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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. 11770/1/25 REV 1, Chapters IV, V, VI) - comments from AT, BE, BG, CZ, HR, LT, LV, MT, NL, PL, RO, SE, SI, LU, DE, IE, FI, IT, ES, EE, FR, HU, PT

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Proposal for a Regulation establishing the European Competitiveness Fund (doc. 11770/1/25 REV 1) Deadline: ***30 September 2025***
From: Table, AT, BE, BG, CZ, HR, LT, LV, MT, NL, PL, RO, SE, SI, LU, DE, IE, FI, IT, ES, EE, FR, HU, PT **Updated: 08/10/2025 17:36**

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.**

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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!

Commission proposal	Drafting Suggestions and Comments
General Comments	CZ (Comments): **We would like to signal that it is likely that we will wish to propose further amendments to certain Articles once a revised version of the draft Regulation is submitted for consideration. In this regard, we respectfully reserve the right to review and provide comments on the next version of the draft Regulation, as not all elements could be fully examined and discussed at the national level at this stage.** MT (Comments): Malta believes the European Competitiveness Fund is a step in the right direction. In terms of process, we recognise the Presidency's ambition in driving this dossier forward, but we must emphasise the necessity for sufficient time to enable Member States to undertake the necessary

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	interministerial consultations and ensure that all relevant perspectives are fully reflected in our collective deliberations. One needs to factor in that 14 EU programmes are being placed under one umbrella. Given the timeframes set, the below remarks remain preliminary in nature as consultation is still ongoing with the various line Ministries involved. The possibility of further input and proposed amendments cannot be excluded. Malta stresses the need for proportionality and the avoidance of excessive administrative burdens, given limited administrative capacity. It is important to ensure grants remain available alongside financial instruments, as Malta's market size and underdeveloped capital markets limit access to equity/venture funding. There needs to be a geographical balancing mechanism to ensure that enterprises in all EU Member States benefit from the European Competitiveness Fund. Furthermore, it is important that excellence is spread throughout the Union and to reinforce a diverse and dynamically competitive Union. Companies and investors need the ECF to be simple, clear and to minimize administrative hurdles. Simplification, transparency, and flexibility must be central tenets in the ECF's governance and operation with practical application processes and pre-financing options to support liquidity, especially for SMEs. Robust transitional mechanisms and active Member State involvement in governance to guarantee geographic balance and prevent excessive concentration is also beneficial. The application processes need to be more practical and in the case of grant schemes one needs to consider pre-financing to safeguard liquidity requirements particularly of SMEs.

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	Malta also advocates for dedicated and ring-fenced budget lines for SMEs and Small Mid-Caps, with clear targets and tangible measures to facilitate their participation. Separate funding streams must be established for SMEs and SMCs, recognising their distinct characteristics and needs. A geographical balancing mechanism is indispensable to ensure that enterprises in all Member States benefit, and that excellence is spread throughout the Union. The utilization of a comprehensive range of instruments, including grants, equity, guarantees, loans, and blended finance, applying each where it provides the greatest benefit for specific projects. Enhanced leverage through market-driven financial instruments, such as those under ECF InvestEU, will be vital to attract private capital and amplify the impact of public investment. 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. Engagement with companies and investors must be proactive, ensuring that the Fund's offerings are tailored to real-world needs throughout the Union. Malta asserts that the effectiveness of the Fund's financial instruments in mobilising private capital hinges on their capacity to address market failures, catalyse investment in strategic sectors, and foster the integration of SMEs into European industrial ecosystems. Malta also highlights the importance of deploying the right financial instruments—grants, equity, guarantees, loans, and blended finance. The Fund should also support riskier but strategically vital projects that are

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	unlikely to attract private investment independently, particularly by absorbing commercialisation risk premiums for breakthrough technologies. Malta supports the inclusion of the Important Projects of Common European Interest (IPCEIs) top up possibility, notably in the semiconductor sector. In conclusion, Malta believes the Fund's success will be measured by its ability to deliver real simplification, inclusivity, and speed, while safeguarding the interests of all Member States and placing SMEs at the heart of Europe's competitiveness agenda. Malta stands ready to work constructively to ensure that the European Competitiveness Fund becomes a true engine of growth, innovation, and resilience for all. PL (Comments): The ECF proposal is ambitious, but it lacks clear and direct references to key EU legislation such as the revised Waste Water Directive of 2024 (Directive 2024/3019) and the Water Reuse Regulation (Regulation 2020/741). The inclusion of more specific references to increase the Fund's consistency with existing and new EU regulations could strengthen the strategic rationale for financing water-related projects, making them more credible and easier to implement. Issues related to support for rail transport appear to have been omitted or marginalized. While it is indicated that one of the objectives of the ECF is, inter alia, clean transformation and support will be directed, for example, towards the production of clean technologies, it has not been precisely specified whether support will be directed to rail transport, e.g., for companies producing rolling stock. Among the listed activities potentially eligible for ECF support, only high-speed rail is mentioned. In the opinion of the

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	Government of the Republic of Poland, the objective should be to support activities across rail transport in general, and not only high-speed lines, which are very limited in Poland. We would like to point out that the ECF focuses mainly on manufacturing companies, at the expense of the service sector. We believe that services are the backbone of the EU economy, with the service sector employing around three-quarters of the EU workforce. The service sector is also key to the development of the digital economy and "digital leadership," which is one of the ECF's objectives. We therefore propose that ECF instruments cover the full spectrum of industries—not only traditional industry, but also services. RO (Comments): Romania has already submitted some genereral comments and reformulation proposals on the link between the ECF and the Performance Regulation, stressing the need for clearer provisions on indicators, the role of national development banks and intermediary partners, reporting consistency with other EU funds, and the importance of ensuring geographically balanced participation and fair access for all Member States. DE (Comments): General scrutiny reservation: We are still in the process of examining the very extensive draft regulation in detail. The following comments are therefore preliminary and we reserve the right to make further comments. The orientation of the ECF, including the four windows, seems to be very suitable to us in principle. The question of detail and flexibility of the policy

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	windows is strongly connected to the overarching award criteria, targets of the work programmes as well as governance of the ECF. Funding of the ECF must focus on support for actual key strategic technologies and activities. This requires clear priorities which areas contribute most effectively to the Union's competitiveness as well as security and resilience. A particular focus shall be put on strategic technologies contributing to the Union's open strategic autonomy. At the same time, we welcome the foreseen flexibility for the next MFF and the ECF. We deem it unwise to limit the ECF to those key strategic technologies that we can identify today since new challenges and technologies might arise between now and 2034. But such additional flexibility can only be possible if an effective governance structure is in place, especially with respect to overarching award criteria and targets of the work programmes. Key overarching / strategic decisions must not be determined in implementing acts, e.g. in the work programmes. The selection/award criteria of the ECF as well as the principles for prioritisation in the work programmes must fundamentally and consistently be regulated in the Regulation itself, not only in some of its areas (such as Art. 53). Those criteria must ensure that excellence and competitiveness are promoted effectively. Mechanisms to ensure predictable support for actual key strategic technologies must be strengthened. In addition, MS must play a sufficient role in the strategic management of activities. Among other things, concerning comitology, the examination procedure should be used throughout the adoption of the work programmes, not only in the Security/Defence window. We will provide concrete text propsals on Article 12 and Article 15 focusing on these criteria for award procedures and prioritisation as well as on governance aspects shortly.

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	Besides, it is important to ensure planning security and predictability. Certain indicative minimum budget envelops for long-term planning and commitments as in recital 41 can be an instrument for that. IE (Comments): **General Horizontal Issues** IE welcomes the aim of simplifying the process of applying for funding. IE would appreciate further details on how simplification would attract private investors as well as how would the issues of security guarantees, ownership control would be handled in that event? IE seeks clarity re funding pathways for SME's IE have concerns about the practical implications of the proposed links between the ECF and other EU funds, specifically the future framework programme for research and innovation ('FP10'), the Innovation Fund and LIFE. In particular, it is important that the 'ECF Toolbox' (see Chapter II of the draft ECF Regulation) is designed so it complements the funding instruments to be used in FP10, IE take the view that the fund may be well-aligned with EU strategic goals, but its success will depend on how effectively it can be implemented and coordinated. Indicators will be essential to achieve the ambitions of the proposal. IE notes that procurement opportunities and innovation procurement in particular get little mention in the chapters. This should be addressed

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	IE note the references to the Framework Programme for Research and Innovation, and look forward to further clarification of the relationship between it and the ECF **Digital Leadership** IE request further detail on how the digital fund will be allocated among the many different areas. In terms of the 4 pillars identified under the ECF, and specifically on digital leadership, will there be separate 'pots' with particular themes and dedicated criteria i.e. will there be some level of ringfencing for certain thematic areas/pots? IE seeks clarity on how activities currently supported under CEF Digital will be subsumed into the new ECF, and how the new activities will differ from the existing DEP and CEF Digital programmes? Regarding the Digital Europe Programme (DEP), IE seeks clarification if a name change is anticipated and whether a new Committee representing the views of the Member States be convened or will the present Committee continue? IE strongly supports continued and increased expenditure on funding for activities under Support for Digital Leadership. IE has concerns that a broad implementation of European digital sovereignty may result in shortages of specialist components and suppliers in certain sectors IE note that improved management of existing infrastructure, including physical and digital infrastructure, will be critical to competitiveness. There needs to be a clear recognition that 'digital infrastructure' will be critical and

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	needs to be considered in the context of existing infrastructure and not just separate. IE welcome the acknowledgement of infrastructures more generally, but would also highlight the specific importance of shared research infrastructures as a critical enabler of the development of cutting-edge, innovative products and services, particularly by SMEs, who otherwise would be priced out of access. IE note the extremely broad scope of the policy window – which includes support to health, biotech, agriculture and bioeconomy policies – creates a concern as to how priorities will be established across the breadth of sectors within the windows. **Clean Transition and Industrial Decarbonisatsion** IE note it is essential that climate adaptation and resilience objectives are embedded in the criteria and parameters to be developed and adopted for the Fund and the digital leadership pillar in particular. IE notes managing the balance between transport connectivity and competitiveness on the one hand, and the need for accelerated climate mitigation across all modes of transport on the other, represents a key challenge. The EU's climate leadership, however, must remain strong - as has been the case in the Fit for 55 legislative package, and as signalled by the ambitious targets being negotiated in respect of 2040 (in the proposed amendment to Regulation (EU) 2021/1119, establishing the framework for achieving climate neutrality). IE notes the decarbonisation challenge will require continued EU-level leadership, support, and innovation across all modes of transport - both in terms of technological solutions, and financial instruments (public funding

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	mechanisms and mobilising private investment) – if it is to be appropriately balanced against strengthening of EU-wide competitiveness. To accelerate the decarbonisation of transport in the EU and increase European industrial competitiveness, targeted supports in alternative fuels, infrastructure, and innovative technologies are required. **Resilience Security, Defence and Space** IE would be keen to see as early as possible the intended distribution of funding under the heading "Resilience and Security, Defence Industry and Space", it is important that the civil space programmes receive adequate funding. IE notes a significant amount of cyber security related legislation has emanated from the Commission in the last five years and Member States, especially those who are still maturing in their capacity in this area, require adequate supports and assistance in an unrestricted manner in order to ensure we are building a secure EU. IE note the inclusion of the Space Programmes in this Regulation, with the role of EUSPA to be dealt with in a further regulation, seems to run counter to the overall goal of simplification. It is not clear that including the Space Programmes in such detail in this regulation adds value over a shorter section providing for the level of funding, with the programme details included in the Regulation for the EUSPA. **Health, Biotech, Agriculture and Bioeconomy** While IE welcomes the reference to carbon farming in recital 33, it is not repeated / specifically referred to in the provisions. Given its importance and ongoing policy development in this space, it is worth mentioning this in the

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	body of the Regulation. Similarly, with regards to "restoration" which is only mentioned once, in recital 34.
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]	HU (Comments): The introductory provisions (Preamble) highlight only the Renewable Energy Directive as the relevant sectoral regulation related to energy. Based on the supported activities, the reference to the Energy Efficiency Directive, the TEN-E Regulation, the Gas Decarbonisation Package, the Building Energy Efficiency Directive, the Electricity Market Package and other regulatory elements should be included for a technology-neutral approach.
Chapter I	
	PL (Comments): The document provides for support for skills development, but it does not sufficiently emphasize the digital skills gap in SMEs. It should be supplemented by noting that particular attention needs to be paid to the development of digital skills in the SME sector, including in the areas of AI, cybersecurity, and data analytics.

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General Provisions	SI (Comments): SI welcomes the proposal for the European Competitiveness Fund. However, we underline the importance of ensuring that competitiveness objectives do not undermine the principles of accessibility, equity and inclusion, particularly in the public health and social sectors We recommend that the Regulation explicitly integrates horizontal principles such as gender equality, social inclusion, and non-discrimination across all policy windows. Furthermore, the Fund should support the development of skills and employment opportunities in sectors undergoing green and digital transitions, with particular attention to vulnerable groups and regions. Digital transformation actions should ensure accessibility for all, including persons with disabilities and older persons, and promote inclusive digital public services." ES (Comments): The adoption of work programs under the ECF should be carried out through implementing acts via the examination procedure, in order to include the vote of the Member States. This comment is also relevant for the CEF Regulation proposal. Moreover, the mechanism provided in Articles 15.5 and 15.6 leaves the adoption of the work program in the hands of the Commission in the event of a crisis or if it has not been adopted by October 1st. This should be limited to clearly defined circumstances to ensure Member State participation in the process.

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	As an additional reflection, it is important that both the regulation and the calls for proposals maintain a **level playing field** that enables fair competition.
SECTION 1	
OBJECTIVES AND STRUCTURE OF THE FUND	

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Article 3	PL (Drafting Suggestions): The general objective of the ECF is to increase European competitiveness across all EU countries and regions, notably in strategic sectors and technologies, while fully taking into account regional and local potentials and absorption capacities across the Union, along the entire investment journey by: PL (Comments): We emphasize that excessively limiting the sectoral scope of the European Competitiveness Fund to a narrow group of sectors considered strategic from the perspective of the entire EU, which are concentrated only in certain EU regions, would represent an approach that narrows the developmental potential of regions and fails to address the Union's diverse territorial challenges. It is therefore essential to maintain adequate flexibility of this fund, so as to enable the implementation of projects based on renewed smart specialisations relevant to individual countries and regions, while fully leveraging their local resources and absorption capacities. RO (Comments): Romania has already submitted comments and reformulation proposals on Article 3 in its document of 18.09.2023, underlining the need for clearer eligibility criteria, inclusion of societal impact, full-cycle support for strategic technologies, definition of strategic companies, stronger links with the Capital Markets Union, European University Alliances and the Union of Skills initiative.

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Objectives	ES (Comments): The development of cross-border infraestructure is a general objective (Art. 3.1) of this proposal, and the deployment of renewables or flexibility is a specific objective (Art. 3.2a). Likewise, article 6 of the proposal provides for complementary with other European funds, something we agree witj. In this context, how will the application of the ECF and the CEF be coordinated in the field of energy in PCI projects (infrastructures, storage) and cross-border renewables? Article 6 of the CEF Regulation also provides for complementary with other funds. How will this complementarity be achieved in practice? In particular, the eligibility criteria for cross-border projects are set out in the Trans-European Energy Networks (TEN-E) Regulation, which will be reviewed by the Commission at the end of 2025. It is thus important to have a clear vision of the possible interaction between the ECF and the CEF in terms of what could be useful for maximising access by priority projects. Will there be any link to the Energy Highways announced by president Von der Leyen in the 2025 State of the Union speech?
2. Under the general objectives set out in paragraph 1, the ECF shall in particular pursue the following specific objectives:	NL (Drafting Suggestions): 2. Under the general objectives set out in paragraph 1, the ECF shall in particular pursue the following specific objectives. **The general objectives under the Fund should, where possible, focus on the most strategic technologies and sectors, based on the impact on the geo-economic security of the EU, added value to the European economy and its**

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	growth, added value to urgent societal challenges and the current position of the EU in the world. NL (Comments): We notice that the scope of the ECF is very wide, and should instead focus on the most strategic technologies and sectors, in line with article 3(1). Acoording to the NL, this should be sharply prioritized based on four criteria: (i) impact on geo-economic security of the EU, (ii) contribution to the European economy and growth potential, (iii) contribution to urgent societal challenges, and (iv) current position of the EU, such as market share or technlogical readiness level. PL (Comments): Article 3(2): it is proposed to add issues related to technological products (med-tech) and bionic organs, critical medicines, and batch medicines for rare diseases. FI (Comments): Health and biotechnology, as well as agriculture and the bioeconomy, are such distinct and separate fields that establishing dedicated committees for each would better address their specific challenges and opportunities. These sectors also require their own targeted strategies, which demand specialized expertise to develop health and biotechnology policies or agriculture and bioeconomy policies in a consistent and effective manner. ES (Comments): Following the proposed changes in the CAP, in the absence of explicit references to investments in the processing and marketing of agricultural

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	products as actions eligible for financing through the ECF, the European Commission is required to provide detailed clarification on where this aid is contemplated, what the priority objectives are, and what instruments (subsidies, guarantees, loans, etc.) are intended to be used. EE (Drafting Suggestions): 2. Under the general objectives set out in paragraph 1 and, where applicable, **in close synergy with Horizon Europe's strategic planning** the ECF shall in particular pursue the following specific objectives: EE (Comments): Adding this reference strengthens legal clarity and avoids duplication of roles between the two programmes.
(a) For support to Clean Transition and Industrial Decarbonisation, the specific objectives of support to decarbonisation of European industry, including SMEs and energy intensive industries, clean tech manufacturing and its supply chains, and contributing to the shift towards a sustainable, circular, energy-, water- and resource-efficient, climate-neutral and resilient economy. This includes the uptake by industries of decarbonisation technologies and other solutions for their industrial processes and activities, as well as the decarbonisation of energy supply, promotion of energy efficiency, the uptake of renewable and clean energy solutions, the development of energy system flexibility, the uptake of lead markets for clean products , the development, resilience, integration and digitalisation of the energy and transport infrastructures and systems, boosting smart mobility and sustainable alternative fuels, as well as boosting the sustainable blue economy, the development of innovative nature-based business models and demand side	AT (Drafting Suggestions): For support to Clean Transition and Industrial Decarbonisation, the specific objectives of support **including the support of excellent collaborative research and innovation activities integrating also social sciences and humanities** to decarbonisation of European industry, including SMEs and energy intensive industries, clean tech manufacturing and its supply chains, and **advanced and raw materials** contributing to the shift towards a sustainable, circular, energy-, water- and resource-efficient, climate-neutral and resilient economy. **For support to resilience of supply chains, the specific objectives of reinforcing Europe's resilience by strengthening the Union capacity in exploration, extraction, processing and recycling of raw materials and diversifying supply sources and markets, and improving the timely availability of such products, including through the**

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solutions for clean and decarbonised buildings, transport and industry, and production ramp up contributing to Europe's strategic autonomy.	**reduction of their delivery lead time, reservation of manufacturing slots or stockpiling of products, intermediate products or raw materials.** This includes the uptake by industries of decarbonisation technologies and other **circular** solutions for their industrial processes, **production systems** and activities, **as well as the support to the diversification of European industries, manufacturers and value chains to enter into cutting edge, high-value-added, high potential clean tech and clean energy technology manufacturing value chains** as well as the decarbonisation of energy supply, promotion of energy efficiency, the uptake of renewable and clean energy solutions, the development of energy system flexibility, the uptake of lead markets for clean products , the development, resilience, integration and digitalisation of the energy and transport infrastructures and **mobility** systems **and services**, boosting smart mobility, ~~and~~ sustainable alternative fuels **and novel batteries,** as well as boosting the sustainable blue economy, the development of innovative nature-based business models and demand side solutions for clean and decarbonised buildings **and neighborhoods,** transport and industry, and production ramp up contributing to Europe's strategic autonomy AT (Comments): **AT** comment: Technical note: In red, we added new additions – not yet submitted on September 18. : This is indispensable to ensure reliable and robust public service provision to ensure coverage of fundamental societal needs! This is a strategic technology to make Europe independent from foreign suppliers in geostrategically competing world regions

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	Strengthening Europe's strategic autonomy by quickly ramping up production of clean tech solutions, particularly cutting edge clean energy solutions, will need to be based on current European fields of manufacturing strength and ecosystems (incl. expertise, facilities, and infrastructure) that are not yet part of clean energy technology value and supply chains but could, with innovation, up-/re-skilling, adapted and/or innovative production processes and production systems, (quickly) diversify and expand into these new to them product and business fields. Therefore, this policy window should explicitly address the promotion of diversification of European industries and manufacturers into (more) innovative, high value-added, high-potential clean tech sectors (especially in the areas covered under NZIA) BE (Drafting Suggestions): (a) For support to Clean Transition and Industrial Decarbonisation, the specific objectives of support to **decarbonize** ~~decarbonisation of~~ European industry~~,~~ **(**including SMEs and energy intensive industries, clean tech manufacturing and its supply chains**)**, and ~~contributing~~ **contribute** to the shift towards a sustainable, circular, energy-, water- and resource-efficient, climate-neutral and resilient economy. This includes the uptake by industries of decarbonisation technologies and other solutions for their industrial processes and activities, as well as the decarbonisation of energy supply, promotion of energy efficiency, the uptake of renewable and clean energy solutions, the development of energy system flexibility, the uptake of lead markets for clean products , the development, resilience, integration and digitalisation of the energy and transport infrastructures and systems, boosting **sustainable and** smart mobility and sustainable alternative fuels, **circular economy, water efficiency, ocean and health solutions, efforts in support of climate and water resilience, pollution prevention, control and remediation,** as well as boosting the sustainable blue economy, **sustainable and clean transition of SMEs,** the development of innovative

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	nature-based business models and demand side solutions for clean and decarbonised buildings, transport and industry, **skills development**, and production ramp up contributing to Europe's strategic autonomy. BE (Comments): Also the activities under art 33 (e), (i), (j), (k), (m) en the skills development part of (n) should be reflected in the list starting after 'This includes…' CZ (Drafting Suggestions): (a) For support to Clean Transition and Industrial Decarbonisation, the specific objectives of support to decarbonisation of European industry, including SMEs and energy intensive industries, clean tech manufacturing and its supply chains, and contributing to the shift towards a sustainable, circular, energy-, water- and resource-efficient, climate-neutral and resilient economy. This includes the uptake by industries **of** decarbonisation technologies**, including in the transport sector,** and other solutions for their industrial processes and activities, as well as the decarbonisation of energy supply, promotion of energy efficiency, the uptake **and development** of renewable and **clean energy solutions, including nuclear energy,** the development of energy system flexibility, the uptake of lead markets for clean products, the development, resilience, integration and digitalisation of the energy and transport infrastructures and systems, boosting smart mobility and sustainable alternative fuels, as well as boosting the sustainable blue economy, the development of innovative nature-based business models, and demand side solutions for **ecosystem and climate resilience**, clean and decarbonised buildings, transport and industry, and production ramp up contributing to Europe's **open** strategic autonomy. CZ

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	(Comments): CZ - It remains unclear whether this window and the subsequent work programmes are intended to enhance competitiveness and resilience solely through the uptake of existing technologies, or also through the development of new, innovative solutions. This is particularly relevant for renewable and clean energy technologies, which advance continuously. Czechia requests the explicitly list **nuclear energy** among the clean energy solution objectives under this window. For further justification, please visit our additional comments on Art. 33, para 1. Czechia also proposes a broader inclusion of LIFE program topics in the clean transition window, since there is no justification in the draft Regulation for excluding some of thematic areas currently supported by the LIFE programme. While the Clean Transition and Industrial Decarbonisation window is framed mainly around green transition and industrial decarbonisation, LIFE has also supported biodiversity protection, nature and landscape conservation, and climate change adaptation — here proposed collectively as **solutions for ecosystem and climate resilience** — which merit explicit mention beyond "innovative nature-based business models". Note that para 2(b)(4) links these/similar areas too narrowly to agriculture and food. We would also kindly request these issues being clarified in written response to our comments, **in particular should our proposed amendments not be reflected.** With regard to LIFE's areas of *"biodiversity protection, nature and landscape conservation, and climate change adaptation"*, should these not be encompassed within the ECF, the question arises as to how the European Commission intends to ensure continued and adequate support for these domains. We would appreciate receiving written clarification on this matter.

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	HR (Drafting Suggestions): (a) For support to Clean Transition and Industrial Decarbonisation, the specific objectives of support to decarbonisation of European industry, including SMEs and energy intensive industries, clean tech manufacturing and its supply chains, and contributing to the shift towards a sustainable, circular, energy-, water- and resource-efficient, climate-neutral and resilient economy. This includes the uptake by industries of decarbonisation technologies and other solutions for their industrial processes and activities, as well as the decarbonisation of energy supply, promotion of energy efficiency, the uptake of renewable and clean energy solutions, the development of energy system flexibility, the uptake of lead markets for clean products , the development, resilience, integration and digitalisation of the energy and transport infrastructures and systems, boosting smart mobility and sustainable alternative fuels, as well as boosting the sustainable blue economy, the development of innovative nature-based business models and demand side solutions for clean and decarbonised buildings, transport and industry, ~~and~~ production ramp up contributing to Europe's strategic autonomy~~.~~ **and contributing to EU missions.** LT (Drafting Suggestions): (a) For support to Clean Transition and Industrial Decarbonisation, the specific objectives of support to decarbonisation of European industry, including SMEs and energy intensive industries, clean tech manufacturing and its supply chains, and contributing to the shift towards a sustainable, circular, energy-, water- and resource-efficient, climate-neutral and resilient economy. This includes the uptake by industries of decarbonisation technologies and other solutions for their industrial processes and activities, as well as the decarbonisation of energy supply, promotion of energy efficiency, the uptake

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	of renewable and clean energy solutions, the development of energy system flexibility, the uptake of lead markets for clean products-, the development, resilience, integration and digitalisation of the energy and transport infrastructures and systems, boosting smart mobility and sustainable alternative fuels **to satisfy the specific demands of the different sectors**, as well as boosting the sustainable blue economy, the development of innovative nature-based business models and demand side solutions for clean and decarbonised buildings, transport and industry, and production ramp up contributing to Europe's strategic autonomy**, while reflecting specific national and regional contexts, including the role of SMEs and industrial ecosystems in the transition, and their contribution to strengthening the resilience and security of energy systems and the economy as a whole**. LT (Comments): According to the data provided by COM and the activities of the different sectors, there is an increasing internal competition for the alternative fuels. For example, the aviation and shipping sectors. Therefore, it is necessary to focus on the sectors individually and meet their unique needs. Moreover, we would like to emphasize the importance of the national and regional context of SMEs and industrial ecosystems, as well as their role in fostering Europe's strategic autonomy. LV (Drafting Suggestions): For support to Clean Transition and Industrial Decarbonisation, the specific objectives of support to decarbonisation of European industry, including SMEs and energy intensive industries, clean tech manufacturing and its supply chains, and contributing to the shift towards a sustainable, circular, energy-, water- and resource-efficient, climate-neutral and resilient economy. **This shall also encompass the use of nature-based solutions, the**

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	protection and restoration of ecosystems, and measures to halt and reverse biodiversity loss, in line with the Union's biodiversity and climate objectives. It also includes the uptake by industries of decarbonisation technologies and other solutions for their industrial processes and activities, as well as the decarbonisation of energy supply, promotion of energy efficiency, the uptake of renewable and clean energy solutions, the development of energy system flexibility, the uptake of lead markets for clean products , the development, resilience, integration and digitalisation of the energy and transport infrastructures and systems, boosting smart mobility and sustainable alternative fuels, as well as boosting the sustainable blue economy, the development of innovative nature-based business models and demand side solutions for clean and decarbonised buildings, transport and industry, and production ramp up contributing to Europe's strategic autonomy. LV (Comments): Addition included to ensure continuation of the current LIFE programme and Union's nature and biodiversity goals. MT (Drafting Suggestions): For support to Clean Transition and Industrial Decarbonisation, the specific objectives of support to decarbonisation of European industry, including SMEs and energy intensive industries, clean tech manufacturing and its supply chains, and contributing to the shift towards a sustainable, circular, energy-, water- and resource-efficient, climate-neutral and resilient economy. This includes the uptake by industries of decarbonisation technologies and other solutions for their industrial processes and activities, as well as the decarbonisation of energy supply, promotion of energy efficiency, the uptake of renewable and clean energy solutions, the development of energy system

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	flexibility, the uptake of lead markets for clean products , the development, resilience, integration and digitalisation of the energy and transport infrastructures and systems, boosting smart mobility and sustainable alternative fuels, as well as boosting the sustainable blue economy, the development of innovative nature-based business models and demand side solutions for clean and decarbonised buildings **and infrastructures**, transport and industry, and production ramp up contributing to Europe's strategic autonomy. MT (Comments): Materials and technologies used for low-carbon buildings—such as concrete, steel, and insulation—are also relevant for infrastructures. Including "infrastructures" ensures decarbonisation solutions apply to both buildings and larger infrastructural projects. NL (Drafting Suggestions): For support to Clean Transition and Industrial Decarbonisation, the specific objectives of support to decarbonisation of European industry, including SMEs and energy intensive industries, clean tech manufacturing and its supply chains, and contributing to the shift towards a sustainable, circular, energy-, water- and resource-efficient, climate-neutral, **nature-positive** and resilient economy. This includes **supporting** the **upscaling and market** uptake by industries of decarbonisation **and defossilisation** technologies and other solutions for ~~their~~ **clean** industrial processes and activities, as well as the decarbonisation of energy supply, promotion of energy efficiency, the uptake of renewable and clean energy solutions, the development of energy system flexibility, the uptake of lead markets for clean products , the development, resilience, integration and digitalisation of the energy and transport infrastructures and systems, boosting smart mobility and

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	sustainable alternative fuels, as well as boosting the sustainable blue economy, the development of innovative nature-based business models and demand side solutions for clean and decarbonised buildings, transport and industry, and, **where proportionate**, production ramp up contributing to Europe's strategic autonomy. NL (Comments): NL: Important to highlight also under this window that we work towards an economy that is also nature-positive. Two-thirds (65%) of the EU's gross value added is estimated to have a high or medium dependency on nature – and between 19% and 36% of the EU's gross value added is estimated to be highly dependent on ecosystem services. The ECB found that 3 million companies, representing 75% of bank loans in the Eurozone, are highly dependent on at least one ecosystem service to produce their goods or provide their services. PL (Drafting Suggestions): To add:...towards a sustainable, circular, energy-, water- and resource-efficient, climate-neutral and resilient economy, including through **the implementation of Directive 2024/3019 of the European Parliament and of the Council** **concerning urban wastewater treatment and the application of treated reclaimed water in line with the objectives of Regulation (EU) 2020/741.** (a) For support to Clean Transition and Industrial Decarbonisation, the specific objectives of support to decarbonisation of European industry, including SMEs and energy intensive industries, clean tech manufacturing and its supply chains **including advanced materials**, and contributing to the shift

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	towards a sustainable, circular, energy-, water- and resource-efficient, climate-neutral and resilient economy. PL (Comments): Strengthening the link between the ECF and the EU Wastewater Directive (EU) 2024/3019 and the Water Reuse Regulation. The new requirements introduced by the Wastewater Directive 2024/3019, such as the removal of micropollutants from wastewater (tertiary/IV-level treatment), pathogen monitoring, energy neutrality of wastewater treatment plants, as well as water reuse from treated wastewater, require the provision of adequate financial resources, as well as the conduct of research and the implementation of innovative technologies. The ECF regulation refers to Advanced Materials Act as the policy background. Also lists advanced material as one of specific activities of this policy window (Art.33, p.1(h). Therefore advanced materials should be included into objectives defined in Article 3. SE (Comments): Which parts of the LIFE programme will continue under the ECF and which will go in to the NRPPs? Will some parts go into other programmes? Would also like to see a clear comparison between the governance of the current LIFE programme and how the governance under the ECF will look like. SI

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	(Drafting Suggestions): (a) For support to Clean Transition and Industrial Decarbonisation, the specific objectives of **research and innovation as well as** support to decarbonisation of European industry, including ~~SMEs and~~ energy intensive industries, clean tech manufacturing and its supply chains **as well as SMEs**, and contributing to the shift towards a sustainable, circular, energy-, water- and resource-efficient, climate-neutral and resilient **society and** economy. This includes the uptake by industries of decarbonisation technologies and other solutions for their industrial processes and activities, as well as the decarbonisation of energy supply, promotion of energy efficiency, the uptake of renewable and clean energy solutions, the development of energy system flexibility, the uptake of lead markets for clean products , the development, resilience, integration and digitalisation of the energy and transport infrastructures and systems, boosting smart mobility and sustainable alternative fuels, as well as boosting the sustainable blue economy, the development of innovative nature-based business models and demand side solutions for clean and decarbonised buildings, transport and industry., and production ramp up contributing to Europe's strategic autonomy. SI (Comments): All four policy windows are connected to pillar II.of Horizon Europe and this should be reflected in the text DE (Drafting Suggestions): a) For support to Clean Transition and Industrial Decarbonisation, the specific objectives of support to decarbonisation of European industry, including SMEs and energy intensive industries, clean tech manufacturing and its supply chains, and contributing to the shift towards a sustainable, circular, energy-, water- and resource-efficient, climate-neutral and resilient

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	economy. This includes the uptake by industries of decarbonisation technologies and other solutions for their industrial processes and activities, as well as the decarbonisation of energy supply, promotion of energy efficiency, the uptake of renewable and clean energy solutions, the development of energy system flexibility, the uptake of lead markets for clean products **processes and services**, the development, resilience, integration and digitalisation of the energy and transport infrastructures and systems, boosting smart mobility and sustainable alternative fuels, as well as boosting the sustainable blue economy, the development of innovative nature-based business models, **circular construction** and demand side solutions for clean and decarbonised buildings, , transport and industry, and production ramp up contributing to Europe's strategic autonomy, **research and innovation support for sustainable competitiveness**. DE (Comments): **Re:** "clean products**, processes and services**": The development and establishment of new and innovative "clean processes and services" are key for mastering the transformation and may create competitive advantages. **Re "circular construction":** Advancing circularity in the construction and building sector is key for a future-oriented development of the sectors. Today, the construction sector has a high rate of resource consumption and contributes substantially to waste production. Circular construction is key to solving current and future material-related supply, environmental and health problems and a smart, flexible use of building infrastructure and has the potential for developing new business models. Regarding refernces to **clean energy**: To what extent will the references to clean energy open up TFEU-based EU programmes for energy generation through nuclear fission? Would it be possible to fund the construction and

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	maintenance of nuclear power plants? Would this expenditure be counted against the climate quota? Re, **research and innovation support for sustainable competitiveness:** research dimension which is implemented through the Horizon Europe activities of this chapter should be mentioned. FI (Drafting Suggestions): " (a) For support to Clean Transition and Industrial Decarbonisation, the specific objectives of support to decarbonisation of European industry, including SMEs and energy intensive industries, clean tech manufacturing and its supply chains, and contributing to the shift towards a sustainable, circular, energy-, water- and resource-efficient, climate-neutral, **nature-positive** and resilient economy. This includes the uptake by industries of decarbonisation technologies and other solutions for their industrial processes and activities, as well as the decarbonisation of energy supply, promotion of energy efficiency, the uptake of renewable and clean energy solutions, the development of energy system flexibility, the uptake of lead markets for clean products , the development, resilience, integration and digitalisation of the energy and transport infrastructures and systems, boosting smart mobility and sustainable alternative fuels **and electrification of transport**, as well as boosting the sustainable blue economy, the development of innovative nature-based business models and demand side solutions for clean and decarbonised buildings, transport and industry, and production ramp up contributing to Europe's strategic autonomy. FI (Comments): FI proposes adding the perspective of nature and biodiversity in the objectives.

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	In many applications, electricity is already a sufficiently competitive alternative to fossil fuels, but not in all. In the future, it must also be monitored whether efforts are made to define in more detail what is meant by "sustainable fuels", which is a vague expression compared to the language used in other EU regulations. IT (Drafting Suggestions): (a) For support to Clean Transition and Industrial Decarbonisation, the specific objectives ~~of~~ **are to** support ~~to~~ **the** decarbonisation of European industry, **in compliance with the principle of technology neutrality**, including SMEs and energy intensive industries, **hard-to-electrify sectors, automotive sector,** clean tech manufacturing and its supply chains, and contributing to the shift towards a sustainable, circular, energy-, water- and resource-efficient, climate-neutral and resilient economy **while minimizing the economic impact on the most vulnerable households and consumers.** IT (Comments): We should ensure that the decarbonisation process is based on the principle of technology neutrality, which was already included in the European Council conclusions. The transition of the automotive sector should be accompanied by an adequate amount of financial resources, to be paired with/to national ones. This to support the demand and the supply side of this sector, with a special focus on the needs of all actors of the automotive value chain.

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	ES (Drafting Suggestions): (a) For support to Clean Transition and Industrial Decarbonisation, the specific objectives of support to decarbonisation of European industry, including SMEs and energy intensive industries, clean tech manufacturing and its supply chains, and contributing to the shift towards a sustainable, circular, energy-, water- and resource-efficient, climate-neutral and resilient economy. This includes the uptake by industries of decarbonisation technologies and other solutions for their industrial processes and activities, as well as the decarbonisation of energy supply, promotion of energy efficiency, the uptake of renewable and clean energy solutions, foster **energy storage**, the development of energy system flexibility **and demand response**, the uptake of lead markets for clean products , the development, resilience, integration and digitalisation of the **domestic and cross-border** energy and transport infrastructures and systems, boosting smart mobility and sustainable alternative fuels, as well as boosting the sustainable blue economy, the development of innovative nature-based business models and demand side solutions for clean and decarbonised buildings, transport and industry, and production ramp up contributing to Europe's strategic autonomy. ES (Comments): Energy storage is one of the drivers for industrial descarbonization, combined with flexibility and demand response. EE (Drafting Suggestions): Suggestion 1: Add: *"…contributing to the shift towards a sustainable, circular, energy-, water- and resource-efficient, climate-neutral and resilient*

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	*economy, **where competitiveness is based on reducing environmental and climate footprint**."* Suggestion 2: (a) For support to Clean Transition and Industrial Decarbonisation, the specific objectives of support to decarbonisation of European industry, including SMEs and energy intensive industries, clean tech manufacturing and its supply chains, and contributing to the shift towards a sustainable, circular, energy-, water- and resource-efficient, climate-neutral and resilient economy, **biodiversity protection and water resilience.** EE (Comments): Comment 1: EE supports that the ECF remains strongly focused on clean transition and climate/environment objectives, ensuring that these do not disappear from EU budget priorities. It is essential to maintain funding for biodiversity, nature conservation, circular economy and water-related projects, alongside large industrial projects. A smooth transition from LIFE programmes must be guaranteed to avoid interruption of ongoing projects. Comment 2: As flagged by the stakeholders. HU (Drafting Suggestions): (a) For support to Clean Transition and Industrial Decarbonisation, the specific objectives of support to decarbonisation of European industry, including SMEs and energy intensive industries, clean tech manufacturing and its supply chains, and contributing to the shift towards a sustainable, circular, energy-, water- and resource-efficient, climate-neutral and resilient economy. This includes **knowledge and technology transfer and development,** the uptake by industries of decarbonisation technologies and

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	other solutions for their industrial processes and activities, as well as the decarbonisation of energy supply, promotion of energy efficiency, the uptake of renewable and clean energy solutions, the development of energy system flexibility, the uptake of lead markets for clean products , the development, resilience, integration and digitalisation of the energy and transport infrastructures and systems, boosting smart mobility and sustainable alternative fuels, as well as boosting the sustainable blue economy, the development of innovative nature-based business models and demand side solutions for clean and decarbonised buildings, transport and industry, and production ramp up contributing to Europe's strategic autonomy. HU (Comments): It is important to emphasize, that not just the uptake, but also the newly developed technologies' transfer and development should be promoted. Knowledge and technology transfer and multiplication throughout Europe is key to boost the competitiveness of Member States. PT (Drafting Suggestions): a) For support to Clean Transition and Industrial Decarbonisation, the specific objectives of support to decarbonisation of European industry, including SMEs and energy intensive industries, **including downstream sectors, circular economy**, clean tech manufacturing and its supply chains, and contributing to the shift towards a sustainable, **highly** circular, energy-, water- and resource-efficient, climate-neutral and resilient economy. This includes the uptake by industries of decarbonisation technologies and other solutions for their industrial processes and activities, as well as the decarbonisation of energy supply, promotion of energy efficiency, the uptake of renewable and clean energy solutions, the development of energy system flexibility, the uptake of lead markets for clean products , the development,

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	resilience, integration and digitalisation of the energy and transport infrastructures and systems, boosting smart mobility and sustainable alternative fuels, as well as boosting the sustainable blue economy, **with a special focus on ocean renewable energies, sustainable aquaculture, and blue biotechnology,** the development of innovative nature-based business models and demand side solutions for clean and decarbonised buildings, transport and industry, **including the strengthening of the entire circular economy value chain, from ecodesign and repair to the high-efficiency recycling of complex waste streams,** and production ramp up contributing to Europe's strategic autonomy. PT (Comments): -Coherence must be ensured with industrial legal frameworks in force (CRMA, NZIA, Circular Economy Act) and the forthcoming (IDAA) for energy intensive industries. -We must also ensure that the support for energy intensive industries in their effort to descarbonization also include their **downstream sectors that depend on these industries** (construction, automotive, packaging, textiles, etc.) to promote balanced competitiveness of national and European industries. -We need to reinforce in the text energy interconnections and networks. **We need to access clean, secure and competitive and affordable energy, and we need investment in energy grids and modernize and increase interconnections, an aspect to which we attach particular importance. This is pivotal to completing the European Energy Union.** -Lack of reference to ensuring at the same time **EU's economic, social and territorial cohesion in the pursuit of industrial leadership** (geographically balanced coverage)**.**

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	- Investment in renewable energies, including **green hydrogen** for which a market needs to be developed, is vital (the path of renewables in Portugal reflects the strong investment in this sector), and in **carbon capture, utilisation and storage for sectors where total decarbonisation is not technically feasible in the short term. We do not see this dimension. It should be included.** - Given the strong industrial relevance of circular economy approaches, particularly in energy intensive industries and in clean tech manufacturing and advanced materials, it is important to ensure that circularity is consistently addressed in several areas and not only as an environmental measure. **- Blue Economy:** The generic mention of "sustainable blue economy" is positive, but specifying the focus areas (ocean renewable energies, aquaculture, blue biotechnology) is crucial for directing investment toward sectors with higher added value and growth potential. This clarification ensures that strategic projects, such as the development of offshore wind and wave energy, will be clearly eligible, thereby strengthening both national and European competitiveness.
(b) For support to Health, Biotechnology, Agriculture and Bioeconomy:	AT (Drafting Suggestions): CZ (Comments): CZ - We would appreciate a written explanation as to whether, and in what manner, the forthcoming EU Bioeconomy Strategy (scheduled for publication in the fourth quarter of 2025) has been duly taken into account in the design of this thematic window.

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	We would also like to draw attention to the fact that many medicinal products are produced synthetically, and that pharmaceutical development often involves formulation challenges (e.g., controlled or targeted release), which are not necessarily biotechnological in nature. A similar situation applies to certain medical devices, as not all of them are bio-based. Is the support for all medical products and devices considered, or only those that are being bio-based under paragraph 2(b)(2)? We would appreciate receiving written clarification on this matter. PL (Drafting Suggestions): To add::...**resilience of the agriculture, fisheries and aquaculture, forestry and rural and coastal areas and their role in the transition to a climate-neutral climate-resilient, water-smart economy, including the reduction of water pollution from nitrates, in line with the objectives of Directive 91/676/EWG, and monitoring of antimicrobial resistance in urban wastewater in line with the Directive 2024/3019 and the protection of natural resources...** For support to Health, Biotechnology, Agriculture and Bioeconomy **encompassing research and innovation activities**. PL (Comments): This chapter concerns, among other things, agriculture and health, and constitutes an appropriate place to link the Fund to the Nitrates Directive as well as the Wastewater Directive. Explicit reference to nitrate pollution would provide a solid basis for financing innovations and technologies in agriculture

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	and wastewater management in the context of public health, thereby supporting the objectives of these directives. (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; contributing to the objectives of the European Health Union and Europe's Beating Cancer Plan by addressing unmet medical needs through targeted innovation and investment in supporting the development of innovative therapies, including small- and large-molecule medicines as well as advanced therapy medicinal products (ATMPs). (2) For support to biotechnology, the specific objectives of contributing to the development and scalable production and uptake, availability and accessibility of medicinal products, medical devices, diagnostics and other medical countermeasures; reinforcing the capacity to address unmet medical needs by supporting research, innovation and industrial investment in novel treatment modalities, including small- and large-molecule medicines and ATMPs (leads, drug candidates, pharmaceutical components, APIs etc); ensuring timely, safe and equitable access to such solutions across Member States. Art. 3 ust 2b – należy wskazać wprost odniesienie do obszaru B+R, w obecnym brzmieniu zapisy zawierają dość ogólne sformułowania jak: „discovery, development, derisking, demonstration, piloting and scaling-up", „biotechnology innovations" Brakuje odniesienia wprost do „research and innovation activities".

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	We propose that this article include a clear reference to research and development (R&D) activities. The current wording is too general, and there is no explicit mention of "research and innovation activities SE (Comments): Note that the current EU4Health has been divided into the ECF and UCPM. How does the content of the two new regulations differ from the current EU4Health program, and what will this will mean in practice for the work in the health sector? Also, how does COM envision that health-related work will be kept coherent given the new structure? And how does COM intend to ensure coordinated governance? IE (Drafting Suggestions): For support to Health and Biotechnology**:** IE (Comments): IE suggests the importance of establishing a separate mechanism to ensure that public health and associated biotechnology issues receive adequate attention and prioritisaton in line with the unique challenges and opportunities within these fields. For example, a dedicated policy window would allow for more focused expertise, ensuring that both public health and associated biotechnology policies are developed and implemented in a consistent and effective manner. FI (Drafting Suggestions):

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	"For support to Health, Biotechnology, **Nature-Based Solutions,** Agriculture and Bioeconomy:" FI (Comments): FI proposes adding the perspective of nature-based solutions in the scope of this policy window at the objective level.
(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.	AT (Drafting Suggestions): For support to health, the specific objectives of fostering **research**, 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 **supporting structural reforms,** strengthening innovation and resilience of health systems. NL (Drafting Suggestions): (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; **contributing to** 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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	PL (Comments): We recommend to add provisions regarding medicines safety and ensuring the production of medicines, critical medicines and actve pharmaceutical ingredients (APIs). SE (Comments): What does it mean to support the competitiveness of the health sector? The health sector is broader than the sector for medicines and medical technology. Why should the health sector, as a whole, be subject to competitiveness, seeing that the health sector is mainly a public responsibility and not a competitive market area? It largely falls under national competence, and its governance and financing are primarily determined by public policy rather than market mechanisms. How does this play in with what is intended with the ECF? SI (Drafting Suggestions): (1) For support to health, the specific objectives of fostering **research and** innovation and ~~competitiveness~~ **development** of **the public as well as private** 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. SI (Comments):

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	In particular public health sectors should not be bound to the characteristics of competitiveness. All four policy windows are connected to pillar II.of Horizon Europe and this should be reflected in the text. DE (Drafting Suggestions): (1) For support to health, the specific objectives of fostering innovation and competitiveness of the health sector **and bringing its benefits to citizens and society across the Union** 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 **providing better innovative diagnosis and treatment and** 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 **and care** systems. DE (Comments): The text should also take into account the dimension of health research which is implemented through the Horizon Europe activities of this chapter. The benefit to society should be mentioned here as it is already done in the digital policy window. IE (Drafting Suggestions): 1) For support to health, the specific objectives of **strengthening the equity, accessibility, sustainability resilience and innovation capacity of**

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	national health systems and the development of the European Health Union by fostering **the** 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 **policies** and One Health policies approach, and by strengthening innovation**, quality accessibility** and resilience of health systems, **in line with the objectives of the European Health Union** IE (Comments): IE believe the current wording does not clearly reflect key aspects related to public health and healthcare priorities, and it fails to mention cooperative and transnational aspects related to the European Health Union. The Council Conclusions on the Future of the European Health Union: a Europe that cares, prepares and protects (9900/24, 29 May 2024) underline the importance of ensuring that EU policies contribute to resilient, sustainable, equitable and accessible health systems, capable of responding to future cross-border threats to health and should be the inspiration of this article and related actions FI (Drafting Suggestions): (1) For support to health, the specific objectives of **strengthening the equity, accessibility, sustainability, resilience and innovation capacity of national health systems and the development of the European Health Union by** fostering **the** 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

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	prevention across the life span through a health-in-all and One Health policies approach, and by strengthening innovation and resilience of health systems. FI (Comments): The starting point of the current health programme has been people's well-being and strenghtening national health systems, whereas the current ECF proposal has a strong industrial emphasis, with companies and the maximisation of their growth potential as its foundation. The competitiveness fund should recognise that health is an independent value, a key competitiveness factor, and a builder of resilience. With the current text, the concern is that this important perspective on health is being overlooked. IT (Drafting Suggestions): For support to health, the specific objectives of **are to** 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; **harnessing the potential of digital health, health data and new technologies to accelerate transformation**; and strengthening innovation, sustainability and resilience of health systems. ES (Drafting Suggestions): **(**1) For support to health, the specific objectives of **strengthening the equity, accessibility, sustainability, resilience and innovation capacity and the cross-border dimension of national health systems and the**

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	development of the European Health Union by fostering **the** innovation and competitiveness of the health sector while ensuring supply security and the industrial capacity and **manufacturing** capability to manage future serious cross-border threats to health; improving and protecting public and population health, **with particular attention to key populations, across the life course** by prioritising health promotion and disease prevention ~~across the life span~~ through a Health-In-All **Policies** and One Health ~~policies~~ approach; **accelerating the pathway from scientific breakthroughs to accessible market solutions** ~~by strengthening innovation and resilience of health systems~~. ES (Comments): We believe the current wording does not clearly reflect key aspects related to public health and healthcare priorities, and it fails to mention cooperative and transnational aspects related to the European Health Union. The Council Conclusions on the Future of the European Health Union: a Europe that cares, prepares and protects (9900/24, 29 May 2024) underline the importance of ensuring that EU policies contribute to resilient, sustainable, equitable and accessible health systems, capable of responding to future cross-border threats to health and should be the inspiration of this article and related actions. EE (Drafting Suggestions): (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

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	strengthening innovation and resilience of health systems, **including preparedness for future health crises.** EE (Comments): As flagged by the stakeholders. HU (Comments): The specific objectives defined in the section – particularly the role of the healthcare sector in innovation and supply security, as well as support for the bioeconomy, biotechnology, and agriculture – make it clear that EU4Health is not only a health policy tool but also an economic strategy instrument. Strengthening the links between health, biotechnology, and agriculture creates an opportunity for health policy interventions to generate long-term economic growth and sustainability. However, we do not agree with merging the EU health programme – which has existed separately for the past 20 years – into a large competitiveness fund, where it is not defined, for example, how much of the €20.393 billion earmarked in Article 3(2)(b) for health, biotechnology, agriculture, and bioeconomy objectives will actually be allocated to healthcare developments, compared to the current EU4Health programme's budget of €4.4 billion within the planned overall budget of €234.3 billion. PT (Comments): -It seems that the references to SMEs could be harmonised as they are not mentioned in this paragraph or paragrah 2, but are mentioned in the following regarding bioeconomy. There might be some inconsistency here.
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	(Drafting Suggestions): (c) For support to Agriculture and Bioeconomy: IE (Comments): Consequence of the amendement to article 3 (2) b
(2) For support to biotechnology, the specific objectives of contributing to the development and scalable production and uptake, availability and accessibility of medicinal products, medical devices, diagnostics and other medical countermeasures.	AT (Drafting Suggestions): For support to biotechnology, the specific objectives of contributing to the **scalable** development and ~~scalable~~ production and uptake, availability and accessibility of medicinal products, medical devices, diagnostics and other medical countermeasures. AT (Comments): **Rationale:** Already the scalable development of medicinal products and not only the scalable production of medicinal products is hampered. Therefore, this slight change of wording. BE (Drafting Suggestions): (2) For support to biotechnology, the specific objectives of contributing to the development and scalable production and uptake, availability and accessibility of medicinal, **food, feed and other** products, medical devices, diagnostics and other medical countermeasures. BE

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	(Comments): Why focus solely on medicines and medical devices? There are many more products derived from biotechnology than just medical products that need support (agrobiotechnology, industrial biotechnology, etc.). We strongly encourage the European Commission to take a broader view of biotechnology and not limit it solely to biotechnology in the field of health. Importance of mainstreaming support to SMEs, startups and scaleups CZ (Comments): CZ - The current drafting of the Regulation explicitly refers to biotechnology only in the context of medical and pharmaceutical applications, thereby creating a potentially misleading and unduly narrow definition of the field. This wording may give rise to the interpretation that Article 37(1)(d) applies solely to medicine and pharmacy, which was presumably not the intention of the Commission. We kindly request that this issue be clarified in a written response to our comments, and, if the Commission shares this assessment, reflected in a revision of the draft Regulation. HR (Drafting Suggestions): (2) For support to biotechnology, the specific objectives of contributing to the development and scalable production and uptake, availability and accessibility of medicinal products, medical devices, diagnostics and other medical countermeasures~~.~~**, including those set by EU missions.** SI (Drafting Suggestions): (2) For support to biotechnology, the specific objectives of contributing **to research and innovation** and the development and scalable production

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	and uptake, availability and accessibility of medicinal products, medical devices, diagnostics and other medical countermeasures. SI (Comments): All four policy windows are connected to pillar II.of Horizon Europe and this should be reflected in the text. DE (Drafting Suggestions): (2) For support to biotechnology, the specific objectives of contributing to the development and scalable production and uptake **of industrial biotechnologies, fostering e.g.** availability and accessibility of medicinal products, medical devices, diagnostics and other medical countermeasures; **developing the substantial potential offered by all forms of biotechnology for industry and agriculture.** DE (Comments): The current text on biotechnology addresses solely red biotechnology. There is considerable potential for application in other domains also, which is already reflected in the Biotech Act initiative and should be reflected here. IE (Drafting Suggestions): HU (Drafting Suggestions):

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	For support to biotechnology, the specific objectives of contributing to the development **of skills related to** and scalable production, **multiplication** and uptake, availability and accessibility of **biotech innovations,** medicinal products, medical devices, diagnostics and other medical countermeasures. HU (Comments): This paragraph should not focus only on the medicinal sector, biotech should bring broad opportunities throughout several sectors. The specific objective is to make it accessible and to be able to bring the biotech on the European market in all possible areas. For reference please consider also the Council Conclusion of 30 September 2025 on life sciences for the Union's competitiveness. PT (Drafting Suggestions): 2) For support to biotechnology, the specific objectives of contributing to the development and scalable production and uptake, availability and accessibility of medicinal products, medical devices, diagnostics and other medical countermeasures. **Blue, green and white biotechnology are also contributing to the objectives of delivering impactfull innovative solutions to industrial, environmental, blue and agri-food applications** PT (Comments): Although biotechnology is recognised as a strategic sector for Europe, the proposed merged structure ("Health, Biotechnology, Agriculture, and Bioeconomy") risks allowing health-focused biotech to overshadow other domains such as industrial, environmental, blue, and agri-food applications.

