliers, manufacturers, and innovators from different Member States and diversify sources of supply **while not distorting the single market and safeguarding openness through rules-based trade**. SE (Comments): SE considers it important not to promote domestic production when open trade is more efficient.
	SI (Drafting suggestions):

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

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Article 17 **EU Tech frontrunners**	FI (Comments): FI This is a very important instrument and as a prerequisite it needs to be implemented with open calls and through transparent and excellence-driven award criteria (see above in the comments). This instrument would continue the legacy of Horizon Europe second pillar higher TRL and industry-driven projects including the once in PPPs or JUs, being at the same time more bottom-up, openly designed, smaller, more agile and extending towards commercialisation through crowding in private capital. This instrument also needs to be implemented seamlessly with Horizon Europe as the instrument operates at the interface and the project could include also research and innovation activities. Unlike Single Market value chains builder we see this as including also RDI activities and thus manifeting the seamless investment journey from HE to ECF and private funding. There is thus a need to substantiate this instrument further. Clarity needed on this article on: •What type of entities qualify as "EU Tech Frontrunners"? Does this term apply only to companies/industry-driven consortia only, or what role is foreseen for RTOs as tech providers? •An indication of potential funding mechanisms and amounts should be given to encourage participation. •Identify and support EU Tech Frontrunners along with their suppliers to invest in new innovative solutions. FR (Comments): Quelle articulation entre **EU Tech Frontrunners** et les programmes européens déjà consacrés à l'innovation comme l'EIC ? **Quels sont les co-financements associés à cette initiative ? Quel est le régime d'aide d'Etat applicable ?**

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	HU (Comments): The concept of EU Tech frontrunners must be clarified. It must be detailed what we mean by it, and more precise criteria might be lay down. Furthermore, geographical balance must be ensured also in this context. IE (Comments): Given this proposal is targeting high TRLs, this article needs to address market failures. PT (Comments): PT supports the adoption of two-stage formats that are able to reduce application costs and efforts and are, for this reason, more SME-friendly. Nonetheless, this article requires further clarification regarding its implementation just as article 16. Which conditions will be considered in the decision of including these calls in the work programmes? Will these result from suggestions by the Strategic Stakeholders Board? What role is foreseen for Committees in this process? What level of articulation is envisaged with FP10, and EIC, more specifically? Who are the target stakeholders for these actions supporting EU Tech Runners? What measures are foreseen to ensure a balanced geographical coverage? What dedicated measures are foreseen to support SME's participation? Are these calls mentioned here different from the remaining calls in each window? What is the role of MS? How they will be consulted?

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1. The work programmes may include dedicated two-stage bottom-up award procedures to identify and support EU Tech frontrunners through industry-driven consortia leveraging on their role as innovation and export drivers to strengthen their global competitive position along with their European SME suppliers through investments in new solutions and identification of relevant partners. Project preparation as well as crowding in of additional public and private capital may be supported.	AT (Drafting suggestions): 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, **especially** ~~public and~~ private **capital, as well as crowding in public funding in a proportionate manner** may be supported. DE (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 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. **Projects supported under this Article should entail high-risk or an outstanding innovation potential.** DE (Comments): We need further guardrails for these projects. FI (Drafting suggestions):

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	The work programmes may include dedicated two-stage bottom-up award procedures **through open, competitive and transparent calls** 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. FR (Comments): La délégation pourra soutenir une inscription dans le règlement des critères d'attribution décrits dans la fiche technique IE (Drafting suggestions): The work programmes may include dedicated two-stage bottom-up award procedures **through open, competitive and transparent calls** 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. IE (Comments): IE – calls should be open and transparent to secure trust and buy in. LV (Drafting suggestions): The work programmes may include dedicated two-stage bottom-up award procedures to identify and support EU Tech frontrunners through industry-

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	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 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. LV (Comments): 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. NL (Drafting suggestions): The work programmes may include dedicated two-stage bottom-up award procedures **through open, competitive and transparent calls** 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. NL (Comments):

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	Support this tool and are positive towards the concept and idea behind it, but like to emphasize open, competitive and transparent calls are key for successful implementation of this tool. RO (Drafting suggestions): The work programmes may include dedicated two-stage bottom-up award procedures to identify and support EU Tech frontrunners through industry-driven consortia leveraging on their role as innovation and export drivers to strengthen their global competitive position along with their European SME suppliers through investments in new solutions and identification of relevant partners. **SMEs with potential, including those from less developed regions or Member States, should be actively promoted into partnerships to ensure internal cohesion and enhance Europe's competitive added value.** Project preparation as well as crowding in of additional public and private capital may be supported. RO (Comments): The partnership with entities with innovation and technology transfer potential (SME network, academic centres and innovation ecosystems) should be integrated, only in this way can the technological and competitive strengthening of the EU be guaranteed. At the same time, it is essential to ensure the access and integration of local SMEs with potential, including those from less developed regions or Member States, in order to promote internal cohesion and European added value. SI (Drafting suggestions): 1. The work programmes may include dedicated two-stage bottom-up award procedures to identify and support EU Tech frontrunners through

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	industry-driven consortia leveraging on their role as innovation and export drivers to strengthen their global competitive position along with their European SME suppliers **and academic R&I partners** through investments in new solutions and identification of relevant partners. Project preparation as well as crowding in of additional public and private capital may be supported.
	IT (Drafting suggestions): **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.**
2. At the first stage, an open call for expression of interest for goods, works or services that might contribute to Union competitiveness in general, or in a specified sector, may be published without specification of the kind of activities or the instrument of budget implementation to be used.	FR (Comments): Comment ce nouveau mécanisme serait-il structuré ? IE (Drafting suggestions): .2. At the first stage, an open call for expression of interest for goods, works or services that might contribute to Union competitiveness in general, **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 IE (Comments): IE suggested text amendment to focus on addressing market failures.

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3. At the second stage, analysis and crowding in of additional public and private capital shall be supported.	
4. Proposals and offers shall be evaluated and ranked based on common award criteria such as their comparative contribution to Union competitiveness.	FI (Drafting suggestions): Proposals and offers shall be evaluated and ranked based on common award criteria **set out in Article 9a**~~, such as their comparative contribution to Union competitiveness~~. FI (Comments): This needs further specification. Therefore, suggestion to link it to the new Article 9a. IE (Drafting suggestions): Proposals and offers shall be evaluated and ranked based on common award criteria **set out in Article 9a**, ~~such as their comparative contribution to Union competitiveness.~~ IE (Comments): **IE** – On article 17(4), query how this links with new Para 9a on award criteria. Welcome clarity on the evaluation process especially in terms of transparency and accountability. None of these tools should distort the single market so support inclusion of a reference to addressing market failures. IT

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	(Comments): Criteria should explicitly include SMEs participation. NL (Drafting suggestions): Proposals and offers shall be evaluated and ranked based on common award criteria **set out in Article 9a**~~, such as their comparative contribution to Union competitiveness~~. NL (Comments): This needs further specification. Therefore, suggestion to link it to the new Article 9a. PL (Drafting suggestions): „Proposals and offers shall be evaluated and ranked based on common award criteria, including their comparative contribution to Union competitiveness. **The evaluation process shall explicitly include a criterion to identify and reward technological frontrunners from across the entire Union, ensuring a balanced geographical participation and distribution. To this end, additional points shall be awarded to projects that are led by or include key partners from Member States or regions with lower innovation, investemnt and absorptive potential."** PL (Comments): Poland's proposal establishes clear, strategic criteria aligned with the EU's competitiveness objectives; it encourages consortia to deliver scalable, high-impact projects and to build strong partnership structures PT (Comments):

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	Is the evaluation of the proposals expected to follow the general award criteria proposed under 9a? SE (Drafting suggestions): Proposals and offers shall be evaluated and ranked based on common award criteria **in article 9a** such as their comparative contribution to Union competitiveness. SI (Drafting suggestions): Proposals and offers shall be evaluated and ranked based on common award criteria such as their comparative contribution to Union competitiveness **and pan-European coverage**. EL (Drafting suggestions): Proposals and offers shall be evaluated and ranked based on common award criteria such as their comparative contribution to Union competitiveness **and pan-European coverage.** EL (Comments): Encourages broader participation across Member States and promotes geographically diversified consortia, contributing to a more inclusive and resilient European competitiveness landscape.
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.	FR (Comments): Quelle est la relation du comité d'évaluation mentionné avec les programmes de travail ?

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	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. PL (Drafting suggestions): „The evaluation committee shall recommend the most appropriate financing instrument under Regulation (EU, Euratom) 2024/2509 and propose the maximum Union contribution **and its form—such as grants, equity-like instruments or budgetary guarantees—tailored to each project's risk profile and scale-up needs.** PL (Comments): The proposed clarification ensures that each flagship project receives a financing structure individually tailored to its development stage and risk level, optimizes the use of the EU budget, and complies with the legal framework governing financial instruments. PT (Comments): Who will form this evaluation committee? External experts? SI (Drafting suggestions): 5. The evaluation committee**, composed partially or fully of independent external experts with in-depth knowledge of EU technology landscape** shall determine the most appropriate instrument of budget implementation, as well as propose the maximum amount and form of the Union contribution. EL (Comments): We believe that we **should clarify the authority, the competence of the evaluation committee and procedures to be applied.**

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	DE (Drafting suggestions): 6. **The work programmes shall also include the possibility for the support of tech frontrunners to run tech challenges on specific questions** DE (Comments): We would propose to foresee also a possibility to deviate from the two stage procedure and include so-called tech challenges. In Germany, the SPRIND has gained very good experience with those kind of challenges.

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Article 18 **Production Ramp up actions**	DE (Comments): We wonder how additionality of funding can be guaranteed in projects under this article. In any case, the justification of the deviation from the Budget Regulation in case of urgency should be legally certain, unambiguous and appropriate. The reference to general resilience objectives is not sufficient FR (Comments): 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 apparaitre dans le règlement. **Quels sont les co-financements associés à cette initiative ? Quel est le régime d'aide d'Etat applicable ?** IE (Comments): IE – for Article 18.1 we are very cautious about the retroactive nature of the proposal and its potential for deadweight. At very least we would like to see evidence of market failures to be a criterion for support. IE also 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. IE therefore suggest this article be deleted in its entirety RO (Comments):

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	RO supports the direct granting of the Competitiveness Seal and the prioritization of such projects for funding under the ECF. For these actions, derogations from the principle of non-retroactivity (Art. 196(2) of the Financial Regulation) may be applied, allowing exceptional support for projects started before the submission of the proposal. However, there is need for additional safeguards — ensuring the necessity, proportionality, and temporary nature of such support — so as not to reduce the allocations available for other eligible projects within the context of the new MFF 2028–2034.
1. By way of derogation from Article 196(2) of the Financial Regulation, financial contributions may, where necessary for the implementation of manufacturing projects essential to support the ~~general~~**Union's** resilience ~~objective as indicated on~~**as referred to in** Article ~~3(1)~~**3(1)(b)**, or activities required to ensure the security, resilience or service continuity to support the ~~objective~~**objectives** referred to in Article 3(2), point (d), cover actions that started prior to the date of the submission of the proposal for those actions .	AT (Drafting suggestions): 1. By way of derogation from Article 196(2) of the Financial Regulation, financial contributions may, where necessary for the implementation of manufacturing projects essential to support the Union's resilience as referred to in Article 3(1)(b), or activities required to ensure the security, resilience or service continuity to support the objectives referred to in Article 3(2), point (d), cover actions that started **up to [X] months** prior to the date of the submission of the proposal for those actions AT (Comments): For the production ramp-up actions, we are hesitant to allow for an open-ended grandfathering of projects that have started prior to the submission of a proposal. We could, however, support a maximum allowed timespan, e.g. 3 months. DE (Drafting suggestions):

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	1. By way of derogation from Article 196(2) of the Financial Regulation, financial contributions may, where necessary for the implementation of manufacturing projects essential to support the Union's resilience objective as indicated 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 prior to the date of the submission of the proposal for those actions DE (Comments): From a space point of view, the second part of Art. 18(1) (referencing service continuity and specifically relating to space (Art (3(2)(d)) MUST be deleted. Alternatively, it must be excluded that responsibilities for production ramp-up that already exist at the European Space Agency (ESA) are shifted to the EU FI (Drafting suggestions): By way of derogation from Article 196(2) of the Financial Regulation, financial contributions may, **in exceptional and duly justified cases addressing market failures**, where necessary for the implementation of manufacturing projects essential to support the general resilience objective as indicated on Article 3(1), or activities required to ensure the security, resilience or service continuity to support the objective referred to in Article 3(2), point (d), cover actions that started prior to the date of the submission of the proposal for those actions, **when there is duly justified value-added to do that**. FI (Comments):

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	we should at least introduce a maximum number of months that the action can have started prior to the date of submission of the proposal. The exceptional nature of retroactive support is insufficiently anchored. 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 objective**s** 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. FR (Comments): La délégation pourra soutenir une inscription dans le règlement des critères d'attribution décrits dans la fiche technique. La résilience étant aussi un élément important des articles 3(1) et 3(2), nous proposons de supprimer les références restrictives aux sous-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. **Quels sont les critères concrets permettant de définir un projet « essentiel à la résilience ou à la sécurité économique » ?**

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	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? HU (Drafting suggestions): 1. By way of derogation from Article 196(2) of the Financial Regulation, financial contributions may, where necessary for the implementation of manufacturing projects essential to support the ~~general~~**Union's** resilience ~~objective as indicated on~~**as referred to in** Article ~~3(1)~~**3(1)(b)**, or activities required to ensure the security, resilience or service continuity to support the ~~objective~~**objectives** referred to in Article 3(2), point (d), **or the deployment of digital technologies, such as artificial intelligence and robotics as referred to in Article 3(2)(c),** cover actions that started prior to the date of the submission of the proposal for those actions HU (Comments): We recommend extending the scope of the article to other industries, linking the ramp-up of production to industrial robotization, artificial intelligence, and/or digitalization. NL (Drafting suggestions): ~~By way of derogation from Article 196(2) of the Financial Regulation, financial contributions may, where necessary for the implementation of manufacturing projects essential to support the general~~**Union's** ~~resilience objective as indicated on~~**as referred to in** ~~Article 3(1)~~**3(1)(b)**~~, or activities~~

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	~~required to ensure the security, resilience or service continuity to support the objective~~**objectives** ~~referred to in Article 3(2), point (d), cover actions that started prior to the date of the submission of the proposal for those actions~~ NL (Comments): NL not convinced of the need for this possibility. If not deleted, If not, we should at least introduce a maximum number of months that the action can have started prior to the date of submission of the proposal. Furthermore, additionality of EU support needs to be a prerequisite for applying this Article. The exceptional nature of retroactive support is insufficiently anchored. PT (Comments): How to avoid overlap with other existing instruments that also foresee production ramp up actions? SE (Drafting suggestions): By way of derogation from Article 196(2) of the Financial Regulation, financial contributions may, **in exceptional cases** where necessary for the implementation of manufacturing projects essential to support the ~~general~~**Union'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 ~~objective~~**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. SE (Comments):

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	SE is sceptical of retroactive funding and stresses the importance of clear delimitations, such as this instrument only being used only in exceptional cases. Welcome the narrowing of the scope of the article.
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.	FI (Drafting suggestions): ~~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.~~ FR (Comments): La Commission peut-elle préciser quelles sont les “conditions supplémentaires” mentionnées ? NL (Drafting suggestions): ~~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.~~ NL (Comments): NL not convinced of the need for this possibility. SI (Drafting suggestions):

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	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. EL (Drafting suggestions): 2. The work programme or the documents related to the award procedure shall set out additional conditions to ensure that the support is necessary and proportionate, **of pan-European relevance,** excluding overcompensation and double funding, is temporary and decreases over time. EL (Comments): Encourages broader participation across Member States and promotes geographically diversified consortia, contributing to a more inclusive and resilient European competitiveness landscape.

Article 20 **Accelerated and Targeted Actions for Competitiveness**	AT (Comments): We wish to highlight that projects and other actions concerning health priorities need to be eligible for the exceptions and derogations outlined in Art 20. While the article references the eligibility of actions and projects that fulfil the general and specific objectives set out in Art 3, we see the need to explicitly mention projects and actions on health since these projects might not yield results that can be easily measured as contributing to the Union's competitiveness. Thank you for providing the technical note on industrial policy tools. 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. BE (Comments): We appreciate the Commission's efforts to address two main challenges: namely administrative simplification and to be able to respond more effectively to crises and urgent situations. We recognize these urgent challenges and are committed to reflecting on them together. However, we remain concerned about potential risks of arbitrariness with the introduction of this article. Given that we consider these challenges a priority and are expected to find an appropriate solution, we would like to make a study reservation and to come back with written amendments later. DE (Comments):

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	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. FI (Comments): This article does not specify clear criteria for activating these shortened procedures. FR (Comments): La France soutient une inscription dans le règlement des critères d'attribution décrits dans la fiche technique. **Quels sont les co-financements associés à cette initiative ? Quel est le régime d'aide d'Etat applicable ?** 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. RO (Comments): It is important to clarify the use of derogations and more active involvement of Member States in decisions on the identification of actions and

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	beneficiaries, to ensure transparency, control and alignment with national priorities. SE (Comments): SE is very hesitant to the need of this instrument in the ECF (and Horizon Europe). Difficult to have meaningful comments on para 2 before we have the outcome of the discussion in the MFF-track on para 1. SI (Comments): Scrutiny reservation on entire article.
2. In accordance with paragraph 1, one or more of the following measures may be applied to an award procedure:	IT (Comments): 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. PT (Comments): PT maintains its reservations in what concerns the application of art 20 to FP10, at least when it comes to bottom-up initiatives. How are MS consulted on the implementation of this article? Clarification is welcome.

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(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:	DE (Comments): Q at PCY/COM: why is this limited to grants only? FI (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 cases** specify that an award procedure takes the form of a targeted intervention to: FI (Comments): this procedure should be used with great caution. 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 cases** specify that an award procedure takes the form of a targeted intervention to IE (Comments): IE seeks a text addition to limit the use of this measure NL (Drafting suggestions):

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	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 cases** specify that an award procedure takes the form of a targeted intervention to: NL (Comments): In order to clarify that this procedure should be used with great caution.
(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,	FR (Comments): La Commission peut-elle préciser ce qu'il faut entendre par "intérêts publics impératifs de l'Union" ? PT (Comments): Which criteria will be considered in the definition of imperative public interests? What role is foreseen for Committees, and the Strategic Stakeholders Board is this process? The definition of this criteria is crucial to uphold the competitiveness principle and avoid market distortions.
(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	PL (Drafting suggestions): (2) set out an amount up to which proposals may be identified and invited that have been awarded a seal referred to in Article 8 of this Regulation but have not received Union funding due to lack of budget. **Prior to the award process, the eligibility and selection criteria shall be made public.** The applicants may be invited to resubmit their proposal without a call; where the proposal is resubmitted without substantial change, the granting

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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,	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 **a comprehensive** list of awarded actions shall be published in the Annual Activity Report referred to in Article 74(9) of Regulation (EU, Euratom) 2024/2509; or, PL (Comments): PL believes all award criteria should be published before the selection process begins for the transparency of the process.
(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.	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. **Where projects funded under predecessor 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**. CZ (Comments):

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	Purpose: To ensure transitional support or bridge funding for existing high-value projects financed under previous programmes. 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 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 agreed by the Programme Committee and** 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**, while ensuring that no double funding occurs**. FR (Comments): La Commission pourrait-elle préciser — y compris en donnant un exemple — ce que l'on entend par "catégories de bénéficiaires" ? Pourrait-elle confirmer que ce paragraphe renvoie au secteur de l'ensemble et de la formation professionnels et de l'enseignement supérieur du programme Erasmus+ ? 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

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	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.
(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:	FI (Drafting suggestions): By way of derogation from Articles 199, 201, 203 regarding grants or from Article 170(1), points (b) and (c), and (2) regarding procurement, of Regulation (EU, Euratom) 2024/2509, the work programme may **in exceptional cases** specify that an award procedure takes the form of an accelerated intervention to: FI (Comments): this procedure should be used with great caution. 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 exceptional cases** specify that an award procedure takes the form of an accelerated intervention to:

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	IE (Comments): IE seeks an amendment to the text to limit the use of this measure 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 cases** specify that an award procedure takes the form of an accelerated intervention to: NL (Comments): In order to clarify that this procedure should be used with great caution.
(1) limit the requirements for the award decision and signature of legal commitments to a preliminary evaluation of award and exclusion criteria; the award decision shall be taken based solely on a self-declaration of applicants and tenderers on selection and eligibility criteria without request for corresponding supporting documents during pre-evaluation; the final evaluation, including for selection and eligibility criteria, and the requests for any relevant supporting documents shall be conducted within three months of the signature of the legal commitment; and,	
(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	FR (Comments): Que signifie l'expression "dons non financiers" ? Des contributions en nature ? Ce n'est pas la formulation convenue dans les règlements précédents.

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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.	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.
(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.	
(d) The work programme may set up special two-stage bottom-up award procedures in accordance with the following rules:.	
(1) during the first stage, a call for expression of interest may be launched without specification of the kind of activities or the instrument of budget implementation to be used, to enable applicants, tenderers and pillar-assessed entities to submit project proposals or offers for goods, works or services that might contribute to Union competitiveness in general or in a specified sector.	

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(2) proposals and offers shall be evaluated and ranked based on common award criteria such as their comparative contribution to Union competitiveness. The evaluation committee shall determine the most appropriate instrument of budget implementation under direct or indirect management, in particular grant, procurement, non-financial donations, contribution agreements or other support, as well as propose the maximum amount and form of the Union contribution.	FI (Drafting suggestions): proposals and offers shall be evaluated and ranked based on common award criteria ~~such as their comparative contribution to Union competitiveness~~ **set out in 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. IE (Drafting suggestions): proposals and offers shall be evaluated and ranked based on common award criteria ~~**such as their comparative contribution to Union competitiveness**~~ **set out in 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. IE (Comments): IE suggests replacing text with link to Article 9a, to ensure clarity NL (Drafting suggestions): proposals and offers shall be evaluated and ranked based on common award criteria ~~such as their comparative contribution to Union competitiveness~~ **set out in 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,

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	contribution agreements or other support, as well as propose the maximum amount and form of the Union contribution. NL (Comments): Current text is too ambiguous. SI (Drafting suggestions): (2) proposals and offers shall be evaluated and ranked based on common award criteria such as their comparative contribution to Union competitiveness **and pan-European 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.
(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.	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-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.
	SI (Drafting suggestions):

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

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Presidency text (doc.14282/25)	Drafting suggestions and Comments
SECTION 2 **ECF INVESTEU INSTRUMENT**	IT (Comments): In general, the common objective of support provided through financial instruments is to mitigate the consequences of market failures, which typically take the form of credit rationing, by facilitating access to credit for deserving enterprises that private financiers would not otherwise be willing to support. In order to ensure the effectiveness of financial instruments, however, it is essential to adopt appropriate criteria for designing and implementing measures that are consistent with the characteristics of the entrepreneurial system concerned. It is necessary to avoid an exclusive or excessive centralisation at EU level in the management of financial instruments for SMEs, so as to allow, at national level, the definition of instruments with the required flexibility to take into account the entrepreneurial fabric of the relevant territories/regions. More specifically, with regard to access to credit, it should be noted that the use of European instruments and platforms, while offering limited advantages in terms of leverage effect and ability to address the actual financial needs of enterprises, involves the adoption of "rigid" intervention models, which are administratively burdensome and, unless laboriously adjusted through corrective measures, cannot be operationally implemented in a flexible manner that meets the consolidation and/or development needs of territorially rooted enterprises. This is particularly relevant, in the case of Italy, for enterprises located in less developed areas, or characterised by sectoral or dimensional diversity.

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Article 21 **General Framework**	AT (Comments): We wish to highlight that projects and other actions concerning health priorities need to be eligible for support under the ECF InvestEU Instrument. While the article references the eligibility of actions and projects that fulfil the general and specific objectives set out in Art 3, we see the need to explicitly mention projects and actions on health since these projects might not yield results that can be easily measured as contributing to the Union's competitiveness. FR (Comments): **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.** 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. **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.** La délégation pourra demander davantage de précision sur l'évaluation du taux de provisionnement IE

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	(Comments): RO (Comments): Is the possibility to combine resources under ECF InvestEU with resources to become available and capacity under legacy instruments envisaged, such as it is foreseen in Omnibus II for InvestEU?
1. As a horizontal delivery tool for Union internal policies, the ECF InvestEU Instrument shall contain the budgetary guarantee and financial instruments, including when combined with non-repayable support in a blending operation, for the purpose of contributing to the general and specific objectives set out in Article 3, and may be implemented in synergy with other Union or national activities, including through compartments for Member States.	DE (Drafting suggestions): 1. As a horizontal delivery tool for Union internal policies, the ECF InvestEU Instrument shall contain the budgetary guarantee and **other** financial instruments, including when combined with non-repayable support in a blending operation, for the purpose of contributing to the general and specific objectives set out in Article 3, and may be implemented in synergy with other Union or national activities, including through compartments for Member States. DE (Comments): The term "financial instrument" is unclear and circular. Financial instruments within the meaning of Art. 2 (30) of the Financial Regulation are "equity or equity based instruments, loans or guarantees, or other risk-sharing arrangments […]" . This should be clearified. Otherwise a specific definition of "financial instrument" should be added to the ECF Regulation. FR (Comments):

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	L'instrument InvestEU ne devrait pas être implémenté par des programmes de travail. La délégation soutiendra 4 configurations du comité d'investissement InvestEU, répliquant les fenêtres thématiques. La France salue l'ambition du Fonds européen pour la compétitivité (FEC) de mobiliser les investissements privés par le biais de l'instrument InvestEU du FEC. Le financement devrait être conditionné à des critères de préférence européenne et reposer exclusivement sur les ressources existantes de l'Union, sans charge supplémentaire pour les budgets nationaux. 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. IT (Comments): The Commission should clarify whether and how continuity is ensured with regard to the possibilities, currently provided for in the InvestEU Regulation (Articles 9(2) and 10(3) of Regulation (EU) 2021/523), to combine the two compartments in a single operation with selective risk allocation between different levels (tranches PL (Comments): We would like the European Commission to provide more details on these possibilities and clarify how such actions will stimulate equal participation of Member States in calls. In our view, combined with another provision regarding the need to ensure additional funding for project implementation, this could only increase the inequality of Member States' participation in the programme, where award beneficiaries would be those entities and countries able to secure the missing financing.