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	PT is concerned that this could lead to reduced funding and visibility for non-health biotech areas, including biobased materials, enzymes, synthetic biology for environmental uses, and alternative proteins. Dedicated fields, such as industrial (white) biotechnology, the bio-based economy, and food biotechnologies, may become fragmented or deprioritised. Blue biotechnlogogy is a priority that should be highlighted.
	IE (Drafting Suggestions): [redacted]
(3) For support to bioeconomy policy, the specific objectives of fostering an innovative and competitive bioeconomy in the Union, including in the areas of biobased materials and products, biomanufacturing, innovative food products and biochemicals; including support to SMEs, start ups and scaleups, contribute to the development and scalable production and uptake, availability and accessibility of bioeconomy innovations, including those based on cross-sectoral cutting-edge biotechnology; strengthen supply chains and increase their resilience.	CZ (Comments): CZ - We note that the concept of the "bioeconomy" is currently defined in vague terms, and that greater terminological precision is required, particularly with regard to the expected coverage of the various (bio)technologies. In this context, we request a clearer definition of *bioeconomy* in the Regulation, e.g. in Article 2. We kindly request that this issue be reflected in a revision of the draft Regulation. HR (Drafting Suggestions): (3) For support to bioeconomy policy, the specific objectives of fostering an innovative and competitive bioeconomy in the Union, including in the areas of biobased materials and products, biomanufacturing, innovative food products and biochemicals; including support to SMEs, start ups and scaleups, contribute to the development and scalable production and uptake,

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	availability and accessibility of bioeconomy innovations, including those based on cross-sectoral cutting-edge biotechnology; strengthen supply chains and increase their resilience~~.~~ **, including EU missions** MT (Drafting Suggestions): For support to bioeconomy policy, the specific objectives of fostering an innovative and competitive bioeconomy in the Union, including in the areas of biobased materials and products, biomanufacturing, innovative food products and biochemicals, **and food waste valorisation**; including support to SMEs, start ups and scaleups, contribute to the development and scalable production and uptake, availability and accessibility of bioeconomy innovations, including those based on cross-sectoral cutting-edge biotechnology; strengthen supply chains and increase their resilience. MT (Comments): Food waste is an important topic which is not captured under any of the current topics, and Malta feels that its inclusion here is therefore warranted. NL (Drafting Suggestions): (3) For support to bioeconomy policy, the specific objectives of fostering an innovative, **sustainable**, and competitive bioeconomy in the Union, including in the areas of biobased materials and products, biomanufacturing, innovative food products and biochemicals; including support to SMEs, start ups and scaleups, contribute to the development and scalable production and uptake, availability and accessibility of bioeconomy innovations, including those based on cross-sectoral cutting-edge biotechnology; strengthen supply chains and increase their resilience. PL

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	(Drafting Suggestions): For support to bioeconomy policy, the specific objectives of fostering an innovative and competitive bioeconomy in the Union, including in the areas of biobased materials and products, biomanufacturing, innovative food products and biochemicals; including support to SMEs, start ups and scaleups, contribute to the development and scalable production and uptake, availability and accessibility of bioeconomy innovations, including those based on cross-sectoral cutting-edge biotechnology; ~~strengthen supply chains and increase their resilience.~~ **strengthening, shortening supply chains and increasing their resilience".** PL (Comments): Article 3(2)(b3) – instead of 'strengthening supply chains and increasing their resilience,' it is proposed to supplement with 'strengthening, shortening supply chains and increasing their resilience.'" SI (Drafting Suggestions): For support to bioeconomy policy, the specific objectives of fostering an **circular, sustainable**, innovative and competitive bioeconomy in the Union, including in the areas of biobased materials and products, biomanufacturing, innovative food products and biochemicals; including support to SMEs, start ups and scaleups, contribute to the development and scalable production and uptake, availability and accessibility of bioeconomy innovations, including those based on cross-sectoral cutting-edge biotechnology; strengthen supply chains and increase their resilience. SI

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	(Comments): We suggest that the circularity and sustainability aspects of the bioeconomy, as highlighted in the latest EU bioeconomy strategy, should also be emphasised. DE (Drafting Suggestions): For support to bioeconomy policy, the specific objectives of fostering an innovative and competitive bioeconomy in the Union, including in the areas of biobased materials and products, biomanufacturing, innovative food products and biochemicals; including support to SMEs, start ups and scaleups, contribute to the development and scalable production and uptake, availability and accessibility of bioeconomy innovations, including those based on cross-sectoral cutting-edge biotechnology **and bio-based solutions**; strengthen supply chains and increase their resilience. DE (Comments): It is essential to acknowledge the potential of **bio-based solutions**, as they can deliver competitive, cost-efficient, scalable, and climate-resilient alternatives to purely technological approaches. ES (Drafting Suggestions): (3) For support to bioeconomy policy, the specific objectives of **promoting the development of bioeconomy value chains that can strengthen local economies in rural areas, as well as** fostering an innovative and competitive bioeconomy in the Union, including in the areas of biobased materials and products, biomanufacturing, innovative food **and feed** products and biochemicals **(biofertilizers and others) as well as plant and animal**

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	breeding with new genomic techniques; including support to SMEs, start ups and scaleups, contribute to the development and scalable production and uptake, availability and accessibility of bioeconomy innovations, including those based on cross-sectoral cutting-edge biotechnology; strengthen supply chains and increase their resilience. ES (Comments): Genetic improvement in plants is also a key element for the bioeconomy because it will allow for a more sustainable and efficient increase in available biomass by developing crops that are more resource-efficient, resilient, and higher-yielding. It will also allow for crop diversification, so that in addition to traditional agricultural uses, they can also have industrial purposes, such as the production of high value-added molecules. Likewise, genetic improvement applied to livestock will make it possible to obtain breeds that are better adapted to environmental conditions, allowing for optimal and more efficient use of natural resources, for example through R&D&I to improve conversion rates or by selecting animals through breeding programs with lower greenhouse gas emissions. Futhermore, the positive impact of the bioeconomy on rural areas should be emphasised. EE (Drafting Suggestions): (3) For support to bioeconomy policy, the specific objectives of fostering an innovative and competitive bioeconomy in the Union, including in the areas of **sustainable use of natural resources,** biobased materials and products, biomanufacturing, innovative food products and biochemicals; including support to SMEs, start ups and scaleups, contribute to the

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	development and scalable production and uptake, availability and accessibility of bioeconomy innovations, including those based on cross-sectoral cutting-edge biotechnology; strengthen supply chains and increase their resilience. EE (Comments): As flagged by stakeholders. HU (Drafting Suggestions): For support to bioeconomy policy, the specific objectives of fostering an innovative and competitive bioeconomy in the Union, including in the areas of **biomass, including waste production and processing,** biobased materials and products, biomanufacturing, innovative food products and biochemicals; including support to SMEs, start ups and scaleups, contribute to the development and scalable production and **market** uptake, availability and accessibility of bioeconomy innovations, including those based on cross-sectoral cutting-edge biotechnology; strengthen supply chains and increase their resilience **with Lead Market Intiative; cross-border, macro-regional and EU wide knowledge, skills and technology transfer, adaptation and development to local and regional conditions to boost sustainability and competitiveness in the Member States.** HU (Comments): We should consider the whole value chain, including primary production and processing. It is important to emphasize the market uptake, that is one of the weakest point in Europe in terms of competitiveness.

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	LMI is key for the policy success, it should be continued, and the knowledge and technology transfer and adaptation throughout all EU Member States should be a strategic objective to avoid fragmentation and lagging behind.
	FI (Drafting Suggestions): Add a section here: **"For support to the nature-based solutions,** FI (Comments): FI proposes adding the perspective of nature-based solutions in the scope of this policy window at the objective level.
(4) For support to the agriculture and food security, the specific objective of fostering the competitiveness, sustainability, and resilience of the agriculture, fisheries and aquaculture, forestry and rural and coastal areas and their role in the transition to a climate-neutral climate-resilient, water-smart, nature-positive economy and the protection of natural resources biodiversity while contributing to long term food security in the Union.	BE (Drafting Suggestions): (4) For support to the agriculture and food security, the specific objective of fostering the competitiveness, sustainability, and resilience of the agriculture, fisheries and aquaculture, **food processing industry,** forestry and rural and coastal areas and their role in the transition to a climate-neutral, climate-resilient, water-smart, nature-positive economy and **ensuring** the protection of natural resources of biodiversity while contributing to long term food security in the Union. BE (Comments): The food processing industry is a key actor in the transition towards climate neutral, climate-resilient, water-smart etc.. food systems. Its competitivness and resilience is very relevant for food security and crucial for the European economy, so it seems logical to include them in this paragraph.

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	Importance of mainstreaming support to SMEs, startups and scaleups HR (Drafting Suggestions): (4) For support to the agriculture and food security, the specific objective of fostering the competitiveness, sustainability, and resilience of the agriculture, fisheries and aquaculture, forestry and rural and coastal areas and their role in the transition to a climate-neutral climate-resilient, water-smart, nature-positive economy and the protection of natural resources biodiversity while contributing to long term food security in the Union~~.~~ **, including EU missions.** MT (Drafting Suggestions): For support to the agriculture and food security, the specific objective of fostering the competitiveness, sustainability, and resilience of the agriculture, fisheries and aquaculture, forestry and rural and coastal areas and their role in the transition to a climate-neutral climate-resilient, water-smart, nature-positive economy, **nature-based solutions** and the protection of natural resources biodiversity while contributing to long term food security in the Union. MT (Comments): Nature-based solutions is an important, high-level topic in this context, and merits inclusion in the text. NL (Drafting Suggestions): (4) For support to ~~the~~ agriculture ~~and food security~~, the specific objective of fostering the competitiveness, **innovation**, sustainability, and resilience of

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	the agriculture, fisheries and aquaculture, forestry and rural and coastal areas and their role in the transition to a climate-neutral climate-resilient, water-smart, nature-positive economy **in complementarity with the objectives under [NRPP regulation], thereby also contributing to food security** ~~and the protection of natural resources biodiversity while contributing to long term food security in the Union.~~ SI (Drafting Suggestions): (4) For support to the agriculture and food security, the specific objective of fostering the **attractiveness**, competitiveness sustainability, and resilience of the agriculture, fisheries and aquaculture, forestry, and rural and coastal areas **with the support of research and innovation**, **while strenthening** ~~and~~ their role in the transition to a climate-neutral climate-resilient, water-smart, nature-**friendly** ~~positive~~ economy and the protection of natural resources biodiversity while contributing to long term food security **and supply at reasonable prices** for consumers in the Union. SI (Comments): Research and innovation is an important tool for fostering competitiveness of any sector. Furthermore, SI We believse that the term "nature-positive economy" is not holistic enough and does not cover all aspects of the impact of economic activity on the environment and nature, so we propose the term "nature-friendly economy." In addition to food security, we suggest that emphasis be placed on the supply of food at reasonable prices for consumers, which is one of the main objectives of the CAP under Article 39 TFEU.

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	LU (Drafting Suggestions): For support to the agriculture and food security, **including the processing chain for food and feed,** the specific objective of fostering the competitiveness, sustainability, and resilience of the agriculture, fisheries and aquaculture, forestry, and rural and coastal areas and their role in the transition to a climate-neutral climate-resilient, water-smart, nature-positive economy and the protection of natural resources biodiversity while contributing to long term food security in the Union. LU (Comments): Luxembourg recalls that it is essential to ensure that food production processes and their respective value chains remain eligible under the ECF. DE (Drafting Suggestions): (4) For support to the agriculture and food security, the specific objective of fostering the competitiveness, sustainability, and resilience of the agriculture, fisheries and aquaculture, forestry and rural and coastal areas and their role in the transition to a climate-neutral climate-resilient, water-smart, nature-positive economy and the protection of natural resources **and** biodiversity while contributing to long term food security in the Union. DE (Comments): We should avoid duplication with NRPP regulation. Further information on relation of / differences between pillar 1 and 2 would be helpful, e.g. on financial support for agriculture.

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	Also: Minor language correction to improve the clarity of the text. FI (Drafting Suggestions): (4) For support to the agriculture and food security, the specific objective of fostering the competitiveness, sustainability, and resilience of the agriculture, fisheries and aquaculture, forestry and rural and coastal areas and their role in the transition to a climate-neutral climate-resilient, water-smart, nature-positive economy and the protection of natural resources biodiversity while contributing to long term food security in the Union. ES (Drafting Suggestions): (4) For support to the agriculture and food security, the specific objective of fostering the competitiveness, sustainability, and resilience of the agriculture, fisheries and aquaculture, forestry, **agri-food production systems** and rural and coastal areas and their role in the transition to a climate-neutral climate-resilient, water-smart, nature-positive economy and the protection of natural resources **(including soil health) and** biodiversity while contributing to long term food security in the Union. ES (Comments): Explicitly including soil health is essential because this increasingly scarce and degraded resource (erosion, salinization, compaction, and sealing) sustains productivity and reduces costs by improving water and nutrient efficiency. Soils with more organic matter retain water, increase resilience to droughts and floods, and sequester carbon, contributing to climate neutrality. Living soil promotes functional biodiversity and reduces runoff and diffuse pollution,

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	protecting water and coastlines. Prioritizing it reinforces long-term food security and consistency with the EU Soil Strategy and the CAP. HU (Drafting Suggestions): For support to the agriculture and food security, the specific objective of fostering the competitiveness, sustainability, and resilience of the agriculture, fisheries and aquaculture, forestry and rural and coastal areas and their role in the transition to **healthy soils**, **to** a climate-neutral climate-resilient, water-smart, nature-positive economy and the protection of natural resources biodiversity while contributing **to rural development and** long term food security in the Union. HU (Comments): This specific objective should have reference to healthy soils, because this issue is key in defining policies and funds. The aim of the synergies of EU funds is foreseen to bring closer different funds, and to avoid parallel development programs, to support development throughout the whole value chain. PT (Drafting Suggestions): 4) For support to the agriculture and food security, the specific objective of fostering the competitiveness, sustainability, and resilience of the agriculture, fisheries and aquaculture, forestry and rural and coastal areas and their role in the transition to a climate-neutral climate-resilient, water-smart, nature-positive economy and the protection of natural resources biodiversity **and ecosystem services** while contributing to long term food security in the Union. PT

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	(Comments): At EU level and having in mind the climate and biodiversity goals that have been set ecosystem services preservation is a main goal to attain sustainability and resilience of our common goods.
(c) For support to Digital Leadership policy, the specific objectives of fostering innovation and competitiveness of digital sector for a competitive and secure Union and bringing its benefits to citizens and society, public administrations and businesses across the Union. This shall include, but not be limited to, supporting the entire digital value- and supply-chains and activities including support to start-ups, scale-ups and SMEs, in particular along the following dimensions: Achieving leadership in digital and AI technologies, including through technology transfer and innovation, and through cutting-edge infrastructures such as AI-powered digital twins; Achieving technological sovereignty by building resilient digital ecosystems and ensuring a high-level of cybersecurity in the Union; Enabling the power of digital for businesses and citizens by deploying advanced digital applications and services, infrastructures, capacities and capabilities and by reinforcing interoperability across the Union, Including support to digitalisation of companies, including SMEs, small mid-cap companies, start-ups and scale-ups; Supporting the digital transformation and interoperability of public and private sectors through the rapid uptake of AI, the wallet technologies, such as EU Digital Identity Wallets and trust services established pursuant to Regulation (EU) No 910/2014 and the forthcoming European Business	AT (Drafting Suggestions): (c) For support to Digital Leadership policy, the specific objectives of fostering innovation and competitiveness of the digital sector for a competitive and secure Union and bringing its benefits to citizens and society, public administrations and businesses across the Union. This shall include, but not be limited to, supporting the entire digital value- and supply-chains and activities including support to start-ups, scale-ups and SMEs, in particular along the following dimensions: Achieving leadership in digital and AI technologies, including through technology transfer**, collaborative research** and innovation, and through cutting-edge infrastructures such as AI-powered digital twins; Achieving technological sovereignty by building resilient digital ecosystems and ensuring a high-level of cybersecurity in the Union; **In this context, digital technologies shall be fostered as integral enablers across Europe's key technology priorities, in particular Artificial Intelligence (AI), Chips and Semiconductors, Manufacturing (including Automation and Robotics), Quantum Technologies (including Photonics), and Advanced Materials.** Enabling the power of digital for businesses and citizens by deploying advanced digital applications and services, infrastructures, capacities and capabilities and by reinforcing

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Wallets and other digital innovative solutions. Support to cultural and creative industries, complementing the AgoraEU programme.	interoperability across the Union, Including support to digitalisation of companies, including SMEs, small mid-cap companies, start-ups and scale-ups; Supporting the digital transformation and interoperability of public and private sectors through the rapid uptake of AI, the wallet technologies, such as EU Digital Identity Wallets and trust services established pursuant to Regulation (EU) No 910/2014 and the forthcoming European Business Wallets and other digital innovative solutions. Support to cultural and creative industries, complementing the AgoraEU programme. AT (Comments): **AT** comments: These drafting suggestions were already included in our submission on September 18 BE (Drafting Suggestions): For support to Digital Leadership policy, the specific objectives of fostering innovation and competitiveness of digital sector for a competitive and secure Union and bringing its benefits to citizens and society, public administrations and businesses across the Union. This shall include, but not be limited to, supporting the entire digital value- and supply-chains and activities including support to start-ups, scale-ups and SMEs, in particular along the following dimensions: Achieving leadership in digital and AI technologies, including through technology transfer and innovation, and through cutting-edge infrastructures such as AI-powered digital twins; Achieving technological sovereignty by building resilient digital ecosystems and ensuring a high-level of cybersecurity in the Union; Enabling the power of digital for businesses and citizens by deploying advanced digital applications and services, infrastructures, capacities and capabilities and by reinforcing interoperability across the Union, Including

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	support to digitalisation of companies, including SMEs, small mid-cap companies, start-ups and scale-ups; Supporting the digital transformation and interoperability of public and private sectors through the rapid uptake of AI, the wallet technologies, such as EU Digital Identity Wallets and trusted services established pursuant to Regulation (EU) No 910/2014 and the forthcoming European Business Wallets and other digital innovative solutions. Support to cultural and creative **sectors and** industries, complementing the AgoraEU programme. BE (Comments): So far, sparce on skills uptake or empowering industry and people into adopting the digital capabilities. Data spaces to be added as a key concept in the EU data strategy. CZ (Comments): CZ recommends clarifying the concept of "technological sovereignty," emphasizing the support for the development of digital skills for citizens, including disadvantaged groups, expanding the list of key digital infrastructures, and specifying support for cultural and creative industries with links to existing programs. We also highlight the importance of cross-border and regional cooperation in digitalization within the EU, particularly in Central and Eastern Europe. HR (Drafting Suggestions): (c) For support to Digital Leadership policy, the specific objectives of fostering innovation and competitiveness of digital sector for a competitive and secure Union and bringing its benefits to citizens and society, public administrations and businesses across the Union. This shall include, but not be

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	limited to, supporting the entire digital value- and supply-chains and activities including support to start-ups, scale-ups and SMEs, in particular along the following dimensions: Achieving leadership in digital and AI technologies, including through technology transfer and innovation, and through cutting-edge infrastructures such as AI-powered digital twins; Achieving technological sovereignty by building resilient digital ecosystems and ensuring a high-level of cybersecurity in the Union; Enabling the power of digital for businesses and citizens by deploying advanced digital applications and services, **digital connectivity** infrastructures, capacities and capabilities and by reinforcing interoperability across the Union, Including support to digitalisation of companies, including SMEs, small mid-cap companies, start-ups and scale-ups; Supporting the digital transformation and interoperability of public and private sectors through the rapid uptake of AI, the wallet technologies, such as EU Digital Identity Wallets and trust services established pursuant to Regulation (EU) No 910/2014 and the forthcoming European Business Wallets and other digital innovative solutions. Support to cultural and creative industries, complementing the AgoraEU programme- **and actively contributing to objectives set by EU missions.** HR (Comments): Digital connectivity infrastructure is fundamental to the EU's digital transformation and to the competitiveness of the digital sector. We therefore propose adding an explicit reference to digital connectivity infrastructures within the scope of Digital Leadership policy support. This ensures Union's commitment to achieving its Digital Decade targets. NL (Drafting Suggestions): (c) For support to Digital Leadership policy, the specific objectives of fostering innovation and competitiveness of digital sector for a competitive

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	and secure Union and bringing its benefits to citizens and society, public administrations and businesses across the Union. This shall include, ~~but not be limited to,~~ supporting the entire **digital infrastructure including submarine cables,** digital value- and supply-chains and activities including support to start-ups, scale-ups and SMEs, in particular **in semiconductors, quantum, AI, network technology, cloud, and cybersecurity,** along the following dimensions: Achieving leadership in digital ~~and AI~~ technologies, including through technology transfer and innovation, and through cutting-edge infrastructures such as AI-powered digital twins; Achieving technological sovereignty by **mitigating high risk strategic dependencies, strengthening our position with focused investments in key technologies,** building resilient digital ecosystems, **entering into international partnerships** and ensuring **the right conditions such as** a high-level of cybersecurity in the Union; Enabling the power of digital for businesses and citizens by deploying advanced digital applications and services, infrastructures, capacities and capabilities and by reinforcing interoperability across the Union, Including support to digitalisation of companies, including SMEs, small mid-cap companies, start-ups and scale-ups **and promoting the industrial-scale deployment and adoption of digital technologies**; Supporting the digital transformation and interoperability of public and private sectors through the rapid uptake **and development** of AI, ~~the wallet technologies, such as EU Digital Identity Wallets and trust services established pursuant to Regulation (EU) No 910/2014 and the forthcoming European Business Wallets and other digital innovative solutions. Support to cultural and creative industries, complementing the AgoraEU programme.~~ NL (Comments): We view it's important to explicity mention the digital infrastucture, because it is a necessary condition for start-ups, scale ups, SMEs etc to establish themselves and employ activities on EU territory. Explicit mentioning of

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	submarine cables may help with making clear that this is also part of digital infrastructure. In our view, AI is part of digital technologies and doesn't need to be mentioned separately. In order to achieve digital leadership, we need to focus the resources for the digital chapter on a limited set of key technologies. The past 2 decades have taught the EU that a broad investment strategy does not create leadership and even achieves the contrary. The current proposal with a borad scope containing more or less 20 technologies will, in our view, not create the needed shift and acceleration needed to stimulate our productivity growth and keep up with the U.S. and China. Tech sovereignty means we need to mitigate dependencies and stimulate more investment and also strengthen international partnerships. High level security policy in general is needed als a condition for tech sovereignty, of which cybersecurity is one. PL (Drafting Suggestions): (c) For support to Digital Leadership policy, the specific objectives of fostering innovation, ~~and~~ competitiveness of digital sector **and deployment of digital solutions in SME sector** for a competitive and secure Union and bringing its benefits to citizens and society, public administrations and businesses across the Union. This shall include, but not be limited to, supporting the entire digital value- and supply-chains and activities including support to start-ups, scale-ups and SMEs, in particular along t7he following

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	dimensions: Achieving leadership in digital and AI technologies, including through technology transfer and innovation, and through cutting-edge infrastructures such as AI-powered digital twins; Achieving technological sovereignty by building resilient digital ecosystems and ensuring a high-level of cybersecurity in the Union; Enabling the power of digital for businesses and citizens by deploying ~~advanced~~ digital applications and services, infrastructures, capacities and capabilities and by reinforcing interoperability across the Union, Including support to digitalisation of companies, including SMEs, small mid-cap companies, start-ups and scale-ups; Supporting the digital transformation and interoperability of public and private sectors through the rapid **uptake of digital technologies a**nd AI **in particular**, the wallet technologies, such as EU Digital Identity Wallets and trust services established pursuant to Regulation (EU) No 910/2014 and the forthcoming European Business Wallets and other digital innovative solutions. Support to cultural and creative industries, complementing the AgoraEU programme. PL (Comments): It is equally essential to invest in the use of digital technologies, at all levels of advancement, by both businesses and citizens. The competitiveness of the Union's economy is determined not only by investments in the ICT sector and the development of future-oriented technologies, but also by the adoption of digital solutions within enterprises, which accelerates and enhances their productivity. Excessive emphasis on breakthrough technologies and support for innovation, accompanied by limited efforts to strengthen the level of basic digitalisation, may lead to further polarisation of the economy in terms of digital transformation and to disruptions in the value chain. It is therefore crucial to preserve the Union's competitive position while ensuring convergence of digital intensity indicators across the various sectors of the economy.

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	"Article 3(2)(c) – does it also cover AGI for use in product digitalization (additive manufacturing), which strengthens and shortens supply chains and has dual civilian and military applications? SI (Drafting Suggestions): (c) For support to Digital Leadership policy, the specific objectives of fostering **research excellence** innovation and competitiveness of digital sector for a competitive and secure Union and bringing its benefits to citizens and society, public administrations and businesses across the Union. This shall include, but not be limited to, supporting the entire digital value- and supply-chains and activities including support to start-ups, scale-ups, ~~and~~ SMEs **and small mid-cap companies,** in particular along the following dimensions: Achieving leadership in digital, and AI **and other** technologies, including through **research**, technology transfer and innovation, and through cutting-edge infrastructures such as AI-powered digital twins; Achieving technological sovereignty by building resilient digital ecosystems and ensuring a high-level of cybersecurity in the Union; Enabling the power of digital for businesses and citizens by deploying advanced digital applications and services, infrastructures, capacities and capabilities and by reinforcing interoperability across the Union, Including support to digitalisation of companies, including SMEs, small mid-cap companies, start-ups and scale-ups; Supporting the digital transformation and interoperability of public and private sectors through the rapid uptake of AI, the wallet technologies, such as EU Digital Identity Wallets and trust services established pursuant to Regulation (EU) No 910/2014 and the forthcoming European Business Wallets and other digital innovative solutions. Support to cultural and creative industries, complementing the AgoraEU programme. SI (Comments):

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	The investment journey begins with excellent research. While we fully acknowledge the value of AI-powered digital twins, it is only one of many examples of AI use in the field and we do not see the added value of examplifying one over the others. All four policy windows are connected to pillar II.of Horizon Europe and this should be reflected in the text. Funds from the Competitiveness Fund should be directed towards strengthening EU digital sovereignty by investing in its own digital infrastructure (HPC, 5G/6G networks, IoT) and promoting European production and development of key technologies such as AI, quantum computing and semiconductors. DE (Drafting Suggestions): (c) For support to Digital Leadership policy, the specific objectives of fostering innovation and competitiveness of digital sector for a competitive and secure Union and bringing its benefits to citizens and society, public administrations and businesses across the Union. This shall include, but not be limited to, supporting the entire digital value- and supply-chains and activities including support to start-ups, scale-ups and SMEs, in particular along the following dimensions: Achieving leadership in digital and AI technologies, including through technology transfer and innovation, and through cutting-edge infrastructures such as AI-powered digital twins; Achieving technological sovereignty by building resilient digital ecosystems and ensuring a high-level of cybersecurity in the Union; Enabling the power of digital for businesses and citizens by deploying advanced digital applications and services, infrastructures, capacities and capabilities and by reinforcing interoperability across the Union, Including support to

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	digitalisation of companies, including SMEs, small mid-cap companies, start-ups and scale-ups; Supporting the digital transformation and interoperability of public and private sectors through the rapid uptake of AI, the wallet technologies, such as EU Digital Identity Wallets and trust services established pursuant to Regulation (EU) No 910/2014 and the forthcoming European Business Wallets and other digital innovative solutions. Support to cultural and creative industries, complementing the AgoraEU programme, **Reducing the resource- and energy-intensity of digital infrastructure and applications**. DE (Comments): Developing and implementing resource- and energy-efficient solutions in the digital sector is a key factor for competitiveness given its currently high resource and energy demand, the fast growth of the sector and the local, regional and global competition for access to electricity and scarce raw materials. FI (Drafting Suggestions): For support to Digital Leadership policy, the specific objectives of fostering innovation and competitiveness of digital sector for a competitive and secure Union and bringing its benefits to citizens and society, public administrations and businesses across the Union. This shall include, but not be limited to, supporting the entire digital value- and supply-chains and activities including support to start-ups, scale-ups and SMEs, in particular along the following dimensions: Achieving leadership in digital and AI technologies, including through technology transfer and innovation, and through cutting-edge infrastructures such as **industry-specific AI models and** digital twins; Achieving technological sovereignty by **fostering European strengths and indispensability in critical niches of global value chains**, building resilient

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	digital ecosystems, **including through closer ties with trusted international partners**, and ensuring a high-level of cybersecurity in the Union; Enabling the power of digital for businesses and citizens by deploying advanced digital applications and services, infrastructures, capacities and capabilities, **by supporting industry-led deployment networks in strategic technology sectors** and by reinforcing interoperability across the Union, including support to digitalisation of companies, including SMEs, small mid-cap companies, start-ups and scale-ups; Supporting the digital transformation and interoperability of public and private sectors through the rapid uptake of AI, the wallet technologies, such as EU Digital Identity Wallets and trust services established pursuant to Regulation (EU) No 910/2014 and the forthcoming European Business Wallets and other digital innovative solutions **that support the expansion of the European real-time economy and the soft infrastructure it requires**. Support to cultural and creative industries, complementing the AgoraEU programme. IT (Drafting Suggestions): (c) For support to Digital Leadership policy, the specific objectives of fostering innovation and competitiveness of digital sector for a competitive and secure Union and bringing its benefits to citizens and society, public administrations and businesses across the Union. This shall include, but not be limited to, supporting the entire digital value- and supply-chains and activities including support to start-ups, scale-ups and SMEs, in particular along the following dimensions: Achieving leadership in digital and AI technologies, including through technology transfer and innovation, and through cutting-edge infrastructures such as AI-powered digital twins; Achieving technological sovereignty by building resilient digital ecosystems and ensuring a high-level of cybersecurity in the Union; Enabling the power of digital for businesses and citizens by deploying advanced digital

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	applications and services, infrastructures, capacities and capabilities and by reinforcing interoperability across the Union, Including support to digitalisation of companies, including SMEs, small mid-cap companies, start-ups and scale-ups; Supporting the digital transformation and interoperability of public and private sectors through the rapid uptake of AI, the wallet technologies, such as EU Digital Identity Wallets and trust services established pursuant to Regulation (EU) No 910/2014 and the forthcoming European Business Wallets and other digital innovative solutions, support**ing the competiveness of EU** cultural and creative industries - **including audiovisual, news media music and publishing sectors**, complementing the AgoraEU programme. IT (Comments): The AgoraEU proposal contains a provision for a specific, distinct objective regarding the news sector. Current funding programmes have struggled to address the emerging challenges faced by news media outlets and quality journalism. These challenges have dramatically scaled since such programs were conceived. Moreover, Italy strongly supports the inclusion of cultural and creative industries, considering their strategic importance and the impact of the digital transition in all steps of their value chains. Enhancing their competitiveness in a global market influenced by large non-EU players can bolster regional growth and create jobs opportunities. The specific needs of European cultural and creative sectors in the digital environment, notably on access to finance, entrepreneurship and innovation, sustainability, digitalisation, Intellectual Property, skills, should continue to be clearly targeted through dedicated measures to maximise the generation of economic wealth.

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	We suggest to include and expressly mention the audiovisual sector, which is essential for European competitiveness. Italy believes that enhancing the economic sustainability of the news media sector through financial support is urgent. A strong, plural, free and independent media system, together with quality journalism, rely on the sustainability of the sector. For this reason, we believe it is important to make a clear reference to the news sector in this paragraph Furthermore, Artificial Intelligence (AI), when integrated into creative processes, proves to be an extraordinary tool for interpreting and representing the complexity of the contemporary world, opening up new perspectives in key sectors of Cultural and Creative Industries (CCIs) such as music and publishing. These fields, rooted in creativity and the production of culturally valuable content, are undergoing a profound transformation thanks to AI, which enhances their expressive, productive, and distributive capabilities. HU (Drafting Suggestions): (c) For support to Digital Leadership policy, the specific objectives of fostering innovation and competitiveness of digital sector for a competitive and secure Union and bringing its benefits to citizens and society, public administrations and businesses across the Union., **ensuring geographical balance**. HU (Comments): We believe that European competitiveness can only be achieved if Member States benefit equally from the actions taken.

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	In general, we consider it important that the specific objectives set out for support to Digital Leadership policy and those defined in the Digital Decade strategy are aligned. The Digital Leadership policy window should focus at achieving its specific objectives. We cannot agree with the last sentence, as we do not see sufficient justification for supporting the objectives of other initiatives in a manner that is not regulated in the text explicitly. PT (Drafting Suggestions): (c) For support to Digital Leadership policy, the specific objectives of fostering innovation and competitiveness of digital sector for a competitive and secure Union and bringing its benefits to citizens and society, public administrations and businesses across the Union. This shall include, but not be limited to, supporting the entire digital value- and supply-chains and activities including support to start-ups, scale-ups and SMEs, in particular along the following dimensions: Achieving leadership in digital ~~**and AI**~~ technologies, including through technology transfer and innovation, and through cutting-edge infrastructures such as ~~**AI-powered**~~ digital twins; Achieving technological sovereignty by building resilient digital ecosystems and ensuring a high-level of cybersecurity in the Union; Enabling the power of digital for businesses and citizens by deploying advanced digital applications and services, infrastructures, capacities and capabilities and by reinforcing interoperability across the Union, Including support to digitalisation of companies, including SMEs, small mid-cap companies, start-ups and scale-ups; Supporting the digital transformation and interoperability of public and private sectors through the rapid uptake **of digital**

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	technologies, including AI, the wallet technologies, such as EU Digital Identity Wallets and trust services established pursuant to Regulation (EU) No 910/2014 and the forthcoming European Business Wallets and other digital innovative solutions. Support to cultural and creative industries, complementing the AgoraEU programme. PT (Comments): - The specific nature of SMEs, start-ups, and scale-ups in the digital sector is often highlighted – and rightly so - with reference in this paragraph to "small mid-caps." An analysis of the coherence and consistency of these references should be carried out in the entire FEC Regulation. - While recognizing the value of providing clarity on key digital technologies, such as AI, Portugal considers that an overly specific reference to particular technologies may inadvertently exclude important areas of innovation that emerge during the period of the regulation's application.
(d) For support to 'Resilience and Security, Defence Industry and Space' policy, respectively the specific objectives of:	CZ (Comments): CZ - *General comment and question to adjust our position to Chapter VII, Section 2*: Czechia would appreciate clarification on whether the objectives in Art. 3 (d)(2) and the respective implementation will build on the positive experience of programmes such as EDF, EDIRPA, ASAP and PESCO. In particular, it is important to understand how the design will ensure the

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	avoidance of inefficiencies, including complex procurement procedures, excessive administrative burden, overlaps between instruments, lengthy approval processes and overly restrictive participation criteria.
(1) For support to resilience of supply chains, the specific objectives of reinforcing Europe's resilience by strengthening the Union capacity in exploration, extraction, processing and recycling of raw materials and diversifying supply sources and markets, and improving the timely availability of such products, including through the reduction of their delivery lead time, reservation of manufacturing slots or stockpiling of products, intermediate products or raw materials.	AT (Drafting Suggestions): ~~(1) For support to resilience of supply chains, the specific objectives of reinforcing Europe's resilience by strengthening the Union capacity in exploration, extraction, processing and recycling of raw materials and diversifying supply sources and markets, and improving the timely availability of such products, including through the reduction of their delivery lead time, reservation of manufacturing slots or stockpiling of products, intermediate products or raw materials.~~ AT (Comments): **AT** comments: These drafting suggestions were already included in our submission on September 18 CZ (Drafting Suggestions): (1) For support to resilience of supply chains, the specific objectives of reinforcing Europe's resilience by strengthening the Union capacity in exploration, extraction, processing and recycling of raw materials and diversifying supply sources and markets, and improving the timely availability of **and access to** such products **and raw materials**, including through the reduction of their delivery lead time, reservation of manufacturing slots or stockpiling of products, intermediate products or raw materials.

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	CZ (Comments): CZ - EU has relatively limited access to raw materials and other essential components from outside its borders. The objective should therefore also encompass strengthening the Union's access to such raw materials, which constitutes a necessary prerequisite for the diversification of supply sources and markets. This approach would be consistent with other Union initiatives, including the *Critical Raw Materials Act*. NL (Drafting Suggestions): (1) For support to resilience of supply chains, the specific objectives of reinforcing Europe's resilience by strengthening the Union capacity in exploration, extraction, processing and **recovery**, recycling **and reuse** of raw materials and diversifying supply sources and markets, and improving the timely availability **and responsible use of such products to support the twin transitions and competitiveness**, including through the reduction of their delivery lead time, reservation of manufacturing slots or stockpiling of products, intermediate products or raw materials NL (Comments): See justification in art. 42, 2 point (a). Raw materials are also needed to support the transitions and broader competitiveness PL (Drafting Suggestions): (1) For support to resilience of supply chains, the specific objectives of reinforcing Europe's resilience by strengthening the Union capacity in

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	exploration, extraction, processing and recycling of raw materials and diversifying supply sources and markets, and improving the timely availability of such products, including through the reduction of their delivery lead time, reservation of manufacturing slots or stockpiling of products, intermediate products or raw materials **and substitution of Critical Raw Materials** SI (Drafting Suggestions): (1) For support to resilience of supply chains, the specific objectives of reinforcing Europe's resilience by strengthening the Union capacity in exploration, extraction, processing, **substitution** and recycling of raw materials **in particular critical raw materials**, and diversifying supply sources and markets, and improving the timely availability of such products, including through the reduction of their delivery lead time, reservation of manufacturing slots or stockpiling of products, intermediate products or raw materials. SI (Comments): In addition to raw matereials in general we should add reference to CRM that are indespensable for the resilience of the EU economy. DE (Drafting Suggestions): (1) For support to resilience of supply chains, the specific objectives of reinforcing Europe's resilience by strengthening the Union capacity in exploration, extraction, processing**, recovering, reusing** and recycling of raw materials and diversifying supply sources and markets, and improving the timely availability of such products, including through the reduction of their delivery lead time, reservation of manufacturing slots or stockpiling of products, intermediate products or raw materials.

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	DE (Comments): The development of innovative solutions for the recovering, reusing and recycling of secondary raw materials are all key steps in order to safeguard the availability of raw materials for manufacturing and to reduce dependencies. They also have great potential for new competitive business models whose establishment should be supported by the ECF. ES (Drafting Suggestions): (1) For support to resilience of supply chains, the specific objectives of reinforcing Europe's resilience by strengthening the Union capacity in exploration, extraction, processing and recycling of raw materials and diversifying supply sources and markets, and improving the timely availability of such products, including through the reduction of their delivery lead time, reservation of manufacturing slots **and industrial capabilities** or stockpiling of products, intermediate products or raw materials. PT (Comments): Resilience is cross-cutting to all policy windows. Why it is detailed only in this policy window ? We consider there is an imbalance when comparing to other policy windows? Clarification is welcome.
(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	CZ (Drafting Suggestions): (2) For support to EU defence industry. the specific objectives of promoting defence industrial readiness of the Union and its Member States

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defence ecosystem; Collaborative research and development of defence 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.	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 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**, <u>while duly taking into account geopolitically driven defense requirements concerning the geographical distribution of resources.</u>** CZ (Comments): CZ - The aim of the ECF needs to be competitiveness of the EU as a whole. The persistent threat on the eastern borders requires major funding to reach the desired level of deterrence capability. Therefore, resources from EU need to be distributed geographically, with particular attention to the specific defense needs of the CEE EU countries and the strengthening of the EU's eastern border. We kindly request this issue being addressed in written response, in particular should our proposed amendment not be reflected**.** NL (Drafting Suggestions): (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~~ **<u>in particular</u>** support to start-ups, scale-ups and SMEs, fostering an innovative EU defence ecosystem **<u>and Europeanization and integration of defence supply chains in the EU</u>**; Collaborative research and

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	development of defence 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. SI (Drafting Suggestions): (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 **and small mid-cap companies**, fostering an innovative EU defence ecosystem; Collaborative research and development of defence 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. DE (Drafting Suggestions): (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~~ **the adjustement** of the European Defence Technological and Industrial Base (EDTIB) **to structural changes**, including support to start-ups, scale-ups and SMEs, fostering an innovative EU defence ecosystem; Collaborative research and development of defence 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

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	European defence projects of common interest; ~~Adjustment of industry to structural changes~~ DE (Comments): The last part of this paragraph does not really fit and was therefore deleted and inserted at the beginning. It is clear that the sentence *"…defence industrial readiness of the Union and its Member States through the strengthening of the competitiveness, responsiveness and ability of the EDTIB…*" is taken from EDIP but the word "ability" only makes sense when the whole EDIP sentence would have been inserted here, we therefore propose to replace "ability" by "the adjustement to structural changes" FI (Drafting Suggestions): 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 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. FI (Comments): EDPCI is not an objective but an instrument/concept with which we support EDTIB competitiveness. Also, the EDIP general approach objectives doesn't mention EDPCI, even though the instrument would fund them.

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	HU (Drafting Suggestions): For support to EU defence industry, ***in line with the respective competences conferred by the Treaties,*** 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 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. HU (Comments): In order to strengthen consistency with the related EUCO conclusions, incorporating agreed language (adopted by EUCO 6/25). PT (Comments): We welcome clarification on what it is meant by "***Adjustment of industry to structural changes".***
(3) For the implementation of EU space systems and space policy, the specific objectives of developing, maintaining and operating space systems, providing cutting-edge space-based information, data and services supporting Union policies, notably in the area of security, defence, sustainable growth, environment protection and climate resilience, global engagement and strategic independence; Maximising the socio-economic benefits of space-	AT (Drafting Suggestions): 3) For the implementation of EU space systems and space policy, the specific objectives of developing, maintaining~~, and~~ operating **and improving** space systems, providing cutting-edge space-based information, data and

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based activities, in particular by fostering the development of an innovative and competitive Union space economy and supporting the development of a genuine Single Market for space activities, including collaborative research and innovation for space products and technologies and support to SMEs; Enhancing the safety, security and sustainability of all outer space activities; Promoting the role of the Union as a global actor in the space sector.	services supporting Union policies, ~~notably~~ **inter alia** in the area of security, defence, sustainable growth, environment protection and climate resilience, **telecommunication, transport, agriculture, disaster management,** global engagement and strategic independence; Maximising the socio-economic benefits of space-based activities, in particular by fostering the development of an innovative and competitive Union space economy and supporting the development of a genuine Single Market for space activities, including collaborative research and innovation for space products and technologies and support to SMEs; Enhancing the safety, security and sustainability of all outer space activities; Promoting the role of the Union as a global actor in the space sector. AT (Comments): **AT** comments: These drafting suggestions were already included in our sibmission on September 18 CZ (Comments): CZ - *General comment:* Czechia stresses that the construction, operation, and development of EU space systems require a stable environment, supported by clear legislative and financial instruments, as these systems already serve critical applications. From this perspective, the question arises as to whether it is appropriate to subsume the EU Space Programme under a general ECF regulation. Should the answer be affirmative, all space activities must nevertheless be framed as part of the EU Space Programme, ensuring continuity with Regulation (EU) 2021/696. We kindly request the issue being clarified in written response to this comment. NL (Drafting Suggestions):

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	(3) For the implementation of EU space systems and space policy, the specific objectives of developing, maintaining and operating space systems, providing cutting-edge space-based information, data and services supporting Union policies, notably in the area of security, **preparedness and resilience**, defence, sustainable growth, environment protection and climate resilience, global engagement and strategic independence; Maximising the socio-economic benefits of space-based activities, in particular by fostering the development of an innovative and competitive Union space economy and supporting the development of a genuine Single Market for space activities, including collaborative research and innovation for space products and technologies and support to SMEs; Enhancing the safety, security and sustainability of all outer space activities; Promoting the role of the Union as a global actor in the space sector. SI (Drafting Suggestions): (3) For the implementation of EU space systems and space policy, the specific objectives of **conducting research and innovation and transfer them in the economy, as well as** developing, maintaining and operating space systems, providing cutting-edge space-based information, data and services supporting Union policies, notably in the area of security, defence, sustainable growth, environment protection and climate resilience, global engagement and strategic independence; Maximising the socio-economic benefits of space-based activities, in particular by fostering the development of an innovative and competitive Union space economy and supporting the development of a genuine Single Market for space activities, including collaborative research and innovation for space products and technologies and support **to start-ups, scale-ups, SMEs and small-mid cap companies**.-; Enhancing the safety, security and sustainability of all outer space activities; Promoting the role of the Union as a global actor in the space sector. SI

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	(Comments): All four policy windows are connected to pillar II.of Horizon Europe and this should be reflected in the text. DE (Drafting Suggestions): (3) For the implementation of EU space systems and space policy, the specific objectives of developing, maintaining and operating space systems, providing **high quality and up-to-date** ~~cutting-edge~~ space-based **/ -related data**, information~~, data~~ and services **able to** support~~ing~~ Union policies, notably in the area of ~~security, defence,~~ sustainable growth, environment protection and climate resilience, **transport,** global engagement and strategic independence, **and, to the extent requested by the Member States and without prejudice to national prerogatives, security and defence**; Maximising the socio-economic benefits of space-based **/ -related** activities, in particular by fostering the development of an innovative and competitive Union space economy and supporting the development of a genuine Single Market for space activities, including **innovative and competitive European upstream and downstream sectors,** collaborative research and innovation for space products and technologies and support to SMEs **while promoting the widest possible uptake and use of the data, information and services provided by the (sub-)components**; Enhancing the safety, security and sustainability of all outer space activities; Promoting the role of the Union as a global actor in the space sector **inter alia to avoid undue dependencies on third countries and actors for space services and space access**. DE (Comments): The EU space programme components are foremost civilian programmes under civilian control. Mentioning security and defence first suggests

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	otherwise. As outer space is a dual use domain, the components may also contribute to security and defence, but only to the extent requested by the Member States.
(4) For support to civil industrial security, the specific objectives of strengthening the competitiveness and responsiveness of the European civil security industry, in the application areas of security, resilience of critical and dual-use infrastructures, technologies including critical energy infrastructure, and solutions for the control of goods and persons at borders, the protection of borders, maritime security, customs security and civil preparedness against security threats, as well as reinforcing the capabilities of the relevant end-users in the civil security sector.	AT (Drafting Suggestions): ... technologies including critical energy **and transport** infrastructure**s** ... AT (Comments): **AT** comment: This is a new comment – not part of our submission on September 18! Transport is one of the crucial levers to ensure European unity and cohesion and is pivotal as well for military and defence purposes. Transport infrastructures are a *typical* example for dual use applications! CZ (Drafting Suggestions): (4) For support to civil industrial security, the specific objectives of strengthening the competitiveness and responsiveness of the European civil security industry, in the application areas of security, resilience of critical and dual-use infrastructures , technologies including critical energy infrastructure **and military mobility, protection of critical supply chains**, and solutions for the control of goods and persons at borders, the protection of borders, maritime security, customs security and civil preparedness against security threats, as well as reinforcing the capabilities of the relevant end-users in the civil security sector. CZ

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	(Comments): CZ - Including *military mobility* here ensures coherence between civil security objectives and dual-use infrastructure, thereby strengthening the Union's capacity to respond effectively to crises. The relevance of this insertion is further underlined by the *Military Mobility Package/ White Paper for European Defence – Readiness 2030*, which integrates these aspects into the broader EU security framework. Similarly, including *protection of critical supply chains* ensures that the resilience of the European civil security sector comprehensively addresses not only physical and technological infrastructures but also the continuity and reliability of essential goods and services. This is further supported by the EU's *Strategic Framework on Critical Infrastructure and Supply Chain Resilience*, which highlights the central role of secure and robust supply chains in maintaining security, economic stability, and crisis preparedness. NL (Drafting Suggestions): (4) For support to civil ~~industrial~~ security **industry**, the specific objectives of strengthening the competitiveness and responsiveness of the European civil security industry, in the application areas of security, resilience of critical and dual-use infrastructures, technologies including critical energy infrastructure~~, and solutions for the control of goods and persons at borders, the protection of borders, maritime security, customs security and civil preparedness against security threats, as well as reinforcing the capabilities of the relevant end-users in the civil security sector.~~ NL (Comments): Is in the first sentence meant "For support to **civil security industry**, the specific objectives (…)" instead of "For support to **civil industrial security** (…)"?