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	The European Investment Bank Group (EIBG) is currently treated as one of several implementing partners under the InvestEU guarantee instrument (ECF). This status does not reflect the key role and substantial experience of the EIBG. To date, the EIB's partnership with the European Commission under InvestEU has been strategic and collaborative, particularly in risk assessment and the design of financial instruments. Limiting this role could weaken implementation effectiveness and hinder the rapid market deployment of the instrument. The Commission's rationale for this approach is unclear, especially since the implementation of InvestEU by the EIB/EIF—and previously EFSI—was positively evaluated. Regarding specific questions: • Dedicated allocation for EIBG: Why has no dedicated pool been foreseen for the EIBG? This could pose a serious issue for the bank's participation in the instrument, particularly regarding portfolio building, which requires long-term capital planning and maintaining relationships with financial institutions and clients. What would be the role of other EU national promotional banks? • Risk assessment: Under InvestEU, the EIB played a key role in risk assessment and co-designing instruments with the Commission, leveraging its long-standing experience and capacity to manage investment project risks. It is unclear who will be responsible for risk assessment in the new system and on what basis, particularly given the planned "open architecture" and the resulting increase in implementing partners. In light of the above, the issue of EIB's management role in running the instrument is also crucial. While the document generally refers to the roles of various partners, it does not clearly define the EIB's role in fund management, including participation in investment committees, consultations on investment guidelines, and monitoring activities. SI (Drafting suggestions): 1. As a horizontal delivery tool for Union internal policies, the ECF InvestEU Instrument shall contain the budgetary guarantee and financial instruments, **as stated in point 2 of this article** 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. SI

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	(Comments): We believe that it should be added which are financial instruments under this Regulation: loans, guarantees, counter-guarantees, capital market instruments, any other form of funding or credit enhancement, including subordinated debt, or equity or quasi-equity investments. Blending instruments are already stated in the following text.
2. The ECF InvestEU Instrument shall address market failures or suboptimal investment situations. The ECF InvestEU Instrument may in particular provide loans, guarantees, counter-guarantees, capital market instruments, any other form of funding or credit enhancement, including subordinated debt, or equity or quasi-equity investments, provided directly or indirectly through financial intermediaries, funds, investment platforms or other vehicles to be channelled to final recipients.	AT (Drafting suggestions): 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. 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. IT (Comments): Not clear what kind of instrument the ECF InvestEU Instrument may provide: if all those listed "loans, guarantees, counter-guarantees, capital market instruments, any other form of funding or credit enhancement,

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	including subordinated debt, or equity or quasi-equity investments, funds, investment platforms or other vehicles to be channelled to final recipients", is there a share for each instrument OR How will the (3). Budgetary guarantee of EUR 70b be used toward such instrument? A guarantee to finance a loan? It appears that a pillar-assessed private bank could also act as a direct implementing partner. If large European banks act as implementing partners, they may end up managing significant portfolios. Has the Commission considered any measures to mitigate such risks? How could it ensure that the investment themes are so clearly defined for commercial actors that there is no risk of guaranteeing banks' regular loan portfolios with taxpayers' money? PT (Comments): How will this be divided between the debt and equity windows? We would like to ensure that national promotional/development banks are included in the list of entity types through which those ECF instruments may be channelled.
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 %.	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 %.** ES (Comments):

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	We support the use of the guarantees for higher risk projects, but in the current programme, the provisioning rate is set so it covers the VaR with a 95% confidence interval, and we believe this confidence interval can be reduced (and thus the provisioning rate also be reduced), given the track record with previous programmes. FR (Drafting suggestions): **[**The maximum amount of the budgetary guarantee under the EU Compartment of the ECF InvestEU Instrument shall be EUR 70 000 000 000 in current prices.**]** It shall be provisioned at the rate of **40**~~50~~ %. FR (Comments): En l'abscence de justificatiôn suffisante, la France soutient un taux identique à celui de la progrrammation précedente. IE (Comments): IE propose the addition of a subarticle 3b under Art 21 to set out the role of the EIB; IT (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** %. PT (Comments): What will be the expected leverage effect of this Guarantee?

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	RO (Comments): A prudent and flexible approach to the provisioning rate is supported, in order to protect the budget against unforeseen events and to adjust the coverage level according to the risks and financial capacities of the implementing countries. At the same time, RO reiterates its request for clarification regarding the rationale behind the establishment of the 50% rate.
3a. [X] % of the EU guarantee under the EU compartment shall be granted to the EIB Group.	AT (Drafting suggestions): ~~3a. [X] % of the EU guarantee under the EU compartment shall be granted to the EIB Group.~~ AT (Comments): We are still of the view that we should aim for a pure open architecture approach. Further, given the guarantee range from EUR 17-70bn Euro, an ex-ante allocation of a specified share seems difficult. If we would like to e.g. keep guarantees for the EIB stable (at around EUR 20bn) that would imply a share of around 30% - 120%, depending on the actual guarantee volume. BE (Comments):

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	It is necessary to ensure that this new provision will not prevent NPBs to have access to both guarantees under EIB and to have a direct access to the EU guarantees – whether they are implementing partners or not. DE (Drafting suggestions): 3a. [X] % of the EU guarantee under the EU compartment shall be granted to the EIB Group. **The EIB Group shall provide an aggregate financial contribution amounting to [X].** DE (Comments): We welcome this addition. Furthermore and as is the case today, the EIB (and other Implementing Partners) should have skin in the game. ES (Drafting suggestions): **3a. [X] % of the EU guarantee under the EU compartment shall be granted to the EIB Group. Independently to the size of the EU compartment, the pre-allocation to the EIB Group should at least amount to EUR [X].** ES (Comments): A defined amount gives more predictability to the EIB. FI (Comments): FI welcomes the addition, we need a clear budget division between EIB and other NPBIs and clear agreements about the partnership.

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	FR (Drafting suggestions): **[X] % of the EU guarantee under the EU compartment shall be granted to the EIB Group. The EIB Group shall provide an aggregate financial contribution amounting to [EUR XXX]. That contribution shall be provided in a manner and form that facilitates the implementation of the European Competitivess Fund and the achievement of the objectives set out in Article 3. The remaining [XX]% of the EU guarantee under the EU compartment shall be granted to other implementing partners, which shall also provide a financial contribution to be determined in the guarantee agreements.** IE (Comments): IE welcome this text. It is important that the instrument provide certainty for the EIB and other implementing partners on its role and that it retains a level of flexibility and agility in terms of governance. NL (Comments): Very much welcome the addition, we need a clear budget division between EIB and other NPBIs. This then has to come then with clear agreements about the partnership. We realise not as extensive as described now in chapter 3, since with the ECF structure changes, but we would like to see somethings back. Especially when it comes to the scoreboard and risk methodology (current art 11b of the current INEU regulation) we would ask to add a new 3b; SE (Drafting suggestions):

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	~~**[X] % of the EU guarantee under the EU compartment shall be granted to the EIB Group.**~~ SE (Comments): SE does not see any need for earmarking of the guarantee. SI (Comments): What are the criteria for this decision? EE (Drafting suggestions): Delete this amendment proposal EE (Comments): In order to have competition between the implementing partners (and applicants for implementing partners) and, consequently should enable to achieve higher impact and more cost-efficient implementation
	IE (Drafting suggestions): **3b. 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:** **- the EIB Group shall implement the portion of the EU guarantee specified in Article art 3a;** **- the EIB Group shall support the implementation of the EU compartment of the InvestEU Fund**

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	NL (Drafting suggestions): **3b. 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:** **- the EIB Group shall implement the portion of the EU guarantee specified in Article art 3a;** **- 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]**
4. **[**The minimum amount of the Union support from ECF delivered through ECF InvestEU Instrument shall be EUR 17 000 000 000, to be used in support of the general and specific objectives set out in Article 3.**]** This minimum amount shall be increased by the contributions from the work programmes set out in Article 15. The contributions shall be a favoured means of implementation under the ECF and used for provisioning of the budgetary guarantee or financing of the financial instruments.	DE (Drafting suggestions): 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 additonal amount shall be used in support of the specific objectives set out in Article 3 (2) point (a) to (d), wheras 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).]** **4a.** 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

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	DE (Comments): **We would also like to discuss minimum quotas for this instrument in appropriate policy windows.** Separate para in order to improve clarity. FR (Comments): 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. IT (Drafting suggestions): 4. **[**The minimum amount of the Union support from ECF delivered through ECF InvestEU Instrument shall be EUR 17 000 000 000, 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. IT (Comments): As also provided for in Recital 50 of the Proposal, work programmes in the multi-annual format would provide greater predictability for implementing partners in relation to budgetary guarantees and financial instruments. Accordingly we propose the following drafting:

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	(50) The ECF should be implemented through work programmes as set out in this Regulation. Work programmes could be adopted under an annual or multi-annual format. The latter could in particular be considered for the purposes of Union support provided for budgetary guarantees and financial instruments, with a view to provide predictability to implementing partners**, as is the case of the ECF InvestEU Instrument**. The designated mode of implementation reflects the identified needs for directionality, flexibility, predictability and efficiency, required to meet the objectives of the Regulation. In accordance with Regulation (EU Euratom) 2024/2059, the work programmes and the call documents will set out more technical implementation details for the budget across the set of policies supported by the ECF, including specific eligibility and award criteria depending on the instrument of budget implementation, be it grant, or procurement, and the specific policy objectives pursued. Work programmes are also the appropriate place to allocate budget in accordance with evolving policy priorities, and they should set out contributions, specific conditions and expected results. RO (Comments): It is necessary to be clarified the volume of the InvestEU instrument under the ECF, as the minimum guarantee value appears to be lower than that of the current InvestEU, despite the stronger focus on competitiveness and innovation through increased private sector participation in the future MFF. The gap between the minimum and maximum guarantee values is very wide, and setting this value on an annual basis is shall not be appropriate for the InvestEU ECF mechanism. SE (Drafting suggestions): 4. **Support through the ECF InvestEU Instrument shall be a favoured means of implementation under the ECF. [**The minimum

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	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 four policy windows in Article 4** 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 **shall be made from the budget in Article 4.** SE (Comments): SE thinks this article might benefit from some clarity.
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.	DE (Drafting suggestions): The Commission is empowered to adopt investment guidelines set out by the Commission shall defineas 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 of implementing partners other than the EIB Group, details of the Guarantee Agreements and coverage and terms of the EU Guarantee.** The investment guidelines shall be prepared in close dialogue with the EIB Group and other potential implementing partners DE (Comments): 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:

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	- 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) 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. FR (Drafting suggestions): 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 Member States**, **EIB Group and other** potential implementing partners. **The investment guidelines should be reviewed annually by the Steering Board.** **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).** FR (Comments): Les lignes directrices d'investissement devraient être définies par la Commission, les Etats Membres et les partenaires de mis en œuvre au même moment que les priorités sectorielles du fond et pour l'entièreté de la période de programmation.

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	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. NL (Comments): Support the addition of EIB group PT (Comments): PT considers that it is necessary to clarify the use of delegated acts. EE (Drafting suggestions): The ~~**Commission is empowered to adopt**~~ investment guidelines ~~set out by the Commission shall define~~ **shall be adopted by means of implementing acts based on the examination procedure 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. EE (Comments): Since the investment guidelines are of essential importance for achieving the objectives of the ECF Regulation, it is important that they should (and may) be established by means of implementing acts (not delegated acts, since those may be used for specifying the less essential aspects of the regulation or directive).

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	BE (Drafting suggestions): **<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>** BE (Comments): 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. DE (Drafting suggestions): **<u>5a. In respect of the minimum amount, the Investment Guidelines shall specify the conditions of implementation</u>** DE (Comments): In our understanding, the minimum amount was never meant to be implemented via the work programmes, as the budget and instrument is already dedicated to the ECF InvestEU Instrument. However, there has been no formal explanation on that by COM. Therefore, we need clarity in the sense that it should be outside of the work programmes and add necessary rules for the mimimum amount to the Investment Guidelines, such as eligibility

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6. The following rules shall apply to the provisioning referred to in paragraph 3:	RO (Comments): There is the need to a prudent and flexible approach to the provisioning rate, so as to protect the budget against unforeseen events and to adapt the level of coverage according to the risks and financial capacities of the implementing countries.
(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;	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 **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** SE (Comments): SE welcomes this addition.
(b) for the purpose of support under other Union programmes referred to in Article 23(2) the provisioning shall be made from that other Union programme;	
(c) the provisioning shall be committed until 31 December 2034 and shall take into account the progress in granting the budgetary guarantee under the ECF InvestEU Instrument.	

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(d) in accordance with Article 214(2) of Regulation (EU, Euratom) 2024/2509, the provisioning shall be constituted until 31 December 2037 and shall take into account the progress in the approval and signature of the financing and investment operations.	FR (Comments): La Commission peut-elle justifier la nécessité de fixer ce délai et préciser les critères utilisés pour le déterminer ? Pourquoi cette disposition n'est pas existante dans le règlement actuel ?
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**.	AT (Drafting suggestions): 7. The Commission is empowered to adopt delegated acts in accordance with Article 84 to amend paragraph 3 to adjust the provisioning rate and to adjust the maximum amount of the budgetary guarantee with up to ~~20~~ **15**% of that amount in light of the economic and financial circumstances. AT (Comments): We welcome the qualification for a possible increase of the budgetary guarantee ("in light of the economic and financial circumstances"). At the same time, we would still prefer to stick to a potential change/ increase of 15% only, as is the case under InvestEU. FI (Comments): preconditions for the minimum to be considered NL (Comments): We do not understand why we set preconditions for the maximum , but not for the minimum.