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Commission proposal	Drafting Suggestions and Comments
	DE (Drafting Suggestions): (4) For support to civil ~~industrial~~ security **industry**, the specific objectives of strengthening the competitiveness and responsiveness of the European civil security industry, in the application areas of security, resilience of critical and dual-use infrastructures, technologies including critical energy infrastructure**, fighting crime and terrorism,** and solutions for the control of goods and persons at borders, the protection of borders, maritime security, customs security and civil preparedness against security threats, as well as reinforcing the capabilities of the relevant end-users in the civil security sector. DE (Comments): Industrial security is something different than security industry. Should stick to the wording of the section here.
	CZ (Drafting Suggestions): **(e) For the mobilisation of substantial private investment, and for the support of financing and investment operations through EU budgetary guarantees, financial instruments and blending operations, thereby maximising the leverage of the Union budget.** CZ (Comments): CZ - New objective (e) clarifies that the ECF is intended to mobilise private investment through budgetary guarantees and other financial instruments. This makes the role of these tools explicit already in Article 3's list of objectives.

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	SI (Drafting Suggestions): **(5) The research and innovation activities under the policy windows shall aim to foster scientific excellence, advance the creation and dissemination of high-quality knowledge, technologies, and solutions, and support the mobility and engagement of researchers, while attracting talent at all levels to actions under the Programme; generate and apply knowledge to support Union policies and boost access to innovative solutions in European industry, particularly SMEs, to tackle global challenges; enhance knowledge, skills, and career opportunities for researchers and contribute to the European Research Area (ERA); promote EU-wide and international collaboration, knowledge sharing, and valorisation of research; reduce disparities in research and innovation capacities across Member States and regions; mobilise public and private investment in research and innovation, aiming to reach 3% of Union GDP in research and development.** SI (Comments): Due to the link between Horizon Europe and ECF, we suggest to mirror their goals, similarly as in FP10 regulation.
Chapter IV	

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Support for Clean Transition and Industrial Decarbonisation	BE (Comments): Question: The FP nor the ECF include a reference to climate targets anymore (35% of the total expenditure as was the case in H2020 (consideration 8) and FP9 (art 7.10)), nor is 'mainstreaming of climate actions' referred. As we understand, all elements related to gender, biodiversity and climate change are to be treated 'horizontally' through the 'performance regulation'. How does the EC consider this to be simplification as yet another regulation has to be taken into account to understand the FP/ECF, and how does this take specific R&I considerations into account? How is referring to a horizontal external regulation stronger than including a dedicated article. More information on this performance regulation is needed and how this will be better for gender/climate related to R&I than dedicated articles. NL (Comments): These reflect first views. We, later in the process, could share additional comments DE (Comments): Affordable, secure and climate-friendly energy supplies as well as a successful clean transition in various sectors are key prerequisites for strengthening the EU's competitiveness. We therefore greatly welcome the focus on this issue in the ECF. We need to ensure that funds are spent in a targeted, efficient and effective manner on actual key technologies and activities that contribute most effectively to the clean transition and industrial decarbonisation. We therefore can only support the very broad scope of this chapter if there are clear overarching award criteria and targets for the work programmes. These

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Commission proposal	Drafting Suggestions and Comments
	must ensure that clear priorities are set on the areas which contribute most effectively to the Union's competitiveness as well as security and resilience. FR (Comments): How do these activities relate to the innovation fund and the future decarbonisation bank, and how will these various initiatives be coordinated? Is the innovation fund intended to replace the decarbonisation component of the FEC from 2031 onwards? PT (Comments): We would like to know how the specific characteristics of the Outermost Regions will be taken into account in this window.
Article 32	
Subject matter	
1. Actions supported under this chapter shall contribute to the general objectives set out Article 3(1) and the specific objectives set out in Article 3(2), point (a).	BG (Drafting Suggestions): **Add sentence at the end of paragraph 1:** "Within this chapter, a distinct LIFE sub-window shall be established to ensure dedicated support for nature, biodiversity, circular economy and climate adaptation actions, with its own governance and multiannual work programme." BG

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	(Comments): In order to ensure the continuity of LIFE activities within this thematic area, Bulgaria requests explicit recognition of a LIFE sub-window and its role in delivering environmental and climate outcomes. This amendment links LIFE operationally to the window's goals while safeguarding its distinct identity, budget, and governance. DE (Comments): We welcome that the topic of a fair and just transition is accounted for through the reference to the general objectives. ES (Drafting Suggestions): 1. Actions supported under this chapter shall contribute to the general objectives set out Article 3(1) and the specific objectives set out in Article 3(2), point (a), **with a particular focus on strengthening the competitiveness and resilience of European industry and SMEs across all industrial ecosystems.** ES (Comments): It is important that the substance of the regulation is balanced to ensure a level playing field that allows competition both thorugh the work programmes and the call for proposals. FR (Drafting Suggestions): 1. Actions supported under this chapter shall contribute to the general objectives set out **in** Article 3(1) and the specific objectives set out in Article 3(2), point (a).

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2. Support for actions under this chapter shall be financed from the budget set out in Article 4 and any additional contributions assigned in accordance with Article 5.	PL (Drafting Suggestions): 2. Funding shall be provided from the budget appropriations specified in Article 4 and any additional contributions pursuant to Article 5, including co-financing instruments for R&I partnerships. PL (Comments): Integrates core and specific objectives with defence R&I to boost innovation and strategic autonomy; explicitly promotes cross-border collaboration for knowledge transfer; ensures flexible, targeted financing. RO (Comments): It is not clear the reason why the link with budget is on the entire article for an not only art 4 (2), lit b. What is the rationale on this? SI (Drafting Suggestions): Support for actions under this chapter shall be financed from the budget set out in Article 4 **(2)(b)** and any additional contributions assigned in accordance with Article 5. FR (Comments): Can the Commission specify what flexibility will be available for this component in the event of a need arising during the programming period ?

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	Can the Commission specify the budget nomenclature envisaged for this component. Will there be a budget line for each type of activity listed in this article?

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Article 33	AT (Comments): **AT** comment: We would kindly request to ask the Commission to clarify the following question of interpretation in connection with Article 33: Could the Commission confirm that, under Chapter IV, in particular pursuant to Article 33 (d–f) in the transport sector, non-repayable grants are foreseen, to be allocated under the direct management of the Commission through calls for proposals published on the basis of work programmes, and clarify how these instruments could be used by Member States – for example for the on-board deployment of mobile assets with ERTMS/ETCS – in relation to the available financing instruments (ECF versus CEF-Transport)? NB: The following specific comments on Art. 33 (d-f) are based on the assumption that this interpretation – i.e. that non-repayable grants in the transport sector are to be allocated through direct management by the Commission – is correct and can confirmed by the Commission. PL (Comments): Article 33, which defines the types of actions that may be supported under the Clean Transformation and Industrial Decarbonisation window, seems very broad – there are many points, and the formulations used are high-level (e.g., "decarbonisation solutions in industry"). Where more details appear, they are introduced through open-ended phrases (e.g., "including…"). At the same time, nothing immediately signals that the construction of these provisions would exclude any projects particularly important for our energy-intensive industries. However, our understanding of which decarbonisation investments Polish energy-intensive industries could undertake in the coming years is not very precise at this stage. Recently, while drafting another position, I tried to engage the Polish Chamber of Chemical Industry more on this topic – I asked whether

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	they have any approximate list of major decarbonisation investments waiting in the pipeline of Polish chemical companies. I learned that they have not so far attempted to aggregate such knowledge from their members. Conclusion: to properly assess this, it would be necessary to involve industry organisations from energy-intensive sectors in drafting the position – ideally also mobilising them to conduct a dedicated analytical exercise with their members (gathering information on potential investments), because this is knowledge that is generally not readily available in their files (though likely could be assembled under time pressure).

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Specific activities to support clean transition and industrial decarbonisation policies	AT (Drafting Suggestions): ~~Specific activities to support clean transition and industrial decarbonisation policies~~ **Support for Green and Clean Transition and Industrial Decarbonisation** AT (Comments): **AT** comment: Art. 33 highlights renewables, sustainable fuels, storage, grids & energy systems, energy efficiency and circular economy as core sustainable solutions with **high relevance for Europe's competitiveness.** We therefore propose **changing the title accordingly to underline that the (green transition and competitiveness go hand in hand).** We furthermore propose to replace "clean" with either "*green and clean*" or simply "*green*". CZ (Comments): CZ - We kindly request clarification on how the activities under Article 33 are intended to be aligned with the overlapping priorities of the new *Fund for Economic, Social and Territorial Cohesion*, ... (COM/2025/565 final), notably in the areas of environmental protection (a), circular economy, water efficiency, ocean health and environmental policy (i), climate and water resilience (j), biodiversity (i), and pollution prevention and control (k), taking into account potential overlaps with other activities, including market uptake, clean energy solutions, mobility, and sustainable tourism (n) (references correspond to the original draft Regulation). We further seek clarification on how overlaps between the activities listed in Article 33 will be avoided, in particular with regard to mobility-related references in subparagraphs (d), (e), (f), and (n). In addition, we would appreciate clarification on whether mobility-related activities are intended to be consolidated into a single work programme or integrated within broader programmes with a more general overarching theme.

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	RO (Comments): Clarifications are needed on how the ECF and other related funds (CEF, Innovation Fund, Horizon Europe) will effectively contribute to the objectives of the Affordable Energy Action Plan (what kind of actions can be financed in order to reduce the price of energy). Furthermore, considering ECF covers all clean technologies, it is necessary to clarify the support for nuclear projects (what types of nuclear projects are feasible and eligible under the programs), as well as to clarify which national components of the network infrastructure are eligible under the ECF (taking into account CEF remains the main instrument for cross-border infrastructure). FI (Comments): The lists of activities in art 33 and art 37 are too comprehensive and cover everything possible from it-systems and skills to supporting production in different sectors. This is incompatible with the heading "specific activities". Also a risk that the lists will expand further during the negotiations. FI emphasizes the importance of research related to climate, biodiversity, environmental issues, circular economy, water resilience, and the sustainable use of natural resources as part of competitiveness. The share of research on these topics must be safeguarded, as they are now bundled under Policy Window 1 (and partly under Policy Window 2) and no longer have a clear, dedicated cluster or destination as in previous periods of the Horizon Europe programme.
1. Support for clean transition, and industrial decarbonisation window shall be implemented in particular through the following activities:	SE (Drafting Suggestions):

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	Support for clean transition~~,~~ and industrial decarbonisation window shall be implemented in particular through the following activities: SE (Comments): An extra comma removed. IE (Drafting Suggestions): Support for **the** clean transition, and industrial decarbonisation window shall be implemented in particular through the following activities: IE (Comments): IE suggest amendment to text to align with wording used elsewhere in the proposal. IE notes that the activities supported by the ECF should be aligned with the aims of proposed Industrial Accelerator Act and that all proposed measures are included in ECF PT (Comments): - It is our understanding that the window 'clean transition and industrial decarbonisation' will be supported through several work programmes, including LIFE and Horizon Europe. Therefore, should this article reflect this new framework? Why only 'LIFE activities' are highlighted here? A potencial advantage of having everything framed in the ECF is to build a pipeline of funding instruments along the value chain of a particular sector.

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	Therefore, HE, LIFE and IF should all fund clean transition and industrial decarbonisation, supporting the full value chain from low TRLs to demonstration and deployment of a technology. Currently, the article is a shopping list of thematic areas.
(a) ”LIFE activities”: providing support to bottom-up projects for the demonstration, testing and market uptake of innovative solutions and best practices in clean transition and industrial decarbonisation and awareness raising on climate and environment to relevant governance levels.	AT (Comments): **AT** comment: We welcome this LIFE reference. However, the current wording is insufficient to ensure that the entire LIFE programme, as defined in the Multiannual Financial Framework (MFF) 2021–2027, is fully reflected in the ECF. The ECF must explicitly cover all LIFE sub-programmes, in particular Climate Action, Nature, and Circular Economy, in order to support effectively the EU’s strategic objectives on climate protection, biodiversity, and the circular economy. Moreover, we would like to emphasize that actions in the field of climate and environment should not be limited to awareness raising as the urgent challenges of climate change and environmental degradation require concrete, action-oriented measures as well. BE (Drafting Suggestions): (a) ”LIFE activities”: providing support to bottom-up projects for the demonstration, testing and market uptake of innovative solutions and best practices in clean transition and industrial decarbonisation and awareness raising on climate, **biodiversity** and environment to relevant governance levels. BG (Drafting Suggestions):

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	Amend wording to: "LIFE activities, implemented through a dedicated LIFE sub-window, providing support to bottom-up projects for the demonstration, testing and market uptake of innovative solutions and best practices in clean transition, biodiversity conservation, nature restoration, circular economy and climate action." BG (Comments): This amendment provides essential clarity and continuity for the LIFE Programme within the ECF. By explicitly distinct LIFE activities in a dedicated sub-window, it secures the governance and budgetary framework needed to preserve the programme's identity and long-standing role in EU environmental policy. It also restores the full range of LIFE's mission, which extends beyond clean transition and industrial decarbonisation to include biodiversity conservation, nature restoration, the circular economy and wider climate action. This broader scope reflects LIFE's proven contribution to the European Green Deal, the Biodiversity Strategy for 2030 and the Nature Restoration Regulation, while maintaining its bottom-up approach that engages local authorities, SMEs, NGOs and research stakeholders. Adopting this wording will ensure that LIFE's catalytic impact and visibility are not diluted as it becomes part of the ECF framework. CZ (Drafting Suggestions): (a) "LIFE activities": providing support to bottom-up projects for the demonstration, testing and market uptake of innovative solutions and best practices in clean transition**,** ~~and~~ **industrial decarbonisation, biodiversity protection, climate change adaptation, nature and landscape conservation**, and awareness raising on climate and environment to relevant governance levels. CZ

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	(Comments): CZ – The extension to projects addressing ecosystem and climate resilience is in line with the current scope of LIFE and the corresponding change we do propose to Art. 3, para 1(a). Should these not be encompassed within the ECF, the question arises as to how the Commission intends to ensure continued and adequate support for these domains (related also to our general comment on Article 33). We would appreciate receiving written clarification on this matter. LT (Drafting Suggestions): ”LIFE activities”: providing support to bottom-up projects for the demonstration, testing and market uptake of innovative solutions and best practices in clean transition and industrial decarbonisation and awareness raising on climate and environment to relevant governance levels. **This includes support for capacity building, technical assistance, and the strengthening of project development capabilities, particularly in regions with limited administrative and technical resources, to enhance participation in the clean transition and facilitate the implementation of national and regional strategies**. LT (Comments): We suggest emphasizing the importance of technical assistance, capacity building and project development, especially for small Member States with limited administrative and technical resources. Additional assistance would be needed to ensure balanced involvement of Member States and it would facilitate the implementation of national plans. LV (Drafting Suggestions):

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	"LIFE activities": providing support to bottom-up projects for the demonstration, testing and market uptake of innovative solutions and best practices in clean transition and industrial decarbonisation, **nature and biodiversity protection, ecosystem restoration, climate change adaptation and mitigation, circular economy and pollution prevention, including support to policy design and implementation, initiatives led by municipalities, research institutions and NGOs, small-scale and community projects, measures to remove market barriers, replication and transfer of best practices, and actions addressing energy poverty, as well as** awareness raising on climate and environment to relevant governance levels. LV (Comments): The current wording narrows the scope compared to current LIFE CET, focusing mainly on industrial decarbonisation. Our suggestion restores the proven CET elements: support to policy design and implementation, municipal and NGO participation, small-scale and community initiatives, and removal of market barriers. These are essential to deliver the clean energy transition at local level and to ensure coherence with EU energy legislation. The current drafting also narrows current LIFE activities primarily to decarbonisation and clean transition. To maintain continuity with all LIFE sub-programmes (Nature & Biodiversity, Environment, Climate Action, Clean Energy Transition), it is essential that the text explicitly covers activities related to biodiversity protection, ecosystem restoration, environment and climate policy support, in addition to clean transition and decarbonisation. NL (Drafting Suggestions):

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	”LIFE activities”: providing support to bottom-up projects for the demonstration, testing**, <u>upscaling</u>** and market uptake of innovative solutions ~~and practices~~ in clean transition and industrial decarbonisation **<u>through clean market creation efforts</u>** ~~and awareness raising on climate and environment to relevant governance levels~~. SE (Drafting Suggestions): ”LIFE activities”: providing support to bottom-up projects for the demonstration, testing and market uptake of innovative solutions and best practices in clean transition and industrial decarbonisation and awareness raising on climate and environment ~~to relevant governance levels~~. SE (Comments): “Awareness raising” has previously meant support for public awareness campaigns. “Bottom-up” projects should be defined. Would like to have clarifications on the coordination between LIFE actions listed here and in the EU facility. SI (Drafting Suggestions): (a) ”LIFE activities”: providing support to bottom-up projects for the demonstration, testing and market uptake of innovative solutions and best practices in clean transition and industrial decarbonisation and awareness raising on climate and environment to relevant governance levels. SI

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	(Comments): Already listed under 1 (c). LU (Comments): Regarding the LIFE programme, Luxembourg emphasises that continuity – if not of the LIFE programme itself, then at least of LIFE activities –is essential. In order to fully understand the environmental and climate-related impacts, the Commission should provide a clear overview of the current actions under the LIFE programme (2021–2027) that will be covered by the ECF, as well as those that would be discontinued, and the reasons why. DE (Comments): We welcome that LIFE activities are included prominently. IE (Drafting Suggestions): LIFE activities": providing support to bottom-up projects for the demonstration, testing and market uptake of innovative solutions and best practices in clean transition and industrial decarbonisation, **nature restoration and nature based solutions**, and awareness raising on climate and environment to relevant governance levels. IE (Comments): IE welcome providing bottom-up support for the demonstration, testing and market uptake of innovative solutions IE suggest amendment to the text and notes while this may be implicit in the existing text, given the Nature Restoration Law, and importance of nature

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	restoration and nature based solutions for numerous EU policy objectives, it is worthwhile inserting specific reference to nature restoration and nature based solutions. EE (Drafting Suggestions): Add: *"...providing support to bottom-up projects ... and awareness raising on climate and environment to relevant governance levels,* ***ensuring continuity for ongoing and newly launched LIFE projects****."* EE (Comments): EE stresses that the transition from LIFE to ECF must be smooth and without interruption to existing or newly started projects. FR (Drafting Suggestions): (a) "LIFE activities": providing support to bottom-up projects for the demonstration, testing and market uptake of innovative solutions and best practices in clean transition**s** and industrial decarbonisation and awareness raising on **the** climate**, water, biodiversity** and environment **crises** to relevant governance levels. FR (Comments): Can the Commission clarify the definition and scope of 'LIFE activities', particularly with regard to the concept of 'bottom-up projects', and can it provide a comparison of the measures eligible for funding with those that were eligible for funding under the 2021-2027 multiannual financial framework under Regulation 2021/783?

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	PT (Comments): - Clarification is welcomed regarding synergies with other funds such as Innovation Fund, Modernisation Fund, or the Just Transition Mechanism. - PT welcomes the proposal to include LIFE-type activities under this chapter. However, the scope remains insufficiently clear. At present, it is not clear if it is intended to apply across all thematic domains (energy, industry, mobility, circular economy, etc.) or whether there will be a specific focus and boundaries. Further clarification would help to understand how these activities will be framed.
(b) Energy efficiency, energy storage, demand-response, domestic transmission and distribution grids, digitalisation of energy systems, integrated renewable energy, energy renovations, and heating and cooling solutions, systems and services.	AT (Drafting Suggestions): Energy efficiency, energy storage, demand-response, domestic transmission and distribution grids, digitalisation of energy systems, integrated renewable energy **supply,** energy renovations, and heating and cooling solutions, systems and services. HR (Drafting Suggestions): (b) Energy efficiency, energy storage, demand-response, domestic transmission and distribution grids, digitalisation of energy systems, **nuclear energy,** integrated renewable energy, energy renovations, and heating and cooling solutions, systems and services HR (Comments):

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	Addition of nuclear energy is in line with reference from Recital 22 that 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. LT (Drafting Suggestions): Energy efficiency, energy storage, demand-response, ~~domestic~~**national** transmission and distribution grids, **gas network repurposing for green gases,** digitalisation of energy systems, integrated renewable, energy renovations, **local energy communities**, **Megawatt Charging System(s)** and heating and cooling solutions, systems and services. LT (Comments): In our view, it would be useful to highlight that local energy communities, heavy-duty electric vehicles charging system (MCSs) play an important role in developing RES energy generation. NL (Comments): What is meant by 'domestic transmission and distribution networks'? Does this also include cross-border infrastructure projects within the EU, or is this precisely the dividing line between CEF and ECF? And does H2 infrastructure and CO2 infrastructure also fall under Article 33? That doesn't seem entirely clear at the moment. SE (Drafting Suggestions): Energy efficiency, energy storage, demand-response, domestic transmission and distribution grids, digitalisation of energy systems, ~~integrated renewable~~

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	clean energy, energy renovations, **energy planning,** and heating and cooling solutions, systems and services. SE (Comments): To sufficently ensure that the regulation can support all clean energy solutions in the transition, it is important that all clean energy sources can be supported. IE (Comments): IE would be supportive of any measures that aid in the delivery of the onshore Grid which will be key in supporting the clean energy transition. IE notes the importance to the production of alternative fuels, particularly Power to Liquid. By producing hydrogen through a grid connection, it may be possible to run a plant for greater hours. However, this would need to be weighed against the possible impacts on the electricity grid of undertaking such a production approach, as there is a risk of renewable hydrogen being produced at times of low renewable production or supply scarcities on the system. IE supports the focus on “domestic transmission and distribution grids” IT (Drafting Suggestions): (b) Energy efficiency, energy storage, demand-response, domestic transmission and distribution grids, digitalisation of energy systems, integrated renewable energy, energy renovations, **and sustainable** heating and cooling solutions, systems and services. IT (Comments):

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	Adding the term "*sustainable*" points out a reference to environmental objectives more explicitly. ES (Drafting Suggestions): (b) Energy efficiency, **flexibility solutions**, energy storage, demand-response, **self-consumption and distributed generation,** domestic **and cross-border** transmission and distribution grids, **including innovative solutions to manage grid flows**, digitalisation of energy systems, integrati**ion~~ed~~ of** renewable energy, energy renovations, and heating and cooling solutions, systems and services. ES (Comments): What types of transport and the distribution projects would be elegible? What is the scope of the term 'integrated renewable energy'? We propose not to restrict flexiblity solutions in the proposal given their importance for the energy system decarbonization in an efficiente manner. Flexible assets are part of the activities supporting the clean transition and decarbonization. We also suggest including self-consumption and distributed generation as solutions to advance the clean transition and industrial decarbonisation. Is is also important to achieve the objectives of adapting network infrastructure to new patterns of distributed generation, capable of managing energy flows more efficiently, ensuring supply stability. This point should be emphasised through the fund allowing innovative solutions to modernise the network of countries that have made the greatest effort to integrate renewable energies in

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	order to achieve the ambitious targets set and incentivise penetration of new technologies in the industry. FR (Drafting Suggestions): (b) Energy efficiency, energy storage, demand-response, domestic transmission and distribution grids, digitalisation of energy systems, integrated renewable energy, **nuclear energy,** energy renovations, and heating and cooling solutions, systems and services. FR (Comments): The European Union's legislation and budget must comply with the principle of technology neutrality, and as such, be inclusive of all clean energy technologies. Could the European Commission confirm that the 35% target of MFF spending which should aim at addressing the Union's "climate and biodiversity objectives" can include all low carbon energy projects, including nuclear energy projects? PT (Comments): - Clarification is welcomed regarding synergies with CEF-Energy. - Reference to investments in renewable energies, including **green hydrogen,** for which a market needs to be developed, is needed and it should be reinforced.
(c) Clean energy and decarbonisation solutions in industry, including electrification of energy intensive industries and carbon capture, storage and	AT

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utilisation (CCS/CCU), and in cities, in particular for energy, transport and buildings.	(Drafting Suggestions): Clean energy and decarbonisation solutions in industry, including electrification of energy intensive industries and carbon capture, storage and utilisation (CCS/CCU), **hydrogen,** and in cities, in particular for energy, transport and buildings **and neighborhoods**. AT (Comments): **AT** comment: Hydrogen is a key technology for Europe's decarbonization and competitiveness and should be explicitly referred to. We welcome the explicit inclusion of clean energy solution in cities. However, the scope should be expanded to explicitly cover neighborhoods in addition to building-level solutions, as many key clean energy and decarbonization efforts must go beyond the building-level (e.g. neighborhood storage, integrated energy planning, local heating and cooling solutions, etc.) CZ (Drafting Suggestions): (c) Clean energy and decarbonisation solutions in industry, including electrification of energy intensive industries and carbon capture, storage and utilisation (CCS/CCU), **as well as direct carbon storage in products**, and in cities, in particular for energy, transport and buildings. CZ (Comments): CZ – We suggest this clarification as CCS/CCU primarily addresses the capture and utilisation of CO_2 from industrial emissions, whilst direct carbon storage in products allows for the permanent fixation of carbon in materials and goods, including bio-based or mineral products, without requiring prior capture from emission streams. Including direct carbon

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	storage in products alongside CCS/CCU thus ensures a comprehensive approach to industrial decarbonisation. LT (Drafting Suggestions): Clean energy and decarbonisation solutions in industry, including **carbon capture, transportation infrastructure of CO2, utilisation and storage technologies**, electrification of energy intensive industries and carbon capture, storage and utilisation (CCS/CCU), **including related infrastructure and measures supporting their deployment across the value chain,** and in cities, in particular for energy, transport**, industry** and buildings. LT (Comments): We ask to include carbon capture, transportation infrastructure of CO2, utilisation and storage technologies in the regulation proposal because these technologies are not mentioned anywhere in the text, even though their funding is extremely important for implementing the green transition, reducing CO2 emissions, and developing new technologies. Also it is important to include industrial manufacturing areas, which are also crucial for the successful integration of RES. MT (Drafting Suggestions): Clean energy and decarbonisation solutions in industry, including electrification of energy intensive industries**, water production** and carbon capture, storage and utilisation (CCS/CCU), and in cities, in particular for energy, transport, **infrastructures** and buildings. MT (Comments):

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	While **<u>water production</u>** could be deemed an energy intensive industry, specific reference to decarbonisation of the sector is essential in water constrained Member States. Materials and technologies used for low-carbon buildings—such as concrete, steel, and insulation—are also relevant for infrastructures. Including "infrastructures" ensures decarbonisation solutions apply to both buildings and larger infrastructural projects. NL (Drafting Suggestions): Clean energy and decarbonisation solutions in industry, including electrification of energy intensive industries**, <u>hydrogen</u>** and carbon capture, storage and utilisation (CCS/CCU)~~, and in cities, in particular for energy, transport and buildings~~. NL (Comments): Does clean energy imply tech neutrality? PL (Comments): We positively evaluate solutions aimed at achieving the decarbonization goals of European industry by promoting the development and deployment of clean technologies. To achieve the decarbonization objectives of European industry, it is crucial to support investments in energy efficiency and to increase the share of renewable energy sources in industrial processes. Equally important are carbon capture and storage technologies, which are recognized both in the European Union and globally as methods for emission reduction and decarbonization. They can find particular application in

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	industry, especially in cement production, but also in steel, chemical industries, and energy sectors. SE (Drafting Suggestions): **Innovative c~~C~~lean energy and decarbonisation solutions in industry, including electrification of energy intensive industries and carbon capture, storage and utilisation (CCS/CCU), and in cities and **rural areas**, in particular for energy, transport and buildings. SE (Comments): The Clean Industrial Deal refers to support to innovative industry (p.10). It is necessary to include a reference to innovation to ensure that the measures supported are at a sufficient innovative level, and in line with best practices and standards. The measures required for the decarbonisation of industry will largely differ from those needed for transport, buildings, and energy systems in cities. Therefore, the activity should be split into two paragraphs. Suggest to add rural areas due to the needs for decarbonisation and clean energy also within a variety of territories, not excluded to cities and urban areas in particular. DE (Comments): To what extent will the references to clean energy open up TFEU-based EU programmes for energy generation through nuclear fission? Would it be

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	possible to fund the construction and maintenance of nuclear power plants? Would this expenditure be counted against the climate quota? IE (Comments): IE notes one of the primary challenges to producing PTL fuels is affordability/accessibility to vast amounts of renewable energy (directly related to the price of green hydrogen production) and the availability/cost of CCUS. IT (Drafting Suggestions): (c) Clean energy and decarbonisation solutions in industry, including electrification of energy intensive industries and carbon capture, storage and utilisation (CCS/CCU) **as well as sustainable fuels including hydrogen, biofuels and biomethane**, and in cities, in particular for energy, transport and buildings. ES (Drafting Suggestions): (c) Clean energy and decarbonisation solutions in industry, including electrification of energy intensive industries **such as steel, aluminum, chemicals, ceramics, paper, glass, cement or automotive; adaptation to renewable gases when electrification is not feasible;** and carbon capture, storage and utilisation (CCS/CCU) **in hard-to-abate industries** and in cities, in particular for energy, transport and buildings. **Indirect CO2 emissions reduction shall also be taken into account. Priority shall be given to industrial projects with high replication potential across Member States.** ES (Comments):

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	Taking the Innovation Fund's pilot auction for industrial heat as a reference, is it planned to include different temperature ranges for industrial heat in this case? Is it planned to consider only electrification, or should it be understood (from the reference to 'including...') that renewable technologies such as solar thermal and district networks for supplying process heat would also be eligible? Renewable gases such as renewable hydrogen or biomethane are clean energy solutions in those hard to abate industries. We suggest limiting carbon capture technology to those industrial sectors where emissions abatement is difficult, as fossil fuel phase-out should be prioritised and it is an energy-intensive technology. Electrification projects where electricity comes from decarbonised electricity generation systems will contribute most to the energy transition, with more affordable energy prices to boost competitiveness. It is suggested that the reduction of indirect CO2 emissions of electricity production be taken into account, prioritising electrification projects where electricity comes from decarbonised generation systems. FR (Drafting Suggestions): Clean energy and decarbonisation solutions in industry, including electrification of energy intensive industries, carbon capture, storage and utilisation (CCS/CCU) **and the use of clean hydrogen or other sustainable fuels and feedstocks**, and in cities, in particular for energy, transport and buildings. HU (Comments): We propose to clarfy whether nuclear energy technology and natural gas are included in clean energy solutions.

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	CZ (Drafting Suggestions): **<u>(d) Development, demonstration and deployment of clean and safe nuclear energy technologies, including advanced reactor concepts.</u>** CZ (Comments): CZ - In line with our request to involve "nuclear energy" among clean energy solutions in Art. 3 (Objectives), para 2(a), the Czech Republic requests the inclusion of a dedicated reference to nuclear energy technologies within the specific aims of the Clean Transition and Industrial Decarbonisation window. This is particularly relevant for the development and deployment of advanced nuclear technologies, including small modular reactors, which are to contribute to the Union's decarbonisation objectives and energy system resilience. In this regard, we draw attention to the Commission's 8th Nuclear Illustrative Programme (PINC, 2025), that identifies advanced nuclear technologies, including small modular reactors, as essential to achieving the Union's decarbonisation, energy resilience, and industrial competitiveness objectives. Adding to this, the Commission's Impact Assessment accompanying the 2040 Climate Target Communication (COM(2024) 63 final), clearly states that the decarbonisation of the energy system will require all zero- and low-carbon energy solutions—primarily renewables, complemented by nuclear energy. In addition to investments in lifetime extension of existing reactors and the construction of new large-scale reactors, further long-term investments will be needed in the development and industrial uptake of small modular reactors (SMRs), advanced modular reactors (AMRs), and nuclear fusion technologies.

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	Globally, there is growing interest in the development of SMRs, AMRs, and microreactors, which do not compete with large-scale reactors but rather address distinct energy needs. These technologies can form part of future hybrid energy systems and provide reliable heat sources for hard-to-abate sectors, including low-carbon hydrogen production. Owing to their operational flexibility, SMRs can also contribute effectively to grid stability and the security of energy supply. *It should further be noted that the nuclear value chain is closely linked to modern healthcare (supply of radioisotopes in medical diagnostics and treatment). This connection reinforces the strategic importance of maintaining and further developing innovative nuclear technologies to ensure patient access to and advances in life-saving medical procedures and therapies.*
(d) Sourcing, production, storage, distribution and uptake of sustainable fuels, facilitating decarbonisation of mobility.	AT (Drafting Suggestions): Sourcing **<u>of critical raw materials and feedstock for the</u>** production, storage, distribution and uptake of **<u>batteries and</u>** sustainable fuels, facilitating decarbonisation of mobility. AT (Comments): **AT** comment: For efficiency reasons, decarbonisation of transport has to rely primarily on electrification (for which batteries are an indispensable element). In hard-to-abate transport segments (in particular aviation and maritime transport) alternative fuels (like SAF) will still remain the only viable pathway for decarbonisation. Given their limited availability and comparatively high costs, sustainable fuels should be strategically prioritised in sectors where no viable alternatives exist. CZ

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	(Drafting Suggestions): ~~(d)~~**(e)** LT (Drafting Suggestions): Sourcing, production, storage, distribution and uptake of sustainable fuels **in particular renewable gases such as green hydrogen as well as sustainable biogas and biofuels from agriculture and waste sources and other sources, synthetic fuels**, facilitating decarbonisation of mobility. LT (Comments): Lithuania proposes adding examples of what is considered sustainable fuels and mentioning the most important ones. A more precise definition of sustainable fuels is necessary to ensure legal clarity and investment security – by specifying exactly which types of fuel are considered sustainable (e.g., green hydrogen, biomethane, biofuels from agriculture and waste and other sources, synthetic fuels) ensures that market participants can plan long-term investments without the risk of uncertainty, it also identifies opportunities to exploit local agricultural and waste resources and existing gas infrastructure, thus contributing to energy security and regional economic growth, while ensuring a more effective contribution to the implementation of EU climate goals. PL (Drafting Suggestions): (d) Sourcing, production, storage, distribution and uptake of sustainable fuels, facilitating decarbonisation **of transport and** mobility. RO (Comments):

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	Definition of the concept or references to official documents (for example, in the *Fit for 55* package) where this concept is defined are needed to be added. Since the existing references include ”alternative fuels”, it is not clear if in the sense of this Regulation the ”sustainable fuels” means ”green fuels” or ”alternative fuels” (already defined) or other definition. SE (Drafting Suggestions): (d) Sourcing, **innovative** production, storage, distribution and uptake of sustainable fuels, facilitating decarbonisation of mobility. IE (Comments): IE notes for aviation, a particular focus should be the sourcing/production element. As Sustainable Aviation Fuel is, like many alternative fuels, a ‘drop in’ fuel, the existing supply chain infrastructure can be used, making the storage/distribution relatively straightforward. The main challenge is scaling up the production of alternative fuels. However, the current high CAPEX and OPEX requirements limit the pool of viable investors for SAF projects, which is further restricted by risks associated with a first of a kind plant. This combination of challenges limits access to financing for SAF plants, which are seen as large for venture capital, and too risky for most other private investors. Diversified funding, through multiple funding sources and types has been used internationally to help spread these risks. IE note in the context of “Sourcing, ... distribution and uptake of sustainable fuels”, the importance of focusing on alternative fuels and technologies (in addition to electrification) in the transport sector cannot be overstated. In addition to the AFIR mandates in respect of green hydrogen refuelling

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	infrastructure, which is expected to have a potentially significant (albeit niche) role to play in the decarbonisation of HDVs, FI (Drafting Suggestions): (d) Sourcing, production, storage, distribution and uptake of sustainable fuels **and power/electricity**, facilitating decarbonisation of mobility. FI (Comments): In many applications, electricity is already a sufficiently competitive alternative to fossil fuels, but not in all. In the future, it must also be monitored whether efforts are made to define in more detail what is meant by "sustainable fuels", which is a vague expression compared to the language used in other EU regulations. IT (Drafting Suggestions): (d) Sourcing, production, storage, distribution and uptake of sustainable fuels, facilitating **the** decarbonisation of mobility **based on the principle of technological neutrality.** IT (Comments): It is important to underline the principle of technological neutrality in the context of mobility. FR (Drafting Suggestions): Sourcing, production, storage, distribution and uptake of sustainable fuels, facilitating decarbonisation of **heavy transport, including hydrogen,**

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	synthetic fuels, advanced biofuels, ammonia and methanol, while ensuring food security, with attention to security of supply and international partnerships. FR (Comments): Regarding sustainable alternatif fuels factory, could the Commission specify at what stage the European competitiveness fund would come into play? Would it be possible to obtain further details regarding the specific projects that are envisaged and eligible for funding in the area of alternative fuel transportation under the European competitiveness fund? It is important to ensure that developing sustainable fuels production does not undermine food security.
	AT (Comments): **AT** comment: AT supports the approach outlined in Article 33. We welcome that a broad range of activities contributing to the clean transition and industrial decarbonisation are covered under this provision. In particular, we would like to underline the importance of paragraph (e) “Clean, multimodal and digitalised, safe transport and mobility solutions, including mobile assets (e.g. vehicles, vessels including fishing vessels, aircrafts, rolling stocks) and infrastructures (among others charging infrastructure, ports or high speed rail), systems and operations” and paragraph (f) “Supporting the development and deployment of smart mobility, including vehicles, infrastructure, connected and automated mobility, smart traffic management systems and related services”. AT considers these areas to play a key role in strengthening European competitiveness, resilience and technological leadership. They make a substantial contribution to the

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	objectives of establishing the European Competitiveness Fund (ECF). We therefore explicitly support the inclusion of these provisions and strongly recommend maintaining these provisions in the final regulation.
(e) Clean, multimodal and digitalised, safe transport and mobility solutions, including mobile assets (e.g. vehicles, vessels including fishing vessels, aircrafts, rolling stocks) and infrastructures (among others charging infrastructure, ports or high speed rail), systems and operations.	AT (Drafting Suggestions): Clean, multimodal, **seamless** and digitalised, safe, **accessible and inclusive** transport and mobility solutions, including mobile assets (e.g. vehicles, vessels ~~including fishing vessels~~, aircrafts, **railway** rolling stock~~s~~) and **related** infrastructures (among others charging infrastructure, ports or high speed rail), systems and operations. AT (Comments): **AT** comment: Mobility solutions cover a fundamental societal need and must therefore be designed to facilitate usage for the broadest possible part of the population. @ "*fishing*": why this specification? This misses the prevailing level of granularity and has to be deleted – otherwise a full shopping list of all kinds of vessels, vehicles etc. for all types of modes would have to be included… CZ (Drafting Suggestions): ~~(e)~~ **(f)** Clean, multimodal and digitalised, safe **passenger, freight and public** transport and mobility solutions, including mobile assets (e.g. vehicles, vessels including fishing vessels, aircrafts, rolling stocks) and infrastructures (among others charging infrastructure, ports or high speed rail), systems and operations, **including technologies for decarbonization of transport and constrution of infrastructures.** CZ

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	(Comments): CZ – The insertion of a clarification referring to *passenger, freight and public transport* is motivated by the need to clearly specify whether the ECF will support all transportat/mobility areas, including activities in the field of public transport, especially in regard to the implementation of the AFIR Regulation. In order to reduce emissions in the transport sector and in the construction of related infrastructure, it is necessary to support *technologies for decarbonization of transport and constrution of* and to ensure that transport decarbonisation measures comprehensively cover all critical components (example: if mere transport is considered, such as with aircrafts, the uptake of clean soulutions for airport ground handling equipment should also be involved). LV (Comments): Lūdzam skaidrot, vai atbalsta ietvaros var tikt paredzētas investīcijas kravas elektrotransportlīdzekļu iegādei un multimododālās (vienotās) biļetes ieviešanai. MT (Drafting Suggestions): Clean, multimodal and digitalised, safe transport and mobility solutions, including mobile assets (e.g. vehicles, vessels including fishing vessels, aircrafts, **drones,** rolling stocks, **land freight transport**) and infrastructures (among others charging infrastructure, ports**, aprons** or high speed rail), systems and operations. MT

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	(Comments): Given their importance, we feel that these topics merit explicit inclusion in the text. The proposal seeks to clarify that infrastructure also covers electrification of airport **aprons**, provinding access to electricity while aircraft are on the ground. NL (Drafting Suggestions): Clean, multimodal and digitalised, safe transport and mobility solutions, including **innovative** mobile assets (e.g. vehicles, vessels including fishing vessels, aircrafts, rolling stocks) and infrastructures (among others charging infrastructure, ports or high speed rail), **digital transportation** systems and operations. NL (Comments): Systems is a rather broad terms and requires specification. Therefore, the addition of 'digital transportation' ensures this specification. PL (Drafting Suggestions): Clean, multimodal and digitalised, **automated,** safe transport and mobility solutions, including mobile assets (e.g. vehicles, vessels including fishing vessels, aircrafts, rolling stocks) and infrastructures (among others charging infrastructure, ports, **airports** or **rail including** high speed rail), systems and operations. SE (Drafting Suggestions):

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	(e) Clean, multimodal and digitalised, safe transport and mobility solutions, including mobile assets (e.g. vehicles, vessels including **small scale** fishing vessels[1], aircrafts, rolling stocks) and infrastructures (among others charging infrastructure, ports **including fishing ports and landing sites,** or high speed rail), systems and operations. **[1] Without prejudice to regulation (EU) No 1380/2013 of the European Parliament and of the Council of 11 December 2013 on the Common Fisheries Policy.** SE (Comments): Support for investments in fishing vessels, including new propulsion technology, may lead to increased fishing capacity, and thereby an increased risk of overfishing. Support for fishing vessels should be targeted towards small-scale fisheries, which face the greatest challenges in terms of profitability and competitiveness, while at the same time being central to the vitality of coastal communities and the development of the blue economy. The availability of charging infrastructure in ports and landing sites is essential to facilitate the energy transition of the fishing fleet. How does COM intend to ensure that the support for fishing vessels is consistent with the DNSH principle, with regard to the risk that such support could lead to increased fishing capacity? DE

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	(Drafting Suggestions): (e) Clean, multimodal and digitalised, safe **and resilient** transport and mobility solutions, including mobile assets (e.g. vehicles, vessels including fishing vessels, aircrafts, rolling stocks) and infrastructures (among others charging infrastructure, ports or high speed rail), systems and operations. DE (Comments): Smart mobility has broad potential for value generation and increased productivity, but also brings with it risks for cybersecurity and critical infrastructure which should be adressed from the start. IE (Drafting Suggestions): Clean, multimodal and digitalised, safe transport and mobility solutions, including mobile assets (e.g. vehicles, vessels including fishing vessels, aircrafts, rolling stocks) and infrastructures (among others **digital, road/traffic,** charging infrastructure, ports or high speed rail), systems and operations. IE (Comments): IE suggest amending text to include digital, road/traffic IE are supportive of any programme funding that may be made available for airports under the Fund IE notes the importance of the development of zero emission propulsion for aviation. Accordingly, the rollout of alternative fuel infrastructure at airports, such as electric recharging stands, is required.

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	In terms of priorities, for aviation, the focus should be on Sustainable Aviation Fuel in the immediate, given that alternative propulsion technologies will not be suitable for all flight routes and considering the lifespan of an aircraft is between 20 to 30 years, aircraft operators will take time to retire and replace them. SAFs therefore present a sustainable alternative to continue operating the existing fleet of commercial aircraft and are consequently should be the central measure to decarbonise aviation in the short to medium term. Given the impact of efficient air traffic management on carbon emissions, the examples given should include explicit reference to ATM infrastructure/systems so that there can be no ambiguity as to whether they are within scope. IE welcomes the focus on incentives for the uptake of alternatively fuelled and zero-emission vehicles, as well as the wider infrastructural requirements in the context of the land transport sector. FI (Drafting Suggestions): (e) Clean, multimodal and digitalised, safe transport and mobility solutions, including mobile assets (e.g. vehicles, vessels including fishing vessels, aircrafts, rolling stocks) and infrastructures (among others ~~charging~~ **alternative fuels** infrastructure, ports or high speed rail), systems and operations. FI (Comments): In terms of infrastructure, the section specifically mentions “charging infrastructure”, but now it remains somewhat unclear whether this refers to the distribution infrastructure of alternative power sources more broadly or only to the electric charging infrastructure. On this basis, it is proposed that

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	instead of "charging infrastructure", it should state "alternative fuels infrastructure". ES (Drafting Suggestions): (e) Clean, multimodal and digitalised, safe transport and mobility solutions, **including electric vehicle and sustainable mobility systems, as well as batteries and other** mobile assets (e.g. ~~vehicles,~~ vessels including fishing and **shipping** vessels, aircrafts, rolling stocks) and infrastructures (among others charging infrastructure, ports or high speed rail), systems and operations. FR (Comments): How will these activities be supported within the FEC, particularly with regard to the digital and resilience aspects of the FEC (e.g. in relation to issues of access to critical materials necessary for certain activities mentioned)? This connection also applies to the following articles f and g. Does this cover electrification and air conditioning infrastructure at airports, as well as the transition to electric ground support equipment? The current wording is not clear and combines several objectives and categories of eligible projects without specifying the eligibility perimeter for each. The scope of eligibility has to be clarified and detailed. Exemples to illustrate would be welcomed

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	What is the distinction between projects typically financed under the Connecting Europe Facility Transport (CEF-T) and those that could fall under this instrument ? PT (Comments): - Clarification is welcomed regarding synergies with CEF-Transports. - Given rail's critical role in decarbonising both passenger and freight transport, clarification is needed on whether rail-related R&I activities will be covered or will be addressed in another part of the programme.
(f) Supporting the development and deployment of smart mobility, including vehicles, infrastructure, connected and automated mobility, smart traffic management systems and related services.	AT (Drafting Suggestions): Supporting the development and deployment of smart mobility, including vehicles, infrastructure, **cooperative, clean,** connected and automated mobility, smart traffic management systems and related services AT (Comments): **AT** comment: This is pivotal to facilitate holistic control and a smooth functioning of the overall (road) mobility system and avoid unfair usage with negative collaterals for others. CZ (Drafting Suggestions): ~~(f)~~ **(g)** NL (Drafting Suggestions):

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	Supporting the development and deployment of smart mobility, including vehicles, infrastructure, connected and automated mobility~~, smart traffic management systems and related services.~~ DE (Drafting Suggestions): (f) Supporting the development and deployment of **cybersecure and trustworthy** smart mobility, including vehicles, infrastructure, connected and automated mobility, smart traffic management systems and related services. DE (Comments): Smart mobility has broad potential for value generation and increased productivity, but also brings with it risks for cybersecurity and critical infrastructure which should be adressed from the start. IT (Drafting Suggestions): f) Supporting the development and deployment of smart mobility, including vehicles, infrastructure, connected and automated mobility **solutions**, smart traffic management systems and related services. IT (Comments): Adding the term "*solutions*" ensure more terminological coherence. FR (Comments):

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	How will these activities be supported within the FEC, particularly with regard to the digital and resilience aspects of the FEC (e.g. in relation to issues of access to critical materials necessary for certain activities mentioned)? PT (Comments): - Clarification is welcomed whether requirements for open/interoperable data and linkage to mobility data spaces to scale MaaS1/traffic management services will be included.
	FR (Drafting Suggestions): **Strenghtening Union capacity in both extraction and refining as well as recycling, re-use and substitution of of critical and strategic raw materials that are crucial for the success of the clean and digital transitions as well as the resilience of the defence and aerospace sectors.**
(g) Clean tech manufacturing and its supply chain, including through financial support to Strategic Projects under Regulation (EU) 2024/1735, scaling up the manufacturing capacity of net-zero technologies and their supply chains, and by ramping up of existing production lines.	AT (Drafting Suggestions): Clean Tech manufacturing**, Industry 4.0, and digital technologies for manufacturing** and its supply chain …. their supply chains, and by ramping up of existing production lines **as well as the support to diversification of European industries and manufacturers to enter into supply and value chains covered under Regulation (EU) 2024/1735** AT (Comments): **AT** Comment: The Industry-topics of Horizon Europe Cluster 4 are now distributed among several policy windows (Industrial decarbonisation and resilience). During the last 5 years Cluster 4 has worked hard to break down

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	silos between digital technologies and manufacturing/materials. Manufacturing industry has undergone significant changes due to the integration of emerging information technologies, such as artificial intelligence, big data, and cloud computing. Digital workflows are becoming increasingly important in materials science and engineering. Against this background, the application of digital technology in manufacturing and materials sciences has become a key driver of innovation and development. On diversification: See comment provided under Art. 3 2(a) CZ (Drafting Suggestions): ~~(g)~~ **(h)** NL (Drafting Suggestions): Clean tech manufacturing and its supply chain, ~~including through financial support~~ **including** to Strategic Projects under Regulation (EU) 2024/1735, scaling up the manufacturing capacity of **innovative** net-zero technologies and their supply chains, and by ramping up of existing production lines, **in case of high-risk strategic dependencies.** PL (Comments): Decarbonization of energy-intensive industries requires appropriate investments, not only in research and development but also in the implementation of technologies and the modernization of industrial plants, which should be supported by dedicated financing mechanisms. It is important to emphasize the significance of fund participation for energy-intensive entities, which, due to rising decarbonization costs, may consider relocating production outside the European Union.

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	SE (Drafting Suggestions): **<u>Innovative c</u>**lean tech manufacturing and its supply chain, including through financial support to Strategic Projects under Regulation (EU) 2024/1735, scaling up the **<u>innovative</u>** manufacturing capacity of net-zero technologies and their supply chains, and by ramping up of existing production lines. DE (Comments): To what extent will the references to the NZIA open up TFEU-based EU programmes for energy generation through nuclear fission? Would it be possible to fund the construction and maintenance of nuclear power plants? Would this expenditure be counted against the climate quota? FI (Comments): Should be clarified how the funding mechanism for NZIA's strategic projects works. Is the mechanism automatic? IT (Drafting Suggestions): (g) Clean tech manufacturing, **<u>including transition technologies,</u>** and its supply chain, **~~including through financial support to Strategic Projects under Regulation (EU) 2024/1735,~~** scaling up the manufacturing capacity of **~~net-zero~~** technologies and their supply chains, and by ramping up of existing production lines**, <u>including through financial support to Strategic Projects under Regulation (EU) 2024/1735.</u>** IT (Comments):

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	Italy deems fundamental to set out clearly the principle of technological neutrality. The DNSH principle already safeguards environmental objectives; therefore, the term "*Net – zero*" should be expunged as not to prejudice any other specific technological options. ES (Drafting Suggestions): (g) Clean tech manufacturing and its supply chain, including through financial support to Strategic Projects under Regulation (EU) 2024/1735, scaling up the manufacturing capacity of net-zero technologies and their supply chains, and by ramping up of existing production lines**, with particular focus on SMEs**. FR (Comments): How will these activities be supported within the FEC,-particularly with regard to the FEC's resilience component (e.g. in relation to issues of access to critical materials necessary for certain activities mentioned)? PT (Comments): - We request clarification regarding the future implementation of IDAA, how will this be connected? - Prioritise ramp-up of net-zero technologies with InvestEU crowding-in; link with Art. 35 competitive bidding (CfD/CCfD) where appropriate.

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(h) Strengthening Union capacity in innovation and industrial deployment of advanced manufacturing and advanced materials.	AT (Drafting Suggestions): Advanced manufacturing and advanced **and raw materials support for the strengthening of the EU capacity in exploration, extraction, processing and recycling of raw materials;** **purchasing of raw materials, in line with economic security needs and the green and digital transition objectives, in order to reduce the risk of supply disruptions for companies in the EU, including the establishment and management of stockpiles of critical raw materials in coordination with Member States and industry;** AT (Comments): **AT** Comment: we need to think raw and advanced materials together: on the primary side you have exploration and on the secondary site substitution of raw by advanced materials, recycling and production of raw materials. Therefore we have to integrate rw materials out of the polics window resilience into the policy window green transition CZ (Drafting Suggestions): ~~(h)~~ **(i)** CZ (Comments): CZ - The concept “strenghthening [of the] Union capacity” should be better specified. Is the creation of EU innovation centres, or other new EU platforms, or funding of business R&I, or collaborative innovation projects of businesses and research organisations, or something else meant? NL

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	(Drafting Suggestions): Strengthening Union capacity in **disruptive** innovation and industrial deployment of advanced manufacturing and advanced materials PL (Comments): This should be clarified as regards advanced materials in line with the Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions "Advanced Materials: A Leadership in Decision-Making" COM(2024) 98 SE (Drafting Suggestions): Strengthening Union capacity in innovati**ve**~~con~~ ~~and~~ industrial deployment of advanced manufacturing, **industrial engineering, materials engineering** and advanced materials. SE (Comments): Why is advanced manufacturing included under this chapter and not under chapter VI on digital leadership? Is there a specific link to green transition? Industrial engineering and materials engineering aiming at broadening scope, as the union needs to develop and innovate production/manufacturing methods as well as new materials beyond the most advanced methods and materials. IE (Comments):

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	IE welcomes the strengthening of Union capacity in the innovation and industrial deployment of advanced manufacturing / materials. FI (Drafting Suggestions): "--advanced manufacturing and advanced materials **related to green transition.**" FI (Comments): FI suggests linking the activity to green transition. FR (Drafting Suggestions): Strengthening Union capacity in innovation and industrial deployment of advanced **and circular design**, manufacturing, and materials.
(i) Circular economy, water efficiency, ocean health and environmental policy, including solutions to protect, restore and improve the quality of the environment, including the air, water, marine and soil, and to halt and reverse biodiversity loss and to tackle the degradation of ecosystem, sustainable solutions for climate action in agri-food and forestry supply chains.	AT (Drafting Suggestions): Circular economy, water efficiency, ocean health and environmental policy, including solutions to protect, restore and improve the quality of the environment **and all natural resources**, including the air, water, marine and soil, and to halt and reverse biodiversity loss and to tackle the degradation of ecosystem, sustainable solutions for climate action in agri-food and forestry supply chains. AT (Comments): This topic is also relevant to Chapter 7/ECF: Space technologies and the data obtained from them are important sources of information for research, including in relation to natural resources.

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	BE (Drafting Suggestions): (i) Circular economy, water **resilience** ~~efficiency~~, ocean health and environmental policy, including **nature-based** solutions to protect, restore and improve the quality of the environment, including the air, water, marine and soil, and to **restore** ~~halt and reverse~~ biodiversity ~~loss~~ and to tackle the degradation of ecosystem, sustainable solutions for climate action in agri-food and forestry supply chains. BE (Comments): Support for international science policy agenda, e.g. IPBES Water resilience is a more appropriate concept, broader than water efficiency and in line with the EU Water Resilience strategy. It is important to highlight and structurally integrate nature based solutions, given their adaptive quality and cumulative benefits. Restore biodiversity is a clearer and more concrete formulation than “to halt and reverse biodiversity loss” CZ (Drafting Suggestions): ~~(i)~~ **(j)** CZ (Comments): . HR (Drafting Suggestions):

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	(i) Circular economy, water efficiency, ocean health and environmental policy, including solutions to protect, restore and improve the quality of the environment, including the air, water, marine and soil, and to halt and reverse biodiversity loss and to tackle the degradation of ecosystem **and ensure nature restoration**, sustainable solutions for climate action in agri-food and forestry supply chains. HR (Comments): Adding nature restoration reference is in line with the new obligations for the Member States in this policy area. LV (Drafting Suggestions): Circular economy, water efficiency, ocean health **, nature and biodiversity protection**, and environmental and climate policy, including solutions to protect, restore and improve the quality of the environment (air, water, marine and soil), **to halt and reverse biodiversity loss, restore degraded ecosystems, protect species and habitats, and ensure coherence with European Union biodiversity and nature legislation (including Natura 2000 and related strategies),** as well as sustainable solutions for climate change adaptation and mitigation in agri-food, forestry and other land-use sectors. LV (Comments): Addition included to ensure continuation of the current LIFE programme and Union's nature and biodiversity goals. MT (Drafting Suggestions):

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	Circular economy, water efficiency, ocean health and environmental policy, including solutions to protect, restore and improve the quality of the environment, including the air, water, marine and soil, and to halt and reverse biodiversity loss and to tackle the degradation of **both marine and land-based** ecosystem, sustainable solutions for climate action in agri-food and forestry supply chains**, including the contribution of marine grasses towards climate change mitigation.** MT (Comments): These are very important topics that merit explicit mention in the text. NL (Drafting Suggestions): (i) Circular economy, **in particular diversification of supply, recovery, recyling, reuse, and repair of (critical) materials and products.** **(x)** water efficiency, ocean health and environmental policy, including solutions to protect, restore and improve the quality of the environment, including the air, water, marine and soil, and to halt and reverse biodiversity loss and to tackle the degradation of ecosystem, sustainable solutions for climate action in agri-food and forestry supply chains. NL (Comments): Important to make clear distinction and have a separate point for CE. This better anchors CE in the ECF.

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	Additonally, recycling should encompass both mechanical and chemical recycling, but it would not be necessary to make this distinction in the regulation itself. PL (Drafting Suggestions): (i) Circular economy, water efficiency **and water management,** ocean health and environmental policy, including solutions to protect, restore and improve the quality of the environment, including the air, water, marine and soil, and to halt and reverse biodiversity loss and…." RO (Drafting Suggestions): (i) Circular economy, water efficiency, ocean health and environmental policy, including solutions to protect, restore and improve the quality of the environment, including the air, water, marine and soil, and to halt and reverse biodiversity loss and to tackle the degradation of ecosystems through nature-positive interventions, sustainable solutions for climate action in agri-food and forestry supply chains. RO (Comments): Incorporating nature-positive interventions ensures that environmental solutions actively restore and enhance ecosystems, promoting long-term sustainability and biodiversity recovery. SE (Drafting Suggestions): i) Circular economy **including the promotion of sustainable products and business models, growth by innovation and investment in resource**

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	efficiency, supply of high-quality recycled materials and market-based stimulation demand for these materials in the EU. **ia)** water efficiency, ocean health and environmental policy, including solutions to protect, restore and improve the quality of the environment, including the air, water, marine and soil, and to halt and reverse biodiversity loss and to tackle the degradation of ecosystem, sustainable solutions for climate action in agri-food and forestry supply chains. SE (Comments): Important to further elaborate on necessary aspects of circular economy. Necessary to separate the importance of circular economy for competitiveness and profitability from environmental protection action SI (Drafting Suggestions): **Sustainable** ~~C~~**c**ircular economy **and bioeconomy**, water efficiency, ocean health and environmental policy, including solutions to protect, restore and improve the quality of the environment, including the air, water, marine and soil, and to halt and reverse biodiversity loss and to tackle the degradation of ecosystem, sustainable solutions for climate action in agri-food and forestry supply chains. SI (Comments): SI believes that the bioeconomy also makes an important contribution to the clean transition and decarbonisation, which is why it is worth mentioning here in connection with the sustainalbe circular economy. IE

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	(Comments): IE notes that projects and incentives that strongly challenge and discourage inbuilt obsolescence in green technology and encourage re-use of pre-used green technology in the mobility sector (e.g. incentives for 2nd hand EVs, eHDVs, eBikes) should be promoted and incentivised. EE (Drafting Suggestions): Add: *"...solutions to protect, restore and improve the quality of the environment ... halt and reverse biodiversity loss and tackle degradation of ecosystems,* ***ensuring balanced funding for biodiversity and nature protection projects alongside industrial decarbonisation projects****."* EE (Comments): EE considers it important that biodiversity and environmental projects receive adequate and balanced support, not being overshadowed by large-scale industrial projects. FR (Drafting Suggestions): i) Circular economy, water efficiency, ocean health and environmental policy, including solutions to protect, restore and improve the quality of the environment, including the air, water, marine and soil, and to halt and reverse biodiversity loss and to tackle the degradation of ecosystem, **through "LIFE activities"**, sustainable solutions for climate action in agri-food, **seafood** and forestry supply chains. FR (Comments):

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	What do the terms "water efficiency, ocean health and environmental policy" mean here? Could "circular economy" be further defined? It could for instance refer to the communication from the Commission to the European Parliament, the Council, the ESCR (A new action plan for a circular economy or the regulation (EU) 2024/1781 establishing a framework for the setting of ecodesign requirements for sustainable products, with particular reference to ecodesign. This paragrah would probably earn a lot from being divided in as many paragraphs as the number of topics in order to precise the content of each of these topics to be financed: (i) circular economy, (ii) water efficiency, (iii) ocean health, (iv) environment including air, water, marine and soil, (v) solutions to halt and reverse biodiversity loss and to tackle the degradation of ecosystems. The last part regarding climate-action in agri-food and forestry supply chains could as well be included within the Health, Biotech, Agriculture and Bioeconomy window. HU (Drafting Suggestions): Circular economy, **in particular through the development of waste management**, water efficiency, ocean health and environmental policy, including solutions to protect, restore and improve the quality of the environment, including the air, water, marine and soil, and to halt and reverse biodiversity loss and to tackle the degradation of ecosystem, sustainable **and competitive** solutions for climate action in agri-food and forestry supply chains. HU

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	(Comments): The transition to a circular economy is a key priority for maintaining and strengthening the competitiveness of the European Union and its Member States. Given that EU manufacturing productivity depends on resource efficiency and the availability of essential raw materials, the ECF must actively contribute to promoting the circular economy, in particular through the development of waste management. These measures will increase the share of raw materials sourced from Member States and reduce import dependency. In order to renew the industry's technology, increase its productivity and enhance its global competitiveness, it is essential to invest in circular economy, expand research and development capacities and support knowledge-based innovation. PT (Drafting Suggestions): (i) Circular economy, **including ecodesign, remanufacturing, repair, and high-efficiency recycling of complex waste streams such as WEEE, batteries, plastics, and textiles;** water efficiency, ocean health and environmental policy, including solutions to protect, restore and improve the quality of the environment, including the air, water, marine and soil, and to halt and reverse biodiversity loss and to tackle the degradation of ecosystem, sustainable solutions for climate action in agri-food and forestry supply chains.

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	PT (Comments): - PT welcome the inclusion of circular economy aspects in this article. However, the current framing places them predominantly within the environmental dimension. Given the strong industrial relevance of circular economy approaches, particularly in energy intensive industries and in clean tech manufacturing and advanced materials, it is important to ensure that circularity is consistently addressed in several areas and not only as an environmental measure. We would therefore encourage clarifying whether and how circular economy will be embedded under other points, namely (c), (g) and (h), in order to reflect its strategic role in industrial decarbonisation and competitiveness - The proposed suggestion details the priority activities that require investment to become economically viable on a European scale. By specifying **ecodesign, remanufacturing, repair, and high-efficiency recycling**, the Fund would support the entire value chain, in line with the waste management hierarchy. The explicit mention of EU priority waste streams (**WEEE, batteries, plastics, and textiles**) is crucial. This change transforms an environmental obligation into a strategic economic opportunity, aligned with the European Green Deal and the Critical Raw Materials Act.
(j) Climate and water resilience.	BE

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	(Drafting Suggestions): (j) Climate ~~and water resilience~~ **resilience and risk management, including nature based solutions**. BE (Comments): Support for international science policy agenda, e.g. IPCC Climate resilience is indispensable for competitiveness, security and prosperity. Therefore, we need to have both a recovery and reactive mode, which leads to preparedness and proactive risk management. Enhanced climate resilience means prevention of economic losses, protection of people and assets at risk, preparation of competitive business models for a changing climate, and prosperity by exploring new opportunities. **For the European climate resilience and risk management Integrated Framework, these are key recent initiatives:** - Preparedness Union Strategy - EU Competitiveness Compass - Vision for Agriculture and Food - EU Water Resilience Strategy - EU Ocean Pact It is also important to highlight and structurally integrate nature based solutions (for instance wetlands, green roofs, urban forests), given their adaptive quality and cumulative benefits. They should be an integral part of resilience strategy CZ (Drafting Suggestions): ~~(i)~~ **(k)**

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	LV (Drafting Suggestions): Climate **change adaptation** and **resilience**, **including** water resilience. LV (Comments): Addition included to ensure continuation of the current LIFE programme and Union's climate change mitigation goals. NL (Drafting Suggestions): ~~Climate and~~ innovative solutions in **pollution prevention, control and remediation** ~~and~~, water **and climate management, and water and resource efficiency** ~~resilience.~~ SE (Drafting Suggestions): Climate and water resilience **as well as climate adaptation**. SE (Comments): Both resilience and adaptation are needed EE (Drafting Suggestions): (j) Climate and water resilience, **with special attention to preparedness for extreme climate events, disasters, and societal challenges such as migration.** EE (Comments):

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Commission proposal	Drafting Suggestions and Comments
	As flagged by stakeholders. FR (Drafting Suggestions): (j) **Climate and water resilience, through climate change mitigation and adaptation, sustainable management of water and land in all sectors, while strengthening the resilience of industrial supply chains to extreme weather, water scarcity, and climate shocks.** FR (Comments): What activities regarding climate and water resilience are concerned here? It would be useful to develop a bit this paragraph in line with the corresponding LIFE activity.
	AT (Comments): **AT** comment: When mentioning "climate resilience", it is essential to explicitly include climate research ("climate sciences") as a core component. Resilience cannot be achieved without a solid understanding of the climate crisis. Climate research (data, models, predictions) is still needed and provides the evidence base for effective policy-making. Tackling the climate crisis requires not only technological solutions, but much more social and system innovations that are currently missing from the proposal.
(k) Pollution prevention, control and remediation.	BE (Comments):

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Commission proposal	Drafting Suggestions and Comments
	Support for international science policy agenda, e.g. ISP-CWP CZ (Drafting Suggestions): ~~(k)~~ **(l)** LV (Drafting Suggestions): Pollution prevention, control and remediation, **including reduction of industrial emissions, integrated approaches to chemicals management, noise reduction, soil decontamination, and remediation of contaminated sites.** LV (Comments): This addition ensures continuity with the current LIFE Environment sub-programme. NL (Drafting Suggestions): ~~Pollution prevention, control and remediation~~ FR (Comments): What activities regarding pollution, prevention, control and remediation are concerned here? In particular, what does the term 'control' refer to here? Does it cover law enforcement operations ?

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Commission proposal	Drafting Suggestions and Comments
(l) Investment, innovation, and modernisation in sustainable blue economy sectors such as shipbuilding and shipping, offshore energy, ocean observation technologies, blue tech and preserving ecosystems.	AT (Drafting Suggestions): ocean observation technologies **and submarine surveillance of critical infrastructures**, AT (Comments): **AT** comment: In times of hybrid warfare, prevention of hybrid attacks on critical civil infrastructure like electricity and internet cables is important for their resilience. NL (Drafting Suggestions): Investment, innovation, and modernisation in sustainable blue economy sectors such as shipbuilding and shipping, offshore energy, ocean observation technologies, blue tech and preserving ecosystems. RO (Drafting Suggestions): (l) Investment, innovation, and modernisation in sustainable blue economy sectors such as shipbuilding and shipping, offshore energy, ocean observation technologies, blue tech and preserving healthy ecosystems. IE (Comments): IE notes ports are key facilitators as delivery and installation hubs, manufacturing, and construction centres, as well delivering the operations and maintenance functions (O&M). In many European locations, ports are often green energy hubs accommodating offshore wind cable landing, energy storage, green hydrogen production, etc.

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Commission proposal	Drafting Suggestions and Comments
	It is in the EU manufacturing sector where additional opportunities can exist; not just limited to just turbine tower manufacture, floating platforms, and mooring systems, but also gravity bases and other steel structures for fixed, large floating structures and even turbine blades; IE welcomes the Innovation in the blue economy sectors IT (Drafting Suggestions): (l) Investment, innovation, and modernisation in sustainable blue economy sectors such as shipbuilding and shipping, offshore energy, ocean observation technologies, blue tech and ~~preserving~~ ecosystems~~.~~ **preservation**. IT (Comments): The term "*Ecosystem preservation*" offers a more concise and consistent form. ES (Drafting Suggestions): (l) Investment, innovation, and modernisation in sustainable blue economy sectors such as shipbuilding and shipping, offshore energy, ocean observation technologies, **fisheries and aquaculture**, blue tech and preserving ecosystems. ES (Comments): Sustainable fisheries and the aquaculture sector should be explicited included as part of the Blue Economy. FR (Drafting Suggestions):

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Commission proposal	Drafting Suggestions and Comments
	(l) Investment, innovation, and modernisation in sustainable blue economy sectors such as shipbuilding and shipping, **including fishing vessels,** offshore energy, ocean observation technologies, blue tech**, tourism, sustainable fishing, aquaculture activities, as well as** ~~and~~ preserving **and restoring biodiversity and coastal and marine** ecosystems**, including through "LIFE actions" and nature-based solutions to ensure the resilience of marine and coastal activities**. FR (Comments): Does "ocean observation technologies" include a part of future IGO Mercator funding? Cf articulation with article 58 Preserving ecosystem item could be focus on a) Life activities Are fishing ships included here ? Do "modernisation" and "shipbuiling" terms here include fishing vessels renewal? PT (Comments): - Although the blue bioeconomy remains a priority for EU sustainability goals, there is concern that the ECF's strong industrial and scale-up orientation may overlook some blue bio areas. Without complementary policies and tailored instruments to address financing challenges and long-term development needs, the blue bioeconomy risks being underserved within the ECF framework.
(m) Sustainability and clean transition of SMEs, including in tourism, construction and other economic sectors.	LV (Drafting Suggestions):

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Commission proposal	Drafting Suggestions and Comments
	(m) Sustainability and clean transition ~~of SMEs~~, including in tourism, construction and other economic sectors. LV (Comments): In order not to create the impression that the ECF does not support large enterprises and small and medium-sized companies, a request to supplement Article 33, paragraph 1 (m), clearly stating that companies are supported regardless of size. In turn, if Article 33, paragraph 1 (m) is understood as specific support only for "SMEs, startups, scale ups and innovators", a request to include an additional point with support for large enterprises and small and medium-sized companies. NL (Drafting Suggestions): Sustainability and clean transition of SMEs **in** ~~including in tourism, construction and other~~ economic sectors, **through the development and uptake of innovative solutions.** PL (Comments): Why tourism and construction sectors are specifically mentioned? SE (Drafting Suggestions): ~~(m)~~ Sustainability and clean transition of SMEs, ~~including in tourism, construction and other economic sectors.~~ **especially sectors with high resource consumption or emissions, or those that can innovate in sustainable products and services.** SE (Comments):

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Commission proposal	Drafting Suggestions and Comments
	Why is tourism specifically mentioned here? Can "economic sectors" be specified? Relevant for almost all sectors. It can be counterproductive to simply mention two. EE (Drafting Suggestions): Suggestion 1. Amend: *"Sustainability and clean transition of SMEs, including in tourism, construction and other economic sectors,* ***with simplified and flexible application procedures to ensure accessibility****."* EE (Comments): Comment 1. EE highlights the importance of ensuring that the Fund is fully accessible for SMEs and that procedures are simple and flexible. Comment 2. Estonia welcomes the explicit reference to tourism SMEs in Article 33(m) of the ECF draft regulation. We recommend that the ECF work programme: • Clearly identifies tourism as a priority sector for SME support, ensuring targeted funding for green and digital transition projects in tourism. • Provides dedicated support for tourism SMEs to implement sustainability, energy efficiency, and digitalisation initiatives, helping the sector meet climate and competitiveness goals. • Ensures that tourism SMEs have fair access to finance, business advisory services, and market entry support, including for regional and community-based tourism initiatives. FR

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Commission proposal	Drafting Suggestions and Comments
	(Drafting Suggestions): (m) Sustainability and clean-transition of SMEs, including in **agri-food**, tourism, construction and other economic sectors. FR (Comments): Could the Commission specify how the activities mentioned above are effectively coordinated with other initiatives supported by the fund for SMEs, start-ups and scale-ups ? The agri-food sector counts a large proportion of SMEs, and is particularly concerned by the sustainability and transitions challenges. It is then useful to mention them explicitly.
(n) Market uptake, capacity building and skills development for the clean transition, including clean energy transition and energy demand side activities (for example NetZero Industry Academies) and transition towards sustainable and safe mobility and sustainable tourism in cities, rural areas, communities, and buildings.	AT (Drafting Suggestions): .....transition towards sustainable and safe mobility sustainable ~~t~~ourism ~~-~~and **urban development in cities**, rural areas, communities, and buildings. AT (Comments): **AT** comment: The transition needs to go beyond sustainable tourism, but rather cover the topic more holistically, i.e. sustainable urban development LT (Drafting Suggestions): Market uptake, capacity building and skills development for the clean transition, including clean energy transition and energy demand side activities

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	(for example NetZero Industry Academies) ~~and~~. **This includes support for reskilling and upskilling in sectors critical to the transition, such as clean technology manufacturing, energy system operation, digital infrastructure deployment, and sustainable mobility. It also encompasses the** transition towards sustainable and safe mobility and sustainable tourism in cities, rural areas, communities, and buildings**; furthermore, this should include the support of innovative mechanisms and pilot measures designed to foster upskilling and reskilling in clean transition and industrial decarbonisation, facilitation of talent attraction to alleviate skills shortages, the development of curricula as well as the adjustment of skills to the evolving requirements of the labour market**. LT (Comments): We would like to highlight the importance of reskilling and upskilling in implementing the green transtion. The lack of skilled worforces in sectors critical to the transition, such as clean technology manufacturing, energy system operation, digital infrastructure deployment, and sustainable mobility might hinder the transition process. To add, taking into account Article 21 of the Preamble, we propose to add that the ECF should also include support for innovative mechanisms and pilot measures for upskilling and reskilling, development of curricula, attraction of foreign talent and matching of skills with the labour market. NL (Drafting Suggestions): Market uptake, capacity building and skills development for the clean transition, including clean energy transition and energy demand side activities (for example NetZero Industry Academies) ~~and transition towards sustainable and safe mobility and sustainable tourism in cities, rural areas, communities, and buildings~~.

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Commission proposal	Drafting Suggestions and Comments
	NL (Comments): Does not fit with objective of ECF of improving competitiveness, in particular in the most strategics markets and technologies. In addition, some overlap with previous points. PL (Drafting Suggestions): (n) Market uptake, capacity building and skills development for the clean transition, including clean energy transition and energy demand side activities (for example NetZero Industry Academies) and transition towards sustainable, safe **transport and** mobility and sustainable tourism in cities, rural areas, communities, and buildings. SE (Drafting Suggestions): (n) Market uptake, capacity building and skills development for the clean transition.~~, including clean energy transition and energy demand side activities (for example NetZero Industry Academies) and transition towards sustainable and safe mobility and sustainable tourism in cities, rural areas, communities, and buildings.~~ SE (Comments): Relevant for almost all sectors. It can be counterproductive to simply mention a few. SE would like to ask why cities, rural areas and communities are mentioned in particular. Are there any areas not included in this selection? IE

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Commission proposal	Drafting Suggestions and Comments
	(Drafting Suggestions): Market uptake **of innovative products/services**, capacity building and skills development for the clean transition, including clean energy transition and energy demand side activities (for example NetZero Industry Academies) and transition towards sustainable and safe mobility and sustainable tourism in cities, rural areas, communities, and buildings IE (Comments): IE suggests this point could benefit from rewording to include a reference to innovation IE stresses it is notable that alternative fuels production is still a developing industry, requiring skilled workers with expertise in renewable feedstocks, catalysis, and synthetic fuel refining. It is therefore important that the EU does not just build facilities but also has the requisite human resource capacity with appropriate expertise built up and supported by green skills training. EE (Comments): Estonia strongly supports the inclusion of sustainable and safe tourism in Article 33(n). We recommend that the ECF work programme: • Guarantees that support for sustainable and safe tourism is accessible to both urban and rural areas, including smaller communities, not just major cities. • Prioritises skills development and training for tourism sector employees, with a focus on green, digital, and management skills, in cooperation with vocational education providers and businesses.

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Commission proposal	Drafting Suggestions and Comments
	• Facilitates market uptake and capacity building for sustainable tourism projects, ensuring that tourism actors can benefit from ECF support for innovation, mobility, and community development. FR (Drafting Suggestions): (n) Market uptake, capacity building and skills development for the clean transition, including clean energy transition and energy demand side activities (for example NetZero Industry Academies) and transition towards sustainable and safe mobility and sustainable tourism in cities, rural areas, communities, and buildings.
(o) Support actions for the development, implementation, monitoring and enforcement of relevant Union legislation and policy. This includes supporting the relevant institutions, the cooperation between national authorities and with stakeholders, studies, the development and deployment of tools and infrastructures, including IT infrastructure and tools.	LV (Drafting Suggestions): Support actions for the development, implementation, monitoring and enforcement of relevant Union legislation and policy. This includes supporting the relevant institutions, the cooperation between national authorities and with stakeholders, studies, the development and deployment of tools and infrastructures, including IT infrastructure and tools**, capacity-building measures for national and regional administrations, support to non-governmental organisations and civil society, and cooperation platforms and networks facilitating the effective application of Union environment, climate and nature related legislation.** LV (Comments): If the LIFE Programme is to be absorbed into the European Competitiveness Fund, there is a risk that its governance and capacity-building dimension will be diluted. It is therefore necessary to ensure continuity of the current LIFE

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Commission proposal	Drafting Suggestions and Comments
	programme by explicitly including capacity-building measures for national and regional administrations, support for NGOs and civil society, and cooperation platforms and networks. These elements are essential for the effective implementation and enforcement of Union environment, climate and biodiversity legislation and must remain a visible part of the new Fund. RO (Drafting Suggestions): (o) Support actions for the development, implementation, monitoring and enforcement of relevant Union legislation and policy. This includes supporting the relevant institutions and strengthening their active engagement, the cooperation, openess and transparency between national authorities and with stakeholders, studies, the development and deployment of tools and infrastructures, including IT infrastructure and tools. RO (Comments): Transparency in data and processes - Setting the stage for a coordinated and inclusive progress. SE (Drafting Suggestions): (o) Support actions for the development, implementation, monitoring and enforcement of relevant Union legislation and policy. This includes supporting the relevant institutions, the cooperation between national **and regional** authorities and with stakeholders, studies, the development and deployment of tools and infrastructures, including IT infrastructure and tools. SE (Comments): Regional authorities should also be included. Would be beneficial to clarify what the meaning of stakeholders is here.

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	DE (Comments): In which areas does COM intend to fund the development, implementation and monitoring of EU legislation with the ECF? When this is linked to the consolidation of various funding programmes, which we welcome in principle, it is important that key tasks of these programmes are fulfilled more effectively and more efficiently by the ECF in order to leverage synergies. If this objective concerns administrative action of the COM, this should be reflected in the administrative expenditures in heading 4 of the MFF. IE (Comments): IE notes it is essential that the Union Database for Biofuels is made fully operational for the purposes of the ReFuelEU Aviation Regulation and that EASA is fully resourced in order to support the application of ReFuelEU Aviation Regulation. IT (Drafting Suggestions): Support actions for the development, implementation, monitoring, **simplification, streamlining** and enforcement of relevant Union legislation and policy. This includes supporting the relevant institutions, the cooperation between national authorities and with stakeholders, studies, the development and deployment of tools and infrastructures, including IT infrastructure and tools. IT (Comments): Favorable conditions for enterprises must be set out through simplification measures and ensuring coherent legislative provisions.

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	ES (Comments): It is suggested that the scope be clarified. Does it refer to support for Member States in developing tools specifically provided for in EU legislation (e.g. UDB in REDIII)? Or to other tools that Member States may develop on their own to ensure compliance with the EU framework? FR (Drafting Suggestions): (o) Support actions for the development, implementation, monitoring and enforcement of relevant Union legislation and policy**, notably environmental legislation and policy**. This includes supporting the relevant institutions, the cooperation between national authorities and with stakeholders, studies, the development and deployment of tools and infrastructures, including IT infrastructure and tools. FR (Comments): Could the Commission specify the actions it intends to support with regard to the coordination of the national authorities mentioned ? PT (Drafting Suggestions): (o) Support actions for the development, implementation, monitoring and enforcement of relevant Union legislation and policy. This includes supporting the relevant institutions, the cooperation between national authorities and with stakeholders, **including fostering cluster national and cross-border colaboration**, studies, the development and deployment of tools and infrastructures, including IT infrastructure and tools.

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	PT (Comments): - Clusters proved to be a powerful tool to enhance local synergies, economies of scale, promote collaborative innovation, and strengthen international competitiveness. These business ecosystems can foster sustainable value creation, stimulate knowledge transfer between scientific entities and companies, and accelerate the transition to circular and digital production models, improving the effectiveness and efficiency of resource's use .
	NL (Drafting Suggestions): **(x) Supporting the development of domestic and permanent carbon removals** PL (Drafting Suggestions): To add "p" (p) reclamation of contaminated post-industrial sites
2. Support provided through the activities referred to in paragraph 1, may be provided in any form, including through 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.	LT (Comments): We have some doubts concerning the foreseen merge of the Work Programmes of the ECF and Horizon Europe. We are worried that this can result in deterioration of the European science base as ECF work Programmes are going to be demand driven and might lack focus on the lower TRLs. SE (Drafting Suggestions): Support provided through the activities referred to in paragraph 1, may be provided in any form, including through collaborative research and

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Commission proposal	Drafting Suggestions and Comments
	innovation activities set out in Regulation (EU) [XXX] [Framework Programme for Research and Innovation] **as** ~~and~~ identified in ~~a specific dedicated part of~~ the **Horizon Europe** Work Programme. SE (Comments): Could only agree to a text where the bottom-up collaborative research and innovation of the HE regulation is safeguarded to ensure efficient, effective and high quality research and innovation supporting activities referred to in paragraph 1 IE (Drafting Suggestions): Support ~~provided through~~ **for** the activities referred to in paragraph 1, may be provided in any form, including through 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. IE (Comments): IE is unsure of the use of the phrase “provided through” It makes the meaning of the clause unclear. Suggest text amendment IE query if there is a reason why this point features in Chapters IV and VII, but not Chapter V: Support for Health, Biotech, Agriculture and Bioeconomy or Chapter VI: Support for Digital Leadership ES (Drafting Suggestions):

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	2. Support provided through the activities referred to in paragraph 1~~,~~ may be provided in any form, including through 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~~ **separate** Work Programme **dedicated to collaborative research and innovation activities.** ES (Comments): Horizon Europe is mandated by the TFEU to strengthen the EU's scientific and technological bases and thus prepare the future engines of growth and technological leadership. This requires a successful bottom-up approach and top-down orientation of collaborative research. The proposed framework impedes the development of especially low- and middle-TRL collaborative research and cannot respond to new and future scientific areas. Excellence-driven disruptive research and innovation, e.g. via the European Research Council (ERC) and Marie-Skłodowska-Curie Actions, are not the sole contributors to disruptive research. R&I collaborative research, whether contributing to incremental technology developments needed by the industry (included in the ECF windows vision) or more breakthrough approaches which are acquired through low- to mid-level collaborative research that will contribute to future industrial needs, does not have an immediate impact on industry's needs unlike the investments made through industrial policies. Thus R&I contributes to the investment journey to market but with a different pace and require a different strategic plan and temporal window. Thus, there is no need to have in a unique work programme for the R&I and industrial/sectoral part, as the needs from each policy perspective are different.

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Commission proposal	Drafting Suggestions and Comments
	Horizon Europe and the previous framework programs have invested public and private funds in significant scientific advances often starting from the most basic knowledge. These investments cannot be lost or forgotten in a broader comitology procedure that also includes other policies. At the same time, there is a broad ecosystem of beneficiaries, public entities, and the industrial sector that are focused on the progress of R&D&I. Pillar II of Horizon Europe has been a key element in gaining access to state-of-the-art technologies and scientific breakthroughs by establishing one of the most successful programs for R&I cooperation at the global level. There is, therefore, a clear need for a specific Programme Committee / Work Programme for each window.
Article 34	PT (Comments): - Operational guidelines needed to avoid abuse and ensure additionality. Each call should include a 'complementarities map' (ECF/CEF/HE).
Complementary rules	
1. For activities supporting Coordination and Support Actions in the area of energy efficiency and clean energy transition, Union support may cover up to [100] % of the eligible costs, without prejudice to the co-financing principle.	AT (Comments): Article 34 refers to LIFE, CEF, and Horizon. What coordination is sought with the **EU Innovation Fund**? AT requests the EC to further explain this and the integration of the EU Innovation Fund into the ECF. BG

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Commission proposal	Drafting Suggestions and Comments
	(Comments): For activities supporting Coordination and Support Actions in the area of energy efficiency and clean energy transition, Union support should cover no more than 90 % of the eligible costs. Thus these areas will attract private capital and guarantee effeciency of the support. Best practices prove that eligible costs up to 100% are not effective and encourage corruption. CZ (Drafting Suggestions): For activities supporting Coordination and Support Actions in the area of energy efficiency**,** clean energy transition **and clean tech manufacturing**, Union support may cover up to **[**100**]** % of the eligible costs, without prejudice to the co-financing principle. CZ (Comments): CZ - In order to support industrial ramp up we support this addition. LV (Drafting Suggestions): 1. For activities supporting Coordination and Support Actions in the area of energy efficiency and clean energy transition, Union support ~~may~~ cover up to **[**100**]** % of the eligible costs, without prejudice to the co-financing principle. LV (Comments): Please clarify the conditions for assessing the intensity of support, in accordance with the provisions of Article 34, Section 1, where the use of the phrase “may cover up to 100%” creates uncertainty regarding the given shift.

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Commission proposal	Drafting Suggestions and Comments
	MT (Drafting Suggestions): For activities supporting Coordination and Support Actions in the area of energy efficiency and clean energy transition, Union support may cover up to 100% of the eligible **direct** costs, **as well as the applicable flat rate for indirect costs,** without prejudice to the co-financing principle. MT (Comments): Malta feels that these textual additions provide more clarity on coverage of costs. Nonetheless, it is not clear why "co-finacing principle" has been inserted here so clarification is sought. RO (Comments): We would like more details on the content of these Coordination and Support Actions, are they among the activities listed under art 33 above? SE (Drafting Suggestions): For activities supporting Coordination and Support Actions in the area of energy efficiency and clean energy transition, Union support may cover up to **[**100**]** % of the eligible costs, without prejudice to the co-financing principle. SI (Drafting Suggestions): For activities supporting Coordination and Support Actions in the area of energy efficiency and clean energy transition, Union support **shall** ~~may~~ cover

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	up to **[**100**]** % of the eligible costs, without prejudice to the co-financing principle IE (Comments): IE notes this Article, through setting a limit of support to 100% of eligible costs for some areas (Article 34(1)) and 25% for others (Article 34(2)) leaves significant ambiguity as regards what percentage of costs can be covered for the areas not referenced. FI (Drafting Suggestions): "--in the area of energy efficiency, clean energy transition, **circular economy, and solutions to protect, restore and improve the quality of the environment,** Union support –" FI (Comments): FI proposes including the mentioned activities. ES (Comments): Does this include CSAs under Horizon Europe? Why only in this chapter? Would state aid be cumulative under the new CISAF in cases where low-carbon natural gas and hydrogen (not green) are consumed, as indicated in the CISAF framework? The wording of Article 33(1) refers to energy efficiency and the transition to clean energy, although in Article 3 or 33, the former is part of the latter. Can the Commission clarify this link?

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Commission proposal	Drafting Suggestions and Comments
	PT (Comments): - Could you provide more information about the referred CSAs?
2. By way of derogation from Article 184(6) of the Financial Regulation, for activities supporting Coordination and Support Actions in the area of energy efficiency and clean energy transition and LIFE activities referred to in Article 34, paragraph 1, point (a), the authorising officer responsible may authorise or impose, in the form of flat-rates, funding of the beneficiary's indirect costs up to a maximum of 25 % total eligible direct costs, excluding direct eligible costs for subcontracting, financial support to third parties and any unit costs or lump sums which include indirect costs.	RO (Comments): What is the justification for setting a flat-rate of 25% for indirect costs in these cases, as a derogation from the general ceiling of 7% established under Article 184(6) of the Financial Regulation? SE (Comments): Whats the reasoning for this derogation? Why are eligible costs regulated specifically for this policy window? There should be a reference to common rules for all policy windows. SI (Drafting Suggestions): 2. By way of derogation from Article 184(6) of the Financial Regulation, for activities supporting Coordination and Support Actions in the area of energy efficiency and clean energy transition and LIFE activities referred to in Article 34, paragraph 1, point (a), the authorising officer responsible may authorise or impose, in the form of flat-rates, funding of the beneficiary's indirect costs up to a maximum of ~~25 % total eligible direct costs, excluding direct eligible costs for subcontracting, financial support to third parties and any unit costs or lump sums which include indirect costs.~~ SI (Comments):

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	This provision is not streamlined in all policy windows (sometimes subcontracting etc. is excluded, sometimes it is not). Does this derogation apply only to activities under LIFE and why does only this policy window contain such derogations? IE (Comments): See comment on Article 34(1) above.
3. Work programmes shall ensure coherence with the types of actions planned to be implemented under the Fund referred to in Article 10a(8) of Directive 2003/87/EC and coherence and complementarity with the Regulation (EU)[XXX] [Connecting Europe Facility]	BE (Drafting Suggestions): Work programmes shall ensure coherence with the types of actions planned to be implemented under the ~~Fund~~ **ECF** referred to in Article 10~~a(8)~~ of Directive 2003/87/EC and coherence and complementarity with the Regulation (EU)[XXX] [Connecting Europe Facility] BE (Comments): Directive 2003/87/EC Article 10 has no further subheadings CZ (Comments): As regards complementarity with the Connecting Europe Facility, CZ believes that the eligible activities in both regulations are defined too broadly. The flexibility gained comes at the expense of predictability and transparency, as it is impossible to estimate how much funding can be used for various transport projects under each programme. CZ would appreciate at least an indicative determination of the types of transport projects eligible for ECF funding and a definition of the framework allocation for transport.

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	CZ would also like to draw attention to the need to ensure complementarity between the CEF and the ECF in the area of military mobility. The CEF is intended to finance infrastructure on TEN-T. However, we are convinced that for the functional EU Priority Military Mobility Corridors, it is also necessary to focus on their connection with key HNS logistics elements, on transport infrastructure within HNS logistics centres (loghubs), i.e. not only on TEN-T. HR (Comments): It is necessary to clarify the connection and coherence between ECF and CEF, as well as the connection with the National and Regional Partnership Plans DE (Comments): How will interplay with the CEF be designed? How will coherence be ensured and duplication avoided? We welcome that this is mentioned in Art. 34 but we miss any specific references to the ECF in the CEF Regulation (beyond the InvestEU instrument). ES (Drafting Suggestions): 3. Work programmes shall ensure coherence with the types of actions planned to be implemented under the Fund referred to in Article 10a(8) of Directive 2003/87/EC and coherence and complementarity with the Regulation (EU)[XXX] [Connecting Europe Facility] **as well as alignment with industrial policy objectives set out in the Net-Zero Industry Act and the Critical Raw Materials Act.** ES

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	(Comments): Including reference to NZIA and CRMA provides legal and policy consistency, while also reinforcing the industrial policy orientation of the Fund. FR (Comments): May the Commission specify the implementation of the consistency with the CEF mentioned above ? Regarding transport projects, could the Commission elaborate on the articulation between the ECF and the CEF-Transport, in particular how overlaps will be avoided and synergies promoted? PT (Comments): - This article determines that Work programmes shall ensure coherence and complementarity with CEF. How will the coordination between the ECF and CEF work?
	DE (Drafting Suggestions): **3a. Work programmes shall ensure coherence and complementarity with the Innovation Fund.**
4. Work programmes adopted in accordance with the rules of this Regulation under this chapter shall integrate in a specific dedicated part and ensure coherence with the Competitiveness and Society activities supported	LT (Comments): We have some doubts concerning the foreseen merge of the Work Programmes of the ECF and Horizon Europe. We are worried that this can

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under the Regulation (EU) [XXX] [Horizon Europe Framework programme for Research and Innovation]	result in deterioration of the European science base as ECF work Programmes are going to be demand driven and might lack focus on the lower TRLs. SE (Drafting Suggestions): 4. Work programmes adopted in accordance with the rules of this Regulation under this chapter shall ~~integrate in a specific dedicated part and~~ ensure coherence with the Competitiveness and Society activities supported under the Regulation (EU) [XXX] [Horizon Europe Framework programme for Research and Innovation] SE (Comments): Could only agree to a text where the bottom-up collaborative research and innovation of the HE regulation is safeguarded to ensure efficient, effective and high quality research and innovation supporting activities referred to in paragraph 1. There is a need for integrating social sciences and humanities where relevant in R&I activities in line with the proposed horizontal principles for Horizon Europe. ES (Drafting Suggestions): 4. Work programmes adopted in accordance with the rules of this Regulation under this chapter shall ~~integrate in a specific dedicated part and~~ ensure **predictable and sustainable financing for strategic industrial projects and** coherence with the Competitiveness and Society activities supported under the Regulation (EU) [XXX] [Horizon Europe Framework programme for Research and Innovation]

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	EE (Drafting Suggestions): Add: *"**Work programmes shall be prepared in close consultation with Member States, allowing sufficient time for national stakeholder involvement, including relevant ministries, NGOs and business organisations.**"* EE (Comments): EE considers it essential that Member States are meaningfully involved and consulted at an early stage in the preparation of work programmes, with maximum transparency and open dialogue. Member States should be left sufficient time for consultations with main partners and stakeholders. FR (Comments): Can the Commission clarify the interplay between FEC and HE? Several questions related to governance, eligibility, program adoption, etc., remain, despite the publication of the fiche n°5.
	BG (Drafting Suggestions): **Add new paragraph:** "For LIFE activities, Union support may cover up to 60 % of eligible costs (or higher where foreseen under the current LIFE Regulation), maintaining LIFE's traditional co-financing principles." BG (Comments): This amendment ensures continuity of LIFE's well-established co-financing approach by allowing Union support to cover up to 60 % of eligible costs, with the possibility of higher rates where already foreseen under the current LIFE

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	Regulation. Maintaining these principles is important to safeguard the accessibility of LIFE projects for local authorities, NGOs, SMEs and other stakeholders who often rely on this level of support to participate. It also preserves a balance between EU funding and beneficiary commitment, which has been key to LIFE's effectiveness and credibility over the past three decades. EE (Comments): EE requests clarification on what "integrated work programmes with Horizon Europe" will mean in practice. Does this imply overlapping topics, shared governance structures or joint programming? Greater clarity is needed to ensure complementarity and avoid duplication.
Article 35	
Competitive bidding mechanisms	BE (Comments): Support for the inclusion of these type of mechanisms to allocate funding. DE (Comments): We welcome the inclusion of competitive bidding mechanisms. Could the Commission please elaborate on how the exposure of the budget will be managed?
1. Award procedures under this chapter may take the form of competitive bidding. That includes contracts for difference, carbon contracts for difference, or fixed premium contracts to support decarbonisation investment, provided	PL (Drafting Suggestions):

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that the financial interests of the Union are protected and the exposure of the budget remains limited to a maximum contribution. Competitive bidding procedures may be implemented through, and in accordance with, any of the budget implementation instruments set out in Article 12.	Competitive bidding mechanisms: Award procedures under this Chapter may take the form of competitive bidding, including contracts for difference, carbon contracts for difference and fixed-premium contracts to support decarbonisation investment while safeguarding the Union's financial interests and capping budget exposure at a maximum contribution; such procedures may be implemented through any budget implementation instrument set out in Article 12. PL (Comments): Consolidates all bidding options under one streamlined provision, explicitly names contract types to guide implementers, reinforces budget protection via contribution caps, and clarifies reliance on Article 12 instruments for flexibility and legal certainty. IE (Comments): IE are supportive of the Competitive bidding mechanisms] IE seeks further clarification if these award procedures could negatively impact higher-risk bids which aim to provide ambitious, cutting-edge innovative solutions, but are not yet market-ready – especially those from smaller companies? IE welcomes the reference to Contracts for Difference and encouraged in the context of green hydrogen for transport ES (Drafting Suggestions):

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	1. Award procedures under this chapter may take the form of competitive bidding. That includes contracts for difference, carbon contracts for difference, or fixed premium contracts to support decarbonisation investment, provided that the financial interests of the Union are protected and the exposure of the budget remains limited to a maximum contribution. **Bidding mechanisms shall be designed to facilitate the participation of SMEs and projects from all Member States.** Competitive bidding procedures may be implemented through, and in accordance with, any of the budget implementation instruments set out in Article 12. ES (Comments): How does the Commission plan to implement auctions as a service in the ECF? Would it be similar to those currently in place under the Innovation Fund? Are there other options? FR (Comments): What proportion of calls for proposals does the Commission intend to subject to competitive tendering procedures? For which projects is this provision intended? What is the associated maximum ceiling? PT (Comments): - Competitive bidding mechanisms can increase efficiency and reduce EU costs, but they also carry important risks. Without safeguards, they may primarily benefit large industrial players, create budget uncertainty linked to volatile carbon prices, and lock funds into transitional rather than genuinely net-zero technologies. There is also a risk that stronger Member States capture the majority of support, leaving SMEs and smaller regions behind.

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	To avoid these outcomes, Article 35 should include clear environmental eligibility rules, transparent reporting, budget caps, and specific measures ensuring access for SMEs and less-advantaged regions.
	LT (Drafting Suggestions): In order to maintain the competetiveness, these measures must be developed to the fullest extent possible within international organisations, as cross-border approach. LT (Comments): To achieve the appropriate result, it is necessary to promote cross-border cooperation and strive for global compatibility.
CHAPTER V	NL (Comments): These reflect first views. We, later in the process, could share additional comments
	PL (Comments): It is concerning that for CHAPTER V - SUPPORT FOR HEALTH, BIOTECH, AGRICULTURE AND BIOECONOMY, no explicit provisions have been defined regarding “Funding rates” or “Ownership of results,” as has been done in CHAPTER VII or VIII, leaving only a reference to the general rules of the Framework Programme. This suggests a lack of new, tailored instruments/mechanisms or targeted measures for this sector, but only the regrouping and consolidation of selected Horizon segments under a dedicated ECF umbrella. Such an approach raises concerns that this area may be treated as secondary, with proposed changes amounting primarily to a relabeling of

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	existing instruments rather than the introduction of genuinely new opportunities and support mechanisms.