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	RO (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 20% of that amount **in light of cleary justified ~~of the~~ economic and financial circumstances, subject to prior consultation with Member States.** RO (Comments): The possibility granted to the Commission to adjust the provisioning rate and the maximum guarantee amount "in light of economic and financial circumstances" provides flexibility to respond to macroeconomic developments, interest rate levels, inflation, or market risks. However, such adjustments should be approached with caution, be clearly justified, and involve consultation with Member States in order to avoid discretionary decisions and ensure coordinated governance. SE (Comments): SE can support the proposed change. 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~~. SI (Comments): Please specify the economic and financial circumstances.

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	EE (Drafting suggestions): The ~~Commission is empowered to adopt delegated acts in accordance with Article 84 to~~ amend**ments to** 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, shall be adopted by means of implementing acts based on the examination procedure**. EE (Comments): Since the provisioning rate and the maximum amount of the budgetary guarantee are of essential importance for achieving the objectives of the ECF Regulation, it is important that they should (and may) be adjusted by means of implementing acts (not delegated acts, since those may be used for specifying the less essential aspects of the regulation).
	BE (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** **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**

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	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. **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).** BE (Comments): If paragraph 8 is introduced in the compromise, additional drafting including implementation modalities should be introduced in order to fully enable combinations as currently offered under InvestEU and further simplified through the Investment Simplification Omnibus expected to be adopted shortly. Use of reflows as introduced under Omnibus II InvestEU Need to comply with state aid rules. ES (Drafting suggestions): **8. The Commission shall ensure that the ECF InvestEU Instrument contributes directly to the Union's industrial policy objectives, in particular by supporting manufacturing projects, industrial scale-up and strategic value chains, and by reporting annually to the ECF General**

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	Committee on the share of operations with industrial and manufacturing impact. ES (Comments): It ensures an explicit connection between the financial instrument and the industrial objectives of the ECF, strengthening accountability to the Member States and enabling the measurement of the instrument's real industrial impact. FR (Drafting suggestions): **Article 21(a) : Monitoring and reporting** **1. Indicators to report on the progress of the ECF InvestEU instruments and the ECF funds towards the achievement of the general and specific objectives laid down in Article 3 shall be set out in Annex XXX** **2. The Commission shall provide anual financial and operational reporting of the ECF fund and reporting of the financing and investment operations under the ECF investment instrument to the Strategiic steering board including reporting on the relevant indicators related to the policy objectives covered.** **3. Every six months, the Commission shall provide to the Startegic steering board a uptodate reporting on the management and proposed reallocation of all revenues, repayments, released guarantees, recoveries or surplus provisions generated under this Regulation, its predecessors Regulations (EU) 2015/1017 and (EU) 2021/523, as well as those referred to in Annex IV of Regulation (EU) 2021/523.** **Article 21(b) : Evaluation.**

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Presidency text (doc.14282/25)	Drafting suggestions and Comments
	1. Evaluations of the ECF InvestEU instrument shall be carried out so that they feed into the decision-making process in a timely manner. **2. By 30 September 2031, the Commission shall submit to the European Parliament and to the Council an independent interim evaluation report on the ECF program assessing its effectiveness, efficiency, impact, relevance, and results in relation to the general and specific objectives of each policy window as well as its coordination with Horizon Europe.** **3.By 30 September 2031, the Commission shall submit to the European Parliament and to the Council an independent interim evaluation report of the ECF InvestEU instrument, in particular on the use of the EU guarantee, on the fulfilment of the implementing partners' obligations, on the allocation of the EU guarantee, on the implementation MS compartiments as well as the Project advisory activities, and on the** **The evaluation shall in particular demonstrate how the ECF InvestEU instrument has contributed to the reaching of ECF Programme targets as well as EU policy goals, especially with regard to added value and the geographical and sectoral balance of the supported financing and investment operations. The evaluation shall also assess the application of the focus on SMEs, as well as the developement of skills nd the support to scaleups and starups.** FR (Comments): La France souhaite bénéficier d'un reporting dédié pour l'instrument au service du Steering Board. Cet article pourra alternativement être inclus dans le règlement performance. IE

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	(Drafting suggestions): **8. Union support provided through the financial instruments established by past programmes[in any case the current InvestEU Regulation (EU) 2021/523] may be combined in financial products to be implemented by the EIB or the EIF under this Regulation.** IE (Comments): IE suggests the following text aimed at avoiding a cliff edge scenario in the transition from the current InvestEU Regulation. LU (Drafting suggestions): **8. Support from a budgetary guarantee or a financial instrument under this Regulation and Union support provided through financial instruments or budgetary guarantees established by programmes in other programming periods may be combined to support financial products or portfolios implemented or to be implemented under this Regulation or any Regulation replacing this Regulation under future programming periods.** **9. The financial products established under InvestEU Regulation and new products under this Regulation are state aid consistent within the meaning of the Financial Regulation Article 212(2).** LU (Comments): LU comments:

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	Point 8: We suggest to introduce an additional para in order to align with the recently adopted Investment Simplification Omnibus. MT (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.** MT (Comments): If paragraph 8 is introduced in the compromise, additional drafting including implementation modalities should be introduced in order to fully enable combinations as currently offered under InvestEU and further simplified through the Investment Simplification Omnibus expected to be adopted shortly. NL (Drafting suggestions): **8. Union support provided through the financial instruments established by past programmes[in any case the current InvestEU Regulation (EU) 2021/523] may be combined in financial products to be implemented by the EIB or the EIF under this Regulation.** NL (Comments): We notice that the combination of portfolios is not possible anymore. What is the reasoning behind this shift from the current InvestEU programme?

Article 22 **Support to scaleups and startups**	ES (Drafting suggestions): Article 22 **Support to scaleups ~~and startups~~** ES (Comments): Based also on the type of support envisioned, this article should focus exclusively on scaleups. FI (Comments): We would like to have more clarity how this relates to EIC, Scaleup Europe Fund and ETCI. FR (Comments): Quelle est l'articulation de cet article avec les initiatives portées par ailleurs comme le Scale_up Europe Fund ? Faut-il comprendre de la fiche technique et de cet article que la Facilité Scale_up à vocation à prendre la suite du Scale-up Europe Fund ? 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). IE

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Presidency text (doc.14282/25)	Drafting suggestions and Comments
	(Comments): IE welcomes the focus on support to scale ups and start ups IT (Comments): Further clarification is needed on its implemetation. Although welcomed, in this context it is also important to ensure that the majority of funds are not absorbed by start-ups, scale-ups, and mid-cap companies to the detriment of SMEs. Moreover, it is not clear the relation to scale ups under Horizon Europe. LV (Comments): At the same time, please clarify whether we understand correctly that "scaleups" include companies of various sizes that are focused on development activities. NL (Comments): Overall we are very much in favour of possibilities for scaling-up under the ECF. This is needed in view of the persistent scale-up funding gap in Europe. Nonetheless, we would still like to have more clarity on how this relates to the Scaleup Europe Fund and ETCI. We wonder for example how these two statements relate to each other, from the technical info note we received *Deep-tech scale-up financing under the Scale-up Europe Fund existing in 2028 will be carried* *out under the terms agreed in the MFF 2021-2027 (Recital (52), the draft ECF Regulation and Recital (16), the draft HE Regulation).*

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Presidency text (doc.14282/25)	Drafting suggestions and Comments
	- However, in accordance with Recital 52 of the draft ECF Regulation and Recital 16 of the draft HE Regulation, all scale-up financing under the MFF 2028-2034 will take place under the ECF to ensure coherence in the support to scale-ups. Does this mean that investments under the Scaleup Europe Fund will remain possible from 2028 onwards in the new MFF? If so, shouldn't Article 23 refer to this possibility?
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.~~	SE (Comments): SE can accept the deletion of this article. EL (Comments): EIC fund- ECF complementarities need to be further addressed. Clarify the application procedure of the linkage between the two frameworks.
2. The Commission shall ~~in particular~~ develop a Scale-up facility in cooperation with the EIB Group, other international financial institutions and National Promotional Banks. ~~The facility shall provide in a coordinated and consistent manner, a comprehensive set of financing tools tailored to the unique needs of scale-ups, including indirect and direct equity and quasi-equity, venture debt, loans, guarantees and blended finance, with a view to attract private investors in supporting scale up financing and facilitate exit options. The facility shall target SMEs and small mid-cap companies and Mid-cap companies.~~	BE (Drafting suggestions): The Commission shall ~~in particular~~ develop a Scale-up facility in cooperation with the EIB Group, ~~**other international financial institutions**~~ and National Promotional Banks **and other implementing partners.** FR (Drafting suggestions):

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	2. 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.~~ 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; - But not every SME or mid-cap company can also bet a scale-up which is depending on their level and speed of growth. 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.
2a. 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.	DE (Drafting suggestions): 2a. ~~It~~ **The facility** shall **in a coordinated and consistent manner, also with regard to existing national, regional and supranational initiatives,** 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. DE

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	(Comments): We underline the importance of consistency with existing tools and instruments. IE (Comments): IE welcome amendments. NL (Drafting suggestions): It shall ensure that high-potential European ~~companies~~ **start-ups and scale-ups** 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. NL (Comments): To make it consistent with 3. SE (Drafting suggestions): **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** SE (Comments): SE proposes to delete “high potential” as this is not a term that is used anywhere else in the regulation. SI (Drafting suggestions):

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	2a. It shall ensure that high-potential European start-up and scale-up 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. SI (Comments): Shouldn't this point refer to startups and scaleups only and not to the entire population of companies?
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.	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. 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. DE (Drafting suggestions): The facility shall provide, in a coordinated and consistent manner, a comprehensive **overview** ~~**set**~~ of financing tools tailored to the unique needs

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	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. **It shall allow for an easier acces to the different pan-european – in partcicular of the EIB Group –, national and regional financing instruments. If gaps in the financing architecture are identified, the facility should make an assessment which cooperation partner is best suited to adress those.** DE (Comments): In our view the facility should focus on mapping the different existing financial instruments (EU, supranational, national and regional) and making them more accessible to startups and scaleups. Should a gap in the financing instruments be identified, it should be first assessed which institution – EIB Group, MS or supranational/regional instruments – is best suited to fill the gap. FR (Drafting suggestions): The facility shall provide in a coordinated and consistent manner, a comprehensive set of financing tools tailored to the unique needs of scale-ups **detailed in the investment guidelines**, including indirect and direct equity and quasi-equity, venture debt, loans, guarantees and blended finance, with a view to attract private investors in supporting scale up financing and facilitate exit options. **The facility shall target SMEs and small mid-cap companies and Mid-cap companies.** IE (Comments): IE welcomes this text NL (Drafting suggestions):

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	The facility shall provide, in a coordinated and consistent manner, a comprehensive set of financing tools tailored to the unique needs of **start-ups and** 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. NL (Comments): Consistent with 3. We wonder whether providing loans and guarantees would not lead to overlap with InvestEU, shouldn't this be more exclusively focused on forms of quity and maybe venture debt? PT (Comments): The coordination with this facility, the EIC Fund and the Startup and Scaleup Strategy should be clearly addressed here, in order to avoid overlaps. SE (Comments): SE wonders if the first sentence shouldn't mention scaleups **and startups,** as they are both mentioned elsewhere in this article.
3. The facility shall intervene where market investors cannot provide sufficient financing for European high-growth, innovative and strategic ~~companies~~**startups and scaleups**, including if needed to protect the Union's strategic assets, interests, autonomy or economic security.	ES (Drafting suggestions): 3. The facility shall intervene where market investors cannot provide sufficient financing for European high-growth, innovative and strategic ~~companies~~ **~~startups and~~ scaleups**, including if needed to protect the Union's strategic assets, interests, autonomy or economic security. IE

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	(Drafting suggestions): . NL (Drafting suggestions): The facility shall intervene where market investors cannot provide sufficient financing for European high-growth, **high-risk,** innovative and strategic startups and scaleups, including if needed to protect the Union's strategic assets, interests, autonomy or economic security. NL (Comments): The focus of the Scale-up facility should be on disruptive start-ups and scale-ups, hence the addition on their necessary high-risk profile. SE (Drafting suggestions): The facility shall intervene where market investors cannot provide sufficient financing **tools** for European high-growth **and** innovative ~~**and strategic companies**~~**startups and scaleups**, including if needed to protect the Union's strategic assets, interests, autonomy or economic security. SE (Comments): SE believes that it is not clear what a strategic startup and scaleup is. Clarification with the additions of "tools"since 2b. refers to "a set of financing tools". SI (Drafting suggestions):

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	3. The facility shall intervene where market investors cannot provide sufficient financing for European high-growth, innovative ~~and strategic companies~~**startups and scaleups**, including if needed to protect the Union's strategic assets, interests, autonomy or economic security. SI (Comments): It is not clear where strategic companies are defined and who defines them.
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.	FR (Drafting suggestions): It will leverage public investment to catalyse substantial private and institutional capital flows, such as from private equity funds, corporates, pension funds, insurance companies, and other long-term investors, thus deepening **the Union's** capital markets and fostering sustainable growth of scale-up companies. EE (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**, while keeping in mind the relevant security considerations,** thus deepening Europe's capital markets and fostering sustainable growth of scale-up companies. EE (Comments): It is important to also keep in mid the relevant security considerations when seeking for maximum leverage of public investment.
	DE

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	(Drafting suggestions): **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.** DE (Comments): 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
Article 23 **Exclusivity clause**	
1. During the period of the MFF 2028-2034, budgetary guarantees, financial instruments, or financial instruments directly implemented by the Commission in accordance with Article 219 of Regulation (EU, Euratom) 2024/2509 to support policy objectives on the territory of the Union shall solely be established under this Section.	IT (Comments): Will it be possible for the Member State to implement financial instruments under the NRPP?