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SUPPORT FOR HEALTH, BIOTECH, AGRICULTURE AND BIOECONOMY	CZ (Drafting Suggestions): SUPPORT FOR HEALTH, BIOTECH, AGRICULTURE, **FOOD PRODUCTION** AND BIOECONOMY CZ (Comments): CZ - While the Objectives section and the recitals rightly refer to innovative food products and food security among the aims of the proposal, Chapter V does not include food production within the scope of specific activities under this window. This omission is unexpected, as food production and food security are recognized as essential components of a resilient and sustainable innovation framework, in line with the EU's integrated Farm to Fork Strategy, the General Food Law Regulation (Regulation (EC) No 178/2002, as amended), Directive (EU) 2022/2557 on the resilience of critical entities, and the findings of the 4th Report on the State of Food Security in the EU. Their explicit inclusion in Chapter V would ensure coherence with overarching Union objectives on public health, consumer protection, and the mitigation of food insecurity in times of crisis. We therefore urge that this gap be addressed in Chapter V and the corresponding Articles. LT (Drafting Suggestions): SUPPORT FOR HEALTH, BIOTECH, AGRICULTURE, **FOOD SECURITY** AND BIOECONOMY LT (Comments):

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	Supplemented text as "Food security" is one of essential components of the green and digital transition and a key factor for Europe's competitiveness and resilience. SI (Drafting Suggestions): The content of article 36 in 37 must be split into two parts: • Support for support to Health and Biotechnology • Support for support to Agriculture and Bioeconomy. SI (Comments): Please see our comments regarding Article 3 (same as BE), We kindly request that this remark be duly considered in the subsequent part of the text LU (Comments): A clearer differentiation between the two thematic blocks consisting of 1) health and biotech on the one hand and 2) agriculture and bioceconomy on the other hand could contribute to ensuring a targeted focus of both clusters. DE (Comments): We welcome the focus on bioeconomy and biotechnology as they are central to a competitive and sustainable economy. We stress that a cross-sectoral approach is essential for bioeconomy and biotechnology. We need to ensure that funds are spent in a targeted, efficient and effective manner on actual key technologies and activities. We therefore can only support the very broad scope of this chapter if there are clear overarching award criteria and targets for the work programmes. These must ensure that

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	clear priorities are set on the areas which contribute most effectively to the Union's competitiveness as well as security and resilience. ES (Comments): Spain could support/accept splitting this cluster into two distinct windows, one for Health and Biotech and a separate one for Agriculture and Bioeconomy.
	AT (Comments): COMMENT: In the health sector, we need research into how public health can be improved and how people can be better motivated to participate in prevention and screening programs, among other things. As a rule, research findings on such issues are less relevant for the development of commercial products, but they are of great importance for the progress of society. The question arises as to how this research can be served within the ECF)
Article 36	IE (Comments): IE suggest to split this cluster in two differentiates windows: One for Health and biotech and a separate one for Agriculture and Bioeconomy.

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Specific provisions for support to health, biotech, agriculture and bioeconomy policies	CZ (Drafting Suggestions): Specific provisions for support to health, biotech, agriculture, **food production** and bioeconomy policies CZ (Comments): dtto LT (Drafting Suggestions): Specific provisions for support to health, biotech, agriculture, **food security** and bioeconomy policies LT (Comments): Supplemented text as "Food security" is one of essential components of the green and digital transition and a key factor for Europe's competitiveness and resilience.
1. Actions supported under this chapter shall contribute to the general objectives set out in Article 3(1) and the specific objectives set out in Article 3(2), point (b).	IE (Drafting Suggestions): Actions supported under this chapter shall contribute to the general objectives set out in Article 3(1) and the specific objectives set out in Article 3(2), point (b) **in line with the EU Health Union framework.** IE (Comments):

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	IE consider it is relevant to align the actions with the general framework of the EU health Union. Suggested text amendment. ES (Comments): Questions arise about the possible existence of specific requirements for SMEs and startups that wish to participate and access financing from this fund (e.g., private initiative digital farm notebooks that offer services to farmers, such as early prediction of pests and diseases to optimize the use of phytosanitary treatments). HU (Comments): Hungary generally supports the provisions set out in Articles 36–37. However, we wish to reiterate our position concerning Article 3(2), point (b).
2. Support for actions under this chapter shall be financed from the budget set out in Article 4(2) , and any additional contributions assigned in accordance with Article 5.	PL (Drafting Suggestions): 2. Support shall be financed from the budget appropriations specified in Article 4(2) and any additional contributions mobilised under Article 5, including co-financing instruments for public-private partnerships and bioeconomy clusters. PL (Comments): 2. Support shall be financed from the budget appropriations specified in Article 4(2) and any additional contributions mobilised under Article 5, including co-financing instruments for public-private partnerships and bioeconomy clusters. RO (Comments):

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	The correct correspondent of the provision of the related budget would be Article 4 (2), lit.c). Is there a rationale what is the entire article 4 (2), because is this way it is not clear the relation of the specific objective and the allocated budget. SI (Drafting Suggestions): 2. Support for actions under this chapter shall be financed from the budget set out in Article 4(2) (c), and any additional contributions assigned in accordance with Article 5. FR (Comments): The delegation may ask the Commission to specify what flexibility will be available for this component in the event of a need arising during the programming period. The delegation may ask the Commission to specify the budget nomenclature envisaged for this component. Will there be a budget line for each type of activity listed in this article? HU (Comments): In line with our general remarks, it is reiterated that we do not agree with merging the EU health programme – which has existed separately for the past 20 years – into a large competitiveness fund, where it is not defined, for example, how much of the €20.393 billion earmarked in Article 3(2)(b) for health, biotechnology, agriculture, and bioeconomy objectives will actually be allocated to healthcare developments, compared to the current EU4Health

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	programme's budget of €4.4 billion within the planned overall budget of €234.3 billion.
	LU (Drafting Suggestions): **3. Support under this Chapter shall build on the Union's past health programme by ensuring continuity with the objectives and actions of Regulation (EU) 2021/522 (EU4Health Programme), thereby preserving dedicated Union investment in public health.** **4. The implementation of this Chapter shall ensure appropriate Member State involvement and coordination with Union health bodies. The Commission shall engage with Member States' health authorities and relevant Union agencies, such as the European Centre for Disease Prevention and Control, the European Medicines Agency and the Health Emergency Preparedness and Response Authority, in the preparation and implementation of work programmes under this Chapter.** LU (Comments): Luxembourg proposes adding paragraph 3 to safeguard continuity of EU4Health. This ensures that the health-related actions under the ECF explicitly build on the objectives and successes of the EU4Health Programme, maintaining momentum and expertise. Importantly, a dedicated (ring-fenced) health funding focus would prevent dilution of resources, guaranteeing that the Union's investment in health remains robust and targeted to public health needs rather than being repurposed for other priorities. This continuity is crucial for preserving ongoing initiatives (e.g. in disease prevention, health promotion, cancer control) and for upholding the Union's long-term health security commitments.

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	Luxembourg also underlines the need for appropriate governance and comitology for the health window. Paragraph 4 is aimed at strengthening Member State and expert involvement in decision-making. In practice, this means that health ministers and national health authorities should have a say in shaping work programmes, and that relevant EU health agencies (notably ECDC, EMA, and HERA) are consulted. Such a governance mechanism would align funding with real-world health policy priorities and expertise, ensure transparency, and foster Member State ownership.
Article 37	
	PL (Comments): 1. **Preclinical work and TRL 4–7 funding gap** The current EU funding system leaves a significant gap in financing preclinical research—particularly at mid-level TRLs. This is a crucial stage for medical biotechnology and pharmaceuticals, where projects require costly validation but do not yet generate revenue. **Recommendation:** explicitly indicate in Article 37 the need to support preclinical work, including translational and validation studies, to close the critical gap between basic and clinical research. 2. **Key technologies** The draft lacks specification of technologies that are strategic for the future of health and EU security. The fund should prioritize support for the following areas: • **Small-molecule drugs** – still a fundamental pillar of pharmacotherapy, essential in many therapeutic areas. • **Biologics** – including monoclonal antibodies, therapeutic proteins, targeted therapies.

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	• **Antibody–drug conjugates (ADCs)** – a new generation of oncology therapies combining the precision of biology with the power of small molecules. • **Advanced medical therapies (ATMPs)** – gene, cell, and tissue therapies, CAR-T, and other innovative genetic engineering–based solutions. • **RNA and other nucleic acids** – mRNA, siRNA, therapeutic oligonucleotides. • **Antibiotics and antimicrobial/biocidal agents** – in the context of the global AMR (antimicrobial resistance) crisis. • **Synthetic biology** – for both biomedical and industrial applications, as a tool for designing new drugs and therapeutic systems. • **Medical biology and chemistry** – the foundation for discovering and developing original drugs, key to safeguarding European know-how. • **Biotechnological techniques** – as tools to accelerate the development of new drugs. **Recommendation:** include in Article 37 a catalog of key technologies requiring priority support. 3. **Testing & Innovation Infrastructure (TII)** Europe needs infrastructure enabling the transition from basic research to pre-market stages, including: • pilot lines, • bioreactors, • GMP laboratories, • “omics” platforms, • toxicology and immunology facilities.

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	Recommendation: include in Article 37 support for TII in biotechnology and pharmaceuticals to provide critical resources for research translation and accelerate biopharmaceutical development. **Article 37** – In its current form, the areas of support indicated in this article focus on data utilization and innovative activities. Issues of protection and safety for EU residents are addressed only in the context of implementing relevant EU health policies. However, there is no reference to medicine security, which is a pillar of effective health policy. It is therefore necessary to expand the provisions of this article to include support for actions aimed at ensuring the EU's pharmaceutical self-sufficiency and access to medicines for all EU residents. These actions must include the development of technologies and increased production capacities for key medicinal products and medical devices. **Article 37** – It is necessary to extend the article's provisions to include support programs for strategic projects in line with the **Critical Medicines Act (CMA)**, similar to what has been envisaged for other categories of strategic projects, e.g., critical raw materials (see Article 42). Omitting support for strategic projects arising from the CMA is completely unjustified.

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Specific Activities	FI (Comments): FI emphasizes the importance of research related to climate, biodiversity, environmental issues, circular economy, water resilience, and the sustainable use of natural resources as part of competitiveness. The share of research on these topics must be safeguarded, as they are now bundled under Policy Window 1 (and partly under Policy Window 2) and no longer have a clear, dedicated cluster or destination as in previous periods of the Horizon Europe programme.
1. Support for Health, Biotech, Agriculture and Bioeconomy policy shall be implemented in particular through the following activities:	CZ (Drafting Suggestions): Support for Health, Biotech, Agriculture, **Food production** and Bioeconomy policy shall be implemented in particular through the following activities: CZ (Comments): dtto LT (Drafting Suggestions): 1. Support for Health, Biotech, Agriculture**, Food Production** and Bioeconomy policy shall be implemented in particular through the following activities: PL (Drafting Suggestions): 1. Support implemented through improving health via health-in-all and One Health; strengthening digital health systems, data and AI; boosting manufacturing and deployment of innovative health and bioeconomy

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	technologies; accelerating biotechnology innovation scale-up; enhancing health security and emergency preparedness; fostering competitive bioeconomy value chains; promoting sustainable agriculture, fisheries, aquaculture, forestry and rural/coastal resilience; and policy support; To add: to ensure medicines security and production of medicines/critical medicines and active pharmaceutical ingredients. PL (Comments): Consolidates detailed sub-activities into coherent clusters for readability and strategic focus; emphasises digital health transformation, innovation scaling, resilience and sustainability across sectors; ensures alignment with Horizon Europe synergies. The lack of reference to the Critical Medicines Act should be clarified. Taking into account the wording of the amended draft Regulation of the European Parliament and of the Council establishing the European Competitiveness Fund, including the detailed work programme on research and innovation in the field of defence, in our opinion, the resources allocated for the achievement of the specific objective set out in Article 3(2)(b) of the draft Regulation — Support for Health, Biotechnology, Agriculture, and the Bioeconomy — which represent the smallest portion (not the full 10%) of the Fund's budget, amounting to only approximately EUR 20.4 billion, may prove insufficient to carry out the activities listed in Article 37(1) of the draft Regulation. RO

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	(Comments): To maximise the contribution of the Health, Biotech, Agriculture and Bioeconomy window, it is recommended to guarantee equitable access to ECF funding and shared infrastructure for less-developed regions. Mechanisms should strengthen the participation of countries and territories with emerging innovation ecosystems, ensuring that bioeconomy and health-related value chains are inclusive and help reduce competitiveness gaps across the Union. SE (Comments): How will the health sector, as regulated in article 37, correlate with the proposed articles for governance in article 14? The health sector is far broader than the sector for medicines and medical technology. Health issues taken as a whole cannot be solved only by focusing on competition and technology. How is it considered that the health sector, excluding medicines and medical technology, is affected or should be affected (or influenced) by competitiveness trends, market failures and suboptimal investment situations (see art 14.4). How will investments in these non tech-areas/non competetive areas be governed and financed? DE (Comments): Which EU4Health activities does the COM intend to continue under the ECF and which EU4Health activities will be continued under different programs? We ask the Commission to examine whether items a, b and c comprehensively cover all areas that are eligible for funding under EU4Health, as set out in

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	Article 3 and 4 of Regulation 2021/522. Should this not be the case, we reserve the right to propose textual amendments. It needs to be ensured that activities possible under EU4Health today will also be possible under the new ECF and UCPM+. IE (Comments): IE suggest clearer segmentation needed. Scope too broad. IE would welcome further clarification on why specific technologies or sectors aren't called out. How will they balance support?
(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.	AT (Drafting Suggestions): (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 noncommunicable diseases, including mental health, degenerative health, ~~autism~~, cardiovascular diseases, cancer and other non-communicable diseases**, <u>especially linked to harmful use of alcohol, tobacco and nicotine use as well</u>** as including those related to pollution and **<u>environmental exposure</u>**, sexual and reproductive health and enhancing international health initiatives and cooperation. AT (Comments):

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	• a lot of additional non-communicable diseases could be mentioned in this paragraph such as neurological diseases, immunological diseases, metabolomic diseases. Therefore, it seems strange that autism is highlighted in such a prominent way while diseases much more common are not mentioned. Therefore, the suggestion to delete autism in this series of items since it is covered anyway under other non-communicable diseases. • Environmental exposure should also be mentioned since e.g. heat due to climate change would not be covered by the term pollution. And effects of climate change is currently a hot topic regarding health promotion and disease prevention. BE (Drafting Suggestions): (a) Improving and protecting health, including cross-border health, by prioritising health promotion**, embracing personalised medicine** 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, **Antimicrobial resistance, addictions (tobacco, alcohol, drugs)** and other non-communicable diseases, including those related to pollution, sexual and reproductive health and enhancing international health initiatives and cooperation. BE (Comments): This section mentions 'enhancing international health initiatives and cooperation'. Supporting international cooperation seems to us a relevant objective in many thematic areas – why is it emphasized here and not elsewhere?

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	Important to also mention personalised medicine Antimicrobial resistance and addictions are important issues to consider. NL (Drafting Suggestions): 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 **and by strengthening innovation and geopolitical resilience of health sectors**~~,~~ 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. PL (Drafting Suggestions): (a) Improving and protecting health, including cross-border health, by (i) prioritising health promotion and disease prevention across the life course through a health-in-all and One Health policies approach, **including promotion of sport and physical activity**, 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, **and (ii) fostering the development of home-grown innovative therapies, addressing critical unmet medical needs, and promoting rapid and equitable access to breakthrough treatments through strategic**

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	investment in the EU's biomedical research, development, and innovation (R+D+I) ecosystem. PL (Comments): Sport and physical activity are important tools for prevention and maintaining health throughout life. Promoting sport and physical activity, both through preventive and rehabilitation measures, plays a crucial role in the health care proceses. Investments in promoting an active lifestyle for people of all ages can generate significant economic savings for the public health system. SE (Drafting Suggestions): 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. SE (Comments): What is the purpose of mentioning or singling out a specific diagnosis (autism) in this context? Autism is not a non-communicable disease but a neuropsychiatric disability. Also, the paragraph states that particular focus should be given to communicable and non-communicable diseases. The phrasing suggests that

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	there are other types of diseases, beyond these two categories. Could you please specify which other types of diseases the paragraph is meant to include, which aren't communicable or non-communicable? SI (Drafting Suggestions): (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 **disorders** ~~health~~, autism, cardiovascular diseases, **rare deseases**, cancer, **antimicrobial resistance, addictions (tobacco, alcohol, drugs)** and other non-communicable diseases, including those related to pollution, sexual and reproductive health and enhancing international health initiatives and cooperation. SI (Comments): SI agrees with BE proposal for this paragraph. Degenerative health is not a standard expression. It would be better to say degenerative diseases or degenerative disorders Rare diseases should be included. Sl also agrees also with Belgium's proposal to add the refrence to rare diseases. LU (Drafting Suggestions): (a) Improving and protecting health, including cross-border health, by prioritising health promotion**, including countering health-related**

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	misinformation, 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**, such as the European Reference Networks (ERNs),** and cooperation. LU (Comments): European Reference Networks (ERNs) are a flagship of EU health cooperation and require continued funding to deliver patient benefits. Health promotion must go hand-in-hand with fighting misinformation, which directly undermines prevention campaigns (e.g. vaccination hesitancy, false health claims). Explicitly mentioning misinformation ensures the ECF supports fact-based communication, public health literacy, and trust in health authorities. DE (Drafting Suggestions): (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 **diagnostics and treatment of** communicable and non-communicable diseases**, based on research and innovation**~~, 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. DE

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	(Comments): The level of detail is very heterogeneous. Could this be streamlined? For example, the specific activities include very specific topics (e.g. autism), whereas certain large areas remain unmentioned (e.g. diagnostics and therapy, personalized medicine, rare diseases, epidemiology). We suggest deleting the specific examples and suggest to rather include more general approaches in health care and health R&I mentioned. What is meant with the terminus: "Improving and protecting health, including **cross-border health**, by (…)" – cross-border health care? Everything related to **cross-border health threats?** See also our general point under paragraph 1 IE (Drafting Suggestions): 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 , **Antimicrobial resistance, addictions (tobacco, alcohol, drugs) rare diseases** and other non-communicable diseases, including those related to **climate change and** pollution, sexual and reproductive health, ~~and~~ **strengthening EU-level cooperation,** enhancing international health initiatives and ~~cooperation.~~**, and systematically addressing unmet patient and societal needs** IE (Comments):

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	IE suggested text amendment. IE notes that environmental impact on health is not only limited to pollution and the important impact of climat change and health should be highligtheted. Antimicrobial resistance and addictions are important issues to consider. Expansion from international cooperation only, to include EU-level cooperation a key pillar of the EUhealth union. New focus on addressing unmet patient and societal needs in line with the Council political messague of the Council Conclusions. FI (Drafting Suggestions): (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 rights** and enhancing ~~international~~**global** health initiatives and cooperation. FI (Comments): FI proposes to delete the list of diseases. Raising mental health is justified in this section, but otherwise the list of diseases can never be exhaustive. ES (Drafting Suggestions):

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	(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, **rare diseases** and other non-communicable diseases, including those related to **climate change and** pollution, sexual and reproductive health, **with particular attention to key populations**; and enhancing international health initiatives and cooperation**, and systematically addressing unmet patient and societal needs.** ES (Comments): Environmental impact on health is not only limited to pollution and the important impact of climat change and health should be highligtheted. New focus on addressing unmet patient and societal needs in line with the Council political messague of the Council Conclusions. Since autism is a concrete type of condition, we don't see the need to highligth it here as it would be part of any broader strategy or plan on mental health or neurological diseases. We would suggest to focusing on rare diseases due their huge burden, innovation challenges and unmet medical needs. European Reference Networks (ERNs) are a flagship EU health cooperation initiative and require sustained funding to deliver patient benefits. FR (Drafting Suggestions):

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	(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 **animal, plant and environmental health**, communicable and non-communicable diseases, including mental health, degenerative health, autism, cardiovascular diseases, cancer and other non-communicable diseases, including those related to **environmental degradation, air, water, marine and soil** pollution, sexual and reproductive health and enhancing international health initiatives and cooperation. FR (Comments): One health policy approach cannot be limited to a list of human health activities, it needs to include explicitly activities on animal (considering in particular the development of zoonoses), plant and environmental health. PT (Drafting Suggestions): (a) Improving and protecting health, including cross-border health, by prioritising health promotion and disease prevention across the life course through **personalised medicine and** a health-in-all and One Health policies approach, with a special emphasis on communicable and non-communicable diseases, including **rare diseases,** 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.
(b) Strengthening the efficiency and resilience of health systems by reinforcing access, use and re-use of health data and digital tools, infrastructures and services, including to support the European Health Data Space, deployment of Artificial Intelligence and robotics based solutions in	AT (Drafting Suggestions):

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healthcare, advancing the digital transformation of healthcare, enhancing access to healthcare services, with particular focus on public health and healthcare workforce, developing and implementing Union health legislation, also by use of digital technologies, promoting evidence-based decision-making, (including by supporting Health technology Assessment), providing digital solutions for monitoring and coordinating and encouraging integrated work among national health systems to ensure coherence and efficiency across the Union.	(b) **Increasing efficiency and resilience of health systems by supporting structural reforms with a particular focus on digitalisation, also through the support of a dedicated EU Investment Hub.** ~~Strengthening the efficiency and resilience of health systems by ꟾ~~ Reinforcing access, use and re-use of health data and digital tools, infrastructures and services, including to support the European Health Data Space, **research, development**, deployment of Artificial Intelligence and **digital** or robotics based solutions in healthcare, advancing the digital transformation of healthcare, enhancing access to healthcare services, with particular focus on public health and healthcare workforce, developing and implementing Union health legislation, also by use of digital technologies, promoting evidence-based decisionmaking, (including by supporting Health technology Assessment), providing digital solutions for monitoring and coordinating and encouraging integrated work among national health systems to ensure coherence and efficiency across the Union. AT (Comments): Only deployment is mentioned in context with AI and robotics solutions. The ECF should also cover research and development of such solutions. Not all digital solutions are AI solutions. Therefore, digital should be added as well. BE (Drafting Suggestions): (b) Strengthening the efficiency and resilience of health systems by reinforcing access, use and re-use of health data and digital tools, infrastructures and services, including to support the European Health Data

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	Space, deployment of Artificial Intelligence and robotics based solutions in healthcare, advancing the digital transformation of healthcare, enhancing access to **and quality of** healthcare services, with particular focus on public health and healthcare workforce, developing and implementing Union health legislation, also by use of digital technologies, promoting evidence-based decision-making, (including by supporting Health technology Assessment), providing digital solutions for monitoring and coordinating and encouraging integrated work among national health systems to ensure coherence and efficiency across the Union. BE (Comments): The quality of healthcare services is essential to ensure effective, safe, and patient-centered care. It helps reduce medical errors, improve patient satisfaction, and control long-term costs. The European Competitiveness Fund must support healthcare systems by financing innovation to modernize medical practices, facilitate access to new technologies, and enhance the efficiency of care across all member countries. LV (Drafting Suggestions): (b) Strengthening the efficiency and resilience of health systems by reinforcing access, use and re-use of health data and digital tools, infrastructures and services, including to support the European Health Data Space, deployment of Artificial Intelligence and robotics based solutions in healthcare, **product development,** advancing the digital transformation of healthcare, enhancing access to healthcare services, with particular focus on public health and healthcare workforce, developing and implementing Union health legislation, also by use of digital technologies, promoting evidence-based decision-making, (including by supporting Health technology Assessment), providing digital solutions for monitoring and coordinating and

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	encouraging integrated work among national health systems to ensure coherence and efficiency across the Union. LV (Comments): Considering that the development of health competitiveness is also related to product development, please supplement Article 37, Paragraph 1 (b) with a reference to not only technology, but also product development. NL (Drafting Suggestions): (b) Strengthening the efficiency, **innovation** and resilience of health systems by reinforcing access, use and re-use of health data and digital tools, infrastructures and services, including to support the European Health Data Space, deployment of Artificial Intelligence and robotics based solutions in healthcare, advancing the digital transformation of healthcare, enhancing access to healthcare services, with particular focus on public health and healthcare workforce, developing and implementing Union health legislation, also by use of digital technologies, promoting evidence-based decision-making, (including by supporting Health technology Assessment), providing digital solutions for monitoring and coordinating and encouraging integrated work among national health systems to ensure coherence and efficiency across the Union. PL (Drafting Suggestions): Strengthening the efficiency and resilience of health systems by reinforcing access, use and re-use of health data and digital tools, infrastructures and services, including to support the European Health Data Space, Critical Medicines Act, deployment of Artificial Intelligence and robotics based solutions in healthcare, advancing the digital transformation of healthcare,

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	enhancing access to healthcare services, with particular focus on public health and healthcare workforce, developing and implementing Union health legislation, also by use of digital technologies, ensuring medicines security and the production of medicines, critical medicines and active pharmaceutical ingredients (APIs), promoting evidence-based decision-making, (including by supporting Health technology Assessment), providing digital solutions for monitoring and coordinating and encouraging integrated work among national health systems to ensure coherence and efficiency across the Union. PL (Comments): In the opinion of PL, the subject matter should be clarified in the regulatory part and included in Article 37 par. 1 let. b of the Critical Medicines Act (alongside the EHDS). The CMA is mentioned in the Competitiveness Compass as an element of legislation aimed at strengthening the supply of critical medicines and their ingredients, thus reducing dependence on third countries. The above proposal should be supplemented by the complementary addition of a section in Article 37 par. 1 addressing drug safety and the production of medicines/critical medicines and APIs. The ECF should enable the EU to preferentially support the production and development of strategic technologies and sectors located in the EU, which undoubtedly includes the pharmaceutical sector and supporting API production in the EU. The EC did not explicitly address the need to secure access to critical technology, such as APIs, in the document.

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	It should also be mentioned that Poland has requested the creation of a financial instrument dedicated solely to supporting production. RO (Drafting Suggestions): (b) Strengthening the efficiency and resilience of health systems by reinforcing access, responsibly conducted use and re-use of health data, taking into account the FAIR principles and complying with strict ethical standards, and digital tools, infrastructures and services, including to support the European Health Data Space, deployment of Artificial Intelligence and robotics based solutions in healthcare, advancing the digital transformation of healthcare, enhancing access to healthcare services, with particular focus on public health and healthcare workforce, developing and implementing Union health legislation, also by use of digital technologies, ensuring up-to-date expertise and alignment of performance with public health needs and priorities, promoting evidence-based decision-making, (including by supporting Health technology Assessment), providing digital solutions for monitoring and coordinating and encouraging integrated work among national health systems to ensure coherence and efficiency across the Union. RO (Comments): We need to ensure transparency, trust and societal acceptance. SE (Drafting Suggestions): (b) Strengthening the efficiency and resilience of health systems by reinforcing access, use and re-use of health data and digital tools, infrastructures and services, including to support the European Health Data Space**, implementations of innovations in health care,** deployment of Artificial Intelligence and robotics based solutions in healthcare, advancing

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	the digital transformation of healthcare, enhancing access to healthcare services, with particular focus on public health and healthcare workforce, developing and implementing Union health legislation, also by use of digital technologies, promoting evidence-based decision-making, (including by supporting Health technology Assessment), providing digital solutions for monitoring and coordinating and encouraging integrated work among national health systems to ensure coherence and efficiency across the Union. SE (Comments): We suggest an addition in either art 37. 1 b) or c). The current text lacks the mention of implementation of innovations in the health care sector. Such implementations are broader in their scope than what the current text that mentions such as AI, digitalization etc. Could COM clarify the link between EHDS and competitiveness of the sector? SI (Drafting Suggestions): Strengthening the efficiency and resilience of health systems by reinforcing access, use and re-use of health data and digital tools, infrastructures and services, including to support the European Health Data Space, deployment of Artificial Intelligence and robotics-based solutions in healthcare, advancing the digital transformation of healthcare, enhancing access to **and quality of** healthcare services, with particular focus on public health and healthcare workforce, developing and implementing Union health legislation, also by use of digital technologies, promoting evidence-based decision-making (including by supporting Health Technology Assessment), **including through Joint**

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	Clinical Assessments with predictable Union funding for Member States acting as assessor or co-assessor, and by promoting the use of Artificial Intelligence and advanced analytics to strengthen the quality, efficiency and consistency of such assessments, providing digital solutions for monitoring and coordinating and encouraging integrated work among national health systems to ensure coherence and efficiency across the Union **while ensuring that patients' health data are adequately protected, safeguarded against any misuse, and processed in full compliance with the General Data Protection Regulation (GDPR) and the broader EU data protection framework, thereby guaranteeing the privacy and fundamental rights of patients.** SI (Comments): SI agrees with BE proposal. The amendment to Article 37(b) makes the reference to HTA more concrete by naming JCAs directly and ensuring Union funding for Member States that perform them. It also highlights the role of Artificial Intelligence in strengthening the quality and reliability of assessments, turning a general objective into a clear operational commitment. DE (Drafting Suggestions): (b) Strengthening the efficiency and resilience of health **and care** systems by reinforcing access, use and re-use of health data and digital tools, infrastructures and services, including to support the European Health Data Space, deployment of Artificial Intelligence and robotics based solutions **and other innovative approaches** in healthcare, advancing the digital transformation of healthcare, enhancing access to healthcare services, with particular focus on public health and healthcare workforce, developing and

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	implementing Union health legislation, also by use of digital technologies, promoting evidence-based decision-making, (including by supporting Health technology Assessment), providing digital solutions for monitoring and coordinating and encouraging integrated work among national health systems to ensure coherence and efficiency across the Union. DE (Comments): See also our general point under paragraph 1 IE (Drafting Suggestions): Strengthening the efficiency and resilience of health systems by reinforcing access, use and re-use of health data and digital tools, infrastructures **– including shared research infrastructures –** and services including to support the European Health Data Space, deployment of Artificial Intelligence and robotics based solutions in healthcare, advancing the digital transformation of healthcare, enhancing access **and quality of** ~~to~~ healthcare services, with particular focus on public health and healthcare workforce, developing and implementing Union health legislation, also by use of digital technologies, promoting evidence-based decision-making, (including by supporting Health technology Assessment), providing digital solutions for monitoring and coordinating and encouraging integrated work among national health systems to ensure coherence and efficiency across the Union **supporting the sustainability of the health system by supporting the uptake of innovative solutions and best practices in clean transition and decarbonisation, and strengthening the resilience and security, including cybersecurity, of health systems. The ECF shall provide support for the demonstration, testing and market uptake of innovative solutions and best practices for these objectives to relevant governance levels.**

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	IE (Comments): IE suggested amendments to text in the following: IE would welcome a more explicit reference to shared research infrastructures within the text considering the importance of shared research infrastructures for the development and testing of innovative products and services – particularly for SMEs. IE would also suggest that the quality of healthcare services is essential to ensure effective, safe, and patient-centered care. In addition, the ECF must support healthcare systems by financing innovation to modernize medical practices, facilitate access to new technologies, and enhance the efficiency of care across all member countries. ES (Drafting Suggestions): (b) Strengthening the efficiency and resilience of health systems **by improving healthcare quality**, reinforcing access, use and re-use of health data and digital tools, infrastructures and services, including to support the European Health Data Space, deployment of Artificial Intelligence and robotics based solutions in healthcare, advancing the digital transformation of healthcare, enhancing access to healthcare services, with particular focus on public health and healthcare workforce, developing and implementing Union health legislation, also by use of digital technologies, promoting evidence-based decision-making, (including by supporting Health technology Assessment), providing digital solutions for monitoring and coordinating and

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	encouraging integrated work among national health systems to ensure coherence and efficiency across the Union. ES (Comments): Healthcare quality is the pillar of an efficient and resolutive healthcare susytem. It should be a key objective of any action devoted to healthcare system and should be highligthed. FR (Comments): How does the Commission intend to respond to sovereignty issues related to digital tools, services or infrastructure in the health sector that may directly affect the resilience and security of the Union? How will these activities be supported within the ECF, particularly with regard to the digital component or the resilience and security component of the ECF? For example, under which component would the establishment of digital health networks be financed?
	IT (Drafting Suggestions): **b.1) Implement support policies to encourage access to healthcare professions (medical and paramedical) and increase the competitiveness of public healthcare system, by building a skilled workforce.**
(c) Fostering the development, production capacity, manufacturing and industrial deployment of health and bioeconomy technologies, to increase the competitiveness of the sector, and ensure availability of Union medicinal products, medical devices, digital solutions and medical countermeasures relevant for preparedness and response to cross-border threats to health, as well as the competitiveness and resilience of the sectors by ensuring that such	AT (Drafting Suggestions): (c) Fostering the **research,** development, production capacity, manufacturing and industrial deployment of health and bioeconomy technologies, to increase the competitiveness

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products are innovative, safe, accessible, available, and affordable, thereby promoting equitable access across the Union.	of the sector, and ensure availability of Union medicinal products, medical devices, digital solutions and medical countermeasures relevant for preparedness and response to cross-border threats to health, as well as the competitiveness and resilience of the sectors by ensuring that such products are innovative, safe, accessible, available, and affordable, thereby promoting equitable access across the Union. AT (Comments): The entire research and development chain starting from research should be covered here. BE (Drafting Suggestions): (c) Fostering the development, production capacity, manufacturing and industrial deployment of health and bioeconomy technologies, to increase the competitiveness of the sector, and ensure availability of Union medicinal products, **critical medicines**, medical devices, digital solutions**, Advanced Therapy Medicinal Products (ATMP)** and medical countermeasures relevant for preparedness and response to cross-border threats to health, as well as the competitiveness and resilience of the sectors by ensuring that such products are innovative, safe, accessible, available, and affordable, thereby promoting equitable access across the Union. BE (Comments): We believe it is important to add a reference to the development of critical medicines

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	CZ (Drafting Suggestions): Fostering the development, production capacity, manufacturing and industrial deployment of health and bioeconomy technologies, to increase the competitiveness of the sector, and ensure availability of Union medicinal products, medical devices, digital solutions and medical countermeasures relevant for preparedness and response to cross-border threats to health, as well as the competitiveness and resilience of the sectors, **including strategic projects under the Critical Medicines Act [*reference to be added after adoption of cf. COM(2025) 102 final*],** by ensuring that such products are innovative, safe, accessible, available, and affordable, thereby promoting equitable access across the Union. CZ (Comments): As ECF absorbs EU4Health [and others relevant to this paragraph], it is important - and we do request - aligning the purpose of this provision with strategic projects under the *Critical Medicines Act*, as set out in the draft Regulation (EU) COM(2025) 102 final. Please refer to the proposed changes in wording. However, Article 16, paragraph 1 (Financial support from the Union), as well as other parts of the *Critical Medicines Act* draft, do not address the succession mechanism for the ECF. This issue should be addressed in the context of our request either here (adjusting wording) or COM(2025) 102 final. NL (Drafting Suggestions): Fostering the development, production capacity, manufacturing and industrial deployment of health and bioeconomy technologies, **including innovative nature-based solutions** to increase the competitiveness of the

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	sector, and ensure availability of Union medicinal products, medical devices, digital solutions and medical countermeasures relevant for preparedness and response to cross-border threats to health, as well as the competitiveness resilience of the sectors by ensuring that such products are innovative, safe, accessible, available, and affordable, thereby promoting equitable access across the Union. PL (Comments): In addition to the Act on critical medicines, it would also be advisable to include a provision supporting the production of medicines for lifestyle diseases, including rare cancers. The list of critical medicines will include drugs that have already been discovered. The discovery of new active molecules is very costly and involves a high risk of failure, but it has enormous strategic importance in the context of treating society for diseases that are currently incurable. RO (Drafting Suggestions): (c) Fostering the development, production capacity, manufacturing and industrial deployment of health and bioeconomy technologies, to increase the competitiveness of the sector, and ensure availability of Union medicinal products, medical devices, digital solutions and medical countermeasures relevant for enhanced preparedness and comprehensively response to cross-border threats to health, including outbreaks, as well as the competitiveness and resilience of the sectors by ensuring that such products are innovative, safe, accessible, available, and affordable, thereby RO (Comments):

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	How can we make sure that people in less-developed parts of the Union have fair access to new medicines, medical devices, and digital health tools? Explicit mechanisms to guarantee equitable access across all Member States are needed. SE (Drafting Suggestions): (c) Fostering **<u>innovation and competitiveness in</u>** the development, production capacity, manufacturing and industrial deployment of health and bioeconomy technologies, **<u>and adressing skill supply</u>** to increase the competitiveness of the **<u>business</u>** sector. **<u>Foster</u>** ~~and ensure~~ availability of Union medicinal products, medical devices, digital solutions and medical countermeasures relevant for preparedness and response to cross-border threats to health, as well as the competitiveness and resilience of the sectors by ensuring that such products are ~~innovative,~~ safe, accessible, available, and affordable, thereby promoting equitable access across the Union. **<u>Particular focus should be given to innovative production and crisis preparedness</u>**. SE (Comments): See comment above regarding implementations of innovations in health care. The addition could be made either in b) or c). Only health sector? If so, why only “bioeconomy technologies”? cf. (f.) below. Addition of “business” to clarify the focus of this Fund.

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	SI (Drafting Suggestions): Fostering the development, production capacity, manufacturing and industrial deployment of health and bioeconomy technologies, to increase the competitiveness of the sector, and ensure availability of Union medicinal products**, including critical medicines,** medical devices, digital solutions and medical countermeasures relevant for preparedness and response to cross-border threats to health, as well as the competitiveness and resilience of the sectors by ensuring that such products are innovative, safe, accessible, available, and affordable, thereby promoting equitable access across the Union. SI (Comments): SI suggests to add reference to critical medicines. DE (Drafting Suggestions): Fostering the development, production capacity, manufacturing and industrial deployment of health, **biotechnologies** and bioeconomy technologies, to increase the competitiveness of the sector, and ensure availability of Union medicinal products, medical devices, digital solutions and medical countermeasures relevant for preparedness and response to cross-border threats to health, as well as the competitiveness and resilience of the sectors by ensuring that such products are innovative, safe, accessible, available, and affordable, thereby promoting equitable access across the Union. DE

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	(Comments): Include all kinds of industrial bio-based solutions, not only health. See also our general point under paragraph 1 IE (Drafting Suggestions): Fostering the development, production capacity, manufacturing and industrial deployment of health and bioeconomy technologies, to increase the competitiveness **of these sectors.** **Addressing health technologies to** ensure availability, **access and security of supply** of Union medicinal products, critical medicines, medical devices, **diagnostics**, digital solutions and **other** medical countermeasures relevant for preparedness and response to cross-border threats to health, as well as the competitiveness and resilience of the sectors by ensuring that such products are innovative, safe, accessible, available, and affordable, thereby promoting equitable access across the Union. **Addressing bioeconomy technologies to ensure availability of Union bio-based products, advanced biomaterials, biotechnological processes and sustainable biological resources relevant for industrial transformation and for competitive advantage in global markets, as well as the competitiveness and resilience of the sectors by ensuring that such products are innovative, high-performing, scalable, market-ready, and cost-competitive, thereby promoting enhanced industrial competitiveness and market leadership across the Union."** IE (Comments):

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	IE welcomes ensuring the competitiveness and resilience of the biotechnology sector by ensuring that products are innovative **The following out text amendments** IE notes the proposal text addresses both health and bioeconomy technologies. These are two very different technologies. And the Commission Proposal text seems primarily targeted at health technologies. Suggested text split. IE suguest that specific references to diagnostic devices and to security of supply, in line with the latest legislative developments in the EU (MCM strategy, CMAct…) are included and suggest text amendments IE would suggest the inclusión of Critical Medicines within the text . ES (Drafting Suggestions): (c) Fostering the development, production capacity, manufacturing and industrial deployment of health and bioeconomy technologies, to increase the competitiveness of the sector, and ensure availability, **access and security of supply** of Union medicinal products, medical devices, **diagnostics**, digital solutions and **other** medical countermeasures relevant for preparedness and response to cross-border threats to health, as well as the competitiveness and resilience of the sectors by ensuring that such products are innovative, safe, accessible, available, and affordable, thereby promoting equitable access across the Union. ES (Comments):

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	We have included specific references to diagnostic devices and to security of supply, in line with the latest legislative developments in the EU (MCM strategy, CMAct…). FR (Comments): Similarly, how does the Commission intend to respond to the sovereignty issues related to the activities mentioned, which directly affect its ability to respond to crises or external threats? How will these activities be coordinated with those of the resilience and security component of the ECF, as well as with the proposed new MPCU+? The ECF should also be able to support strategic projects as defined in the Critical Medicines Act. The objectives outlined in Article 3 align with this notion, focusing on initiatives that expand manufacturing capacities for critical medicines within the Union, thereby reinforcing supply security and ensuring their long-term availability and affordability.
(d) Supporting the discovery, development, derisking, demonstration, piloting and use, and scaling-up of biotechnology innovations, accelerating the market introduction and market uptake of biotechnology solutions, strengthening emerging value chains and providing access to finance and other support for SMEs, startups, scale ups and innovators.	BE (Drafting Suggestions): (d) Supporting the discovery, development, derisking, demonstration, piloting and use, and scaling-up of biotechnology innovations, accelerating the market introduction and market uptake of biotechnology solutions, strengthening emerging value chains, **by building a skilled workforce** and providing access to finance and other support for SMEs, startups, scale ups and innovators. BE

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	(Comments): As with the bioeconomy in general (f), breakthroughs in biotechnological innovations require a skilled workforce, which must be supported. CZ (Comments): CZ - See our comment on Article 3, paragraph 2(b)(2): biotechnology appears to be explicitly linked only to the 'red' category, whereas other biotechnology-related activities are subsumed under the bioeconomy in a manner that is currently unclear. This lack of clarity may hinder the proper identification of, and expectations for, relevant biotechnology initiatives. LT (Drafting Suggestions): Supporting the discovery, development, derisking, demonstration, piloting and ~~use, and scaling up~~**industrial scale-up** of biotechnology innovations, **with strong focus on market-driven solutions and commercial viability. Enhancing the competitiveness of the Union's industrial base by** accelerating ~~the market introduction and market uptake of biotechnology solutions, strengthening emerging value chains and providing access to finance and other support for SMEs, startups, scale-ups and innovators~~**the uptake of biotechnology across strategic value chains, facilitating access to finance and tailored support for SMEs, startups, scale-ups and farmers and fostering public-private partnerships to ensure rapid deployment and global competetiveness of European innovations**. LT (Comments): An assessment of the provisions of the document in the field of the bioeconomy shows that the main focus is placed on environmental protection,

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	biodiversity conservation, sustainability objectives, and the promotion of research. However, the link with industrial development remains insufficiently developed. In order to better address the needs of industry, it would be appropriate to reinforce the provisions relating to commercial applicability, market uptake, and industrial scale-up. It is also important that, in the context of the bioeconomy, energy aspects are more clearly integrated – in particular those related to biofuels, biomethane, and other forms of sustainable bioenergy that contribute both to climate objectives and to energy independence. To add, the text is supplemented by "fermers" as Farmer's activities are also very important in the use and adaptation of biotechnological innovations, as well as in promoting newly emerging value chains. LV (Drafting Suggestions): (d) Supporting the discovery, development, derisking, demonstration, piloting and use, and scaling-up of biotechnology innovations, accelerating the market introduction and market uptake of biotechnology solutions, strengthening emerging value chains and providing access to finance and other support ~~for SMEs, startups, scale ups and innovators~~ **companies.** LV (Comments): In order not to create the impression that the ECF does not support large enterprises and small and mid-cap companies, a request to supplement Article 37, paragraph 1 (d), clearly stating that companies are supported regardless of size. In turn, if Article 37, paragraph 1 (b) is understood as specific support only for *"SMEs, startups, scale ups and innovators"*, a request to include an additional point in Article 37, paragraph 1, with support for large enterprises and small and mid-cap companies. PL

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	(Drafting Suggestions): (d) Supporting the discovery, development, derisking, demonstration, piloting and use, and scaling-up of biotechnology innovations, accelerating the market introduction and market uptake of biotechnology solutions, strengthening emerging value chains and providing access to finance and other support for SMEs, startups, scale- ups and innovators, **while fostering research, development and innovation (R+D+I) in drug discovery and the development of innovative therapies, including small- and large-molecule medicines and advanced therapy medicinal products (ATMPs), and addressing critical unmet medical needs across Europe.** PL (Comments): Does this provision take into account the shortening of medical research? At lower TRL levels, it is important to replace animal testing with computer simulations using predictive models and machine learning tools. Does the European Competitiveness Fund foresee support for such research? RO (Drafting Suggestions): (d) Supporting the discovery, development, derisking, demonstration, piloting and use, and scaling-up of biotechnology innovations, accelerating the market introduction and market uptake of biotechnology solutions, development of pipelines for private sector investment, market-based instruments, and fiscal mechanisms for result-based budgeting, strengthening emerging value chains and providing access to finance and other support for SMEs, startups, scale ups and innovators. RO (Comments):

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	ECF support should guarantee equitable access to biotechnology infrastructure and financing in all regions of the Union, implementing mechanisms to prevent benefit concentration and address innovation disparities. DE (Drafting Suggestions): (~~dc~~e) Supporting the discovery, development, derisking, demonstration, piloting and use, and scaling-up of biotechnology innovations, accelerating the market introduction and market uptake of biotechnology solutions, strengthening emerging value chains and providing access to finance and other support for SMEs, startups, scale ups and innovators. DE (Comments): We propose moving this point to e, while moving e to d. The rationale behind this being that the current point e still specifically relates to the issue of health, whereas point d is already the next category in this window, namely 'biotechnology'. In addition, the wording of the current point d is – in our view appropriately – formulated in such a way that it is open to all sectors and shades of biotechnology (red, white, green, blue) and is not solely limited to the health domain. FR (Comments): The delegation will be able to question the Commission on how the activities mentioned above are effectively coordinated with other initiatives supported by the fund for SMEs, start-ups and scale-ups. HU

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	(Drafting Suggestions): Supporting the discovery, development, derisking, demonstration, piloting and use, and scaling-up of biotechnology innovations, accelerating the market introduction and market uptake of biotechnology solutions, **driving EU-wide technology transfer and adoption**, strengthening emerging value chains and providing access to finance and other support for SMEs, startups, scale ups and innovators. HU (Comments): This paragraph should also focus on the key problem of the EU biotech sector on avoiding silo-based, region-specific development.
(e) Protecting people by supporting the development, implementation and monitoring of health security policies, in cooperation with Member States authorities and stakeholders, as well as coordinating Union and national prevention, preparedness and response plans.	RO (Drafting Suggestions): (e) Protecting people by supporting the development, implementation and monitoring of health security policies, in cooperation and coordination with Member States authorities and stakeholders, as well as ensuring coordination of ~~coordinating~~ Union and national prevention, preparedness , ~~and~~ response and recovery plans. SE (Drafting Suggestions): (e) Protecting people by supporting the development, implementation and monitoring of health security policies, in cooperation with Member States authorities and stakeholders, as well as coordinating Union and national **and regional** prevention, preparedness and response plans. SE (Comments):

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	What is the meaning of "health security policies" in this paragraph? Does it refer to health threats or something else? DE (Drafting Suggestions): (~~ed~~) Protecting people by supporting the development, implementation and monitoring of health security policies, in cooperation with Member States authorities and stakeholders, as well as coordinating Union and national prevention, preparedness and response plans. DE (Comments): See comment above. FR (Drafting Suggestions): (e) Protecting people, **animals and environment**, by supporting the development, implementation and monitoring of health security policies, in cooperation with Member States authorities and stakeholders, as well as coordinating Union and national prevention, preparedness and response plans. FR (Comments): The delegation may request the Commission to clarify the provisions for cooperation with Member States underlying

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	Animal health needs (and already uses) the kind of coordination that is the object of this paragraph, and that is of particular importance in relation to zoonoses.
	LT (Drafting Suggestions): **(f) Supporting actions for the protection and resilience of critical energy infrastructure. This includes measures for deterrence to prevent hostile actors from targeting installations, enhanced detection capacities to identify threats to critical energy infrastructure, protection measures to physically secure and harden assets against potential disruptions, and recovery mechanisms to enable the rapid repair and restoration of damaged infrastructure.** LT (Comments): The inclusion of new paragrapph is necessary to define specific activities for safeguarding critical energy infrastructure that underpin economic stability, public safety, and security of supply. By strengthening deterrence, detection, protection, and recovery capacities, the initiative will address growing risks from both physical and emerging threats, such as cyber or drone-enabled attacks. Investing in these measures ensures that energy infrastructure remains resilient against disruptions and capable of rapid restoration in crisis situations.
(f) Fostering an innovative and competitive bioeconomy sector in the Union, including in the areas of health biotech, biobased materials and products, valorising farm and forest residues, carbon negative products, biomanufacturing and biochemicals, 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 bioeconomy solutions; by strengthening emerging value chains; by building a skilled	BE (Drafting Suggestions): f) Fostering ~~an~~ **a safe, sustainable,** innovative and competitive bioeconomy sector in the Union, including in the areas of health biotech, **agrobiotech, industrial biotech,** biobased materials and products, valorising farm and forest residues, carbon negative products, biomanufacturing and biochemicals, in particular by supporting the discovery, development,

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workforce, by providing access to finance and other support for SMEs, startups, scale ups and innovators.	derisking, demonstration, piloting, and scaling-up of bioeconomy innovations; **by taking into account the cascading use of biomass and avoiding the significant harmful impact on ecosystems;** by accelerating the market introduction and market uptake of bio-based materials from agriculture and forestry 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. BE (Comments): Biomass sustainability is crucial as highlighed by this EU-wide study by Materials Economics [and by this Belgian Study "Biomasse et neutralité climatique")] The green and industrial biotech seems to be forgotten here. Again only a focus on health biotech. However the other areas in biotech are key part of the bioeconomy and should be mentioned as well. CZ (Drafting Suggestions): (f) Fostering an innovative and competitive bioeconomy sector in the Union, including in the areas of health biotech, biobased materials and products, valorising **food waste**, farm and forest residues, carbon negative products, biomanufacturing and biochemicals, 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 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. CZ

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	(Comments): CZ - Note that the valorization of food waste is a [key] pillar of the EU Bioeconomy Strategy, which was recently subject to public consultation and aims to promote the circular and sustainable use of biological resources to support climate neutrality and resource efficiency. Adding to this, the Union's commitments under the Farm to Fork Strategy (COM(2020) 381 final) and the Circular Economy Action Plan (COM(2020) 98 final) prioritise the reduction and reuse of food waste as a means to lower environmental impact and enhance the resilience of the food system. Last but not least, EU Platform on Food Losses and Food Waste has demonstrated that innovation in food waste valorisation contributes directly to development of new bio-based value chains, not mentioning positive impact on the economic competitiveness and job creation. LT (Drafting Suggestions): Fostering ~~an innovative and competitive bioeconomy sector in the Union~~, **a market-oriented and industrially scalable bioeconomy sector in the Union**, including in the areas of health, **agri-food** biotech, biobased materials and products, valorising farm and forest residues, carbon negative products, biomanufacturing and biochemicals, **and sustainable bioenergy solutions such as biogas, bioethanol and biomethane production, particularly when derived from agricultural and industrial residues** in particular by supporting the discovery, development, derisking, demonstration, piloting, and **industrial** scaling-up of bioeconomy innovations; by accelerating the market introduction and market uptake of bio-based materials from agriculture and forestry and bioeconomy solutions; by strengthening emerging value chains; by building a skilled workforce **aligned with industrial needs**, by providing access to finance and other support for SMEs, startups, scale ups and innovators**; furthermore, this should include the support of innovative mechanisms and pilot measures designed to foster upskilling and**

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	reskilling in health, biotech, agriculture and bioeconomy, facilitation of talent attraction to alleviate skills shortages, the development of curricula as well as the adjustment of skills to the evolving requirements of the labour market. LT (Comments): (1) Please refer to the comment provided in Art. 37 (1) (d). (2) What is more the text is supplemented by "agri-food biotehc" as Agri-food biotechnologies are a particularly important component in strengthening an innovative EU bioeconomy sector. (3) To add, taking into account Article 21 of the Preamble, we propose to add that the ECF should also include support for innovative mechanisms and pilot measures for upskilling and reskilling, development of curricula, attraction of foreign talent and matching of skills with the labour market. LV (Drafting Suggestions): (f) Fostering an innovative and competitive bioeconomy sector in the Union, including in the areas of health biotech, biobased materials and products, valorising farm and forest residues, carbon negative products, biomanufacturing and biochemicals, 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 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~~. LV (Comments):

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	Please do not limit the number of beneficiaries. NL (Drafting Suggestions): (f) Fostering an innovative, **sustainable**, and competitive bioeconomy sector in the Union, including in the areas of health biotech, biobased materials and products, valorising farm and forest residues, carbon negative products, biomanufacturing and biochemicals, 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 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. PL (Comments): The ECF provisions should consider the possibility of financing the biotechnology sector without thematic limitations in order to enable the development of the pharmaceutical and biotechnology sector (incl. innovative therapy), which has a key impact on the innovativeness of the economy, and its further strengthening is a condition for ensuring the safety of medicines in the EU. SE (Drafting Suggestions): f) Fostering an innovative and competitive bioeconomy sector in the Union, including in the areas of health **and** biotech, biobased materials and products, valorising farm and forest residues, carbon negative products, biomanufacturing and biochemicals, in particular by supporting the discovery, development, derisking, demonstration, piloting, and scaling-up of

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	bioeconomy innovations; by accelerating the market introduction and market uptake of bio-based materials from agriculture and forestry 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. SE (Comments): only health biotech, or wider ? e.g. biotech and health in the bioeconomy SI (Drafting Suggestions): (f) Fostering a~~n~~ **circular, sustainable** innovative and competitive bioeconomy sector in the Union, including in the areas of health biotech, biobased materials and products, **bioenergy,** valorising farm and forest residues, carbon negative products, biomanufacturing and biochemicals, 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 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. SI (Comments): SI suggests that the circularity and sustainability aspects of the bioeconomy, as highlighted in the latest EU bioeconomy strategy, should also be emphasised. We suggest that bioenergy is also mentioned as one of the bioeconomy sectors.