Presidency text (doc.14282/25)	Drafting suggestions and Comments
Article 24 **EU Compartment and Member States Compartment**	BE (Comments): Correspond à Omnibus II FR (Comments): S'agissant des compartiments Etats membres de l'instrument, la délégation pourra soutenir davantage de mesures les encadrant et une information consolidée au niveau de l'Advisory Board permettant un pilotage global de l'instrument incluant également les opérations de blending. NL (Comments): We notice that no legal texts are included on the Member State compartment: could te Council legal service look into this? Would it be sufficient to refer to the chapter on financial instruments of the Financial Regulation, given the newly created financial instrument under the MS compartment with the omnibus is something else?
1. The ECF InvestEU Instrument shall consist of an EU Compartment and a Member State Compartment.	IT (Drafting suggestions): 1. The ECF InvestEU Instrument shall consist of an EU Compartment and a Member State Compartment. **Where appropriate, these compartments shall be used in a complementary manner, including through a combination of resources in a layered structure to achieve better risk coverage.** IT

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	(Comments): The amendment reproduces that part of the text in Articles 9(2) and 10(3)(g) of the current InvestEU Regulation, which is not included in the new Article 24, and which provides for the possibility of using the EU compartment and the MS-C in a complementarily. Unlike what is indicated in the Commission's fiche, such possibility is not foreseen by Articles 211(2) and 221(2) of the Financial Regulation. PT (Comments): What is the percentage for the MS compartment?
	FR (Drafting suggestions): **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**
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).	
	FR (Drafting suggestions): **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.**

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	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. **The contribution agreement shall at least contain the following elements: (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; (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; (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; (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;** RO (Drafting suggestions): **Article 24a** **State aid**

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	1. **Financial products established under Regulation (EU) 2021/523 and new products established under this Regulation are state aid consistent within the meaning of the Financial Regulation Article 212(2).** 2. **Where Member States contribute from shared management funds to financial products established under this Regulation (top-ups), the resulting financial products are state aid consistent within the meaning of the Financial Regulation Article 212(2).** RO (Comments): It is necessary to ensure that the financial products under the ECF InvestEU are consistent with State aid rules, including their implementation in a contributing Member State through top-ups from shared management funds or the national budget. This new article provides for clarity for both implementing partners and contributing Member States.
Article 25 **Community of implementing partners**	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.**
	DE (Comments): According to recital 69, the implementation of the ECF InvestEU Instrument would build on exisiting guarantee agreements and contractual arrangements.

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	We should discuss if this idea should be explicitly mentioned in the text of the regulation as well
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 European Investment Bank (EIB) Group**.	BE (Drafting suggestions): The ECF InvestEU Instrument will be implemented by the **EIB Group, in accordance with article 21§3a,** partners in an open architecture model, including ~~the European Investment Bank (EIB) Group,~~ international financial institutions, the national promotional banks and E**uropean** institutions **and other international financial institutions**. ~~**while acknowledging the special role of the European Investment Bank (EIB) Group**~~. HU (Drafting suggestions): 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 ***with accepting the validity of the pillar assessments carried out by the Commission in accordance with Article 157 of Regulation (EU, Euratom) 2024/2059.*** HU (Comments): the term “special role” is not legally precise and can lead to confused interpretations, therefore we suggest to delete the amendments. It would be crucially important for the already pillar assessed entities to regulate that previous pillar assessments shall remain in force and that there will be no need for any renewed assessment procedure. In our opinion, this supplementary proposal would not create a contractual obligation, because our proposal would simply state that the validity of the acquired pillar assessment remains in force.

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	IE (Comments): IE would welcome clarification on the role and definition of implementing partners. MT (Comments): Malta would like to thank the Presidency for inserting '**while acknowledging the special role of the European Investment Bank (EIB) Group**. However, Malta firmly believes that 75% of the financial resources of ECF InvestEU need to be earmarked to the EIB Group and that an interim evaluation should take place mid-way through the programming period. NL (Comments): We support this addition. RO (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 European Investment Bank (EIB) Group**, in accordance with article 21, paragraph 3, point a.** RO (Comments): For clarity and correspondence. SE

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	(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. 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 European Investment Bank (EIB) Group**. 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. EL (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 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** EL (Comments):

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	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.
	FR (Drafting suggestions): **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.** **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** FR (Comments): Cet article devrait mentionner les défis liés à la consolidation des rapports des différents partenaires afin d'assurer une gestion efficace de cet instrument. Dispositions permettant aux partenaires de mise en œuvre d'InvestEU de soumettre de nouveaux accords de garantie sans avoir à subir une nouvelle évaluation du pilier.
2. By way of derogation from Article 211(5) of Regulation (EU, Euratom) 2024/2509, and subject to Article 12 of this Regulation, the implementation of a budgetary guarantee or financial instrument, including when combined with non-repayable support in a blending operation, may be	BE (Comments): Must respect the state aid rules PT

Presidency text (doc.14282/25)	Drafting suggestions and Comments
entrusted to any entity referred to in Article 62(1), first subparagraph, point (c), of Regulation (EU, Euratom) 2024/2509.	(Comments): We 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.
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.	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**~~ 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.

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	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~~~~.~~ DE (Comments): Explanations by COM on why this is needed have not convinced us so far. There might be a need for outside EU operations under the Global Europe regulation, however such a case has not been presented by COM in sufficient clarity. Therefore, we ask for explanation or otherwise deletion. NL (Drafting suggestions): ~~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~~

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	~~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.~~ NL (Comments): The Commission has not convinced us of the need to extent it to bodies governed by private law, we suggest to delete whole art 25.3
	BE (Drafting suggestions): **(4) Implementing partners under EU Regulation (EU) 2021/523 may implement the ECF InvestEU Instrument based on the guarantee agreements under EU Regulation (EU) 2021/523, which may be amended to extend their application under this Regulation.** BE (Comments): Provision to avoid having to renegotiate the terms of agreements and thus, in the spirit of omnibus legislation, accelerate project implementation and disbursements by avoiding years of negotiations on guarantee agreements.

Chapter III **Project Advisory, SME Collaboration, skills development and Access to Funding**	DE (Comments): Throughout this chapter, we have to discuss how the envisaged projects provide EU added value and address true market failure. LV (Drafting suggestions): Chapter III Project Advisory, SME and small mid -cap companies collaboration, skills development and Access to Funding LV (Comments): Considering that section article 26 para 2 (b) includes small mid-cap companies, the chapter name should be clarified accordingly. PL (Comments): DK Presidency question: *What should be the division of labour between the Project Advisory and the EU for Business Network to ensure complementarity, avoid duplication, make use of existing structures and make business support services under the European competitiviness fund available to companies from all MS?* **PL position:** A clear, functional, and hierarchical division of labour is essential for the success of the European competitiveness fund. The structure must ensure that companies from all Member States (MS), especially SMEs, can seamlessly access high-quality, non-duplicative support. The model should be client-centric, guiding the company through a investment journey. The Network should act as the decentralized, visible, and accessible front office for companies. The Project Advisory should act as the centralized, high-expertise back office, reserved for complex cases that go beyond the capacity of the Network. The Project Advisory should provide direct, hands-on support for complex projects requiring deep, niche expertise, develop standardized toolkits, guidelines, and best practices (e.g., on ESG criteria, circular economy business models). These resources could be used in the Network to uplift its overall advisory capacity. PT

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	(Comments): Notwithstanding the suggestions and comments mentioned below, PT would like to stress that both Project Advisory and EU for Business Network's responsibilities in supporting SMEs, start-ups and scale-ups cover only part of needs, in what concerns both the dissemination of the programme and its funding opportunities and rules, and the variety of stakeholders that are expected to be involved in actions under the four policy windows, This particularly relevant for collaborative research and innovation under the four policy windows. National Contact Points should play a decisive role in sustaining a plethora of potential applicants and can make a decisive contribution to materialise the 'investment journey' vision.
	MT (Comments): With regards to the question placed by the Presidency - ***What should be the division of labour between the Project Advisory and the EU for Business Network to ensure complementarity, avoid duplication, make use of existing structures and make business support services under the ECF available to companies from all MS?*** A key element of the ECF regulation is the provision of advisory services and business support, which are outlined in art 26-28. There is broad support for having these types of activities under the ECF, that they should build on existing structures including at the national and regional level and that it is important to ensure access for companies in all MS. Malta is calling for a hub and spoke approach meeting: (a)hub - there would be an enhanced centralized Project Advisory in art. 26, building on the current InvestEU advisory hub particularly for large projects that go over EUR 50 million; and (b) spoke - decentralized EU for Business Network, building on the European Enterprise Network. These would be Competence Centres and would

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	handle projects under EUR 50 million. The Exchange of best practices would be handled through the Business Network.

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SECTION 1 **PROJECT ADVISORY**	FR (Comments): Les autorités françaises sollicitent par ailleurs 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. PT (Comments): PT considers that the division of labour between the Project Advisory and the EU for Business Network needs to be clarified to avoid overlaps, and should be based on functional specialisation and coordinated referral mechanisms. The Project Advisory should focus on investment-related advisory services, project preparation and structuring, and pipeline development under the ECF/InvestEU Instrument, working closely with the EIB Group, industrial alliances and clusters. In contrast, the EU for Business Network should provide broader business support aimed at strengthening SME competitiveness, including access to technology infrastructures, internationalisation services, IP valorisation, standardisation support and entrepreneurship skills. To avoid duplication, both instruments should rely on existing EU advisory ecosystems, ensure mutual referrals when support needs fall outside their respective mandates, and use interoperable information systems. A geographically balanced deployment of the EU for Business Network, combined with hybrid service delivery, will ensure access for companies across all Member States, including less developed and outermost regions. This approach maximises complementarity, ensures continuity of existing structures and makes business support services under the ECF widely accessible.

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Article 26 **Project Advisory**	FR (Comments): **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 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.** **Est-ce que la Commission peut préciser l'articulation 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. 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 InvestEU, afin de garantir la clarté des missions et d'éviter toute confusion pour les entreprises. HU (Comments): Geographical balance must be ensured also in this context.
	RO (Drafting suggestions):

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	Project Advisory services shall be implemented in accordance with art. 12(2) or through the award procedures provided for in art. 12. RO (Comments): It is requested to clarify whether the Project Advisory services will be implemented through a procurement procedure or under direct and indirect management. In this regard, we recommend adding an introductory paragraph to this article to specify the implementation framework and forms of Union support, with reference to Article 12. RO supports maintaining an open architecture for the implementation of advisory services and requests the Commission to clarify the distinction between consulting partners and service providers. We support that interventions under the ECF InvestEU and Project Advisory should not be determined through annual work programmes, and we request the explicit mention of an exception to this rule. EL (Comments): Targeting to enhance SME participation and balanced geographical outreach.
1. The Project Advisory shall be made available for repayable and non-repayable instruments. Actions and activities supported under this chapter shall contribute to the general objectives set out in Article 3(1) and shall support and complement, where relevant, activities under the other chapters.	FI (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? NL (Comments):

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	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? RO (Comments): Renumbering the paragraph
2. A centralised access to advisory and business acceleration services shall be provided, which may include:	FR (Comments): L'articulation et les synergies avec les actions du « Business Accélération Service » de l'EIC doivent être envisagées. PL (Drafting suggestions): „2. A centralised access to advisory and business acceleration services shall be provided, **ensuring accessibility and fair opportunities for companies and project promoters across all Member States,** which may include". PL (Comments): Ensuring accessibility and equal treatment across all Member States in the provision of project advisory services is crucial to prevent geographical imbalances and to guarantee that enterprises in less developed innovation ecosystems are not disadvantaged. While efficiency and synergies are important, the absence of explicit safeguards creates a risk that advisory support and business acceleration services will be concentrated in Member States and regions with already well-developed innovation and financing environments. By explicitly incorporating accessibility and equal treatment into the rules for project advisory services, the Fund enhances inclusiveness, supports the integrity of the Single Market, and maximises its impact by unlocking untapped potential across all Member States, particularly in regions at risk of brain drain or structural disadvantage

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	RO (Comments): Renumbering the paragraph SE (Drafting suggestions): A centralised access to advisory and business acceleration services shall be provided **and shall be part financed by the recipients**, which may include:
(a) investment advisory services, including market development activities and advisory support for the identification, preparation, development, structuring, procuring and implementation of investment projects, and for enhancing the capacity of project promoters and financial intermediaries to implement financing and investment operations and improve the understanding and use of financial instruments to exploit their full potential. Such support may cover any stage of the life cycle of a project or financing of a supported entity;	
(b) business coaching and acceleration services targeting potential ECF beneficiaries and other project promoters, including SMEs and **small** mid-cap companies, ~~start-ups and scale-ups~~**startups and scaleups**, supporting and facilitating their access to ECF funding and financing, and facilitating matchmaking with private investors and promoting financial literacy of entrepreneurs, including understanding of the opportunities offered by capital market based financing;	HR (Drafting suggestions): HR: HR suggest additional amendment. *b) business coaching and acceleration services targeting potential ECF beneficiaries and other project promoters, including SMEs and mid-cap companies, start-ups and scale-ups, supporting and facilitating their access to ECF funding and financing, and facilitating matchmaking with private investors and promoting financial literacy of entrepreneurs, including understanding of the opportunities offered by capital market based financing;*

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	as well as support for improving managerial and governance capacities of SMEs. HR (Comments): HR suggests including a reference to strengthening managerial and governance capacities to reflect the needs of smaller companies NL (Comments): The proposed project advisory is said to be built on the existing InvestEU Advisory Hub, which is equipped to provide facilitate access to financing, but not European funding. For several existing programmes this is advise is currently provided by National Contact Points, National Focal Points or NCCs. Wouldn't including 'funding' in this article create ambiguity, and impede a dedicated expert advisory envisioned for the ECF InvestEU instrument? PL (Drafting suggestions): „business coaching and acceleration services targeting potential ECF beneficiaries and other project promoters, ~~including~~ **especially** SMEs and ~~small~~ mid-cap companies, start-ups and scale-ups, supporting and facilitating their access to ECF funding and financing, and facilitating matchmaking with private investors and promoting financial literacy of entrepreneurs, ~~including~~ **especially** understanding of the opportunities offered by capital market based financing" PL (Comments): Strengthening small and medium-sized enterprises (SMEs), mid-caps, start-ups, and scale-ups is of particular importance for the EU's strategic objectives, as well as for the goals of the ECF. Therefore, placing greater emphasis on these entities in project advisory services will help achieve these objectives more effectively.