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	"Additionally, we would like to provide a comment on the use of the term "forest residues", i.e., forest residues, which has not yet been clearly defined or specified. DE (Comments): We would like to better understand the relationship between this provision and a possible future Biotech Act, which aims at strenghtening the competitiveness of the European biotech scenes. IE (Drafting Suggestions): Fostering an innovative, **sustainable** and competitive bioeconomy sector in the Union, including in the areas of health biotech, biobased materials and products, valorising farm and forest residues, carbon negative products, **paludiculture based markets and products,** biomanufacturing and biochemicals, 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 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. IE (Comments): IE notes in the immediate term, biofuels are the readily available option to produce Sustainable Aviation Fuel. Given the limited feedstocks, the development of advanced biofuels, such as utilising agriculture and forest residues, should be an EU priority to support

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	IE notes the use of biological resources needs to be managed in line with the principles of sustainable development, as a derisking measure to ensure longevity and stability in the market, for primary producers, production facilities, and end users, while protecting natural resources. IE suggest text edit Given the synergies paludiculture presents for the bioeconomy, climate policy, just transition and nature protection. FI (Drafting Suggestions): Fostering an innovative, **sustainable, circular** and competitive bioeconomy sector in the Union, including in the areas of health biotech, biobased materials and products, valorising farm and forest residues, carbon negative **and nature-positive** products, biomanufacturing and biochemicals, 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 **sustainably sourced** bio-based materials from agriculture and forestry and bioeconomy solutions; by strengthening emerging **and transformative** value chains **(e.g. on green forestry, carbon farming, ecotourism and payments for environmental services)**; by building a skilled workforce, by providing access to finance and other support for SMEs, startups, scale ups and innovators. FI (Comments): FI believes more consideration should be put to emerging pressures and threats. These include the role of forests in achieving climate and biodiversity objectives in times of accelerating climate change, including the preserving the water cycle from source to sea, as mentioned in the EU Water Resilience Strategy, as well as the resilience of forests and forestry to climate change

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	impacts, storms, wildfires, geopolitical instabilities and societal values and expectations for forests and forestry in a transition towards a greener and circular bioeconomy. The policy window should better foster support to major transitions (including increased carbon removals and the restoration of forest ecosystems) and innovations in the sustainable forest-based bioeconomy are developed towards higher added value; and offer better understanding of the trends and bottlenecks, e.g. in the new green forestry business models, including carbon farming, ecotourism and payments for environmental services. ES (Drafting Suggestions): (f) Fostering an innovative and competitive bioeconomy sector in the Union, including in the areas of health **and agriculture** biotech, biobased materials and products, valorising farm and forest residues, carbon negative products, **fishery and aquaculture by-products,** biomanufacturing and biochemicals, 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 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. ES (Comments): This section includes support for the valorization of agricultural and forestry waste, but does not explicitly mention fishery and aquaculture by-products. These generate a significant volume of biomass that can be transformed into high value-added products such as feed, fertilizers, collagen, or bioenergy.

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	EE (Comments): It is unclear at the moment whether the funds for measures planned for innovation and knowledge transfer here from the European Competitiveness Fund in these sub-activities are allocated to each state budget for the new period, or will some of the measures remain European-centered (such as the measures in the European-centered Horizon research program). FR (Drafting Suggestions): f) Fostering an innovative, ~~and~~ competitive**, sustainable and biodiversity-friendly** bioeconomy sector in the Union, including in the areas of health biotech, biobased materials and products, valorising farm and forest residues, **without undermining food security and supply**, carbon negative products, biomanufacturing and biochemicals, 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, **fisheries, aquaculture** 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 FR (Comments): Can the Commission specify how the activities mentioned above are effectively coordinated with other initiatives supported by the fund for SMEs, start-ups and scale-ups ?

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	Can products and co-products from fisheries and aquacaculuture, including algae be covered? HU (Drafting Suggestions): (f) Fostering an innovative and competitive bioeconomy sector in the Union, **to support R&I, as well as the application of biotechnology across all relevant areas where this technology can drive innovation**, including in the areas of health biotech, biobased materials and products, valorising farm and forest residues, carbon negative products, biomanufacturing and biochemicals, 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 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. HU (Comments): Council Conclusion 30/09/2025 on life sciences PT (Drafting Suggestions): (f) Fostering an innovative and competitive bioeconomy sector in the Union, including in the areas of ~~**health**~~ **biotech**, biobased materials and products, **including biofertilizers**, valorising farm, ~~**and**~~ forest **and ocean residues**, carbon negative products, biomanufacturing and biochemicals, in particular by supporting the discovery, development, derisking, demonstration, piloting, and scaling-up of bioeconomy innovations; by accelerating the market

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	introduction and market uptake of bio-based materials from agriculture, **fishing and aquaculture, ~~and~~** forestry 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. PT (Comments): - Although biotechnology is recognised as a strategic sector for Europe, the proposed merged structure ("Health, Biotechnology, Agriculture, and Bioeconomy") risks allowing health-focused biotech to overshadow other domains such as industrial, environmental, blue, and agri-food applications.
	FI (Drafting Suggestions): Add a dedicated activity: **Developing scalable and cost-effective nature-based solutions for improving water quality, managing and protecting biodiversity, improving resilience and flood management, to boost competitiveness, promote health and well-being and prevent biodiversity loss.** FI (Comments): FI proposes adding a dedicated activity on nature-based solutions.
(g) Fostering the competitiveness, the sustainability, the resilience and fairness of agriculture, fisheries, aquaculture, forestry sectors and rural and coastal areas, and contribute to long term food security in the Union.	AT (Drafting Suggestions): (g) Fostering **research, innovation** and the competitiveness, the sustainability, the resilience and fairness of agriculture, fisheries, aquaculture, forestry sectors and rural and coastal areas, and contribute to long term food security in the Union.

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	AT (Comments): The entire research and development chain starting from research should be covered here. BE (Drafting Suggestions): (g) Fostering the competitiveness, the sustainability, the resilience and fairness of agriculture, fisheries, aquaculture, forestry sectors, **food processing industry** and rural and coastal areas, and contribute to long term food security in the Union. BE (Comments): Proposition to explicitly mention the food industry. The food industry is an important industrial sector and is also strongly rooted locally due to the close link with agriculture. If we want to achieve "fairer and more resilient food chains" as stated in the MFF, then the food processing industry is indispensable. The processing industry also needs specific support and needs better access to funding through the MFF in order to continue to guarantee food security, competitiveness, the green transition and a sustainable food chain. CZ (Drafting Suggestions): (g) Fostering the competitiveness, the sustainability, the resilience and fairness of agriculture, **processing of agriculture and food products,**

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	fisheries, aquaculture, forestry sectors and rural and coastal areas, and contribute to long term food security **and safety** in the Union. CZ (Comments): CZ – dtto; it is essential that the scope of this provision be extended to cover "processing of agricultural and food products"**.** The insertion of this wording would also ensure consistency with the Union's strategic objectives on food security, including Directive (EU) 2022/2557 on the resilience of critical entities, which explicitly includes food production, processing and distribution among critical sectors, and the European Parliament resolution of 14 June 2023 on ensuring food security and the long-term resilience of EU agriculture (2022/2183(INI)). The issue of "food safety" should likewise not be overlooked, as it is inherently linked to innovation driven by advances in the understanding of harmful and potentially harmful food components and processing residues, and evolving dietary requirements. Its inclusion is essential to ensure coherence with the Union's overarching objectives on public health, consumer protection, and, in times of crisis, the mitigation of food insecurity. LT (Drafting Suggestions): (g) Fostering the competitiveness, the sustainability, the resilience and fairness of agriculture**, food security**, fisheries, aquaculture, forestry sectors and rural and coastal areas, and contribute to long term food security in the Union. LT (Comments):

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	Supplemented text as Food security is one of essential components of the green and digital transition and a key factor for Europe's competitiveness and resilience. NL (Drafting Suggestions): (g) Fostering the competitiveness, ~~the~~ sustainability, **circularity**, ~~the~~ resilience ~~and fairness~~ of agriculture, fisheries, aquaculture-forestry sectors and rural and coastal areas, **in particular through support for innovative, advanced and cutting-edge bio-based technologies and chemistry and by accelerating and leveraging the development, market introduction and market uptake of knowledge, practices and key technologies, across value chains, including in the field of digitisation, robotisation, automation, sensoring, artificial intelligence and genetics.** **.**~~, and contribute to long term food security in the Union.~~ NL (Comments): Without being exhaustive, NL finds it important that we flesh out what we mean in this paragraph – in line with the other headings under this window - indicating innovation in which fields can help us achieve the aims highlighted in this paragraph. This should provide more guidance and focus for the application of ECF and synergy with other MFF instruments. We need to focus on highly-innovative elements of the agriculture sector where the EU is or has the potential for a leading position. PL (Comments): Does this provision take into account food security in the context of protection against the effects of climate change – e.g., supporting the development of new genomic techniques?

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	RO (Drafting Suggestions): (g) Fostering the competitiveness, the sustainability, the resilience and fairness of agriculture, fisheries, aquaculture, aquaponics, forestry sectors and rural and coastal areas, and contribute to long term food security in the Union. RO (Comments): This activity should also encourage the development and uptake of aquaponics as an innovative circular economy system, providing safe food, sustainable income opportunities and reducing the pressure on natural resources. There should be avoided the overlap between the actions of the ECF and the proposed reform of Common Agricultural Policy (CAP) within the National and Regional Partnership Plans. Could the Commission explain / elaborate more about the sinergies and complementarities between the ECF and NRPP Fund? SE (Comments): What is included in “rural and coastal areas”. Can this include urban areas along the coast? SI (Drafting Suggestions): (g) Fostering the **attractivness**, competitiveness, the sustainability, the resilience and fairness of agriculture, fisheries, aquaculture, forestry sectors

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	and rural and coastal areas, and contribute to long term food security **and supply at reasonable prices** for consumers in the Union. SI (Comments): Primary sectors are facing the problem that fewer and fewer young people are interested in them, so we believe that their attractiveness for employment in these sectors should also be increased. In addition to food security, we suggest that emphasis be placed on the supply of food at reasonable prices for consumers, which is one of the main objectives of the CAP under Article 39 TFEU. LU (Drafting Suggestions): Fostering the competitiveness, the sustainability, the resilience and fairness of **the value chains in** agriculture, fisheries, aquaculture, forestry sectors and rural and coastal areas, and contribute to long term food security in the Union. LU (Comments): Luxembourg recalls that it is essential to ensure that food production processes and their respective value chains remain eligible under the ECF [see comment above]. DE (Comments): What is meant by "fairness"? We should avoid duplications with the NRPP and should ensure that any ECF funding is only awarded based on the principles of excellence and competition.

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	IE (Drafting Suggestions): Fostering the competitiveness, the sustainability, the resilience and fairness of agriculture, fisheries, aquaculture, forestry sectors and rural and coastal areas, and contribute to long term food security and **climate action** in the Union. IE (Comments): IE suggest text edit and notes while this may be implicit in the reference to sustainability, it is worth specifically mentioning climate action given these sectors' central importance to reducing emissions. ES (Drafting Suggestions): (g) Fostering the competitiveness, the sustainability, the resilience and fairness of agriculture, fisheries, aquaculture, forestry sectors, **agri-food production systems,** rural areas and coastal regions**, including by promoting the adoption of digital solutions,** ~~and to contribute~~ **hence contributing** to the long-term food security of the Union. ES (Comments): We would like to highlight the role of new digital technologies for the primary sector, as well as highlight support for investments in processing and marketing in the agri-food industry. In the debates on the drafting of the proposed regulations for the new CAP, these investments do not appear to be included, as has been pointed out by many of the Member States, which are calling for their inclusion.

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	EE (Drafting Suggestions): (g) Fostering the competitiveness, the sustainability, the resilience and fairness of agriculture, **including food processing,** fisheries, aquaculture, forestry sectors and rural and coastal areas, and contribute to long term food security in the Union. EE (Comments): The current wording does not indicate whether food processing is also included in the activities to be supported. In view of the goal of ensuring food security, we also consider it important to support food processing. □ It is unclear at the moment whether the funds for measures planned for innovation and knowledge transfer here from the European Competitiveness Fund in these sub-activities are allocated to each state budget for the new period, or will some of the measures remain European-centered (such as the measures in the European-centered Horizon research program). FR (Drafting Suggestions): Fostering the competitiveness, the sustainability, the resilience and ~~fairness~~ **attractivity** of agriculture, fisheries, aquaculture, forestry sectors and rural and coastal areas **(including outermost regions), including through biodiversity and ecosystem preservation and restoration as well as nature-based solutions; developing workers skills to address climate and environmental transitions and providing them a fair standard of living**, and contribute to long term food security in the Union, **including by promoting tools to facilitate access to financing through innovative instruments.**

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	FR (Comments): What is the scope compared to NRPP? Only by addressing the causes of the current lack of sustainability and resilience of these sectors will it be possible to ensure long-term food security and overall economic competitiveness and resilience within the Union. Ecosystems support the production of goods and services through ecosystem services and need to be preserved and restored. Considering the huge challenge of generational renewal in agriculture, the issues of skills and of attractivity are crucial for Europe's agricultural competitiveness and food sovereignty. The wording proposed is in line with the Commission's vision on agriculture and food. Proposal to introduce tools to facilitate and foster access to private financing : In relation to derisking and access to finance, propose any innovative financial instruments (e.g. equity or quasi equity), and/or budgetary guarantees that may induce leverage effect over public resources for targeted investments, either intangible or tangible (resilience, adaptation and/or mitigation to climate change and sustainability). HU (Drafting Suggestions): Fostering the competitiveness, the sustainability, the resilience and fairness of agriculture, fisheries, aquaculture, forestry sectors and rural and coastal

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	areas, and contribute to long term **rural development, EU-wide knowledge, technology transfer and capacity building** and food security in the Union**, while respecting macro-regional specificities**. HU (Comments): Rural development is key for primary production sectors to be integrated in the bioeconomy. To boost the uptake of technology across the macro-region, driven by sustainability and competitiveness needs. PT (Drafting Suggestions): (g) Fostering the competitiveness, the sustainability, the resilience and fairness of agriculture, fisheries, aquaculture, forestry sectors and rural and coastal areas, and contribute to long term food security in the Union, **including by investing in animal and plant health innovation, biosecurity systems, and food safety monitoring infrastructures.** PT (Comments): - Clarification whether the agricultural innovation issues currently covered by Horizon Europe will be transferred to the ECF. Actions to link farms, technological innovation and digitalization should also be included, contributing to food security and climate adaptation. This action could also be extended to the development of innovative solutions to add-value to farms agrosystems services not related with provisional functions of farm and/or in organization of short supply chains to support the regional market and tourism. - This addition highlights the role of agri-food research institutes in preventing diseases, ensuring traceability, and maintaining market stability

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(h) Supporting actions for the development, implementation, monitoring and enforcement of relevant Union legislation and policy. This includes supporting the relevant institutions, the cooperation between national authorities and with stakeholders, studies, the development and deployment of tools and infrastructures, including IT infrastructure and tools.	AT (Drafting Suggestions): (h) Supporting actions for the development, implementation, monitoring and enforcement of relevant Union legislation and policy. This includes supporting the relevant institutions, the cooperation between national authorities and with stakeholders, studies, the development, **preservation** and deployment of tools and infrastructures, including IT infrastructure and tools. AT (Comments): Certain tools and infrastructures in this area are already existing and just need to be sustained and further developed. BE (Drafting Suggestions): (h) Supporting actions for the development, implementation, monitoring and enforcement of relevant Union legislation and policy. This includes supporting the relevant institutions, the cooperation between national authorities and with stakeholders, studies, the development and deployment of tools and infrastructures, including IT infrastructure and tools. RO (Comments): Will there be subsequent acts adopted by the Commission to facilitate the actions provided by this article?

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	SE (Drafting Suggestions): (h) Supporting actions for the development, implementation, monitoring and enforcement of relevant Union legislation and policy. This includes supporting the relevant institutions, the cooperation between national **and regional** authorities and with stakeholders, studies, the development and deployment of tools and infrastructures, including IT infrastructure and tools. SE (Comments): What is the meaning of stakeholders in this article? SI (Drafting Suggestions): (h) Supporting actions for the development, implementation, monitoring and enforcement of ~~relevant~~ Union legislation and policy. This includes supporting the relevant institutions, the cooperation between national authorities and with stakeholders, studies, the development and deployment of tools and infrastructures, including IT infrastructure and tools. DE (Comments): In which areas does COM intend to fund the development, implementation and monitoring of EU legislation with the ECF? When this is linked to the consolidation of various funding programmes, which we welcome in principle, it is important that key tasks of these programmes are fulfilled more effectively and more efficiently by the ECF in order to leverage synergies. If this objective concerns administrative action of the COM, this should be reflected in the administrative expenditures in heading 4 of the MFF.

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	IT (Drafting Suggestions): (h) Supporting actions for the development, implementation, monitoring, **simplification, streamlining** and enforcement of relevant Union legislation and policy. This includes supporting the relevant institutions, the cooperation between national authorities and with stakeholders, studies, the development and deployment of tools and infrastructures, including IT infrastructure and tools. IT (Comments): Favorable conditions for enterprises must be set out through simplification measures and ensuring coherent legislative provisions. FR (Drafting Suggestions): (h) Supporting actions for the development, implementation, monitoring and enforcement of relevant Union legislation and policy. This includes supporting the relevant institutions, the cooperation between national authorities and with stakeholders, studies, the development and deployment of tools and infrastructures, including IT infrastructure and tools. HU (Drafting Suggestions): Supporting actions for the development, implementation, monitoring and enforcement of relevant Union legislation and policy. This includes **developing Lead Market Intiative**, supporting the relevant institutions, the cooperation between national authorities and with stakeholders, studies, the development and deployment of tools and infrastructures, including **regional and thematic public-public and public-private R&I partnerships,** IT and reserch infrastructure and tools.

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	HU (Comments): LMI is important to create favorable environment in key areas. Partnerships and bringing together MS and private sector funds on key specific areas are important to drive the sector and the regions lagging behind.
	LU (Drafting Suggestions): **(i) Supporting actions for the development, implementation, monitoring and enforcement of relevant Union legislation and policy. This includes supporting the relevant institutions, the cooperation between national authorities and with stakeholders, studies, the development and deployment of tools and infrastructures, including IT infrastructure and tools.** **(j) supporting the work of non-governmental organisations and civil-society actors that deliver health promotion, disease prevention and community-based care, ensuring that EU-level support reaches frontline implementers.** **(k) building sustainable administrative and technical capacity in Member States to absorb Union health funding, to implement health-related reforms, to improve coordination, knowledge transfer and uptake of EU health initiatives.** LU (Comments): Luxembourg recommends introducing a new point (i) to empower and assist national health reforms. The rationale is that many Member States must undertake significant health system improvements (in areas such as primary care strengthening, hospital modernisation, digital health, workforce capacity and public health infrastructure) to boost resilience and accessibility. A

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	dedicated Member-State Health Reform Support Mechanism under the ECF would provide targeted expertise, funding and incentives for these reforms. This mirrors successful approaches in other EU instruments (for example, the Technical Support Instrument and components of the Recovery and Resilience Facility) by offering structured support for reforms – but focused specifically on the health authorities needs and challenges. By explicitly listing support for health reforms as an ECF activity, the Fund would not only invest in innovation and products, but also address underlying health system weaknesses. This holistic approach is critical to ensure that innovations and investments translate into better health outcomes on the ground. Luxembourg's proposal thus fills a policy gap: it links financial support with health policy reforms, helping Member States build more effective and crisis-ready health systems. This initiative would strengthen the European Health Union by fostering convergence towards high standards of quality, sustainability and preparedness in healthcare across all Member States. Support for NGOs: Non-governmental organisations play a unique role in delivering health promotion and prevention at grassroots level, reaching populations that national authorities may struggle to engage. EU support should explicitly include NGOs, ensuring that the Fund contributes to community-based prevention, awareness campaigns and early detection initiatives. Building sustainable capacity: Absorptive capacity is a recurring challenge in EU health funding. Luxembourg proposes that the ECF include explicit measures to strengthen Member States' ability to implement EU-funded health actions, for example by supporting training, staffing and project-management capacity. ES (Drafting Suggestions):

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	1bis. Support provided through the activities referred to in paragraph 1, may be provided in any form, including through collaborative research and innovation activities set out in Regulation (EU) [XXX] [Framework Programme for Research and Innovation] and identified in a separate Work Programme dedicated to collaborative research and innovation activities. ES (Comments): See explanations provided for Art. 33(2) above. PT (Drafting Suggestions): Add new point (i) after (h): **(i) Supporting cross-border cooperation between research entities, Member States' authorities, and private sector for tackling transboundary plant pests and diseases, animal diseases, and zoonoses.** PT (Comments): - Addresses the need for coordinated EU-wide response capacity in animal and plant health, as experienced during African Swine Fever, avian influenza, and Xylella outbreaks.
2. Work programmes adopted in accordance with the rules of this Regulation under this chapter shall integrate in a specific dedicated part and ensure coherence with [Competitiveness and Society activities supported under the Regulation (EU) [XXX] [Horizon Europe Framework programme for Research and Innovation	LT (Comments): We have some doubts concerning the foreseen merge of the Work Programmes of the ECF and Horizon Europe. We are worried that this can result in deterioration of the European science base as ECF work

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	Programmes are going to be demand driven and might lack focus on the lower TRLs. MT (Comments): Malta seeks clarification regarding the lack of complementary rules (like Art 34) for health, biotech, agriculture and bioeconomy. SE (Drafting Suggestions): 2. Work programmes adopted in accordance with the rules of this Regulation under this chapter shall ~~integrate in a specific dedicated part and~~ ensure coherence with [Competitiveness and Society activities supported under the Regulation (EU) [XXX] [Horizon Europe Framework programme for Research and Innovation SE (Comments): Could only agree to a text where the bottom-up collaborative research and innovation of the HE regulation is safeguarded to ensure efficient, effective and high quality research and innovation supporting activities referred to in paragraph 1. IE (Comments): IE welcome the intention to create a coherent ECF- Horizon Europe architecture that will enable a seamless investment journey for projects ES (Drafting Suggestions):

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Commission proposal	Drafting Suggestions and Comments
	2. Work programmes adopted in accordance with the rules of this Regulation under this chapter shall ~~integrate in a specific dedicated part and~~ ensure coherence with [Competitiveness and Society activities supported under the Regulation (EU) [XXX] [Horizon Europe Framework programme for Research and Innovation. ES (Comments): See explanations provided for Art. 33(2) above. EE (Comments): EE requests clarification on what "integrated work programmes with Horizon Europe" will mean in practice. Does this imply overlapping topics, shared governance structures or joint programming? Greater clarity is needed to ensure complementarity and avoid duplication. FR (Comments): Can the Commission clarify the interplay between FEC and HE? Several questions related to governance, eligibility, program adoption, etc., remain, despite the publication of the fiche n°5.
	DE (Drafting Suggestions): **3. Work programmes shall ensure coherence and complementarity with the Regulation (EU)[XXX] [Union Civil Protection Mechanism+]**

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Commission proposal	Drafting Suggestions and Comments
CHAPTER VI	NL (Comments): These reflect first views. We, later in the process, could share additional comments

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SUPPORT FOR DIGITAL LEADERSHIP	PL (Comments): In the area of digitalization, connectivity and infrastructure are highlighted, but there is a lack of emphasis on SME cybersecurity. It is proposed to add that the Fund should support the development of cybersecurity tools and services tailored to SME needs, including those available in a service model (Cybersecurity-as-a-Service). There is no explicit reference to cross-border digital projects for SMEs. It is proposed to add that the Fund should support the creation and implementation of cross-border digital projects for SMEs, promoting the integration of the Digital Single Market and the scaling of innovation. DE (Comments): Digitalisation is one of the key prerequisites for strengthening the EU's competitiveness. We therefore welcome the focus on this issue in the ECF. Overdependence on third countries and actors is detrimental to our resilience and prosperity and should be avoided and reduced. For technologies in the build-up phase such as AI, overdepedence should be avoided from the start. We need to ensure that funds are spent in a targeted, efficient and effective manner on actual key technologies that are crucial for the EU's global capacity to act. We therefore can only support the very broad scope of this chapter if there are clear overarching award criteria and targets for the work programmes. These must ensure that clear priorities are set on the areas which contribute most effectively to the Union's competitiveness as well as security and resilience.

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	Should it be the aim of this window to finance European Champions, committing extensive funds to single projects might lead to an undue risk concentration which should be avoided.
	FI (Comments): Further information is needed on how this proposal relates to the structure of the current DEP SO3, which has its own dedicated work programme for cyber security and is managed by the ECCC. Further information on the continuity of this structure is helpful. It is to be expected that other countries will also raise this issue. It is important to ensure that in ECF, cyber is primarily involved in this entity and in the defence sector only in the complementary technology field/enabler/dual-use items. As CEF Digital has been transferred to the Competitiveness Fund it is important to continue to ensure sufficient funding for communications network projects and, in particular, for supporting critical digital infrastructure, such as sea cables. The development of digital infrastructure linked to maritime transport, including ports, should be part of the fund. It is important that intelligent maritime transport management, the digitalisation of ports and, in general, the development and funding measures of digital connections (incl. 5G/6G, space) and technologies (AI, quantum) also cover the needs of maritime transport. A port strategy, maritime industry strategy and SCHOLARSHIP will be issued by the EU in 2026, and the resources related to their digital connections will be important.

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Article 38	
Specific provisions for support to digital leadership policy	FR (Comments): Can the Commission specify what flexibility will be available for this component in the event of a need arising during the programming period (e.g. semiconductors in the current programming period)?
1. Actions supported under this chapter shall contribute to the general objectives set out in Article 3(1) and the specific objectives set out in Article 3(2), point (c).	PL (Drafting Suggestions): Specific provisions for support to digital leadership policy: 1. Actions under this Chapter shall contribute to the general objectives in Article 3(1) and to the specific objective in Article 3(2)(c) by advancing EU digital leadership through AI, data spaces, cybersecurity, cloud services, HPC, connectivity, digital skills, public service digitalisation and SME digital uptake; PL (Comments): Specifies the digital leadership remit with concrete technology and skills priorities to drive EU competitiveness and sovereignty; fosters SME digital adoption, cross-border interoperability and public sector modernisation; aligns budget sources and unlocks targeted instruments like digital innovation hubs and PPPs for maximum policy impact.

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Commission proposal	Drafting Suggestions and Comments
2. Support for actions under this chapter shall be financed from the budget set out in Article 4(2), point (d), and any additional contributions assigned in accordance with Article 5.	PL (Drafting Suggestions): 2. Support shall be financed from the budget appropriations in Article 4(2)(d) and any additional contributions under Article 5, including instruments for digital innovation hubs and public-private partnerships. PL (Comments): Specifies the digital leadership remit with concrete technology and skills priorities to drive EU competitiveness and sovereignty; fosters SME digital adoption, cross-border interoperability and public sector modernisation; aligns budget sources and unlocks targeted instruments like digital innovation hubs and PPPs for maximum policy impact. RO (Comments): In this case, the link is more precisely defined compared with Articles 32(2) and 36(2). It is important to clarify the reason for this distinction with regard to the reference provided for the budget ceiling. FR (Comments): Can the Commission clarify the budget nomenclature envisaged for this section ? Will there be a budget line for each type of activity listed in this article?

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Article 39	PL (Comments): We propose that in the area of DIGITAL LEADERSHIP (Art. 39), support for the construction and modernization of terrestrial telecommunications networks, including backbone terrestrial networks, be explicitly mentioned. We note that the ECF currently refers only to non-terrestrial networks and submarine cables. Such a formulation overlooks the needs of countries like Poland, where the main transmission routes run over land. Support for submarine cables in the case of Poland may have limited utility. We emphasize the need for a clear statement that the ECF will support digital communication infrastructure without favoring specific technologies. We consider that, following the removal of the digital component from the CEF, the area of digital connectivity is insufficiently represented in the ECF, despite being crucial for the functioning of the digital economy and for achieving the objectives of the ECF. Without resilient, high-capacity, and needs-adapted telecommunications connectivity, it is impossible to meet basic societal needs or ensure the efficient operation of Member States. In light of current challenges and threats, we consider support for private investments in this area essential. We propose including support for investments in the resilience of telecommunications infrastructure. In particular, this refers to the construction of alternative routes to existing backbone networks (important in the event of terrorist attacks or natural disasters) and the provision of modern, low-emission power sources for base stations, including emergency power supply in case of prolonged electricity outages. We note that the area of cybersecurity has not been treated with due attention. It is merely mentioned, without concrete instruments to strengthen the resilience of public and private entities against cybercrime. We propose explicit support for cybersecurity in the ECF and the introduction of dedicated

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	instruments – analogous to the Digital Europe Programme, where this area had a separate work programme. We also consider that support should cover not only public administration but also private enterprises, which are most often the targets of attacks.
Specific activities to support digital leadership policy	DE (Comments): ECF should be closely aligned with European Chips Act (ECA), in particular when it comes to the financing of semiconductor capacity. A direct mentioning of ECA would be helpful. Duplications between ECA and ECF should be avoided. In addition, we would like to know if COM intends to continue funding for digital infrastructure from CEF Digital in the ECF.
1. Support for digital leadership shall address, in a comprehensive and coherent manner, the entire scope of the digital sector, such as Artificial Intelligence, (including AI Factories and Gigafactories), high performance computing, quantum technologies, semiconductors and photonics, robotics, large data technologies, telco-edge and cloud technologies, 6G and other wireless technologies, communication networks, advanced connectivity, including 6G and other wireless technologies, sensing technologies, cybersecurity and network resilience, software engineering, augmented reality and virtual worlds, digital twins, Union digital identity and business wallets, trust technologies, new and emerging digital technologies as well as cross-sectoral digital technologies and applications, including those with dual-use potential, support for data technologies and data spaces.	AT (Drafting Suggestions): ~~6G and other wireless technologies,~~ communication networks, advanced connectivity, including 6G and other wireless technologies,... ... support for data technologies and data spaces. **Particular emphasis shall be placed on the Union's key technology priorities, namely Artificial Intelligence (AI), Chips and Semiconductors, Advanced Manufacturing (including Automation and Robotics), Quantum Technologies (including Photonics), and Advanced Materials and their implementation for the triple transition.** AT (Comments):

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	AT comment: 6G is stated two times! BE (Drafting Suggestions): Support for digital leadership shall address, in a comprehensive and coherent manner, the entire scope of the digital sector, such as Artificial Intelligence, (including AI Factories and Gigafactories), high performance computing, quantum technologies, semiconductors and photonics, robotics, ~~large~~ **big** data technologies, telco-edge and cloud technologies, 6G and other wireless technologies, communication networks, advanced connectivity, including 6G and other wireless technologies, sensing technologies, cybersecurity and network resilience, software engineering, augmented reality and virtual worlds, digital twins, ~~Union digital identity~~ **European Digital Identity** and business wallets, trust technologies, new and emerging digital technologies as well as cross-sectoral digital technologies and applications, including those with dual-use potential, support for data technologies and data spaces. BE (Comments): Study Technopolis BG (Drafting Suggestions): Add important subsectors such as: Cloud services technologies, AI and Cloud & Data analytics BG (Comments): Bulgaria considers it important to ensure sustainable and secure access to modern telecommunications infrastructures, including satellite systems, the deployment of 5G/6G networks, etc. This should contribute to achieving the

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	goals of the Digital Decade 2030, strengthening the EU's technological sovereignty and enhancing competitiveness. CZ (Drafting Suggestions): 1. Support for digital leadership shall address, in a comprehensive and coherent manner, the entire scope of the digital sector, such as Artificial Intelligence, (including AI Factories and Gigafactories), high performance computing, quantum technologies, semiconductors and photonics, robotics, large data technologies, telco-edge and cloud technologies, **distributed ledger technology**, 6G and other wireless technologies, communication networks, advanced connectivity, including 6G and other wireless technologies, sensing technologies, cybersecurity and network resilience, software engineering, augmented reality and virtual worlds, digital twins, Union digital identity and business wallets, trust technologies, new and emerging digital technologies as well as cross-sectoral digital technologies and applications, including those with dual-use potential, support for data technologies and data spaces. CZ (Comments): CZ considers that DLT (including blockchain) technologies should be explicitly listed among the supported technologies. We believe that these technologies have also been taken into consideration by the Commission, and for the sake of clarity, we advocate for their explicit mention within the scope of supported digital solutions. LT (Drafting Suggestions): Support for digital leadership shall address, in a comprehensive and coherent manner, the entire scope of the digital sector**, in particular the development**

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	of a secure, reliable and resilient Trans-European Digital networks, ~~such~~ **as well as** Artificial Intelligence, (including AI Factories and Gigafactories), high performance computing, quantum technologies, semiconductors and photonics, robotics, large data technologies, telco-edge and cloud technologies, 6G and other wireless technologies, communication networks, advanced connectivity, including 6G and other wireless technologies, sensing technologies, **radio spectrum monitoring infrustructure and technologies or spectrum efficiency measures,** cybersecurity and network resilience, software engineering, augmented reality and virtual worlds, digital twins, Union digital identity and business wallets, trust technologies, new and emerging digital technologies as well as cross-sectoral digital technologies and applications, including those with dual-use potential, support for data technologies and data spaces. LT (Comments): The Treaty on the Functioning of the European Union Art 170 para 1 states that "To help achieve the objectives referred to in Articles 26 and 174 and to enable citizens of the Union, economic operators and regional and local communities to derive full benefit from the setting-up of an area without internal frontiers, the Union shall contribute to the establishment and development of trans-European networks in the areas of transport, telecommunications and energy infrastructures." ECF recital 20 reflects Art 170 of the Treaty, mentioned above, but ECF Art 39 para 1 doesn't. Therefore, we think that digital leadership policy window shoud be policy based, adding Trans-European digital networks approach. We think this would help to prioritize investments, give a clear message to the private sector and at the same time will consolidate common efforts to invest in achieving the EU digital sector to become a digital ecosystem - secure, reliable and resilient. Such an approach could contribute to increasing overall competitiveness.

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	We propose adding "radio spectrum monitoring infrustructure and technologies or spectrum efficiency measures", as jamming and spooofing are threats that we need to combat, or digital tools to ensuring efficient usage of spectrum, which could also contribute to increasing competitiviness. LV (Drafting Suggestions): Sandboxes, inlcuding multicountry LV (Comments): Please add in the text. MT (Drafting Suggestions): 1. Support for digital leadership shall address, in a comprehensive and coherent manner, the entire scope of the digital sector, such as Artificial Intelligence, (including AI Factories and Gigafactories), high performance computing, quantum technologies, semiconductors and photonics, robotics, large data technologies, telco-edge and cloud technologies, 6G and other wireless technologies, communication networks, advanced connectivity, including 6G and other wireless technologies, sensing technologies, cybersecurity and network resilience, software engineering, augmented reality and virtual worlds, digital twins, Union digital identity and business wallets, trust technologies, new and emerging digital technologies as well as cross-sectoral digital technologies and applications, including those with dual-use potential, support for data technologies and data spaces. **For this purpose, secure-by-design requirements shall be promoted in the development of next-generation standards, including 6G and cloud-edge systems, while recognising the potential civil and defence dimensions of certain emerging technologies.**

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	MT (Comments): The proposed text ensures explicit recognition of dual-use implications and promotes secure-by-design principles in standards development. NL (Drafting Suggestions): Support for digital leadership shall address, in a comprehensive and coherent manner, the entire scope of the digital sector, **primarily focused on** ~~such as~~ Artificial Intelligence, (~~including~~ AI ~~Factories and Gigafactories~~), ~~high performance computing,~~ quantum technologies, semiconductors ~~and photonics, robotics, large data technologies, telco edge and~~ cloud technologies, ~~6G and other wireless technologies, communication~~ network **technologiess**, ~~advanced connectivity,~~ including 6G ~~and other wireless technologies,~~ ~~sensing technologies,~~ cybersecurity ~~and network resilience, software engineering~~, ~~augmented reality and virtual worlds, digital twins, Union digital identity and business wallets, trust technologies,~~ **and** new and emerging digital technologies **of the future** as well as cross-sectoral digital technologies and applications, including those with dual-use potential~~,~~ ~~support for data technologies and data spaces~~. NL (Comments): In order to achieve digital leadership, we need to focus the resources for the digital chapter on a limited set of key technologies. The past 2 decades have taught the EU that a broad investment strategy does not create leadership and even achieves the contrary. The current proposal with a borad scope containing more or less 20 technologies will, in our view, not create the needed shift and acceleration needed to stimulate our productivity growth and keep up with the U.S. and China.

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	NL suggests to focus the scope of the digital leadership chapter on six groups of technologies to achieve genuine impact at EU level and avoid fragmentation. While at the same time leaving ample room to respond to new developments with regards to digital technologies during the span of the new MFF. PL (Drafting Suggestions): **Article 39 – Specific activities to support digital leadership policy**1. Support under this Chapter shall address the full spectrum of digital technologies — including AI (AI Factories and Gigafactories), high-performance computing, quantum, semiconductors, photonics, robotics, large-scale data technologies, telco-edge-cloud and 6G, advanced connectivity, sensing, cybersecurity, software engineering, augmented/virtual reality, digital twins, Union digital identity and business wallets, trust technologies, and emerging cross-sectoral and dual-use applications. PL (Comments): Structures the myriad of digital activities into five coherent clusters for clarity and strategic focus. • Unifies the entire digital technology spectrum to guide implementers and avoid gaps. • Emphasises EU leadership, sovereignty and resilience by linking core R&I with ecosystem building. • Ensures scalable deployment of critical infrastructures and services, aligned with national and multi-country initiatives.

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	• Embeds governance support and cybersecurity as integral pillars, reinforcing policy coherence. , • Mandates alignment with Horizon Europe synergies, maximizing cross-programme complementarities and domestic market creation. SE (Drafting Suggestions): 1. Support for digital leadership shall address, in a comprehensive and coherent manner, the entire scope of the digital sector. **The digital sector include, but is not limited to**, ~~such as~~ Artificial Intelligence, (including AI Factories and Gigafactories), high performance computing, quantum technologies, semiconductors, **including wide bandgap,** ~~and~~ photonics, robotics, large data technologies, telco-edge and cloud technologies, 6G and other wireless technologies, **internet-of-things,** communication networks, **guidance and navigation technologies,** advanced connectivity, ~~including 6G and other wireless technologies~~, sensing technologies, cybersecurity and network resilience, software engineering, augmented reality and virtual worlds, digital twins, Union digital identity and business wallets, trust technologies, new and emerging digital technologies as well as cross-sectoral digital technologies and applications, including those with dual-use potential, support for data technologies and data spaces. SE (Comments): Removal of 6G-reference because of repeat of text. Important to keep "cybersecurity" here, as we want cybersecurity projects to be funded as part of the digital package. At the same time, digital technology including cyber security efforts should be a part of all four policy windows. How will these actions be interlinked with other policy windows?

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	SI (Drafting Suggestions): 1. Support for digital leadership shall address, in a comprehensive and coherent manner, the entire scope of the digital sector, such as Artificial Intelligence, (~~including AI Factories and Gigafactories~~), high performance computing, quantum technologies, semiconductors, ~~and~~ photonics, robotics, ~~large~~ **(support for)** data technologies **and data spaces**, telco-edge and cloud technologies, 6G and other wireless technologies, communication networks, advanced connectivity, including 6G and other wireless technologies, sensing technologies, cybersecurity and network resilience, software engineering, augmented reality and virtual worlds, digital twins, Union digital identity and business wallets, trust technologies, new and emerging digital technologies as well as cross-sectoral digital technologies and applications, including those with dual-use potential, ~~support for data technologies and data spaces.~~ SI (Comments): We do not see a reason to list specific topics within certain areas. Either we begin listing all topics in AI or just list the digital areas that will be covered. We would recommend a wider approach at the regulation level, and leave specifities (data vs. large data technologies) to the call topics. DE (Comments): “6G and other wireless technologies” is mentioned twice, one mention could be deleted. We would also be interested to know if aspects closely related to digital infrastructure, such as repair ships for submarine data cables, are included.

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	IE (Drafting Suggestions): Support for digital leadership shall address, in a comprehensive and coherent manner, the entire scope of the digital sector, such as Artificial Intelligence, (including AI Factories and Gigafactories), high performance computing, quantum technologies, semiconductors and photonics, robotics, large data technologies, telco edge and cloud technologies, ~~**6G and other wireless technologies**~~**,** communication networks, advanced connectivity, including 6G and other wireless technologies, **advanced connectivity infrastructures including submarine cables and non-terrestrial networks,** sensing technologies, cybersecurity and network resilience, software engineering, augmented reality and virtual worlds, digital twins, Union digital identity and business wallets, trust technologies, new and emerging digital technologies as well as cross-sectoral digital technologies and applications, including those with dual-use potential, support for data technologies and data spaces. IE (Comments): IE would appreciate the removal of the duplicate reference to '6G and other wireless technologies and for the inclusion of 'advanced connectivity infrastructures including submarine cables and non-terrestrial networks'Suggest text edit IE support Initiatives such as the digital identity wallet and business wallet, which form part of the digital pillar of the Single Market Strategy, as are broader enablers such as digital capacity building within EU public administrations FI

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	(Drafting Suggestions): Support for digital leadership shall address, in a comprehensive and coherent manner, the entire scope of the digital sector, such as Artificial Intelligence, (including AI Factories and Gigafactories), high performance computing, quantum **computing and** technologies, semiconductors and photonics, **including chip design and advanced materials and process technologies** robotics, large data technologies, telco-edge and cloud technologies, communication networks, advanced connectivity, including 6G and other wireless technologies, sensing technologies, cybersecurity and network resilience, software engineering, augmented reality and virtual worlds, digital twins, Union digital identity and business wallets, trust technologies, new and emerging digital technologies as well as cross-sectoral digital technologies and applications, including those with dual-use potential, support for data technologies and data spaces. IT (Comments): In pursuing technological sovereignty, the EU's objective should be strengthen Europe's technological capabilities, reduce critical dependencies, and promote strategic autonomy, while fostering innovation, competitiveness and resilience across Member States. FR (Drafting Suggestions): 1. Support for digital leadership shall address, in a comprehensive and coherent manner, the entire scope of the digital sector, such as Artificial Intelligence, (including AI Factories and Gigafactories, **sustainable AI**), high performance computing, quantum technologies, semiconductors and photonics, robotics, large data technologies, telco-edge and cloud technologies, 6G and other wireless technologies, communication networks, advanced connectivity~~, including 6G and other wireless technologies~~,

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Commission proposal	Drafting Suggestions and Comments
	sensing technologies, cybersecurity **including protection of sensitive European data against the application of third countries' extraterritorial laws** network resilience, software engineering, augmented reality and virtual worlds, digital twins, Union digital identity and business wallets, trust technologies, new and emerging digital technologies as well as cross-sectoral digital technologies and applications, including those with dual-use potential, support for data technologies and data spaces. FR (Comments): Support for aligning AI development with global sustainability goals and fostering responsible AI that supports the environmental policies. PT (Drafting Suggestions): 1. Support for digital leadership shall address, in a comprehensive and coherent manner, the entire scope of the digital sector, such as Artificial Intelligence, (including AI Factories and Gigafactories), high performance computing, quantum technologies, semiconductors and photonics, robotics, large data technologies, telco-edge and cloud technologies, 6G and other wireless technologies, communication networks, advanced connectivity, including 6G and other wireless technologies, sensing technologies, cybersecurity and network resilience, software engineering, augmented reality and virtual worlds, digital twins, Union digital identity and business wallets, trust technologies, new and emerging digital technologies as well as cross-sectoral digital technologies and applications, including those with dual-use potential, support for data technologies, **digital twins** and data spaces, **data centers, submarine cables and other physical infrastructures enabling cloud and high-performance computing. Sector sector-specific**

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Commission proposal	Drafting Suggestions and Comments
	applications, such as digital health, biotech and agritech, tourism technologies or smart manufacturing, among others. PT (Comments): - Data centers and submarine cables, due to their critical relevance, should be explicitly referenced as part of the digital scope in this number.
2. Support for digital leadership shall be implemented in particular through the following activities:	LV (Drafting Suggestions): 2. Support for digital leadership shall be implemented in particular through **at least one of** the following activities: LV (Comments): Please clarify whether all of the activities mentioned in Article 39, Paragraph 2 will have to be applied in a specific project or will it be possible to implement at least one of them?
(a) Achieving leadership in digital and AI technologies through research and innovation, applied research, technology transfer, industrial deployment, and market uptake. The implementation shall include, but not be limited to, developing and shaping sustainable core digital technologies that reflect Union values, safeguard the Union's security and foster its competitiveness globally.	AT (Drafting Suggestions): .... and innovation, applied **and collaborative** research .... NL (Drafting Suggestions):

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Commission proposal	Drafting Suggestions and Comments
	(a) Achieving leadership in **the** digital ~~and AI~~ technologies **set out in article 39(1)** through research and innovation, applied research, technology transfer, industrial deployment, and market uptake. The implementation shall include, but not be limited to, developing and shaping sustainable core digital technologies that reflect Union values, safeguard the Union's security and foster its competitiveness globally. PL (Comments): Achieving leadership in digital and AI technologies through research and innovation" – these activities are a part of the HE Programme, we should avoid overlapping the same themes by different EU instruments to ensure clarity and proper planning. SE (Drafting Suggestions): (a) Achieving leadership in digital and AI technologies through research and innovation, applied research, technology transfer, industrial deployment, and market uptake, **including to small and medium-sized companies**. The implementation shall include, but not be limited to, developing and shaping sustainable core digital technologies that reflect Union values, safeguard the Union's security, **open strategic autonomy** and foster its competitiveness globally. SE (Comments): SMEs are added to highlight their role when it comes to wide spread market uptake.