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	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.
	BE (Drafting suggestions): **(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.** BE (Comments): Providing services such as coaching and advise is much needed for many SMEs. However, before they can benefit from these services they must be aware of their existence, which is often not the case when it comes to European funding. CZ (Drafting suggestions): **(c) tailored project advisory and proposal screening services supporting first-time applicants, aimed at reducing barriers to entry and facilitating successful participation and contribution;** HR (Drafting suggestions): HR: HR suggest adding a new letter d) to Art. 26 paragraph 2 with a wording:

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	(d) specific advisory services for first-time applicants and Member States referred to in paragraph 3 of Article 12; SI (Drafting suggestions): **c) specific advisory services for first-time applicants and Member States referred to, in paragraph 3 of Article 12;** **(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;** SI (Comments): To make European projects truly European there is a need for more balanced distribution of funding across the Member States. Otherwise, we risk that many entities from certain Member States – especially those with relatively limited experience with Union-level instruments - will not be able to participate in collaborative efforts. We therefore advocate for the introduction of measures that would better safeguard such balance within ECF.
3. Project advisory shall, among others, support the generation of project pipelines and the development of potential investment projects under the ECF InvestEU Instrument and contribute to their further development. Project advisory shall also cooperate with industrial alliances and European clusters **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**.	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**

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	may also provide support ~~may cover general objectives and~~**for** cross-cutting actions **and general objectives**. 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 **or other relevant European groupings, including Horizon Europe National Contact Points. 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**. ES (Comments): A network of Horizon Europe NCPs shall be set out. Advisory services shall be specialized, and Horizon Europe NCPs shall provide support for EIC and R&I collaborative actions of the policy windows. FI (Comments): ' IE (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, **including regional business networks and/or nascent, sector-**

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	specific 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~~ **and may also provide** support ~~may cover general objectives and~~ for cross-cutting actions and general objective IE (Comments): IE notes the draft assumes existing clusters are sufficient. The EU, and the Fund, should encourage new cluster formation and support SMEs to organise nd access funding collaboratively, to address the need for knowledge and capacity-building. Suggested text amendment NL (Comments): 'all relevant sectors' is quite vague, especially considering the broad scope of topics and sectors currently mentioned in for instance the Digital Leadership policy window. How is collaboration between the project advisory and the sectors in the policy window exactly shaped? 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. RO (Comments):

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	It is not clear what defines the relevance and "European" character of the groups mentioned in this alin, and a distinction is needed between centralized and decentralized advisory activities to ensure complementarity and avoid duplication of efforts. SE (Comments): SE welcomes the revisions. EE (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 **Horizon Europe National Contact Points**, 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 **and shall ensure the provision of advisory services in all Member States.** In addition, advisory support may also cover cross-cutting actions **and general objectives**, **in coordination with National Contact Points.**. EE (Comments): Project Advisory should cooperate closely with NCP network under FP10 to ensure the necessary advice also under the research component and to get maximum use out of already established well-functioning and proven tools.
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	BE (Drafting suggestions):

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geographic coverage across the Union, while taking account of existing structures and work.	4. The Commission may conclude advisory agreements with the **EIB Group and other** advisory partners… BE (Comments): Advisory services must ensure broad geographical and sectoral coverage of these services and their articulation with existing regional schemes. 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. FR (Drafting suggestions): The Commission may conclude advisory agreements with advisory partners and service providers in line with the needs of each policy windows. The Commission and the advisory partners, including the EIB Group, shall cooperate closely with a view to ensuring efficiency, synergies ~~**and effective geographic coverage across the Union,**~~ while taking account of existing structures and work. FR (Comments): Les principes d'excellence, de préférence européenne et de renforcement de notre autonomie stratégique doivent rester les seuls principes directeurs des actions de ce fonds.

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	PL (Drafting suggestions): The Commission may conclude advisory agreements with advisory partners and service providers in line with the needs of each policy windows. The Commission and the advisory partners, including the EIB Group, shall cooperate closely with a view to ensuring efficiency, synergies and effective geographic coverage across the Union, **as well as the cohesion of the Single Market**, while taking account of existing structures and work **and guaranteeing fair and non-discriminatory access for companies and project promoters in all Member States, with particular attention to regions with lower innovation and advisory capacity"** PL (Comments): A clear reference to the "coherence of the Single Market" ensures that the advisory activities under the Fund are not limited solely to efficiency and synergies, but also actively contribute to sustainable development across the Union. The Single Market is the foundation of the EU; however, inequalities between Member States and regions in access to advisory services, financial instruments, and innovation ecosystems create a risk of fragmentation. This addition ensures that the advisory dimension of the Fund supports inclusiveness and accessibility in all Member States, including those with less developed advisory ecosystems. It also guarantees that the Fund's support contributes to strengthening the integrity and unity of the Single Market, avoiding the risk of uneven access to services or deepening existing inequalities. In this way, the reference to coherence ensures both fairness and efficiency in the implementation of advisory support. It enables the creation of tailored partnerships that maximize outreach, avoid duplication of activities, and leverage the knowledge of existing advisory networks, ensuring cost-effective and well-coordinated services. RO (Comments): Please clarify the distinction between consulting partners and service providers. This provision should also be detailed regarding implementation and monitoring mechanisms to avoid disparities, the criteria for selecting

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	partners, and the effective geographical distribution of consultancy resources, as well as how complementarity with existing structures at national and local levels will be ensured. EL (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 effective geographic coverage across the Union, while taking account of existing structures and work. **National advisory partners may act as antennas to ensure geographical coverage and facilitate access for SMEs and first-time applicants.** **4 a. Commission before adopting final agreement shall consult experts designated by each Member State.** EL (Comments): 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 (not only implementing 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.
	LU

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	(Drafting suggestions): **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.** LU (Comments): LU comments: Given the EIB Group's unique expertise and knowledge of the situation in all 27 Member States, we suggest that the EIB play not only a preferential role in the "financial" implementation but also in the advisory support, where the EIB group has a comparative advantage due to its unique situation of an EU-wide Bank.
5. Irrespective of the instrument of budget implementation for the acquisition or provision of advisory services, providers and recipients of the services shall be selected in accordance with the principles of transparency and equal treatment, avoidance of conflict of interest, including conflicting professional interests.	
6. When implementing the Project Advisory, the Commission, its advisory partners and other service providers shall, when appropriate, collaborate with other Union or national public or private advisory and support service providers, including the EU for Business Network.	SE (Drafting suggestions): When implementing the Project Advisory, the Commission, its advisory partners and other service providers shall, when appropriate, collaborate with other Union or national public or private advisory and support service providers, including the EU for Business Network. **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**

SECTION 2 **SME COLLABORATION**	BE (Comments): Support for SMEs is welcome but where is the support to other actors ((e.g. research centres, universities, public organisations, hospitals, etc.) this that could benefit from the ECF? role that is currently held by the National Contact Points (in Horizon Europe, Digital Europe, LIFE, etc.). Such support (guidance on choosing relevant topics and type of action in the WP, advice on administrative procedures and contractual issues, training and assistance on proposal writing, distribution of documentation, assistance in partner search, international networking) for a wider range of actors should be maintained whatever the form it can take. [to be noted also that NCPs are currently seeing their activities extended for 3 more years – end of 2028 – see the thematic call on https://bit.ly/47JhgkU FR (Comments): La France considère que les dépenses visées à cette section 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. LV (Drafting suggestions): SME and small mid-cap companiess collaboration LV (Comments): Considering that section 2 includes small mid-cap companies, the sections name is requested to be clarified accordingly.

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Article 27 **EU for Business Network**	BE (Comments): It seems that this network and related support is based on the existing EEN network with extended activities. A certain flexibility has always been granted to MS to organize their NCPs and member of the EEN network with a variety of organisations (innovation agencies, trade organisations, chambers of commerce, promotional banks, economic development organisations, IP desks, etc.) and with the most appropriate format (national or regional). While missions should be clear within the regulation, flexibility in the format it will take should be maintained. 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. · 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. · FR (Comments):

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	La délégation pourra souhaiter 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 ? 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 ? PT (Comments): The activities described in Articles 27 and 28 closely mirror the scope of services currently implemented by the Enterprise Europe Network (EEN), which has developed over several funding cycles into a credible, mature and EU-wide instrument. Creating or re-branding a new structure would duplicate functions, disperse resources, and waste significant public investment already made, reducing cost-effectiveness for SMEs. It would also introduce governance risks, including fragmentation, loss of institutional memory, and unclear accountability, potentially delaying support to companies across all regions. PT supports a responsible approach that builds on the EEN, reinforces its existing infrastructure, partnerships, and expertise to ensure continuity, efficiency, and immediate impact. SI (Comments):

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	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.
~~1.~~ "EU for Business" Network shall be established to help Union businesses become more competitive and innovate, grow and scale in the Single Market and beyond, with a particular emphasis on SMEs, startups, scaleups and small mid-cap companies. The network shall have a Union-wide and geographically balanced coverage, taking into account the specificities of all types of regions in the Union, including the less developed regions**, transition regions,** and the Union outermost regions.	CZ (Drafting suggestions): "EU for Business" Network shall be established **in each Member State under its coordination** to help Union businesses become more competitive and innovate, grow and scale in the Single Market and beyond, with a particular emphasis on SMEs, startups, scaleups and small mid-cap companies. The network shall have a Union-wide and geographically balanced coverage, taking into account the specificities of all types of regions in the Union, including the less developed regions**, transition regions,** and the Union outermost regions. FR (Drafting suggestions): "EU for Business" Network shall be established to help Union businesses become more competitive and innovate, grow and scale in the Single Market and beyond, with a particular emphasis on SMEs, startups, scaleups and small mid-cap companies. The network shall have a Union-wide and geographically balanced coverage, taking into account the specificities of all types of regions in the Union**~~, including the less developed regions, transition regions, and the Union outermost regions.~~** FR (Comments):

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	La France souhaite que les principes d'excellence, de préférence européenne et de renforcement de notre autonomie stratégique resternt les seuls principes directeurs des actions de ce fonds. Que signifie concrètement une "couverture équilibrée" ? Cela impliquera-t-il une approche préférentielle en faveur des pays moins représentés, ou une approche alignée sur le niveau des contributions financières de chaque pays ? 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 ? HR (Comments): It is necessary to further clarify whether the new network will fully replace the existing initiatives in the long term (for example, the Enterprise Europe Network (EEN)) or whether it will act as an overarching framework that brings them together and coordinates them IE (Drafting suggestions): EU for Business" Network shall be established to help Union businesses become more competitive and innovate, grow and scale in the Single Market and beyond, with a particular emphasis on SMEs, startups, scaleups and small mid-cap companies. The network shall have a Union-wide and geographically balanced coverage, taking into account the specificities of all types of regions in the Union, including the less developed regions, **transition regions,** and the Union outermost regions. **The network shall also include tailored outreach, and support communications campaigns, aimed at SMEs.**

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	IE (Comments): IE notes that SMEs need more targeted outreach and practical support mechanisms to boost uptake. A 'marketing campaign' approach would speak to SMEs in their own business language (plain and straightforward) and recognise their limited capacity for engaging with EU programmes. It would link as seamlessly as possible with activities under Article 26 Project Advisory LU (Comments): LU comments: Could the Commission kindly clarify whether the proposed "EU for Business Network" under Article 27 is intended to supersede the existing Enterprise Europe Network (EEN), or whether it is envisaged as a complementary structure designed to operate alongside and in coordination with the EEN? MT (Drafting suggestions): ~~1.~~ "EU for Business" Network shall be established to help Union businesses become more competitive and innovate, grow and scale in the Single Market and beyond, with a particular emphasis on SMEs, startups, scaleups and small mid-cap companies. The network shall have a Union-wide and geographically balanced coverage **with mínimum physical presence in each Member State**, 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. MT (Comments):

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	The network shall be composed of the competence centres selected by the Commission, with a minimum of one such centre per Member State. Malta had recommended adding the drafting recommendaton **with mínimum physical presence in each Member State**. PL (Drafting suggestions): EU for Business" Network shall be established to help Union businesses become more competitive and innovate, grow and scale in the Single Market and beyond, with a particular emphasis on SMEs **as a priority and also including** startups, scaleups and small mid-cap companies. The network shall have a Union-wide and geographically balanced coverage, taking into account the specificities of all types of regions in the Union, including the less developed regions, transition regions, and the Union outermost regio **and must maintain at least a minimal physical presence in every Member State**. PL (Comments): Given that SMEs account for 99% of the enterprise population, support under the ECF should primarily target them. The extension of proposed measures to SMCs should not take place automatically or without thorough assessment. It is worth highlighting that, in accordance with the "Think Small First" principle set out in the SBA, the specific needs of SMEs should be duly taken into account. Given the specific characteristics of SMEs, in particular the structural limitations in terms of human and financial resources, which may impede their access to funds from the ECF, it would be advisable to grant SMEs clear priority or to clearly single them out as a priority group among the intended beneficiaries – including, where appropriate, small mid-cap companies (SMCs). We underline the strong need to reinforce the focus on SMEs in the relevant provisions of the ECF proposal. Membership in the network shall be composed of competence centres selected by the Commission, with the provision that no fewer than one such centre shall be designated from each Member State PT (Drafting suggestions):

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	"(…) 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~~ **in particular** the less developed regions, transition regions, and the Union outermost regions." PT (Comments): In line with recital 8, special attention should be devoted to the less developed regions. RO (Drafting suggestions): "EU for Business" Network shall be established to help Union businesses become more competitive and innovate, grow and scale in the Single Market and beyond, with ~~a particular emphasis~~ **SMEs as the primary focus, while also supporting** startups, scaleups, and small mid-cap companies. The network shall have a Union-wide and geographically balanced coverage, taking into account the specificities of all types of regions in the Union, including the less developed regions**, transition regions,** and the Union outermost regions. RO (Comments): It is necessary to clarify the mechanisms for expanding and ensuring a wide and geographically coverage, to provide a clear definition of what constitutes such coverage, and to establish transparent selection procedures, in order to guarantee the participation of all regions, including less developed and outermost regions. RO supports the principle of balanced geographical coverage but underlines the need to clarify how the effective participation of SMEs from less developed

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	regions will be secured, ensuring that they can fully benefit from the opportunities offered by the network and contribute to European cohesion and competitiveness. SE (Comments): SE can accept the amendments. EE (Drafting suggestions): "EU for Business" Network shall be established to help Union businesses become more competitive and innovate, grow and scale in the Single Market and beyond, with a particular emphasis on SMEs, startups, scaleups and 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 **small countries,** less developed regions**, transition regions,** and the Union outermost regions. EE (Comments): Estonia is a small EU member state making it rather challenging to be part of EU network. Therefore, we see the need to put specific focus on such small countries and that our businesses will be better integrated in the EU system, with the aim to contribute to improving the competitiveness of the EU as a whole. EL (Drafting suggestions): EU for Business" Network shall be established to help Union businesses become more competitive and innovate, grow and scale in the Single Market and beyond, with a particular emphasis on SMEs, startups, scaleups and small mid-cap companies. The network shall have a Union-wide and geographically balanced coverage, taking into account the specificities of all

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	types of regions in the Union, including the less developed regions**,** **transition regions, insular areas,** and the Union outermost regions. EL (Comments): Insular areas are areas with specificities where businesses face greater challenges and deserve special attention.
	CZ (Drafting suggestions): **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.** CZ (Comments): CZ - We consider it necessary to ensure the provision of advisory services at the level of the Member State. In order to incentivise applicants to submit projects, they need a reliable point of support. Member States already have established structures which may serve as a basis for this purpose. Moreover, these actors are familiar with the environment in which the project will be implemented. For these reasons, it is essential to involve the Member States directly in the advisory process. 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.

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	MT (Drafting suggestions): **2. Centres for competitive excellence shall perform all or some of the following activities to the benefit of and in close cooperation with the Union industry, in particular SMEs and mid-caps, as well as research and technology organisations, universities, and the public sector and other relevant stakeholders across the value chains referred to in paragraph 2 of article 3:** **(a) raising awareness and providing the necessary know-how, expertise and skills to the stakeholders to help them accelerate the development of new technologies, scale-up manufacturing, design options and concepts as well as the integration of new technologies, by effectively using the infrastructure and other available resources of the network;** **(b) raising awareness and providing or ensuring access to expertise, know-how and services, including system design readiness, building minimum viable products and prototypes, new and existing pilot lines and supporting actions necessary to build skills and competences supported by the Instrument;** **(c) facilitating access to testing facilities, knowledge and good practices and encouraging joint programmes and collaboration by effectively using the infrastructure and other available resources of the network;** **(d) developing and managing specific training actions on technologies and their applications to support the development of the talent pool, by skilling and reskilling, and to increase the number of students as well as the quality of education in relevant fields of studies**

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	up to PhD level at schools and universities located in the Union by facilitating connections between students and industry across the Union, while paying particular attention to women's participation. **(e) in collaboration with the network of National Contact Points, the centre will promote the use of the European Competitiveness Fund, Horizon Europe as well as other relevant instruments for the purpose of meeting the objectives of this instrument.** **3.Member States shall designate at least one candidate centres of competitive excellence in accordance with their national procedures, administrative and institutional structures through an open and competitive process.** **Commission is empowered to adopt delegated acts in accordance with Article 84 to specify the selection criteria as well as further details on the implementation of the tasks and functions referred to in this Article.** **4. The centres for competitive excellence shall have substantial overall autonomy to lay down their organisation, composition and working methods. The organisation, composition and working methods of the centres shall comply with and contribute to the objectives of this Regulation.** MT (Comments): Based on the lessons learnt from initiatives under the current MFF period, we believe that building a network of specialised competence centres with the objective of making available resources found throughout the network to reinforce excellence and competitiveness.

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Article 28 **Business support**	FI (Comments): FI This article contains a lot of activities that might also be covered by other instruments. We need more clarity on what is meant by "support" and how substantial budget is in question. Also the diversity of EEN network might not enable such funding activities to be executed in every country, we have to scrutinise this after additional information is given. FR (Comments): La délégation pourra souhaiter que cet article soit davantage développé. Quel est le montant indicatif associé à cet article ? IE (Comments): IE would welcome prioritisation of outlined supports here EL (Comments): Important element of ECF Clarify if SMEs and Mid-caps are equally adressed
1. The ECF shall conduct cross-cutting activities focused on strengthening the competitiveness of the SMEs and achieve additionality at Union level, including through the following measures:	BG (Comments): It is important to ensure that the ECF complements the Horizon Europe programme without unnecessary overlaps, while providing equal access and broad availability for small and medium-sized enterprises (SMEs) and supporting economic convergence between Member States. Advisory support should be directed towards business associations, specialised associations and organisations, as well as the authorities of the Member States.

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	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 ? IE (Comments): IE would like to see clarity in the text on the use of all public monies, to include safegaurds to avoid deadweight. LV (Drafting suggestions): 1. The ECF shall conduct cross-cutting activities focused on strengthening the competitiveness of the SMEs, **small** mid-cap companies 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,** including through the following measures: LV (Comments): 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 regions in the Union, including the less developed regions, transition regions, and the Union outermost regions. PL (Drafting suggestions):

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Presidency text (doc.14282/25)	Drafting suggestions and Comments
	„The ECF shall conduct cross-cutting activities focused on strengthening the competitiveness of the SMEs, **while ensuring accessibility and fair opportunities for these entities across all Member States**, including through the following measure" PL (Comments): Ensuring accessibility and equal treatment in the cross-cutting ECF actions for SMEs is essential to prevent the concentration of support in regions with already well-developed innovation ecosystems. Without explicit consideration of inclusiveness, SMEs and small mid-caps in less developed Member States or peripheral regions may lack the resources, networks, or expertise to fully benefit from EU-level support. RO (Drafting suggestions): The ECF shall conduct cross-cutting activities focused on strengthening the competitiveness of the SMEs, **in principal**, and achieve additionality at Union level, **promoting partnerships with entities from less developed regions and Member States to ensure their access to technologies, innovation, and resources, and their integration into competitive value chains**, including through the following measures: RO (Comments): Articles 28 - 29 – RO supports measures to assist the business environment, as well as sector-specific actions, but considers it necessary to clarify the methods for prioritizing and selecting SMEs in order to maximize impact in strategic sectors and to foster innovation and scaling. SE (Drafting suggestions):

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	The ECF shall, **including by using national advisory and support service providers**, conduct cross-cutting activities focused on strengthening the competitiveness of the SMEs and achieve additionality at Union level, including through the following measures: SE (Comments): SE believes that we should make use of already existing structures and local knowledge.
(a) provision of integrated business advice and support to companies, including through financial support to third parties;	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). PL (Drafting suggestions): a) provision of integrated business advice and support to companies, **with particular attention to companies in regions with lower innovation, investment and absorption capacity**, including through financial support to third parties" PL (Comments): As above
(b) provision of partnering opportunities and capacity building;	NL (Comments):

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	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? 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.
(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;	FR (Drafting suggestions): 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; NL (Comments): 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? PL (Drafting suggestions): "support and assistance for access to technologies, technology infrastructure and facilities, support market uptake of innovation and support business organisations **especially for** SMEs and **also** small mid-cap companies, including startups and scaleups **and business organisations**, to participate in collaborative platforms and sectors"; PL (Comments):

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	Given that SMEs account for 99% of the enterprise population, support under the ECF should primarily target them. The extension of proposed measures to SMCs should not take place automatically or without thorough assessment. It is worth highlighting that, in accordance with the "Think Small First" principle set out in the SBA, the specific needs of SMEs should be duly taken into account. Given the specific characteristics of SMEs, in particular the structural limitations in terms of human and financial resources, which may impede their access to funds from the ECF, it would be advisable to grant SMEs clear priority or to clearly single them out as a priority group among the intended beneficiaries – including, where appropriate, small mid-cap companies (SMCs). We underline the strong need to reinforce the focus on SMEs in the relevant provisions of the ECF proposal. EL (Comments): Equal access for all enterprises across EU with - antennas of support in each MS - coverage of the different needs of all regions - include reference as in par. F less developed regions**, transition regions, <u>insular</u>** and outermost regions
(d) promoting business understanding of Union policies, obtaining feedback on their effectiveness;	NL (Comments): Would end-user and expert opriented groups such as advisory boards (Defense industry committee) or subcommittees and working groups (Space committee) be better suited to obtain feedback on Union policy effectiveness?
(e) increasing the access and the availability of finance for SMEs including micro-finance and support to social enterprises, and for small mid-cap companies;	AT (Drafting suggestions):

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	(e) increasing the access and the availability of finance for SMEs including micro-finance and support to social enterprises, ~~**and for small mid-cap companies**~~; AT (Comments): We refer to the Presidency Flash November 4/5: **deletion** of Small midcaps; LV (Drafting suggestions): (e) increasing the access and the availability of finance for SMEs and **small** mid-cap companies including micro-finance and support to social enterprises, and for small mid-cap companies; PL (Drafting suggestions): „increasing the access and the availability of finance for SMEs **as a priority**, including micro-finance and support to social enterprises, and for small mid-cap companies” PL (Comments): It is worth emphasising that, in accordance with the “Think Small First” principle set out in the SBA, the specific needs of SMEs should be duly taken into account. Considering the particular characteristics of SMEs—especially structural limitations in human and financial resources, which may hinder their access to ECF funds—it is proposed that the relevant provisions be amended to explicitly reflect the need to grant SMEs preferential treatment compared to other categories of enterprises, such as small mid-caps (SMCs).

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(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;	ES (Comments): We support the inclusion of transition regions. FR (Drafting suggestions): facilitation access to markets including through support to the internationalisation of SMEs and provision of market intelligence, ~~including in less developed regions~~**~~, transition regions,~~** ~~and outermost regions;~~ FR (Comments): La 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. LV (Drafting suggestions): (f) facilitation access to markets including through support to the internationalisation of SMEs, and **small** mid-cap companies and provision of market intelligence, ~~including in less developed regions,~~ ~~**transition regions,**~~ ~~and outermost regions;~~ LV (Comments): The end of the sentence deleted because of the addition in Article 28.1 SE (Comments): SE can accept this amendment. EL

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Presidency text (doc.14282/25)	Drafting suggestions and Comments
	(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; EL (Comments): Addition of insular areas
(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;	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."** IE (Comments): IE suggested text amendment LV (Drafting suggestions): (g) improving the business environment for SMEs, small mid-cap companies and promote new business opportunities for SMEs and small mid-cap companies by supporting among others intellectual property valorisation, standard setting and public procurement; and promote new business opportunities by supporting among others intellectual property valorisation, standard setting and public procurement; SI (Drafting suggestions):

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	(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; SI (Comments): SI supports BE proposal.
	EE (Drafting suggestions): **(ga) supporting the creation of R&I spin-offs and start-ups originating from academia and research institutions, including dedicated technical and financial support for the commercialisation of research results (valorisation) and the protection and management of Intellectual Property (IP).** EE (Comments): In Europe we face a challenge where R&D results, despite high academic quality, struggle to find application in business, and spin-off models are underdeveloped. Integrating explicit support for R&I valorisation into the Fund's cross-cutting business support mechanisms ensures that ECF actively closes the gap between early-stage innovation and industrial deployment, thereby strengthening the TAI ecosystem as a whole, especially for high-potential, research-intensive start-ups and SMEs
(h) promoting entrepreneurship, including women and youth entrepreneurship and the acquisition of entrepreneurial and business skills.	BE (Comments): The different services above seem to be aligned with the annual SBA (Small Business Act) reporting for which MS have to explain how they implement 10 principles that support the development of SMEs and entrepreneurship.