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	What is the difference between digital and AI technologies? Are AI technologies not a digital technology? If not, should that be better reflected in paragraph 1? Of course AI is worth mentioning but it creates an uncertainty. What are core digital technologies that reflect Union values? Is this a reference to AI and the AI-act? Or GDPR and data transfers in developing and using technology? SI (Drafting Suggestions): (a) Achieving leadership in digital ~~and AI~~ technologies through research and innovation, applied research, technology transfer, industrial deployment, and market uptake. The implementation shall include, but not be limited to, developing and shaping sustainable core digital technologies **that respect the highest ethical standards,** reflect Union values, safeguard the Union's security and foster its competitiveness globally. SI (Comments): AI is a digital technology. IE (Comments): IE welcome achieving leadership in digital and AI through research and Innovation FI (Drafting Suggestions): (a) Achieving leadership in digital and AI technologies through **world-class** research and innovation, applied research, technology transfer, industrial deployment, and market uptake. The implementation shall include, but not be limited to, developing and shaping sustainable core digital

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	technologies that reflect Union values, safeguard the Union's security and foster its competitiveness globally. FI (Comments): Rapid commercialisation is important as well as company-led innovation ecosystems built around EU Tech frontrunners. FR (Comments): How does the Commission intend to respond to the sovereignty issues raised by the planned activities, which may directly affect the security of the Union? How will these activities be coordinated with those of the security component of the ECF?
	FR (Comments): Some additions could be considered to better define the goals of the Union's supporting action in AI under the ECF, which should be driven by a market-ready approach. The strategic impulse of the programming of such actions should leverage the transversal governance bodies of the ECF, to be defined, which mobilize the Member States for example, via the AI Board.
(b) Achieving technological sovereignty by building resilient digital ecosystems, including advanced digital skills, and ensuring a high-level of cybersecurity in the Union. The implementation shall include, but not be limited to, creating an attractive ecosystem for disruptive innovative companies, SMEs, start-ups and scale-ups, as well as emerging industry leaders in the digital sector to remain, grow and thrive within the Union,	LT (Drafting Suggestions): Achieving technological sovereignty by building resilient digital ecosystems, including advanced digital skills, and ensuring a high-level of cybersecurity in the Union. The implementation shall include, but not be limited to, creating an attractive ecosystem for disruptive innovative companies, SMEs, start-ups and

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supporting them in scaling up, expanding their markets, including through procurement, and contributing to the Union's digital sovereignty, with a focus on addressing the complexity of the technological value chains, standardisation, the security of supply of advanced digital technologies, infrastructures, and services, needed capacities, including manufacturing, production capacity, and advanced digital skills both in the private and public sectors.	scale-ups, as well as emerging industry leaders in the digital sector to remain, grow and thrive within the Union, supporting them in scaling up, expanding their markets, including through procurement, and contributing to the Union's digital sovereignty, with a focus on addressing the complexity of the technological value chains, standardisation, the security of supply of advanced digital technologies, infrastructures, and services, needed capacities, including manufacturing, production capacity, and advanced digital skills both in the private and public sectors**; furthermore, this should include the support of innovative mechanisms and pilot measures designed to foster upskilling and reskilling in digital leadership, facilitation of talent attraction to alleviate skills shortages, the development of curricula as well as the adjustment of skills to the evolving requirements of the labour market**. LT (Comments): Taking into account Article 21 of the Preamble, we propose to add that the ECF should also include support for innovative mechanisms and pilot measures for upskilling and reskilling, development of curricula, attraction of foreign talent and matching of skills with the labour market. LV (Drafting Suggestions): (b) Achieving technological sovereignty by building resilient digital ecosystems, including advanced digital skills, and ensuring a high-level of cybersecurity in the Union. The implementation shall include, but not be limited to, creating an attractive ecosystem for ~~disruptive innovative~~ companies, ~~SMEs, start-ups and scale-ups~~, as well as emerging industry leaders in the digital sector to remain, grow and thrive within the Union, supporting them in scaling up, expanding their markets, including through procurement, and contributing to the Union's digital sovereignty, with a focus on addressing the complexity of the technological value chains,

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	standardisation, the security of supply of advanced digital technologies, infrastructures, and services, needed capacities, including manufacturing, production capacity, and advanced digital skills both in the private and public sectors. LV (Comments): In order not to create the impression that the ECF does not support large businesses and small and mid-cap companies, the request to supplement Article 39, paragraph 2 (b), clearly stipulating that companies are supported regardless of size. However, if Article 39, paragraph 2 (b) is understood as specific support only for "SMEs, start-ups, scale-ups and innovators". MT (Drafting Suggestions): (b) Achieving technological sovereignty by building resilient digital ecosystems, including advanced digital skills, and ensuring a high-level of cybersecurity in the Union. The implementation shall include, but not be limited to, creating an attractive ecosystem for disruptive innovative companies, SMEs, start-ups and scale-ups, as well as emerging industry leaders in the digital sector to remain, grow and thrive within the Union, supporting them in scaling up, expanding their markets, including through procurement, and contributing to the Union's digital sovereignty, with a focus on addressing the complexity of the technological value chains, standardisation, the security of supply of advanced digital technologies, infrastructures, and services, needed capacities, including manufacturing, production capacity, and advanced digital skills both in the private and public sectors. **In particular, support shall be provided for European manufacturing capacity in critical submarine and photonics components, for ensuring SMEs and start-ups have effective access to funding alongside larger consortia, and for embedding specialised skills**

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	programmes in submarine cable engineering, quantum networking and cyber incident response. MT (Comments): The proposed text strengthens technological sovereignty, reduces dependencies, and addresses skills gaps vital for a small country like Malta and as well as Europe. NL (Drafting Suggestions): (b) Achieving technological sovereignty by **reducing and preventing high risk strategic dependencies,** building resilient digital ecosystems, including advanced digital skills, ~~and~~ ensuring **the right conditions such as** a high-level of cybersecurity in the Union and **and entering into international partnerships** . The implementation shall include, but not be limited to, creating an attractive ecosystem for disruptive innovative companies, SMEs, start-ups and scale-ups, **private investors** as well as emerging industry leaders in the digital sector to remain, grow and thrive within the Union, supporting them in scaling up, expanding their markets **and coverage**, including through procurement, and contributing to the Union's digital sovereignty, with a focus on addressing the complexity of the technological value chains, **cybersecurity-by-design as a default industry principle,** standardisation, the security of supply of advanced digital technologies, infrastructures **(including submarine cables)** , and services, needed capacities, including manufacturing, production capacity, and advanced digital skills both in the private and public sectors **as well as increasing cooperation between business, investors, researchers and governments, but also between civil and military sectors.** NL

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	(Comments): Tech sovereignty means we need to mitigate dependencies and at the same time stimulate more investment and also strengthen international partnerships. High level security policy in general is needed als a condition for tech sovereignty, of which cybersecurity is one. NL views it's important to mention private investors when ecosystems are concerned, as it will be crucial to have their support. NL views that cybersecurity-by-design is a leading principle for the digital sector cooperation between business, investors, researchers and governments, but also between civil and military sectors. Explicit mentioning of submarine cables may help with making clear that this is also part of digital infrastructure.

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Commission proposal	Drafting Suggestions and Comments
	PL (Drafting Suggestions): b) securing technological sovereignty by building resilient digital ecosystems, advanced skills, secure supply chains, standardisation, manufacturing capacity and cybersecurity; (a) Achieving technological sovereignty by building resilient digital ecosystems, including advanced digital skills, and ensuring a high-level of cybersecurity in the Union. The implementation shall include, but not be limited to, creating an attractive ecosystem for disruptive innovative companies, SMEs, start-ups and scale-ups, as well as emerging industry leaders in the digital sector to remain, grow and thrive within the Union, supporting them in scaling up, expanding their markets, including through procurement, and contributing to the Union's digital sovereignty, with a focus on addressing the complexity of the technological value chains, standardisation, the security of supply of ~~**advanced**~~ any digital technologies, infrastructures, and services, needed capacities, including **advanced materials**, manufacturing, production capacity, and **as** advanced **as possible** digital skills both in the private and public sectors. PL (Comments): Defining technological sovereignty Technological sovereignty means ensuring the EU can design, produce and secure its own critical digital assets without undue reliance on external actors.

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	It is equally essential to invest in the use of digital technologies, at all levels of advancement, by both businesses and citizens. The competitiveness of the Union's economy depends also on the adoption of digital technology at all levels within enterprises, which accelerates and enhances their productivity. Advanced materals for digital technologies are essential for development of new electronic devices and components. The support should cover the entire value chain. SE (Drafting Suggestions): Achieving technological sovereignty by building resilient digital ecosystems, including advanced digital skills, and ensuring a high-level of cybersecurity in the Union. The implementation shall include, but not be limited to, creating an attractive ecosystem for disruptive innovative companies, SMEs, start-ups and scale-ups, as well as emerging industry leaders in the digital sector to remain, grow and thrive within the Union, supporting them in scaling up **and commercialisation** ~~expanding their markets, including through procurement, and~~ contributing to the Union's digital sovereignty, with a focus on addressing the complexity of the technological value chains, standardisation, the security of supply of advanced digital technologies, infrastructures, and services, ~~needed capacities, including manufacturing, production capacity~~, and advanced digital skills both in the private and public sectors. SE (Comments): What is meant by attractive ecosystem(s)?

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	SI (Drafting Suggestions): (b) Achieving technological sovereignty by **actively engaging in global stnadrad-setting (standardisation)**, building resilient digital ecosystems, including advanced digital skills, and ensuring a high-level of cybersecurity in the Union. The implementation shall include, but not be limited to, creating an attractive ecosystem for disruptive innovative companies, SMEs, start-ups and scale-ups, as well as emerging industry leaders in the digital sector to remain, grow and thrive within the Union, supporting them in scaling up, expanding their markets, including through procurement, and contributing to the Union's digital sovereignty, with a focus on addressing the complexity of the technological value chains, standardisation, the security of supply of advanced digital technologies, infrastructures, and services, needed capacities, including manufacturing, production capacity, and advanced digital skills both in the private and public sectors. DE (Comments): "advanced digital skills" is mentioned twice, one mention could be deleted. IE (Comments): IE welcomes creating an attractive ecosystem for disruptive innovative companies / SMEs / start-ups / scale-ups / industry leaders is welcome – though would appreciate additional details on what form this ambition would take. IE notes the approach should be aimed at a prioritised set of key technologies that have the most impact on the EU's competitiveness and security, building towards technological leadership on select key technologies by 2035. Key

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	digital technologies such as AI, semiconductors and quantum technology should be included in this strategic approach, while also acknowledging the importance of fundamental enablers in the digital domain, such as networking technologies, cloud technology, cybersecurity and the availability of data. These technologies do not stand alone, but are inextricably linked, which requires stimulating synergies. FI (Drafting Suggestions): (b) Achieving technological sovereignty by building **competitive and** resilient digital ecosystems, including advanced digital skills, and ensuring a high-level of cybersecurity in the Union. The implementation shall include, but not be limited to, creating an attractive ecosystem for disruptive innovative companies, SMEs, start-ups and scale-ups, as well as emerging industry leaders in the digital sector to remain, grow and thrive within the Union, supporting them in scaling up, expanding their markets, including through procurement**, access to capital, harmonised Digital Single Market and simplified regulation** and contributing to the Union's digital sovereignty, with a focus on addressing the complexity of the technological value chains, standardisation, the security of supply of advanced digital technologies **and advanced sustainable infrastructures**, and services, needed capacities, including manufacturing, production capacity, and advanced digital skills both in the private and public sectors. IT (Drafting Suggestions): Achieving technological sovereignty by building resilient digital ecosystems, including advanced digital skills, and ensuring a high-level of cybersecurity in the Union**, while also fostering the protection of intellectual capital and**

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	attracting global talent seeking a stable and value-driven regulatory environment. The implementation shall include, but not be limited to, creating an attractive ecosystem for disruptive innovative companies, SMEs, start-ups and scale-ups, as well as emerging industry leaders in the digital sector to remain, grow and thrive within the Union, supporting them in scaling up, expanding their markets, including through procurement, and contributing to the Union's digital sovereignty, with a focus on addressing the complexity of the technological value chains, standardisation, the security of supply of advanced digital technologies, infrastructures, and services, needed capacities, including manufacturing, production capacity, and advanced digital skills both in the private and public sectors. IT (Comments): The objective of digital sovereignty should be reinforced by protecting intellectual capital and strenghtening talent - attraction policies. ES (Drafting Suggestions): (b) Achieving technological sovereignty by building resilient digital ecosystems, including advanced digital skills, and ensuring a high-level of cybersecurity in the Union. The implementation shall include, but not be limited to, creating an attractive ecosystem for disruptive innovative companies, SMEs, start-ups and scale-ups, as well as emerging industry leaders in the digital sector to remain, grow and thrive within the Union, supporting them in scaling up, expanding their markets, including through procurement, and contributing to the Union's digital sovereignty, with a focus on addressing the complexity of the technological value chains, standardisation, the security of supply of advanced digital technologies, infrastructures, and services, needed capacities, including manufacturing,

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	production capacity, **supply chain analytics** and advanced digital skills both in the private and public sectors. ES (Comments): Introduces synergy with advanced data analysis platforms for resilience. FR (Drafting Suggestions): Achieving technological sovereignty by building resilient digital technological ecosystems **(software and hardware)**, including advanced digital skills, and ensuring a high-level of cybersecurity in the Union. The implementation shall include, but not be limited to, creating an attractive ecosystem for disruptive innovative companies, SMEs, start-ups and scale-ups, as well as emerging industry leaders in the digital sector to remain, grow and thrive within the Union, supporting them in scaling up, expanding their markets, including through procurement, and contributing to the Union's digital sovereignty, with a focus on **ensuring a high level of protection for sensitive European data against the application of extraterritorial laws adopted by third countries outside the European Union, and** addressing the complexity of the technological value chains, standardisation, the security of supply of advanced digital technologies, infrastructures, and services, needed capacities, including manufacturing, production capacity, and advanced digital skills both in the private and public sectors. FR (Comments): Can the Commission specify how European preference will be guaranteed, particularly for the digital services and infrastructure activities mentioned,

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	given the importance of sovereignty in these areas? How will these activities be addressed within the ECF, particularly with regard to resilience? It is also necessary to bear in mind the importance of non-digital equipement in the context of discussions on the future of networks. Would it be possible to define more precisely the scope of submarine cables? As digital infrastructure, they contribute to the EU's digital sovereignty and represent a significant power issue (standardization). This topic could be covered minimally in article 39 (2.b and 2.c). HU (Comments): We consider the inclusion of the reference to standardization in this subparagraph to be of particular importance and welcome that standardization appears as a general objective in Chapter 3. It is crucial to strengthen the EU's role in standardization when it comes to achieving technological sovereignty. PT (Comments): - Encourage standardisation/certification of critical equipment; SME helpdesk; link to public procurement. - The meaning of manufacturing, production capacity needs to be further explained in this context. Does it means to increase EU industrial manufacturing and production capacity?
(c) Enabling the power of digital for businesses and citizens by deploying state-of-the-art and sustainable digital applications, infrastructures and	AT

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services across the Union. The implementation shall include, but not be limited to, actions to research and innovate, develop, produce, manufacture, or deploy advanced digital infrastructures at scale across the Union (e.g. high-performance computing, telco-cloud-edge, AI Factories and Gigafactories, data and data spaces, testing and experimentation facilities, semiconductor, photonics and quantum chips pilot lines, quantum computing, communication and sensing infrastructures, cybersecurity hubs, the EU for Business Network, European Digital Innovation Hubs, advanced connectivity infrastructures including submarine cables and non-terrestrial networks), the EU Digital Identity Wallets and trust services as well as the European Business Wallets and services, secure and interoperable digital public infrastructure, to act as a key enabler of the digital transformation and in support of societal resilience and preparedness, bringing clear added-value to businesses, public services and citizens. Where relevant, these actions shall be coordinated with national investments and shall otherwise exploit untapped potential to create a domestic market for advanced digital technologies 'made in Europe'. Such actions may be provided under the framework of Multi-Country Projects established in accordance with Decision (EU) 2022/2481, including notably those implemented through the European Digital Infrastructure Consortia or Joint Undertakings.	(Comments): **AT** comment: The fit of co-funded instruments to the national/regional funding schemes shall be ensured by cocreational processes including the MS. CZ (Drafting Suggestions): (c) Enabling the power of digital for businesses and citizens by deploying state-of-the-art and sustainable digital applications, infrastructures and services across the Union. The implementation shall include, but not be limited to, actions to research and innovate, develop, produce, manufacture, or deploy advanced digital infrastructures at scale across the Union (e.g. high-performance computing, telco-cloud-edge, AI Factories and Gigafactories, data and data spaces, testing and experimentation facilities, semiconductor, photonics and quantum chips pilot lines, quantum computing, communication and sensing infrastructures, cybersecurity hubs, the EU for Business Network, European Digital Innovation Hubs, advanced connectivity infrastructures including submarine cables and non-terrestrial networks), the EU Digital Identity Wallets and trust services as well as the European Business Wallets and services, secure and interoperable digital public infrastructure, **digital applications in smart mobility, including intelligent and connected transport systems and mobility platforms,** to act as a key enabler of the digital transformation and in support of societal resilience and preparedness, bringing clear added-value to businesses, public services and citizens. Where relevant, these actions shall be coordinated with national investments and shall otherwise exploit untapped potential to create a domestic market for advanced digital technologies 'made in Europe'. Such actions may be provided under the framework of Multi-Country Projects established in accordance with Decision (EU) 2022/2481, including notably those implemented through the European Digital Infrastructure Consortia or Joint Undertakings.

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	CZ (Comments): CZ –The insertion of digital applications in smart mobility - including automated transport systems, intelligent traffic management, vehicle-to-infrastructure communication, and mobility-as-a-service platforms - aligns with the Union's goals under the *Sustainable and Smart Mobility Strategy* (COM(2020) 789 final; incl. digitalization of transport, improved traffic efficiency, reduced environmental impact). Adding to this, the inclusion of these applications under (c) may further foster cross-sectoral innovation and interoperability. HR (Drafting Suggestions): Enabling the power of digital for businesses and citizens by deploying state-of-the-art and sustainable digital applications, infrastructures and services across the Union. The implementation shall include, but not be limited to, actions to research and innovate, develop, produce, manufacture, or deploy advanced digital infrastructures at scale across the Union (e.g. high-performance computing, telco-cloud-edge, AI Factories and Gigafactories, data and data spaces, testing and experimentation facilities, semiconductor, photonics and quantum chips pilot lines, quantum computing, communication and sensing infrastructures, cybersecurity hubs, the EU for Business Network, European Digital Innovation Hubs, advanced connectivity infrastructures including submarine cables and non-terrestrial networks, **but also deployment and upgrading of digital infrastructure, including but not limited to backbone, backhaul and access networks**), the EU Digital Identity Wallets and trust services as well as the European Business Wallets and services, secure and interoperable digital public infrastructure, to act as a key enabler of the digital transformation and in support of societal resilience and preparedness, bringing clear added-value to businesses, public services and

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	citizens. Where relevant, these actions shall be coordinated with national investments and shall otherwise exploit untapped potential to create a domestic market for advanced digital technologies 'made in Europe'. Such actions may be provided under the framework of Multi-Country Projects established in accordance with Decision (EU) 2022/2481, including notably those implemented through the European Digital Infrastructure Consortia or Joint Undertakings. HR (Comments): We propose that ECF explicitly includes as eligible for support the backbone, backhaul and access networks. Such infrastructure is a strategic enabler of competitiveness, resilience, and EU digital sovereignty, essential for industry, research and innovation. Taking into account State of the Digital Decade 2025, where it is stated that accelerated action is needed to meet 2030 targets, this kind of support will primarily help reduce still significant rural-urban gap. Furthermore, it would also accelerate the copper network switch-off. LT (Comments): We would like to ask for explanation why Joint Undertakings are mentioned just under this policy window? Does it mean that other policy windows do not foresee support for Joint Undertakings? MT (Drafting Suggestions): (c) Enabling the power of digital for businesses and citizens by deploying state-of-the-art and sustainable digital applications, infrastructures and services across the Union. The implementation shall include, but not be limited to, actions to research and innovate, develop, produce, manufacture,

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	or deploy advanced digital infrastructures at scale across the Union (e.g. high-performance computing, telco-cloud-edge, AI Factories and Gigafactories, data and data spaces, testing and experimentation facilities, semiconductor, photonics and quantum chips pilot lines, quantum computing, communication and sensing infrastructures, cybersecurity hubs, the EU for Business Network, European Digital Innovation Hubs, advanced connectivity infrastructures including submarine cables and non-terrestrial networks), the EU Digital Identity Wallets and trust services as well as the European Business Wallets and services, secure and interoperable digital public infrastructure, to act as a key enabler of the digital transformation and in support of societal resilience and preparedness, bringing clear added-value to businesses, public services and citizens. **With regard to submarine cables, emphasis shall be placed on geographic redundancy and route diversity to avoid single points of failure, on ownership and governance safeguards to protect Union interests where non-Union entities are involved, and on the integration of submarine systems, including landing stations, within the scope of obligations under Directive (EU) 2022/2555 and Directive (EU) 2022/2557.** Where relevant, these actions shall be coordinated with national investments and shall otherwise exploit untapped potential to create a domestic market for advanced digital technologies 'made in Europe'. Such actions may be provided under the framework of Multi-Country Projects established in accordance with Decision (EU) 2022/2481, including notably those implemented through the European Digital Infrastructure Consortia or Joint Undertakings. MT (Comments): The proposed text is intended to highlight the fact that submarine cables are vital to Malta and EU resilience. Explicit reference hence ensures redundancy, safeguards, and regulatory integration.

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	Furthermore, Malta seeks clarification as to whether the text "Where relevant, these actions shall be coordinated with national investments" is referring to partnership-type of proposals. NL (Drafting Suggestions): (c) Enabling the power of digital for businesses and citizens by deploying state-of-the-art and sustainable digital applications, infrastructures and services across the Union. The implementation shall include, but not be limited to, actions to research and innovate, develop, produce, manufacture, or deploy advanced digital ~~infrastructures~~ **technologies** at scale across the Union ~~(e.g. high-performance computing, telco-cloud-edge, AI Factories and Gigafactories, data and data spaces, testing and experimentation facilities, semiconductor, photonics and quantum chips pilot lines, quantum computing, communication and sensing infrastructures, cybersecurity hubs, the EU for Business Network, European Digital Innovation Hubs, advanced connectivity infrastructures including submarine cables and non-terrestrial networks), the EU Digital Identity Wallets and trust services as well as the European Business Wallets and services, secure and interoperable digital public infrastructure, to act as a key enabler of the digital transformation and in support of societal resilience and preparedness, bringing clear added value to businesses, public services and citizens.~~ **Deployment of digital applications, infrastructures and services should be closely aligned with European research programmes (such as Horizon) to enhance and accelerate research objectives and stimulating valorization.** Where relevant, these actions shall be coordinated with national investments and shall otherwise exploit untapped potential to create a domestic market for advanced digital technologies 'made in Europe'. Such actions may be provided under the framework of Multi-Country Projects established in accordance with Decision (EU) 2022/2481, including notably those implemented through the European Digital Infrastructure Consortia or Joint Undertakings.

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	NL (Comments): NL suggests to remove the list of technologies in this provision, to enhance clarity and ensure that there is not more than one article stating the scope of the digital chapter of the ECF, which in our view should be article 38(1). Suggestion to avoid duplication with other articles by repeating specific technologies, applications and so on. With this amendment, article 39(1) become the key provision in the regulation that specifies the strategic priorities of the ECF in the digital field. NL views it's important to add the link with reasearch programmes here, to fully make research projects also a success for businesses to implement and further develop what has started in the field of research. Therefore the results in the research field should be aligned with the efforts achieved under the ECF to avoid fragmentation in efforts to develop technologies.

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	PL (Drafting Suggestions): (c) Enabling the power of digital for businesses and citizens by deploying state-of-the-art and sustainable digital applications, infrastructures and services across the Union. The implementation shall include, but not be limited to, actions to research and innovate, develop, produce, manufacture, or deploy advanced digital infrastructures at scale across the Union (e.g. high-performance computing, telco-cloud-edge, AI Factories and Gigafactories, data and data spaces, testing and experimentation facilities, semiconductor, photonics and quantum chips pilot lines, quantum computing, communication and sensing infrastructures, cybersecurity hubs, the EU for Business Network, European Digital Innovation Hubs, advanced connectivity infrastructures including submarine cables and non-terrestrial networks), the EU Digital Identity Wallets and trust services, ~~as well as~~ the European Business Wallets, the **Once-Only Technical System** and services, secure and interoperable digital public infrastructure **aiming at streamling data exchange, as well as deploy digital technologies suitable to the requirements and stage of development of the entity concerned** to act as a key enabler of the digital transformation and in support of societal resilience and preparedness, bringing clear added-value to businesses, public services and citizens. Where relevant, these actions shall be coordinated with national investments and shall

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	otherwise exploit untapped potential to create a domestic market for advanced digital technologies 'made in Europe'. Such actions may be provided under the framework of Multi-Country Projects established in accordance with Decision (EU) 2022/2481, including notably those implemented through the European Digital Infrastructure Consortia or Joint Undertakings. PL (Comments): 1. It is equally essential to invest in the use of digital technologies, at all levels of advancement, by both businesses and citizens. The competitiveness of the Union's economy depends also on the adoption of digital technology at all levels within enterprises, which accelerates and enhances their productivity. 2. This suggestion enables better alignment with the Single Market Strategy (Chapter 4: Digitalising the Single Market). "The implementation shall include, but not be limited to, actions to research and innovate," – this is another activity overlapping with these being the core of the HE Programme. A clear demarcation line between the funds (ECF and HE) should be drawn. RO (Drafting Suggestions): Enabling the power of digital for businesses and citizens by deploying state-of-the-art and sustainable digital applications, infrastructures and services across the Union, contributing to the functioning of the Single Market. The implementation shall include, but not be limited to, actions to research and innovate, develop, produce, manufacture, or deploy advanced digital infrastructures at scale across the Union (e.g. high-performance computing, telco-cloud-edge, AI Factories and Gigafactories, data and data spaces, testing and experimentation facilities, semiconductor, photonics and quantum chips

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	pilot lines, quantum computing, communication and sensing infrastructures, cybersecurity hubs, the EU for Business Network, European Digital Innovation Hubs, advanced connectivity infrastructures including submarine cables and non-terrestrial networks), the EU Digital Identity Wallets and trust services as well as the European Business Wallets and services, secure and interoperable digital public infrastructure, to act as a key enabler of the digital transformation and in support of societal resilience and preparedness, bringing clear added-value to businesses, public services and citizens. SE (Drafting Suggestions): Enabling the power of digital for businesses and citizens by **inventing, developing and** deploying state-of-the-art and sustainable digital applications, infrastructures and services across the Union. The implementation shall include, ~~but not be limited to,~~ actions to research and innovate, develop, ~~produce, manufacture~~, or deploy advanced digital infrastructures **and solutions** at scale across the Union (e.g. high-performance computing, telco-cloud-edge, AI Factories and Gigafactories, data and data spaces, testing and experimentation facilities, semiconductor, photonics and quantum chips pilot lines, quantum computing, communication and sensing infrastructures, cybersecurity hubs, the EU for Business Network, European Digital Innovation Hubs, advanced connectivity infrastructures including submarine cables and non-terrestrial networks), the EU Digital Identity Wallets and trust services as well as the European Business Wallets and services, secure and interoperable digital public infrastructure, to act as a key enabler of the digital transformation and in support of societal resilience and preparedness, bringing clear added-value to businesses, public services and citizens. Where relevant, these actions shall be coordinated with national investments and shall otherwise exploit untapped potential to create a domestic market for advanced digital technologies 'made in Europe' **while maintaining an openness towards**

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	third countries. Such actions may be provided under the framework of Multi-Country Projects established in accordance with Decision (EU) 2022/2481, including notably those implemented through the European Digital Infrastructure Consortia or Joint Undertakings. SE (Comments): Inventing, developing, and deploying should be included here as in order to promote and drive renewal and competitiveness. Digital infrastructures are important but large-scale solutions are often needed as well. SI (Drafting Suggestions): (c) Enabling the power of digital for businesses and citizens by deploying state-of-the-art and sustainable digital applications, infrastructures and services across the Union. The implementation shall include, but not be limited to, actions to research and innovate, develop, produce, manufacture, or deploy advanced digital infrastructures at scale across the Union (e.g. high-performance computing, telco-cloud-edge, AI Factories and Gigafactories, data **technologies** and data spaces, testing and experimentation facilities, semiconductor, photonics and quantum chips pilot lines, quantum computing **and simulation**, communication and sensing infrastructures, **robotics**, cybersecurity hubs, the EU for Business Network, European Digital Innovation Hubs, advanced connectivity infrastructures including submarine cables and non-terrestrial networks), the EU Digital Identity Wallets and trust services as well as the European Business Wallets and services, secure and interoperable digital public infrastructure, to act as a key enabler of the digital transformation and in support of societal resilience and preparedness, bringing clear added-value to businesses, public services and citizens. Where relevant, these actions shall be coordinated with national investments and shall otherwise exploit untapped potential to create a domestic market for advanced

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	digital technologies ~~'made in Europe'~~. Such actions may be provided under the framework of Multi-Country Projects established in accordance with Decision (EU) 2022/2481, including notably those implemented through the European Digital Infrastructure Consortia or Joint Undertakings. SI (Comments): Why is the made in Europe provision applied only to the Digital Leadershhip policy window and not others? DE (Comments): The coordination with national investments, including the implementation through EDICs or Joint Undertakings, relies on state aid rules that are adequate to support the deploying actions mentioned in this paragraph. Current rules hinder such coordinated national investments. IE (Drafting Suggestions): Enabling the power of digital for businesses and citizens by deploying state-of-the art and sustainable digital applications, infrastructures – **including shared research infrastructures –** and services across the Union. The implementation shall include, but not be limited to, actions to research and innovate, develop, produce, manufacture, or deploy advanced digital infrastructures at scale across the Union (e.g. high-performance computing, telco-cloud-edge, AI Factories and Gigafactories, data and data spaces, testing and experimentation facilities, semiconductor, photonics and quantum chips pilot lines, quantum computing, communication and sensing infrastructures, cybersecurity hubs, the EU for Business Network, European Digital Innovation Hubs, advanced connectivity infrastructures including submarine cables and non-terrestrial networks), the EU Digital Identity

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	Wallets and trust services as well as the European Business Wallets and services, secure and interoperable digital public infrastructure, to act as a key enabler of the digital transformation and in support of societal resilience and preparedness, bringing clear added-value to businesses, public services and citizens. Where relevant, these actions shall be coordinated with national investments and shall otherwise exploit untapped potential to create a domestic market for advanced digital technologies 'made in Europe'. Such actions may be provided under the framework of Multi-Country Projects established in accordance with Decision (EU) 2022/2481, including notably those implemented through the European Digital Infrastructure Consortia or Joint Undertakings IE (Comments): IE note that Subsea cables are currently included in the Connecting Europe Facility (CEF Digital) programme. And notes the proposal calls out synergies with the CEF, but it is not clear how this will actually transpire, and IE request clarity in particular to how Subsea cables are affected and categorised IE welcome the Deployment of state-of-the-art and sustainable infrastructures, considering the importance of shared research infrastructures for the development and testing of innovative products and services – particularly for SMEs. IE would welcome a more explicit reference to shared research infrastructures. FI (Drafting Suggestions):

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	(c) Enabling the power of digital for businesses and citizens by deploying state-of-the-art and sustainable digital applications, infrastructures and services across the Union. The implementation shall include, but not be limited to, actions to research and innovate, develop, produce, manufacture, or deploy advanced digital infrastructures at scale across the Union (e.g. high-performance computing, telco-cloud-edge, AI Factories and Gigafactories, data and data spaces, testing and experimentation facilities, semiconductor, photonics and quantum chips pilot lines, quantum computing, communication and sensing infrastructures, cybersecurity hubs, the EU for Business Network, European Digital Innovation Hubs, advanced connectivity infrastructures including submarine cables and non-terrestrial networks, **industry-led deployment networks for AI and other strategic technologies**), the EU Digital Identity Wallets and trust services as well as the European Business Wallets and services, secure and interoperable digital public infrastructure, to act as a key enabler of the digital transformation **and the European real-time economy** and in support of societal resilience and preparedness, bringing clear added-value to businesses, public services and citizens. Where relevant, these actions shall be coordinated with national investments and shall otherwise exploit untapped potential to create a domestic market for advanced digital technologies **and services** 'made in Europe'. FI (Comments): Funding for revolutionary technologies, such as artificial intelligence, 6G, cloud and edge services, immersive technologies, space technologies, quantum and encryption technologies, must aim at new innovations and their transformation into products and services on the market. This requires allocating funding not only to RDI but also to application, interoperability and scalability of technologies on a case-by-case basis and facilitating the

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	demonstration of conformity of innovations and services (sandboxes, regtech tools, standard libraries, etc.) IT (Drafting Suggestions): Enabling the power of digital for businesses and citizens by deploying state-of-the-art and sustainable digital applications, infrastructures and services across the Union. The implementation shall include, but not be limited to, actions to research and innovate, develop, produce, manufacture, or deploy advanced digital infrastructures at scale across the Union (e.g. high-performance computing, telco-cloud-edge, AI Factories and Gigafactories, data and data spaces, testing and experimentation facilities, semiconductor, photonics and quantum chips pilot lines, quantum computing, communication and sensing infrastructures, cybersecurity hubs, the EU for Business Network, European Digital Innovation Hubs, advanced connectivity infrastructures including submarine cables and non-terrestrial networks), the EU Digital Identity Wallets and trust services as well as the European Business Wallets and services, secure and interoperable digital public infrastructure, to act as a key enabler of the digital transformation and in support of societal resilience and preparedness, bringing clear added-value to businesses, public services and citizens. **In pursuing these actions, particular attention shall be paid to the strategic implications of technology adoption, especially in contexts where European supply remains limited. The Union shall promote deployment choices that strengthen domestic capabilities and avoid reinforcing structural dependencies on non-EU providers. Furthermore, the design and deployment of digital technologies shall be guided by the recognition that such technologies are not neutral instruments, but reflect embedded values, assumptions and priorities. Accordingly, digital infrastructures supported under this Regulation shall contribute to safeguarding Europe's cognitive and intellectual assets.**

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	Where relevant, these actions shall be coordinated with national investments and shall otherwise exploit untapped potential to create a domestic market for advanced digital technologies 'made in Europe'. Such actions may be provided under the framework of Multi-Country Projects established in accordance with Decision (EU) 2022/2481, including notably those implemented through the European Digital Infrastructure Consortia or Joint Undertakings. IT (Comments): By offering a value-driven, transparent and democratic digital environment, the Union can affirm itself as a promoter of innovation, but also as a guardian of its intellectual sovereignty. FR (Drafting Suggestions): (c) Enabling the power of digital for businesses and citizens by deploying state-of-the-art and sustainable digital applications, infrastructures and services across the Union. The implementation shall include, but not be limited to, actions to research and innovate, develop, produce, manufacture, or deploy advanced digital **European** infrastructures at scale across the Union (e.g. high-performance computing, telco-cloud-edge, **telecom infrastructures**, AI Factories and Gigafactories, data and data spaces, testing and experimentation facilities, semiconductor, photonics and quantum chips pilot lines, quantum computing, communication and sensing infrastructures, cybersecurity hubs, the EU for Business Network, European Digital Innovation Hubs, advanced connectivity infrastructures including submarine cables and non-terrestrial networks), the EU Digital Identity Wallets and trust services as well as the European Business Wallets and services, secure and interoperable digital public infrastructure, to act as a key enabler of the digital transformation and in support of societal resilience and preparedness,

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	bringing clear added-value to businesses, public services and citizens. Where relevant, these actions shall be coordinated with national investments and shall otherwise exploit untapped potential to create a domestic market for advanced digital technologies 'made in Europe'. Such actions may be provided under the framework of Multi-Country Projects established in accordance with Decision (EU) 2022/2481, including notably those implemented through the European Digital Infrastructure Consortia or Joint Undertakings. FR (Comments): Can the Commission elaborate on how European preference will be guaranteed, particularly for the digital services and infrastructure activities mentioned, given the importance of sovereignty in these areas ? How will these activities be addressed within the ECF, particularly with regard to resilience? It is indeed important to guarantee and protect the development of European actors, especially in telco cloud, which are facing severe competition from stronger extra-European clouders. The delegation may request the Commission to clarify the provisions for coordination with national investments. HU (Drafting Suggestions): (c) Enabling the power of digital for businesses and citizens by deploying state-of-the-art and sustainable digital applications, infrastructures and services across the Union~~.~~ **, building on previous achievements.** HU

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	(Comments): We note and welcome the references to the European Digital Innovation Hubs (EDIHs) and the European Digital Infrastructure Consortia (EDICs). At the same time, it is important that the ECF builds on previous achievements. PT (Comments): - Further details need to be provided on: - the plans for the European Digital Innovation Hubs and the projected needs for European Funding of the network as a whole. - the principles and mechanisms to fund Multi-Country Projects under ECF.
(d) Supporting the Union's digital transformation of public and private sectors, including to support the development and the circulation of digital skills. The implementation shall include, but not be limited to, providing the necessary support to accelerating and deepening the uptake and deployment of digital solutions across economic sectors, through research, innovation and deployment, to boost their productivity and competitiveness, with a focus on more complex technologies, as well as to achieve societal benefits. Support to public sector applications as well as the broader digitalisation of the public sector shall aim at ensuring a cohesive Union-wide interoperable digital public services landscape, support technological sovereignty, maximising their efficiency for businesses and citizens. The digital transformation of economic and public sectors shall also be supported by the other sectoral windows of the ECF.	MT (Drafting Suggestions): (d) Supporting the Union's digital transformation of public and private sectors, including to support the development and the circulation of digital skills. The implementation shall include, but not be limited to, providing the necessary support to accelerating and deepening the uptake and deployment of digital solutions across economic sectors, through research, innovation and deployment, to boost their productivity and competitiveness, with a focus on more complex technologies, as well as to achieve societal benefits. Support to public sector applications as well as the broader digitalisation of the public sector shall aim at ensuring a cohesive Union-wide interoperable digital public services landscape, support technological sovereignty, maximising their efficiency for businesses and citizens. **For this purpose, submarine systems shall be recognised as a foundational layer of Union digital public infrastructure. Interoperability requirements shall explicitly cover backbone continuity and resilience. Multi-country projects for**

Commission proposal	Drafting Suggestions and Comments
	submarine systems shall be coordinated at Union level to ensure coherent governance of landing rights and routing and to avoid fragmentation. The digital transformation of economic and public sectors shall also be supported by the other sectoral windows of the ECF. MT (Comments): The proposed text is intended to highlight the fact that submarine cables are vital for EU digital infrastructure. Soverenity over such an important resource is therefore deemed essesntial in order for the block to be in total control of it high speed digital backbones. PL (Drafting Suggestions): d) accelerating digital transformation in public and private sectors by promoting interoperable digital public services and advanced business solutions; d) Supporting the Union's digital transformation of public and private sectors, including to support the development and the circulation of digital skills. The implementation shall include, but not be limited to, providing the necessary support to accelerating and deepening the uptake and deployment of digital solutions across economic sectors, through research, innovation and deployment, to boost their productivity and competitiveness, with a focus on more complex technologies, as well as to achieve societal **and economic** benefits. Support to public sector applications as well as the broader digitalisation of the public sector shall aim at ensuring a cohesive Union-wide interoperable digital public services landscape, support technological sovereignty, maximising their efficiency for businesses and citizens. The digital transformation of economic and public sectors shall also be supported by the other sectoral windows of the ECF.

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	PL (Comments): It is important to underline not only societal benefits but also economic. The implementation shall include, but not be limited to, providing the necessary support to accelerating and deepening the uptake and deployment of digital solutions across economic sectors, through research, innovation –a remark analogical to previous one. The digital transformation of economic and public sectors shall also be supported by the other sectoral windows of the ECF. – how the other windows will support the digital transformation and what amount of financial resources will be dedicated to them? RO (Drafting Suggestions): (d) Supporting the Union's digital transformation of public and private sectors, including to support the development and the circulation of digital skills. The implementation shall include, but not be limited to, providing the necessary support to accelerating and deepening the uptake and deployment of digital solutions across economic sectors, through adoption, research, innovation and deployment, to boost their productivity and competitiveness, with a focus on ~~more complex~~ technologies, as well as **on** ~~to achieve~~ societal benefits, while minimizing their environmental footprint. Support to public sector applications as well as the broader digitalisation of the public sector shall aim at ensuring a cohesive Union-wide interoperable digital public services landscape, support technological sovereignty, maximising their efficiency for businesses and citizens. The digital transformation of economic

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	and public sectors shall also be supported by the other sectoral windows of the ECF. SE (Drafting Suggestions): (d) Supporting the Union's digital transformation of public and private sectors, including to support the development and the circulation of digital **and AI** skills. The implementation shall include, but not be limited to, providing the necessary support to accelerating and deepening the uptake and deployment of digital solutions across economic sectors, through research, innovation and deployment, to boost their productivity and competitiveness, with a focus on more complex technologies, as well as to achieve societal benefits. Support to public sector applications as well as the broader digitalisation of the public sector shall aim at ensuring a cohesive Union-wide interoperable digital public services landscape, support technological sovereignty, maximising their efficiency for businesses and citizens. The digital transformation of economic and public sectors shall also be supported by the other sectoral windows of the ECF. SE (Comments): What does "complex technologies" mean in context? DE (Drafting Suggestions): (d) Supporting the Union's digital transformation of public and private sectors, including to support the development and the circulation of digital skills. The implementation shall include, but not be limited to, providing the necessary support to accelerating and deepening the uptake and deployment of digital solutions across economic sectors, through research, innovation and deployment, to boost their productivity and competitiveness, with a focus on

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	more complex technologies, as well as to achieve societal **or sustainability** benefits. Support to public sector applications as well as the broader digitalisation of the public sector shall aim at ensuring a cohesive Union-wide interoperable digital public services landscape, support technological sovereignty, maximising their efficiency for businesses and citizens. The digital transformation of economic and public sectors shall also be supported by the other sectoral windows of the ECF. DE (Comments): Re "**sustainable**": Reference to the above-suggested addition of "Reducing the resource- and energy-intensity of digital infrastructure and applications." to Art. Art. 3 Para. 2 lit c. In Art. 38 Para 2 lit. c "sustainability" is already referenced. It should be refrenced in lit. d as well IE (Comments): IE welcomes deepening the uptake and deployment of digital solutions across economic sectors, through research, innovation and deployment FI (Drafting Suggestions): Supporting the Union's digital transformation of public and private sectors, including to support the development and the circulation of digital skills. The implementation shall include, but not be limited to, providing the necessary support to accelerating and deepening the uptake and deployment of digital solutions across economic sectors, through research, innovation and deployment, to boost their productivity and competitiveness, with a focus on more complex technologies, as well as to achieve societal benefits. Support ~~to public sector~~ applications **used by public sector** as well as the broader digitalisation of the public sector shall aim at ensuring a cohesive Union-

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	wide interoperability **framework for** digital public services ~~landscape~~, support technological sovereignty, maximising their efficiency for businesses and citizens. The digital transformation of economic and public sectors shall also be supported by the other sectoral windows of the ECF. FI (Comments): How does this paragraph differ in material terms from the preceding two? If the intention is to focus only on digitalisation in the public sector, the language should be changed accordingly. Now the private sector is also circumscribed here. Funding could be allocated to the implementation of the Interoperable Europe Framework and the Act, not to the creation of any Landscape. Provisions on this have already been laid down. IT (Drafting Suggestions): Supporting the Union's digital transformation of public and private sectors, including the development and circulation of digital skills**, with a focus on fostering critical thinking and awareness of risks and implications**. The implementation shall include, but not be limited to, providing the necessary support to accelerating and deepening the uptake and deployment of **safe** digital solutions across economic sectors, through research, innovation and deployment, to boost their productivity and competitiveness, with a focus on more complex technologies, as well as to achieve societal benefits**.** Support to public sector applications as well as the broader digitalisation of the public sector shall aim at ensuring a cohesive Union-wide interoperable digital public services landscape, support technological sovereignty, maximising their efficiency for businesses and citizens. The digital transformation of

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	economic and public sectors shall also be supported by the other sectoral windows of the ECF. IT (Comments): This emendament takes into consideration the importance of trust for citizens, businesses and public administrations to adopt technologies confidently and responsibly. FR (Drafting Suggestions): Supporting the Union's digital transformation of public and private sectors, including to support the development and the circulation of digital skills. The implementation shall include, but not be limited to, providing the necessary support to accelerating and deepening the uptake and deployment of digital solutions across economic sectors, through research, innovation and deployment, to boost their productivity and competitiveness, with a focus on more complex technologies, as well as to achieve societal benefits. Support to public sector applications as well as the broader digitalisation of the public sector shall aim at ensuring a cohesive Union-wide interoperable digital public services landscape, support technological sovereignty, maximising their efficiency for businesses and citizens. The digital transformation of economic and public sectors shall also be supported by the other sectoral windows of the ECF. FR (Comments): A specific support should be provided for the digitalisation of SMEs, so as to boost their growth and competitiveness. Actions towards SMEs should be concerted through joint initiatives between technology providers, service providers, professional organisations and government, so as to address

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	accurately needs in every sector. Actions can range from diagnoses, training, to more intensive support and funding. The digital transformation of economic and public sector can also be accelerated by the development of a trusted environment that guarantees the highest standards of cybersecurity, including both high technical criteria and protection of sensitive data from the extraterritorial laws of countries outside the European Union. HU (Drafting Suggestions): (d) Supporting the Union's digital transformation of public and private sectors, including to support the development and the circulation of digital skills. The implementation shall include, but not be limited to, providing the necessary support to accelerating and deepening the uptake and deployment of digital solutions across economic sectors, including in the energy sector through research, innovation and deployment, to boost their productivity and competitiveness, with a focus on more complex technologies, as well as to achieve societal benefits. Support to public sector applications as well as the broader digitalisation of the public sector shall aim at ensuring a cohesive Union-wide interoperable digital public services landscape, support technological sovereignty, maximising their efficiency for businesses and citizens. The digital transformation of economic and public sectors shall also be supported by the other sectoral windows of the ECF. HU (Comments): We propose reference to the digitalisation in the energy sector, as a priority area in terms of deployment of cost efficient and security solutions. PT (Comments):

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	- It would be helpful to clarify the meaning of "economic sectors" in this context to better understand the underlying rationale. In particular, could the sectoral windows encompass funding and investment specifically aimed at the digitalization of these sectors?
(e) Support actions for the development, implementation, monitoring and enforcement of relevant Union legislation and policy. This includes supporting the relevant institutions, the cooperation between national authorities and with stakeholders, studies, the development and deployment of tools and infrastructures, including IT infrastructure and tools.	NL (Drafting Suggestions): ~~(e) Support actions for the development, implementation, monitoring and enforcement of relevant Union legislation and policy. This includes supporting the relevant institutions, the cooperation between national authorities and with stakeholders, studies, the development and deployment of tools and infrastructures, including IT infrastructure and tools.~~ NL (Comments): ECF should not be used to support implemenation or enforcement of Union legsislation. These type of administrative costs are not appropriarte under the ECF, and causes overlap. Other funding programs and MFF pillars are more suited for this. PL (Drafting Suggestions): e) supporting governance through development, implementation, monitoring and enforcement of digital policies, tools and infrastructures (e) Support actions for the development, implementation, monitoring and enforcement of relevant Union legislation and policy. This includes supporting the relevant institutions, the **efficient coordination and** cooperation between national authorities and with stakeholders, studies, the development and deployment of tools and infrastructures, including IT infrastructure and tools.

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	PL (Comments): Many analyses indicate that the coordination of the digital transformation ecosystem is imperfect, and this is the key to effectiveness, complementarity and synergy. SE (Drafting Suggestions): (e) Support actions for the development, implementation, monitoring and enforcement of relevant Union legislation and policy. This includes supporting the relevant institutions, the cooperation between national **and regional** authorities and with stakeholders DE (Comments): In which areas does COM intend to fund the development, implementation and monitoring of EU legislation with the ECF? When this is linked to the consolidation of various funding programmes, which we welcome in principle, it is important that key tasks of these programmes are fulfilled more effectively and more efficiently by the ECF in order to leverage synergies. If this objective concerns administrative action of the COM, this should be reflected in the administrative expenditures in heading 4 of the MFF. IE (Comments): IE support the inclusion of specific provisions in relation to cyber security skills development. FI

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	(Drafting Suggestions): (e) Support actions for the development, **simplification,** implementation, monitoring and enforcement of relevant Union legislation and policy. This includes supporting the relevant **industry initiatives**, institutions, the cooperation between national authorities and with stakeholders, studies, the development and deployment of tools and infrastructures, including IT infrastructure and tools **as well as regulatory sandboxes.** IT (Drafting Suggestions): Support actions for the development, implementation, monitoring, **simplification, streamlining** and enforcement of relevant Union legislation and policy shall be guided by a comprehensive vision of digital sovereignty. This includes supporting relevant institutions, fostering cooperation between national authorities and stakeholders, **conducting studies, and developing and deploying tools and infrastructures — particularly IT systems — that safeguard Europe's cognitive and intellectual assets. Accordingly, the Union shall promote a regulatory and operational environment that ensures Europe's attractiveness for talent and innovation.** IT (Comments): Favorable conditions for enterprises must be set out through simplification measures and ensuring coherent legislative provisions.

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Commission proposal	Drafting Suggestions and Comments
	Digital technologies, especially artificial intelligence, are not neutral instruments, but can influence how technologies behave, whom they serve, and what risks they pose. FR (Comments): Can the Commission clarify the provisions for coordination with national authorities ?
	ES (Drafting Suggestions): **2bis. Support provided through the activities referred to in paragraph 2, may be provided in any form, including through collaborative research and innovation activities set out in Regulation (EU) [XXX] [Framework Programme for Research and Innovation] and identified in a separate Work Programme dedicated to collaborative research and innovation activities.** ES (Comments): See explanations provided for Art. 33(2) above.
3. Activities under this Section shall support the development, deployment and procurement of advanced cybersecurity capacities, infrastructures, technologies and capabilities, with a view to ensure the security of critical infrastructures & digital supply chains, develop an Union situational picture of the threat landscape as well as improve detection capacities and incident response capabilities; supporting the competitiveness of the Union cybersecurity industrial base, cybersecurity skills development	AT (Comments): 1.Which mechanisms will the EC implement to enable the mentioned synergies in cyber security between the different policy windows? As the ECF is a completely new concept in the MFF, AT invites the Commission to provide a first outlay - or optimally a description - of these mechanisms and their actors, and the actors' roles, respectively. Such insights would help us a

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together with the cyber maturity of the European industrial basis, including SMEs.	lot to understand and potentially support the Commission's ideas in this regard. Furthermore, which agencies/ Commission DGs will manage EU funds in the area of cybersecurity under the new MFF? 2. In the context of the activities under this section, what will the role of the European Cybersecurity Competence Centre (ECCC) be? Generally, the responsibility for content and implementation of cybersecurity issues, both within the framework of Digital Europe Program (DEP) (Deployment/ Uptake) and HEU CL3 (Research & Innovation), has lain with the ECCC. The ECCC and the National Cybersecurity Coordination Center (NCC) network are not mentioned in the documents, leaving their future existence and responsibilities open. LV (Drafting Suggestions): 3. Activities under this Section shall support the development, deployment and procurement of advanced cybersecurity capacities, infrastructures, **products,** technologies and capabilities, with a view to ensure the security of critical infrastructures & digital supply chains, develop an Union situational picture of the threat landscape as well as improve detection capacities and incident response capabilities; supporting the competitiveness of the Union cybersecurity industrial base, cybersecurity skills development together with the cyber maturity of the European industrial basis, including SMEs. LV (Comments): Considering that it is also important to develop innovative products within the framework of digital transformation, please supplement Article 39, Paragraph 3 with a reference not only to technologies, but also to products.