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	These activities are thus already covered at national/regional level with dedicated organisations dealing with it. Clarification is thus needed to avoid duplication – it remains unclear at the moment how/if such organisations would have to officially be part of (the national/regional consortium of) the "EU for Business Network". Also to be noted that even for one service (e.g. promoting entrepreneurship for women and young people), several organisations are already active in this domain. BG (Comments): Support for women and youth entrepreneurship should include support for small family businesses, creative industries and crafts, which should be considered as a key factor for sustainable growth. HR (Drafting suggestions): HR: HR suggest additional amendment. *h) promoting entrepreneurship, including women and youth entrepreneurship and the acquisition of entrepreneurial and business skills****, particularly towards fostering entrepreneurship in less developed regions.*** HR (Comments): HR proposes reinforcing the reference to regional balance by highlighting the importance of entrepreneurship support in less developed areas PL (Drafting suggestions): …. **through dedicated training, mentoring and skills-development programmes."**

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	PL (Comments): The proposal strengthens the diversity and renewal of the entrepreneurial ecosystem by supporting underrepresented groups and equipping them with key business and innovation skills. SI (Drafting suggestions): (h) promoting entrepreneurship, including women and youth entrepreneurship and the acquisition of **design thinking, design management,** entrepreneurial and business skills. EL (Comments): Add: in less developed regions
	BE (Drafting suggestions): **(i) providing SMEs with ex ante guidance for which European funding they might be eligible, including this Regulation;** BE (Comments): The risk of this European Competitiveness Fund is that funding will not reach SMEs. This due to a lack of administrative power in SMEs but also because of a lack of knowledge of which European funding might be applicable to them.

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Article 29 **Dedicated SME Actions to increase SME participation**	AT (Comments): The budget for the horizontal window "“Project advisory, SME collaboration and skills” seems to be quite limited. It is necessary to provide a more detailed specification of the resources allocated for SMEs. Regarding the dedicated SME Actions to increase SME participation, more information should be provided. Could the COM please clarify, what type of actions can be expected? 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. Quel est le montant indicatif associé à cet article ? LV (Drafting suggestions): **Dedicated SME Actions to increase SME and small mid-cap companies participation** LV (Comments): Considering that article 29 includes small mid-cap companies, the chapter name was requested to be clarified accordingly. PT (Comments): Is this related with 2a of article 15? Are we talking of actions only available to SMEs? How will this address the necessary inclusion of SMEs in collaborative R&I that fall under FP10 for each of the policy windows?

Presidency text (doc.14282/25)	Drafting suggestions and Comments
~~1.~~ 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.	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. BE (Comments): Cf. previous arguments. SMEs should be able to know where opportunities lie. BG (Comments): 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. ES (Drafting suggestions): ~~1.~~ 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**, with simplified calls and fast-track evaluation for SMEs in strategic sectors**. FR (Drafting suggestions):

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	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. FR (Comments): 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 IE (Comments): IE broadly supports the improved emphasis on SMEs within the overall text and welcomes the change to Article 29 to remove the mid-caps reference LV (Drafting suggestions): 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.** LV (Comments):

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	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. RO (Drafting suggestions): ~~1.~~ Each window shall support dedicated, sector-specific actions targeting, **in principal**, ~~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, **while ensuring balanced access to funding across all Member States.** SE (Drafting suggestions): 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. SE (Comments): SE is sceptical of having specific and dedicated calls. EL (Comments): We welcome the change in the wording that allows for calls dedicated to SMEs- distinct group of enterprises with special characteristics-.
	CZ (Drafting suggestions):

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	2. All actions under the ECF shall allow the participation of SMEs and be designed accordingly. Dedicated actions or calls as referred to in paragraph 1 shall not limit the participation of innovative enterprises in non-dedicated actions. 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. ES (Drafting suggestions): **An amount of EUR [X] of the amount referred to in the paragraph 1 of Article 4 shall be allocated for SMEs.** 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). HR (Drafting suggestions): HR: HR suggest additional paragraph. ***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.***

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	HR (Comments): HR suggest dedicated action regarding smaller enterprises that are not primarily technology-intensive.
Article 30 **Support for skills development**	FR (Comments): 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.
~~1.~~ 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.	AT (Drafting suggestions): The ECF shall finance activities in support of skills development, in particular in the strategic sectors, building strong links between higher education, vocational education and training providers, applied research and businesses, **as well as research and technology organisations** 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. BG (Comments):

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	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. DE (Comments): 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 FR (Drafting suggestions): The ECF shall finance activities in support of skills development, in particular in the ~~strategic sectors,~~ **economic** 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. **Where relevant and appropriate, the ECF should also finance activities of the**

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	European Universities Alliances, as they constitute a lever for integrated European ecosystems across Europe. 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 financement, car elles constituent un levier pour les écosystèmes d'innovation européens intégrés à travers l'Europe. IE (Drafting suggestions): The ECF shall finance activities in support of skills development, in particular in the strategic sectors **including Tourism** 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 tourism** and industrial ecosystems **across the Member States.** IE (Comments): IE would like to include tourism here as it is a very significant economic sector, with common upskilling and education requirements across the different MS.

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	NL (Comments): We're still awaiting the proposal for the pilot on the European Skills guarantee [EVT: expected in this last quarter of 2025]. Yet, this article already refers to the final result of this Guarantee. Can the Commission please elaborate on how to read this article, without being able to define what the European Skills guarantee is? RO (Comments): IT is necessary to clarify the definition of ***applied research*** and, where relevant, align it with the concepts of industrial research and experimental development, to ensure coherence in interpretation and implementation. It is recommended to align the provisions with the terminology already established in the development of policies, strategies, programmes, and funding instruments in the RDI domain and avoid using terms or expressions that require additional explanations or definitions outside the framework of the Frascati Manual and State aid rules (https://www.oecd.org/en/publications/frascati-manual-2015_9789264239012-en.html) and OECD terminology (https://www.oecd.org/en/publications/oecd-science-technology-and-innovation-outlook-2025_5fe57b90-en.html). This ensures consistency, clarity, and comparability across EU documents and facilitates understanding by all stakeholders. SE

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Presidency text (doc.14282/25)	Drafting suggestions and Comments
	(Comments): Regarding "building strong links between higher education, vocational education and training providers" it needs to be clarified how this is meant to be. Cooperation between education institutions needs to build on a voluntary basis. Higher education institutions are autonomous. Regarding "European Skills Guarantee" it needs to be clarified what organisation or institution that is responsible for providing this guarantee. SI (Drafting suggestions): The ECF shall finance activities in support of skills development, in particular in the strategic sectors **as well as in areas of future technologies**, 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~~ **existing Erasmus+ and other mechanisms aimed at skills development** 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, **such as through Centres of Vocational Excellence, Pact for Skills and European University Alliances.** SI (Comments): EU needs to be future-oriented also when supporting skills development.

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	We suggest 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. EE (Drafting suggestions): The ECF shall finance activities in support of skills development, in particular in the strategic sectors **as well as in areas of future technologies**, 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, **such as through Centres of Vocational Excellence and European University Alliances.** EE (Comments): 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. **European Skills Guarantee -** if this refers to a pilot project mentioned in the *Union of Skills* communication, it would not be reasonable to include

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	anything in the regulation that lacks clarity at the moment or Council approval. We would like to delete it. **Centres of Vocational Excellence and European University Alliances** are examples of existing EU initiatives that support skills development and cooperation between education and business. They have proven their effectiveness and deserve to be highlighted.
SECTION 3 **BENEFICIARY SERVICE DESK**	

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Presidency text (doc.14282/25)	Drafting suggestions and Comments
Article 31 **Access to Union funding**	FR (Comments): 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. PL (Drafting suggestions): „In accordance with Article 150 of Regulation (EU, Euratom) 2024/2509, the ECF shall finance and support the maintenance, extension and user-centric designed enhancement of the single electronic data interchange area and related digital grant management infrastructure. This shall apply irrespective of the mode or instrument of budget implementation and shall integrate advisory and business-acceleration services as well as the single gateway for access to Union support under the Performance Regulation" PL (Comments): It provides a simplified and consistent digital access point for all ECF participants, reduces administrative burdens within the financing instruments, and integrates advisory and acceleration support directly into the online access platform.
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.	BE (Drafting suggestions): The ECF may support any additional activities, **which must be premilary discussed in the Advisory board and be in line with the decision of the Council**, to facilitate and accelerate access to Union funding, and other

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	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. BE (Comments): Need to streamline the work of the Commission. ES (Drafting suggestions): 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**, including a beneficiary service desk and one-stop tools to accelerate access.** PL (Comments): The regulation does not mention the existing structures of the National Contact Points network, which in recent years have invested in capacity building, professional advisory services, and network development. We believe that the experience and value of these structures should be recognised and reflected in the regulation. It expands the scope of ECF activities to remove remaining access barriers, promotes rapid proof-of-concept testing and project implementation, and utilises both digital and on-site tools to maximise the use and impact of funded outcomes. RO (Drafting suggestions): 2. The ECF may support any additional activities to facilitate and accelerate **fair and balanced** access to Union funding, and other funding, financing and investments, as well as to ensure valorization and uptake of

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	results through tools and instruments such as proof of concept, deployment grants, advisory and business support services, and any dedicated platform. EL (Drafting suggestions): **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.** EL (Comments): **A linkage with cohesion policy objectives is necessary so ECF may support in complementarity activities under NRPP.** Ensure complementarity, coherence and additionality between the ECF and the National and Regional Partnership Plans (NRRPs). Projects awarded a Competitiveness Seal under the ECF should remain eligible for support under the NRRP without re-evaluation.
	LV (Drafting suggestions): Article 37 para 1 (a) Improving and protecting health, including cross-border health, by prioritising health promotion and disease prevention across the life course through a health-in-all and One Health ~~policies~~ approach, with a special emphasis on communicable and non-communicable diseases, including mental health, degenerative health, autism, cardiovascular diseases, cancer and other non-communicable diseases, including those related to pollution, sexual and reproductive health and enhancing international health initiatives and cooperation. Article 37 para 1 (f) Fostering an innovative and competitive bioeconomy sector **and related cross-sectors** in the Union, including in the areas of health

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	biotech, biobased materials and products, valorising farm and forest residues, carbon negative products, biomanufacturing and biochemicals, **deep science and deep engineering** in particular by supporting the discovery, development, derisking, demonstration, piloting, and scaling-up of bioeconomy innovations; by accelerating the market introduction and market uptake of bio-based materials from agriculture**,** ~~**and**~~ forestry **and fisheries** and bioeconomy solutions; by strengthening emerging value chains; by building a skilled workforce, by providing access to finance and other support for SMEs, startups, scale ups and innovators. Article 37 para 1 (g) Fostering the competitiveness, the sustainability, the resilience and fairness of agriculture, **food processing**, fisheries, aquaculture, forestry sectors and rural and coastal areas, and contribute to long term food **and feed** security in the Union. LV (Comments): (Chapter V) Are there foreseen any guidelines on the availability of support and procedures specifically for agriculture and the bioeconomy? (SUPPORT FOR HEALTH, BIOTECH, AGRICULTURE AND BIOECONOMY) LV calls for **division into two separate parts – Health and Biotechnology separate from Agriculture and Bioeconomy**. Health and biotechnology should be treated separately from agriculture and the bioeconomy. Agriculture is a strategically important sector, as it ensures a stable and secure food supply, contributes to economic growth and export potential, and plays a crucial role in managing natural resources and achieving climate objectives. Are there foreseen any guidelines on the availability of support and procedures specifically for agriculture and the bioeconomy?

Presidency text (doc.14282/25)	Drafting suggestions and Comments
	Article 36 para. 1: Latvia considers that support mechanisms should be available not only for large and international projects, but also for smaller-scale initiatives and regional programmes. There are currently concerns about securing geographical balance. Article 37 para 1 (a) We have concers wheather reference to One Health refers to the policies or it just simply the One Health approach. Article 37 para 1 (g) LV calls for a clear reference to food processing. Food processing is a distinct and strategically important sector, as it transforms agricultural and fisheries products into value-added goods, creates jobs and export opportunities, requires specific regulations and technologies, and ensures more efficient use of resources, thereby strengthening both food security and overall competitiveness of the sector •The "Health, Biotech, Agriculture & Bioeconomy" window should explicitly cover measures to boost trade reputation and competitiveness, including heard health management, animal disease surveillance and prevention with the aim of disease-free status, and enhance the national and cross-border AMR containment actions. Commission proposal Drafting Suggestions Comments • A clear reference to the One Health approach, emphasizing all involved sectors, should be included in this section.