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	MT (Drafting Suggestions): 3. Activities under this Section shall support the development, deployment and procurement of advanced cybersecurity capacities, infrastructures, technologies and capabilities, with a view to ensure the security of critical infrastructures & digital supply chains, develop an Union situational picture of the threat landscape as well as improve detection capacities and incident response capabilities; supporting the competitiveness of the Union cybersecurity industrial base, cybersecurity skills development together with the cyber maturity of the European industrial basis, including SMEs. **Such support shall include post-quantum cryptography and quantum key distribution pilots, the establishment of an EU-wide situational awareness capability covering submarine infrastructure and cross-border incidents, the development of trusted certification schemes for submarine cable equipment and associated infrastructure, and measures to strengthen the cyber maturity of SMEs operating in submarine and telecom supply chains.** **Support shall also extend to the protection of landing stations and coastal facilities under resilience planning, to coordination with defence, maritime and security authorities in order to mitigate sabotage or hostile interference, and to clarifying that while non-terrestrial networks complement international capacity, they cannot substitute submarine systems for bulk data transport.** MT (Comments): The proposed text reinforces cybersecurity resilience, prepares for post-quantum threats, and strengthens supply-chain security. SE

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Commission proposal	Drafting Suggestions and Comments
	(Drafting Suggestions): 3. Activities under this Section shall support the **innovation,** development, deployment and procurement of advanced cybersecurity capacities, infrastructures, technologies and capabilities, with a view to ensure the security of critical infrastructures & digital supply chains, develop an Union situational picture of the threat landscape as well as improve detection capacities and incident response capabilities; supporting the competitiveness of the Union cybersecurity industrial base, cybersecurity skills development together with the cyber maturity of the European industrial basis, including SMEs. SE (Comments): What activities are envisioned here? Is it a way to formalise the risk assessment work within the Economic Security framework? Is it a way to finance the work imposed on the Commission following e g the provisions of mapping and alerting system in the Chips act? DE (Comments): Does this adequately cover the physical security of the infrastructure? We think the focus seems to be very much on cybersecurity. We suggest also including aspects such as physical resilience. FI (Drafting Suggestions): Activities under this Section shall support the development, deployment and procurement of advanced cybersecurity capacities, infrastructures, technologies and capabilities, with a view to ensure the security of critical infrastructures & digital supply chains, develop an Union situational picture of the threat landscape as well as improve detection capacities and incident

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	response capabilities **without creating unnecessary administrative burden for companies**; supporting the competitiveness of the Union cybersecurity industrial base, cybersecurity skills development together with the cyber maturity of the European industrial basis, including SMEs. FI (Comments): For example cyber-related reporting requirements are already fairly heavy. FR (Drafting Suggestions): Activities under this Section shall support the development, deployment and procurement of advanced cybersecurity capacities, infrastructures, technologies and capabilities, with a view to ensure the security of critical infrastructures **& ~~digital~~** supply-chains, develop an Union situational picture of the threat landscape as well as improve detection capacities and incident response capabilities; supporting the competitiveness of the Union cybersecurity industrial base, cybersecurity skills development together with the cyber maturity of the European industrial basis, including SMEs. FR (Comments): The delegation will be able to question the Commission on how activities are effectively coordinated with other initiatives supported by the fund for SMEs, start-ups and scale-ups. HU (Drafting Suggestions):

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Commission proposal	Drafting Suggestions and Comments
	3. Activities under this Section shall support the development, deployment and procurement of advanced cybersecurity capacities, infrastructures, technologies and capabilities, with a view to ensure the security of critical infrastructures & digital supply chains, develop an Union situational picture of the threat landscape as well as improve detection capacities and incident response capabilities; supporting the competitiveness of the Union cybersecurity industrial base, cybersecurity skills development together with the cyber maturity of the European industrial basis, including SMEs **building on and cooperating with the existing structures such as the European Cybersecurity Competence Centre and National Coordination Centres.** HU (Comments): The ECF should build more strongly on the already existing bodies that bring together national actors within the Member States (NCCs) and at Union level (ECCC) PT (Comments): - Clarification on the scope of "advanced cybersecurity capacities, infrastructures, technologies and capabilities" is required as well as the critical infrastructures covered, and how the Union situational picture of the threat landscape will be developed and coordinated with national efforts. It is important to ensure that support for the cybersecurity industrial base, including SMEs, is inclusive, complementary to existing initiatives, and fosters innovation and competitiveness across the European digital ecosystem.

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Commission proposal	Drafting Suggestions and Comments
4. Work programmes adopted in accordance with the rules of this Regulation under this chapter shall integrate in a specific dedicated part and ensure coherence with Competitiveness and Society activities under the Regulation (EU) [XXX] [Horizon Europe Framework programme for Research and Innovation	LT (Comments): We have some doubts concerning the foreseen merge of the Work Programmes of the ECF and Horizon Europe. We are worried that this can result in deterioration of the European science base as ECF work Programmes are going to be demand driven and might lack focus on the lower TRLs. MT (Comments): Malta seeks clarification regarding the lack of complementary rules (like Art 34) for digital leadership. PL (Drafting Suggestions): 4. Work programmes shall include a dedicated section ensuring coherence with Competitiveness and Society activities under the Horizon Europe Framework Programme. PL (Comments): Ensuring strategic alignment with Horizon Europe Embedding a dedicated “Coherence with Competitiveness and Society” section in work programmes secures thematic consistency with Horizon Europe, steering proposals toward joint climate-digital and societal challenges: guides applicants to integrate broader research and innovation frameworks; avoids parallel call design and siloed funding; signals explicit areas for cross-programme impact. Reducing administrative complexity

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Commission proposal	Drafting Suggestions and Comments
	A standalone coherence section harmonises eligibility criteria, cost models and reporting templates across both programmes: simplifies proposal development and evaluation; prevents applicants from deciphering separate rulebooks; accelerates grant negotiation and financial closure. <u>Amplifying funding leverage</u> Linking to competitiveness and society activities fosters co-funding and joint-call opportunities: eneables layering of ECF and Horizon Europe grants for deeper research-to-deployment pipelines; multiplies impact per euro by combining complementary instruments; attracts broader consortia with both climate-digital and societal mandates. A request to the Commission to explain this provision. SE (Drafting Suggestions): Work programmes adopted in accordance with the rules of this Regulation under this chapter shall ~~integrate in a specific dedicated part and~~ ensure coherence with Competitiveness and Society activities under the Regulation (EU) [XXX] [Horizon Europe Framework programme for Research and Innovation SE (Comments): Need to integrate social sciences and humanities where relevant in R&I activities in line with the proposed horizontal principles for Horizon Europe.

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Commission proposal	Drafting Suggestions and Comments
	Could only agree to a text where the bottom-up collaborative research and innovation of the HE regulation is safeguarded to ensure efficient, effective and high quality research and innovation supporting activities referred to in paragraph 1. IE (Comments): IE notes this reference and look forward to further clarification of the relationship between the ECF and the research framework programme. ES (Drafting Suggestions): 4. Work programmes adopted in accordance with the rules of this Regulation under this chapter shall ~~integrate in a specific dedicated part and~~ ensure coherence with Competitiveness and Society activities under the Regulation (EU) [XXX] [Horizon Europe Framework programme for Research and Innovation. ES (Comments): See explanations provided for Art. 33(2) above. EE (Comments): EE requests clarification on what "integrated work programmes with Horizon Europe" will mean in practice. Does this imply overlapping topics, shared governance structures or joint programming? Greater clarity is needed to ensure complementarity and avoid duplication. HU (Comments):

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Commission proposal	Drafting Suggestions and Comments
	As a way of balancing flexiblity with predictability, we stress the importance of multiannual work programmes. Work programmes that integrate the Competitiveness and Society activities under the Regulation (EU) [XXX] [Horizon Europe Framework programme for Research and Innovation] and is adopted under the rules and governance of the ECF must be approved according to the examination comitology procedures, instead of the proposed advisory procedures [cf. Articles 15 and 83 of ECF draft Regulation, Article 4(3) of the draft HE Specific Programme]. PT (Comments): - Clarify the link with the Competitiveness Coordination Tool.
	PL (Comments): There is no information on the rates of co-financing for the DL window – this is an important factor for estimating the capabilities of the particular countries to benefit from the programme and also in order to plan the necessary additional resources/mechanisms that could allow for participation in the DL window activities. For a lot of the other windows the rates are set in the proposal. We ask the EC to present information on the co-funding rates it plans to apply in the DL window.
CHAPTER VII	NL (Comments): These reflect first views. We, later in the process, could share additional comments

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Commission proposal	Drafting Suggestions and Comments
SUPPORT FOR RESILIENCE AND SECURITY, DEFENCE INDUSTRY AND SPACE	DE (Comments): Embedding security research in a policy window together with defence appears useful for better integration of the two areas and for Europe's overall security and defence. General question: How will the support to the different sections and policy windows (here, e.g. resilience and security industrial policy) and specifically for technology developments etc. be delineated - how will lines be drawn and synergies ensured when the subject matter could fall into one or another policy window? FR (Comments): Can the Commission specify the budget nomenclature envisaged for this component ? Can the Commission specify what flexibility will be available for this component in the event of needs arising during the programming period ? Can the Commission elaborate on the articulation between FEC and Horizon Europe, and in particular regarding comitology and eligibility criteria of Horizon Europen for activities referred to in article 2, as it is mentioned that such activities will be funded through Horizon Europe?
SECTION 1	

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Commission proposal	Drafting Suggestions and Comments
SUPPORT FOR RESILIENCE POLICY	LT (Drafting Suggestions): SUPPORT FOR **INDUSTRY** RESILIENCE POLICY LT (Comments): Since this Section concerns industrial resilience, the title of the policy should be correspondingly narrowed down so as not to create a misleading impression or misunderstandings. This is particularly important as the preamble refers extensively to resilience in a broader sense. DE (Comments): We emphasize that the EU's resilience in the supply of critical raw materials is of great importance. We therefore welcome that this issue is being addressed in the ECF. FR (Comments): How these specific resilience-related activities fit in with the thematic areas? Will there be a dedicated cross-cutting work programme?
Article 42	

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Commission proposal	Drafting Suggestions and Comments
Specific activities to support resilience policies	LT (Drafting Suggestions): Specific activities to support **industry** resilience policies LT (Comments): Please refer to the comment porvided above. FR (Drafting Suggestions): 1. Support to Resilience policy shall reinforce the strategic autonomy, economic security and the resilience of the Union industry by strengthening the different stages of the raw materials value chain, including through diversification of the supply of critical raw materials from third countries **as well as support to relocating activities**. FR (Comments): Can the Commission specify what flexibility will be available for this section in the event of needs arising during the programming period ? Can the Commission specify the budget nomenclature envisaged for this component. Will there be a budget line for each type of activity listed in this article? French authorities would like to promote the support to relocating activities within EU territories to support the resilience of EU's value chains.

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Commission proposal	Drafting Suggestions and Comments
1. Support to Resilience policy shall reinforce the strategic autonomy, economic security and the resilience of the Union industry by strengthening the different stages of the raw materials value chain, including through diversification of the supply of critical raw materials from third countries.	AT (Comments): **AT** comment: We argue that raw materials should be part of the policy window clean transition. In 2025, the European Commission introduced the Clean Industrial Deal: A Joint Roadmap for Competitiveness and Decarbonisation, aimed at boosting Europe's industrial competitiveness and accelerating its green transition. This initiative focuses on decarbonising energy-intensive industries like steel, cement, and chemicals, while scaling up clean technologies and promoting circular resource use. We need a clean and resilient industry. In this line of thinking, you have to put R&D policy on Raw Materials together with the goal of a clean industry. BE (Drafting Suggestions): 1. Support to Resilience policy shall reinforce the **open** strategic autonomy, economic security and the resilience of the Union industry by strengthening the different stages of the raw materials value chain, including through diversification of the supply of critical raw materials from third countries BE (Comments): Add "open": common wording. NL (Drafting Suggestions): 1. Support to Resilience policy shall reinforce the strategic autonomy, economic security and the resilience of the Union industry by strengthening the different stages of the raw materials value chain, including through diversification of the supply of critical raw materials from third countries, **and ensuring their availability and responsible use to support the twin transitions and competitiveness.**

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Commission proposal	Drafting Suggestions and Comments
	RO (Drafting Suggestions): 1. Support to Resilience policy shall reinforce the strategic autonomy, economic security and the resilience of the Union industry by strengthening the different stages of the raw materials value chain, including through diversification of the supply of critical raw materials from third countries, **and by reducing strategic dependencies, notably through reshoring, friend-shoring, substitution and material efficiency measures.** RO (Comments): Resilience requires not only diversification of supply but also active reduction of strategic dependencies, promoting alternatives and more efficient use of resources. SE (Drafting Suggestions): Support to Resilience policy shall reinforce the **open** strategic autonomy, economic security and the resilience of the Union industry by strengthening the different stages of the raw materials value chain, including through diversification of the supply of critical raw materials from third countries. ES (Drafting Suggestions): 1. Support to Resilience policy shall reinforce the strategic autonomy, economic security and the resilience of the Union industry**, with particular attention to SMEs,** by strengthening the different stages of the raw materials value chain, including through diversification of the supply of critical raw materials from third countries.

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Commission proposal	Drafting Suggestions and Comments
2. Support for resilience policy shall be implemented in particular through the following activities:	CZ (Drafting Suggestions): a) support for the strengthening of the EU capacity in **access to,** exploration, extraction, processing and recycling of raw materials; CZ (Comments): CZ - EU has relatively limited access to raw materials and other essential components from outside its borders. The objective should therefore also encompass strengthening the Union's access to such raw materials, which constitutes a necessary prerequisite for the diversification of supply sources and markets. This approach would be consistent with other Union initiatives, including the *Critical Raw Materials Act*. SE (Comments): How come only raw materials policy is included in the resilience policy section, when resilience is a much broader policy area?
(a) support for the strengthening of the EU capacity in exploration, extraction, processing and recycling of raw materials;	NL (Drafting Suggestions): (a) support for the strengthening of the EU capacity in exploration, extraction, processing, **recovery,** ~~and~~ recycling **and reuse** of raw materials; NL (Comments): Critical Raw Materials Act (art. 25) has wording on recovery, recycling and re-use, so using those fundamentals here as well would align the ECF with the CRMA.

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Commission proposal	Drafting Suggestions and Comments
	Potentially, the circular part of raw materials could be included as a new sub-paragraph abis/d to: (a) support for the strengthening of the EU capacity in exploration, extraction and processing ~~**and recycling**~~ of raw materials; **(a bis) support for the strengthening of the EU capacity in recovery, re-use and recyling of raw materials** PL (Drafting Suggestions): (a) support for the strengthening of the EU capacity in exploration, extraction, processing, ~~**and**~~ recycling **and substitution** of raw materials; PL (Comments): Substitution of CRMs is an immanent activity aiming at reduction of dependencies of CRM suppies and the decrease of environmental impact of raw materials acquisition. FI (Drafting Suggestions): support for the strengthening of the EU capacity in **raw material management, including circular economy value chains,** exploration, extraction, processing and recycling of materials. FI (Comments): FI proposes a stronger focus on circular economy approaches to support the EU's strategic autonomy and resilience in raw materials. PT

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Commission proposal	Drafting Suggestions and Comments
	(Drafting Suggestions): (a) support for the strengthening of the EU capacity along the **primary raw materials value chain, from sustainable exploration and extraction to processing and refining; and, in parallel, the development of a robust value chain for secondary raw materials through high-efficiency recycling, particularly of WEEE and batteries**; PT (Comments): - The original wording is too compact, grouping four distinct industrial activities (exploration, extraction, processing, recycling) into a single sentence. This could lead to a lack of clarity when defining investment priorities in the work programmes. The proposed suggestion clearly separates the **primary value chain** (mining) from the **secondary/circular value chain** (recycling). This distinction is crucial because: 1. **It Provides Strategic Clarity:** It aligns the Fund with the dual approach of the Critical Raw Materials Act (CRMA), which values both sustainable extraction and recovery from waste. 2. **It Balances Priorities:** It places "urban mining" (recycling WEEE and batteries) on an equal footing with traditional mining, treating it as a strategic industrial activity for EU resilience.
(b) purchasing of raw materials, in line with economic security needs and the green and digital transition objectives, in order to reduce the risk of supply disruptions for companies in the EU, including for establishing and managing stockpiles of critical raw materials in coordination with Member States and industry;	CZ (Drafting Suggestions): (b) purchasing of raw materials, in line with economic **and food** security needs and the green and digital transition objectives, in order to reduce the risk of supply disruptions for companies in the EU, including for establishing and managing stockpiles of critical raw materials in coordination with Member States and industry;

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Commission proposal	Drafting Suggestions and Comments
	CZ (Comments): CZ – dtto; We would also like to draw attention to the possibility of including such an addition to the provision. Specifically, the inclusion of "*and food*" in this provision could enhance consistency with the EU Stockpiling Strategy (COM(2025)528 final), which identifies agri-food products as essential goods requiring coordinated stockpiling efforts at Union level. LT (Drafting Suggestions): (b) purchasing of raw materials, in line with economic **and food security** needs and the green and digital transition objectives, in order to reduce the risk of supply disruptions for companies in the EU, including for establishing and managing stockpiles of critical raw materials in coordination with Member States and industry; LT (Comments): Supplemented text as "Food security" is one of essential components of the green and digital transition and a key factor for Europe's competitiveness and resilience. PL (Drafting Suggestions):

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Commission proposal	Drafting Suggestions and Comments
	purchasing of raw materials, in line with economic and defence security needs and the green and digital transition objectives, in order to reduce the risk of supply disruptions for companies in the EU, including for establishing and managing stockpiles of critical raw materials in coordination with Member States and industry PL (Comments): The text does not appear to specify that the procurement of raw materials should also take into account the needs of the sector and defence itself; the reference seems to focus solely on economic security and the green transition. SE (Drafting Suggestions): [purchasing of raw materials, in line with economic security needs and the green and digital transition objectives, in order to reduce the risk of supply disruptions for companies in the EU, including for establishing and managing stockpiles of critical raw materials in coordination with Member States and industry]; SE (Comments): What is the relation to stockpiling provisions and other provisions in the IMERA and CRMA? Important that defintions in the two legislations are aligned and that the scope of CRMA is not extended through the ECF. Would like to see clarifications on the scope of "green and digital" that seem very broad. ES

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Commission proposal	Drafting Suggestions and Comments
	(Drafting Suggestions): (b) purchasing of raw materials, in line with economic security needs and the green and digital transition objectives, in order to reduce the risk of supply disruptions for companies in the EU, including for establishing and managing stockpiles of critical raw materials **and strategic reserves of production capacities on stand-by** in coordination with Member States and industry; ES (Comments): It allows for the integration of production capacity that can be activated in times of crisis as an industrial resilience policy for raw materials.
(c) financial support to Strategic Projects under the Critical Raw Materials Act in line with economic security needs and the green and digital transition objectives.	PL (Drafting Suggestions): DPO: financial support to Strategic Projects under the Critical Raw Materials Act in line with economic and defence security needs and the green and digital transition objectives PL (Comments): as above SE (Drafting Suggestions): (c) [financial support to Strategic Projects under the Critical Raw Materials Act in line with economic security needs and the green and digital transition objectives.] SE (Comments):

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Commission proposal	Drafting Suggestions and Comments
	Same comments as on paragraph (b) SI (Drafting Suggestions): (c) financial support to Strategic Projects under the Critical Raw Materials Act **and Critical Medicines Act** in line with economic security needs and the green and digital transition objectives. SI (Comments): SI suggests to add reference to Critial Medicines Act. ES (Drafting Suggestions): (c) financial support to Strategic Projects under the Critical Raw Materials Act in line with economic security needs and the green and digital transition objectives; **and measures facilitating industrial deployment, substitution and circularity that increase security of supply and reduce strategic dependencies.** ES (Comments): Explicit reference to industrial deployment and circularity strengthens the practical impact of resilience measures and addresses strategic dependencies, an issue of concern for all Member States.
3. support provided through the activities referred to in paragraph 2, may be provided in any form, including through collaborative research and innovation activities set out in the Framework Programme for Research and Innovation [REF] and identified in a specific dedicated part of the Work Programme.	SE (Comments): Could only agree to a text where the bottom-up collaborative research and innovation of the HE regulation is safeguarded to ensure efficient, effective

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Commission proposal	Drafting Suggestions and Comments
	and high quality research and innovation supporting activities referred to in paragraph 1 IE (Comments): IE seeks clarification if Is there a reason why this point features in Chapters IV and VII, but not Chapter V: Support for Health, Biotech, Agriculture and Bioeconomy or Chapter VI: Support for Digital Leadership? ES (Drafting Suggestions): 3. Support provided through the activities referred to in paragraph 2, may be provided in any form, including through 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~~ **separate** Work Programme **dedicated to collaborative research and innovation activities**. **Such support shall ensure simplified access and proportionate administrative requirements for SMEs.** ES (Comments): Simplified procedures lower barriers for SMEs, which are often underrepresented in EU programmes. This enhances inclusiveness without undermining accountability. FR (Comments): Can the Commission provide an indicative amount for the part dedicated to collaborative research on resilience?

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Commission proposal	Drafting Suggestions and Comments
	Can the Commission elaborate about the articulation between FEC and Horizon Europe, and in particular regarding comitology and eligibility criteria of Horizon Europen for activities referred to in article 2, as it is mentioned that such activities will be funded through Horizon Europe?
4. Work programmes adopted in accordance with the rules of this Regulation under this chapter shall integrate in a specific dedicated part and ensure coherence with Competitiveness and Society activities under the Regulation (EU) [XXX][Horizon Europe Framework programme for Research and Innovation]	LT (Comments): We have some doubts concerning the foreseen merge of the Work Programmes of the ECF and Horizon Europe. We are worried that this can result in deterioration of the European science base as ECF work Programmes are going to be demand driven and might lack focus on the lower TRLs. MT (Comments): Malta seeks clarification regarding the lack of complementary rules (like Art 34) for resilience. SE (Drafting Suggestions): Work programmes adopted in accordance with the rules of this Regulation under this chapter shall integrate in a specific dedicated part ~~and ensure coherence with Competitiveness and Society activities under the Regulation (EU) [XXX][Horizon Europe Framework programme for Research and Innovation]~~ SE (Comments):

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Commission proposal	Drafting Suggestions and Comments
	Could COM clarify if this window is the specific programme referred to in the Horizon Europe regulation proposal art. 1 paragraph 2 (b). Why is the coherence relevant in this parapraph? It should be regulated in the framework programme (and not the delegated act). ES (Drafting Suggestions): 4. Work programmes adopted in accordance with the rules of this Regulation under this chapter shall ~~integrate in a specific dedicated part and~~ ensure coherence with Competitiveness and Society activities under the Regulation (EU) [XXX][Horizon Europe Framework programme for Research and Innovation] **and alignment with the objectives and instruments under Regulation (EU) 2024/1735 (NZIA) and Regulation (EU) 2024/1252 (CRMA), avoiding overlaps and ensuring complementarities with national measures.** ES (Comments): Referencing NZIA and CRMA ensures legal consistency, reduces duplication, and aligns Union funding with established industrial priorities, which benefits all Member States. EE (Comments): EE requests clarification on what “integrated work programmes with Horizon Europe” will mean in practice. Does this imply overlapping topics, shared governance structures or joint programming? Greater clarity is needed to ensure complementarity and avoid duplication.
	DE (Drafting Suggestions):

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Commission proposal	Drafting Suggestions and Comments
	5. Work programmes shall ensure coherence and complementarity with the Regulation (EU)[XXX] [Union Civil Protection Mechanism+]
Article 43	
Complementary rules	DE (Comments): In combination with Article 20: 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). It is unclear under which conditions the ECF could support such projects. We are very critical towards ECF funding solely based on a Member States decision by declaring certain projects as strategic. We ask COM for further information on this Article and Article 20.
1. Strategic projects under CRMA and strategic projects foreseen in relevant sectoral legislation may apply the rules in Article 20.	AT (Comments): **AT** comment: To be clear, acronyms like „CRMA" should be avoided in a legal text. IE (Comments): IE suggest it would be useful to have CRMA mentioned as per NZIA and RED III at the foot of article 20 (Paragraph 3). IT (Comments):

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Commission proposal	Drafting Suggestions and Comments
	In addition, a reference to strategic projects under NZIA may be appropriate. ES (Drafting Suggestions): 1. Strategic projects under CRMA and strategic projects foreseen in relevant sectoral legislation may apply the rules in Article 20. **When implementing these rules, work programmes shall prioritise projects with clear industrial deployment pathways in the Union, including offtake and long-term supply agreements, and shall ensure consistency with applicable State aid frameworks, including the Clean Industrial Deal State Aid Framework (CISAF).** ES (Comments): Requiring deployment pathways and consistency with CISAF increases legal certainty, facilitates bankability, and ensures that strategic projects translate into real industrial impact across the Union.
	BE (Drafting Suggestions): SECTION 3 - Article 61.2: This component shall cover in particular the following eligible activities […] **(f) exploration and integration of military use cases for the Secure Connectivity system, in close cooperation with the EDA.** - Article 75 (d). BE (Comments): Article 61.2: military use cases for IRIS2 infrastructure? Could be as well integrated under point (d). Article 75 (d): could COM clarify why the role of

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Commission proposal	Drafting Suggestions and Comments
	ESA in IRIS2 is defined slightly differently than in the IRIS2 regulation 2023/588 article 28, though copying a part of that description?
SECTION 4	
SUPPORT FOR SECURITY INDUSTRY POLICY	DE (Comments): We welcome that a specific section on civil security is foreseen and that almost all key areas of civil security are taken into account. Enhanced resilience against hybrid threats and attacks on critical infrastructure must be taken into account in the MFF. Reducing fragmentation in this area plays an important role, we thus see an European added value here. Section 4 should therefore continue to support (pre-competitive) cooperation between public security actors and industry. In addition to technology development, the framework conditions for using the solutions must also be examined and implemented.
Article 79	PT (Comments): - Clarify if civil critical infrastructure protection, including ports and transport hubs, is covered.

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Commission proposal	Drafting Suggestions and Comments
Specific provisions for support to civil security industry policy	FR (Comments): Can the Commission specify what flexibility will be available for this section in the event of a need arising during the programming period ?
1. Actions supported under this section shall contribute to the general objectives set out in Article 3(1) and the specific objectives set out in Article 3(2), point (f).	RO (Drafting Suggestions): Actions supported under this section shall contribute to the general objectives set out in Article 3(1) and the specific objectives set out in Article 3(2), point ~~(f)~~ (d). RO (Comments): Article 3 (1) point (f) is refering to *developing Union cross-border and critical infrastructure key to the Union's competitiveness, and strategic independence in particular energy and transport,* *digital and security, defence and space infrastructure as well as social infrastructure* *and related data and services;* Article 3(2) point (f) doesn`t exist, but point d refers to the support to 'Resilience and Security, Defence Industry and Space' policy, ES (Drafting Suggestions): 1. Actions supported under this section shall contribute to the general objectives set out in Article 3(1) and the specific objectives set out in Article 3(2), point (f)~~.~~ **with a view to strengthening EU industrial capabilities and**

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Commission proposal	Drafting Suggestions and Comments
	supply-chain resilience, including SME participation and cross-border industrial cooperation. ES (Comments): It strengthens the industrial dimension by ensuring SME involvement and cross-border cooperation, preventing benefits from concentrating in a few Member States. FR (Comments): What does Article 3(2), point f, refer to ? It does not seem to appear in the text.
2. Support for actions under this section shall be financed from the budget set out in Article 4(2), point (e), and any additional contributions assigned in accordance with Article 6.	ES (Drafting Suggestions): 2. Support for actions under this section shall be financed from the budget set out in Article 4(2), point (e), and any additional contributions assigned in accordance with Article 6, **ensuring proportionate administrative requirements for SMEs.** FR (Comments): Can the Commission clarify the budget nomenclature envisaged for this section. Will there be a budget line for each type of activity listed in this article?
3. Actions shall be implemented in accordance with the general provisions set out in Chapter I and any additional rules set out in this section.	RO (Drafting Suggestions):

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Commission proposal	Drafting Suggestions and Comments
	Actions shall be implemented in accordance with the general provisions set out in Chapter I, any additional rules set out in this section **and in the subsecvent work programmes**. RO (Comments): Since some additional elements could be includded in the work programmes (e.g. eligibility issues - art. 9(5), 10 (2)), references to work programmes are to be indicated, wherever relevant, in text of the regulation.
Article 80	

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Commission proposal	Drafting Suggestions and Comments
Specific activities to support civil security industry policy	LT (Drafting Suggestions): Specific activities to support civil security industry policy **and critical energy infrastructure** LT (Comments): General comment: we propose clarifying the definition of infrastructure (too broad), defining separately what constitutes critical civil infrastructure and what constitutes critical infrastructure, with particular attention to energy and transport. As one of the objectives outlined in Article 3, point 4, is to support "technologies including critical energy infrastructure", this activity should be reflected in the title of Article 80 or designated as a separate article. SE (Drafting Suggestions): **Specific activities to support civil security innovation and industry policy** SE (Comments): This section would benefit from including innovation for civil security. IE (Comments): IE notes the provisions article 80, around investment in technologies for the control and surveillance of goods at the EU's external borders could also serve to support EU market surveillance and product compliance objectives.

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Commission proposal	Drafting Suggestions and Comments
1. Support for civil security industry policy shall address in particular the following application areas:	LT (Drafting Suggestions): Support for civil security industry policy **and critical energy infrastructure** shall address in particular the following application areas: LT (Comments): The same comment as mentioned in the line above. FR (Comments): How the activities mentioned will be coordinated with other EU programmes, in particular MPCU+.
(a) Security and resilience of critical civil infrastructures, in particular against hybrid threats;	AT (Drafting Suggestions): Security and resilience of critical civil infrastructures **and public service provision**, such as **mobility services and (public) transport infrastructure**, in particular against hybrid threats AT (Comments): **AT** comment: A well-functioning, robust and resilient public service is the foundation for a smooth and stable functionning of our societies and (other) vital civil infrastructures, thus contribution to protect our democratic structures and way of life. We have to make sure that next to (private) industry, activities not subject to competition on commercial markets but rather serving public needs on the more comprehensive societal markets be supported through the ECF as well.

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Commission proposal	Drafting Suggestions and Comments
	CZ (Drafting Suggestions): (a) Security and resilience of critical civil infrastructures **and supply chains**, in particular against hybrid threats; CZ (Comments): CZ - See our comment on Article 3, para 2(d)(4) LT (Drafting Suggestions): Security and resilience of critical civil infrastructures, in particular against **physical, cyber and** hybrid threats**.** LT (Comments): We suggest specifying the types of threats: physical, cyber and hybrid. NL (Drafting Suggestions): Security and resilience of critical civil infrastructures, in particular against hybrid **and other** threats NL (Comments): What does the Commission consider "critical civil infrastructures"? RO (Drafting Suggestions): (a) Security and resilience of critical civil infrastructures and democratic processes, in particular against hybrid threats, **including the protection and**

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Commission proposal	Drafting Suggestions and Comments
	cybersecurity of digital infrastructures and services of strategic importance; RO (Comments): Protecting critical infrastructures, including digital systems, is essential to ensure the continuity of essential services and to prevent disruptions from hybrid threats, cyberattacks, or other intentional actions. This aspect should be integrated into the concept of resilience and security, being part of it, and highlighting it in the legislative text ensures clarity. FR (Comments): What activities are covered by the idea of fighting "against hybrid threats"? Hybrid threats' attribution is a national prerogative and that coordinated action against hybrid threats at the European level is to be decided upon on an intergovernemental basis.
(b) Technologies, capabilities and solutions relevant for the prevention of and response to crime, in particular terrorism and violent extremism, organised crime and cyber-enabled crime	NL (Drafting Suggestions): Technologies, capabilities and **innovative** solutions relevant for the prevention **and investigation** of and response to crime, in particular terrorism and violent extremism, organised crime and cyber-enabled crime. RO (Drafting Suggestions): (b) Technologies, capabilities and solutions relevant for the prevention of and response to crime, in particular terrorism and violent extremism, organised crime and cyber-enabled crime, **including measures enhancing**

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Commission proposal	Drafting Suggestions and Comments
	standardisation, certification and interoperability of security technologies. RO (Comments): Standardisation and interoperability ensure that security solutions can operate effectively across Member States and agencies, enhancing the EU's collective capacity to prevent and respond to crime and terrorism. Standardisation, certification, and interoperability are integral to security technologies, ensuring coherent and secure operation across the Union and strengthening threat prevention and response. DE (Drafting Suggestions): (b) Technologies, capabilities and solutions relevant for the prevention of and response to crime **impacting civil security**, in particular terrorism and violent extremism, organised crime and cyber-enabled crime DE (Comments): "crime" is too broad, the link to "civil security" has to be established. PT (Drafting Suggestions): Technologies, capabilities and solutions relevant for the prevention of and response to crime **and attacks**, in particular terrorism and violent extremism, organised crime and cyber-enabled crime

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Commission proposal	Drafting Suggestions and Comments
(c) Technologies, capabilities and solutions for the control of goods and persons at borders, the protection of borders and logistical hubs, maritime security and surveillance and customs security;	NL (Drafting Suggestions): ~~(c) Technologies, capabilities and solutions for the control of goods and persons at borders, the protection of borders and logistical hubs, maritime security and surveillance and customs security;~~ DE (Drafting Suggestions): Technologies, capabilities and solutions for the control of goods and persons at **Union** borders, the protection of **Union** borders and logistical hubs, maritime security and surveillance and customs security;
(d) Civil preparedness against security threats, whether natural or human-made, accidental or intentional.	LT (Drafting Suggestions): (d) Civil preparedness against security threats, whether natural or human-made, accidental or intentional **with focus on the development of early warning and information systems, strengthening the response capacities of civil protection and other relevant services and engaging the public.** LT (Comments): We propose to amend this article by highlighting the importance of developing early warning and information systems, ensuring prepadness and involving the public in this process. NL (Drafting Suggestions):

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Commission proposal	Drafting Suggestions and Comments
	Technologies, capabilities and innovative solutions relevant for civil preparedness against security threats, whether natural or human-made, accidental or intentional. NL (Comments): Will 'civil preparedness' be defined somewhere? Does this include societal preparedness? RO (Drafting Suggestions): (d) Civil readiness and preparedness against security threats, whether natural or human-made, accidental or intentional ~~–~~ and community resilience during protracted emergencies. ES (Drafting Suggestions): (d) Civil preparedness against security threats, whether natural or human-made, accidental or intentional **as well as dual-use enabling technologies with clear civil market uptake pathways.** ES (Comments): Highlighting dual-use enabling technologies (e.g. advanced sensors, cybersecurity, AI-enabled situational awareness) ensures that investments benefit both civil and defence markets, promoting innovation spillovers across Member States. PT (Drafting Suggestions): Civil preparedness**, prevention and response capabilities** against security threats, whether natural or human-made, accidental or intentional.

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Commission proposal	Drafting Suggestions and Comments
	LT (Drafting Suggestions): (**e) Security and resilience of critical energy infrastructure, in particular against physical and cyber threats** LT (Comments): The listed areas lack focus on critical energy infrastructure. EE (Drafting Suggestions): (NEW) (e) Technologies, capabilities and solutions for the surveillance and protection of critical undersea infrastructure. EE (Comments): Art 3 paragraph 2 (d) (4) outlines critical undersea infrastructure as one of the priorities. The relevant thematic block does not mention this as an eligible activity. Hence we propose to add it.
2. Support for civil security industrial policy shall be implemented in particular through the following activities:	LT (Drafting Suggestions): 2. Support for civil security industrial policy **and critical energy inrastructure** shall be implemented in particular through the following activities: LT (Comments): As one of the objectives outlined in Article 3, point 4, is to support "technologies including critical energy infrastructure", this activity should be reflected in further articles of the regulation.

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Commission proposal	Drafting Suggestions and Comments
	NL (Comments): Is this section applicable to dual-use? SE (Drafting Suggestions): 2. Support for civil security **innovation and** industrial policy shall be implemented in particular through the following activities: IE (Comments): R&I is welcome by IE, but note that Ireland has a v. small stake in dual-use / defence. (also applies to b and c below FR (Comments): In which framework will these activities be implemented? Will there be a specific programme committee for the implementation of activities under this section?
(a) Research and innovation, scale-up, SME support, skills development, and manufacturing actions;	BE (Comments): Skill development is important for instance Training programs to reskill workers in climate adaptation industries (e.g., water management, resilient construction, environmental engineering). LT (Drafting Suggestions):

Commission proposal	Drafting Suggestions and Comments
	Research and innovation, scale-up, SME support, skills development, and manufacturing actions **with a focus on solutions enhancing the resilience, interoperability, and sustainability of critical sectors and their supply chains**; **furthermore, this should include the support of innovative mechanisms and pilot measures designed to foster upskilling and reskilling in civil security industry, facilitation of talent attraction to alleviate skills shortages, the development of curricula as well as the adjustment of skills to the evolving requirements of the labour market;** LT (Comments): This article speaks about the specific activities to support civil security industry policy, therefore, we suggest specifying the focus on ensuring greater security of industry. To add, taking into account Article 21 of the Preamble, we propose to add that the ECF should also include support for innovative mechanisms and pilot measures for upskilling and reskilling, development of curricula, attraction of foreign talent and matching of skills with the labour market NL (Comments): What will be the scope of 'skills development'? Will this cover professional training, for example for private sector and educational staff (also train-the-trainer principle)? SE (Drafting Suggestions): (a) Research and innovation, ~~scale-up,~~ **support to** SME**s, startups and scaleups** support, skills development, and manufacturing actions; SE (Comments):

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Commission proposal	Drafting Suggestions and Comments
	Unclear what scale-up refers to in this context, not sure if suggestion reflects intention DE (Comments): Besides, with regard to the research component of the policy window, societal resilience has to be an objective which should be achieved through ECF. This is nevertheless beneficial for industry, e.g. with regard to platforms and applications. FR (Comments): What synergies are envisaged with the Horizon Europe framework programme in relation to these activities? What synergies are envisaged with the Erasmus+ programme in relation to skills development?
	EE (Drafting Suggestions): NEW (a`) Development of Member States´ capabilities. EE (Comments): We would propose to add that the Union could also support the capability development of the Member States. The protection and surveillance of cross-border enery infrastructure may also require different investments. Thus we propose to add that the relevant capabilities are eligible for support under the regulation.
(b) Testing and validation of technologies and solutions;	LT (Drafting Suggestions):

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Commission proposal	Drafting Suggestions and Comments
	Testing and validation of technologies and solutions**, enhancing stress-testing, training and joint exercises to ensure high level preparedness**; LT (Comments): In our view, it necessery to mention stress-testing, training and joint exercises which are key measures to ensure high level preparedness. RO (Drafting Suggestions): Testing and validation of technologies and solutions, **including actions to ensure standardisation, certification, and interoperability**; RO (Comments): Standardisation and interoperability are essential to avoid market fragmentation and ensure that security technologies can operate seamlessly across different Member States and agencies. Certification guarantees quality and compliance with EU regulatory requirements.
(c) Deployment and market uptake of technologies and solutions, in particular by security practitioners;	LT (Drafting Suggestions): Deployment and market uptake of technologies and solutions, in particular by security practitioners **and operators of essential civil infrastructure**; LT (Comments): Operators of critical civil infrastructure are one of the main entities which ensure deployed of technologies and solutions in relatation to security and protection.

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Commission proposal	Drafting Suggestions and Comments
	LT (Drafting Suggestions): **(d) Strengthening technical monitoring of infrastructure and rapid repair capabilities to maintain the continuity and resilience of essential services;** LT (Comments): We would like to include more concrete measures ensuring the protection of critical infrastructure. Strengthening technical monitoring of infrastructure and ensuring rapid repair capabilities are essential to safeguard the continuity and resilience of critical services. Such measures reduce the risk of disruptions, lower long-term costs, and increase investor confidence by providing a stable environment for economic activity. This directly supports the competitiveness and security of the EU single market. ES (Drafting Suggestions): **(c bis) Facilitating pre-commercial procurement and innovation-friendly public procurement to accelerate market uptake.** ES (Comments): By encouraging public demand for innovative solutions, it helps SMEs and new entrants scale within the security industries.
(d) Support actions for the development, implementation, monitoring and enforcement of relevant Union legislation and policy	LT (Drafting Suggestions): ~~(d)~~ **(e)** Support actions for the development, implementation, monitoring and enforcement of relevant Union legislation and policy". NL

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Commission proposal	Drafting Suggestions and Comments
	(Drafting Suggestions): ~~Support actions for the development, implementation, monitoring and enforcement of relevant Union legislation and policy~~ NL (Comments): ECF should not be used to support implemenation or enforcement of Union legsislation. These type of administrative costs are not appropriarte under the ECF, and causes overlap. Other funding programs and MFF pillars are more suited for this. DE (Comments): In which areas does COM intend to fund the development, implementation and monitoring of EU legislation with the ECF? When this is linked to the consolidation of various funding programmes, which we welcome in principle, it is important that key tasks of these programmes are fulfilled more effectively and more efficiently by the ECF in order to leverage synergies. If this objective concerns administrative action of the COM, this should be reflected in the administrative expenditures in heading 4 of the MFF. IT (Drafting Suggestions): (d) Support actions for the development, implementation, monitoring, **simplification, streamlining** and enforcement of relevant Union legislation and policy IT (Comments):

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Commission proposal	Drafting Suggestions and Comments
	Favorable conditions for enterprises must be set out through simplification measures and ensuring coherent legislative provisions. PT (Comments): - Missing a reference to the importance of combination with complementary funding such as ISF, BMVI and UCPM.
	LT (Drafting Suggestions): (e) **facilitating information-sharing between authorities and critical infrastructure operators regarding risks and threats**; LT (Comments): Facilitating information-sharing between authorities and critical infrastructure operators strengthens preparedness and response to risks and threats. Timely exchange of data ensures that vulnerabilities are identified earlier, and mitigation measures can be coordinated more effectively, reducing the likelihood of service disruptions.
3. Support provided through the activities referred to in paragraphs 1 and 2, may be provided in any form, including through 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.	SE (Drafting Suggestions): support provided through the activities referred to in paragraphs 1 and 2, may be provided in any form, including through collaborative research and innovation activities set out in the Framework Programme for Research and Innovation [REF] and identified ~~in a specific dedicated part of~~ the **Horizon Europe** Work Programme. SE

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Commission proposal	Drafting Suggestions and Comments
	(Comments): Could only agree to a text where the bottom-up collaborative research and innovation of the HE regulation is safeguarded to ensure efficient, effective and high quality research and innovation supporting activities referred to in paragraph 1 ES (Drafting Suggestions): 3. Support provided through the activities referred to in paragraphs 1 and 2, may be provided in any form, including through 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~~ **separate** Work Programme **dedicated to collaborative research and innovation activities, and shall include simplified cost options where appropriate to reduce administrative burden for SMEs**. ES (Comments): Simplified costs reduce red tape, making participation more feasible for SMEs without compromising financial control. FR (Comments): Can the Commission elaborate on the articulation between ECF and Horizon Europe, and in particular regarding comitology and eligibility criteria of Horizon Europe for activities referred to in article 1 and 2, as it is mentioned that such activities could be funded through Horizon Europe?

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Commission proposal	Drafting Suggestions and Comments
4. Work programmes adopted in accordance with the rules of this Regulation under this section shall integrate in a specific dedicated part and ensure coherence with Competitiveness and Society activities supported under the Regulation (EU) [XXX] [Horizon Europe Framework programme for Research and Innovation.	LT (Comments): We have some doubts concerning the foreseen merge of the Work Programmes of the ECF and Horizon Europe. We are worried that this can result in deterioration of the European science base as ECF work Programmes are going to be demand driven and might lack focus on the lower TRLs. MT (Comments): Malta seeks clarification regarding the lack of complementary rules (like Art 34) for civil security and industry. SE (Drafting Suggestions): ~~Work programmes adopted in accordance with the rules of this Regulation under this section shall integrate in a specific dedicated part and ensure coherence with Competitiveness and Society activities supported under the Regulation (EU) [XXX] [Horizon Europe Framework programme for Research and Innovation.~~ SE (Comments): Questions the need to duplicate text from 42.3 here. ES (Drafting Suggestions): 4. Work programmes adopted in accordance with the rules of this Regulation under this section shall ~~integrate in a specific dedicated part and~~ ensure coherence with Competitiveness and Society activities supported under

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Commission proposal	Drafting Suggestions and Comments
	the Regulation (EU) [XXX] [Horizon Europe Framework programme for Research and Innovation, **and shall seek synergies with relevant projects funded pursuant to Section 2 of this Regulation.** ES (Comments): It promotes efficiency by avoiding duplication with other EU programmes, while facilitating civilian market uptake, which benefits broad EU industrial ecosystems. EE (Comments): EE requests clarification on what "integrated work programmes with Horizon Europe" will mean in practice. Does this imply overlapping topics, shared governance structures or joint programming? Greater clarity is needed to ensure complementarity and avoid duplication.
Article 81	PT (Comments): - Safeguards on transfer/licensing of results to third countries (3-year deadline post-final payment); need transparent criteria and objection timelines.
Ownership of results	
1. Where Union support is provided in the form of procurement, results shall be owned by the Union.	IE (Comments):

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Commission proposal	Drafting Suggestions and Comments
	This will require further consideration to ensure it does not have a negative impact on suppliers of innovation procurement ES (Drafting Suggestions): 1. Where Union support is provided in the form of procurement, results shall be owned by the Union. **Such access and licensing shall be exercised in a manner that preserves EU industrial competitiveness and security of supply, ensuring non-exclusive licenses prioritise entities established in the Union or associated countries**. ES (Comments): It protects EU industry from competitive disadvantages while ensuring open but controlled access aligned with EU security interests. FR (Comments): What does the concept "owned by the Union" actually mean in terms of the results of funded projects and to which projects it refers ?
2. Where Union support is provided in the form of a grant, Union institutions, bodies, offices or agencies shall enjoy upon request royalty-free access rights to results for the purpose of developing, implementing and monitoring existing Union policies or programmes in the fields of its competence and the right to grant, or to require the recipients to grant, non-exclusive licenses to third parties to exploit the results under fair and reasonable conditions without any right to sublicense unless otherwise specified in the grant agreement.	MT (Drafting Suggestions): Where Union support is provided in the form of a grant, Union institutions, bodies, offices or agencies shall enjoy upon request royalty-free access rights to results for the purpose of developing, implementing and monitoring existing Union policies or programmes in the fields of its competence and the right to grant, or to require the recipients to grant, non-exclusive licenses to third parties to exploit the results under fair and reasonable conditions

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	without any right to sublicense unless otherwise specified in the grant agreement. **Access shall be limited to non-commercial and non-competitive use.** MT (Comments): Malta feels that this text as currently drafted may deter participation under this theme, particularly from the private sector. Malta proposes the inclusion of a clause (reflecting the wording of the current Horizon Europe Art 41(9)) to mitigate this risk. NL (Drafting Suggestions): . Where Union support is provided in the form of a grant, Union institutions, bodies, offices or agencies shall enjoy upon request royalty-free access rights to results for the purpose of developing, implementing and monitoring existing Union policies, **strategies**, or programmes in the fields of its competence and the right to grant, or to require the recipients to grant, non-exclusive licenses to third parties to exploit the results under fair and reasonable conditions without any right to sublicense unless otherwise specified in the grant agreement. SE (Drafting Suggestions): 2. ~~Where Union support is provided in the form of a grant, Union institutions, bodies, offices or agencies shall enjoy upon request royalty-free access rights to results for the purpose of developing, implementing and monitoring existing Union policies or programmes in the fields of its competence and the right to grant, or to require the recipients to grant, non-exclusive licenses to third parties to exploit the results under fair and~~

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	~~reasonable conditions without any right to sublicense unless otherwise specified in the grant agreement.~~ SE (Comments): There is a risk that private companies avoid engagement with the fund if IP-rights to results developed are unclear. This clause must not hinder private sector engagement. Is these an analysis made of the consequenses by such a clause? ES (Drafting Suggestions): 2. Where Union support is provided in the form of a grant, Union institutions, bodies, offices or agencies shall enjoy upon request royalty-free access rights to results for the purpose of developing, implementing and monitoring existing Union policies or programmes in the fields of its competence and the right to grant, or to require the recipients to grant, non-exclusive licenses to third parties to exploit the results under fair and reasonable conditions without any right to sublicense unless otherwise specified in the grant agreement, **including, where necessary, step-in rights to guarantee continuity of supply for Union users.** ES (Comments): It guarantees continuity of supply for Union entities, even in case of ownership changes, through step-in rights, which is in the collective interest of all Member States. FR (Comments):

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Commission proposal	Drafting Suggestions and Comments
	Could the Commission elaborate on the intellectual property rules envisaged, and whether patents will be shared with EU institutions or other states ? In paragraph 2, what are the intellectual property rules envisaged ? Will patents be shared with EU institutions or other states ?
3. Any transfer of ownership of results, or the granting of exclusive licences for results, generated with support to legal entities established in non-associated third countries or to non-associated third-country entities shall be subject to prior notification and approval by the Commission or the relevant Member State or associated country authorities, which takes place within 3 years after the final payment of the action, under conditions ensuring the protection of the Union's security interests.	NL (Drafting Suggestions): 3. Any transfer of ownership of results, or the granting of exclusive licences for results, generated with support to legal entities established in non-associated third countries or to non-associated third-country entities shall be subject to prior notification and approval by the Commission or the relevant Member State or associated country authorities, which takes place within 3 years after the final payment of the action, under conditions ensuring the protection of the Union's security **and civil resilience** interests. RO (Comments): The wording *"which takes place within 3 years after the final payment"* may create ambiguity. It is unclear whether the three-year period refers to: (i) a strict deadline for notification and approval, or (ii) the timeframe during which the obligation to notify applies, (ii) and (iii) the roles of the Commission versus the relevant Member State or associated country authorities, as it is not clear who approves what and in which context.

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Commission proposal	Drafting Suggestions and Comments
	Clarification of these points would reduce the risk of divergent interpretations.
Article 82	MT (Comments): ‘
Complementary grant rules	
1. For activities supporting Coordination and Support Actions in the area of civil security industry, the Union may cover up to **[**100**]** % of the eligible costs, without prejudice to the co-financing principle.	MT (Drafting Suggestions): For activities supporting Coordination and Support Actions in the area of energy efficiency and clean energy transition, Union support may cover up to 100% of the eligible **direct** costs, **as well as the applicable flat rate for indirect costs,** without prejudice to the co-financing principle. MT (Comments): Malta feels that these textual additions provide more clarity on coverage of costs. Nonetheless, it is not clear why “co-finacing principle” has been inserted here so clarification is sought. RO (Comments):

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Commission proposal	Drafting Suggestions and Comments
	We would like more details on the content of these Coordination and Support Actions, are they among the activities listed under art 80? FR (Comments): Can the Commission explain how a co-financing rate set at 100% does not undermine the principle of co-financing? What factors justify such a level? PT (Comments): - The planning for co-financing principles under the area of civil security industry needs to be explained.
2. By way of derogation from Article 184(6) of the Financial Regulation when applying flat rates, the authorising officer responsible may authorise or impose funding of the beneficiary's indirect costs up to a maximum of 25 % of total eligible direct costs for the action.	RO (Comments): According to the Financial Regulation, a higher flat rate than 7% of the eligible direct costs may be authorized by means of a duly justified Decision of the Commission. We understand that the increase of the flat rate constitutes a derogation. Therefore, we kindly request that you provide the justification for this higher rate as well as the reasons on which the Commission's decision was based. SE (Comments): What is the reasoning for this derogation? ES

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Commission proposal	Drafting Suggestions and Comments
	(Drafting Suggestions): 2. By way of derogation from Article 184(6) of the Financial Regulation when applying flat rates, the authorising officer responsible may authorise or impose funding of the beneficiary's indirect costs up to a maximum of 25 % of total eligible direct costs for the action. **Work programmes may apply simplified cost options and lump sums where appropriate, and set lower minimum project sizes to enable effective SME participation and cross-border consortia, while safeguarding sound financial management.** ES (Comments): Reduced project thresholds and simplified cost structures create opportunities for SMEs and smaller consortia, thereby ensuring broader geographical coverage and participation across the Union. FR (Comments): Can the Commission clarify the scope of indirect costs that may be covered?