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LIMITE

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MEETING DOCUMENT

From:	Presidency
To:	Ad Hoc Working Party on the Multiannual Financial Framework (AHWP MFF) - European Competitiveness Fund
N° prev. doc.:	ST 15348/25 REV1
Subject:	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] - Explanatory note for 3rd compromise text Ad Hoc Working Party meeting on 26 November 2025

Explanatory Note

Ad Hoc Working Party on the Multiannual Financial Framework (European Competitiveness Fund)

Third Presidency compromise text

This document provides additional information, clarification and reasoning for the amendments proposed by the Presidency in the third compromise text. The document is for reference only.

REV1 changes:

ARTICLE	REASONING
Recital (22)	Lists moved from specific activities in article 33. Correction to "Industrial Accelerator Act".
Recital (24)	Lists moved from specific activities in art. 33 Removal of "new energies" due to no definition and no clear added value in mentioning.
Article 2(6a)	Addition proposed by the Council Security Committee.
Article 3(2)(b)(iv)	Minor changes to align with reasoning in table below on same article.
Article 3(2)(c)	Editorial change – objectives split into sub-paragraphs to improve readability.
Article 3(2)(d)(2)	Editorial change – objectives split into sub-paragraphs to improve readability.
Article 3(2)(d)(3)	Editorial change – objectives split into sub-paragraphs to improve readability.

Original:

ARTICLE	REASONING
Recital (2)	Amendment is in line with point 1.2 of the Competitiveness Compass.
Recital (2a)	Recital (2a) is introduced to clarify the balance between the general objectives listed in Article 3. The overall objective of strengthening the Union's Competitiveness is the common denominator among the objectives. Individual activities shall not exhaustively fulfil all objectives, but it is rather the sum of activities shall ensure, that all objectives are pursued.
Recital (3)	Amendments are in line with Article 3(1)(a) and further amendments in Chapter VII, Section 1.

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Recital (10)	In recital (10) the synergies between ECF and Horizon Europe have been clarified in order to accommodate the majority of Member States' request on specifying when the rules in respectively ECF and Horizon Europe apply in terms of award criteria, eligibility criteria, requirements etc. The recital is based on the Commissions non-paper on rules for participation and dissemination in Horizon Europe 2028-2034 and Interplay with ECF rules in Chapter I section 2 'Single Rulebook', which the Commission have been requested to provide in order to address Member States' concerns.
Recital (12a)	New recital introduced in order to reflect the content of Article 7(3).
Recital (21)	Amendment is in line with amendment in Article 3(1)(h).
Recital (26)	Technologies moved to 28b to collect examples of technologies in one place.
Recital (28)	This recital reflected different central aspects of the digital window, and has been split into four new recitals to clarify and improve readability. Only the first sentence has been retained. No changes have been made to that sentence.
Recital (28a)	This new recital is based on the second sentence in the original recital 28. Reference to NIS2 has been added, as other key legal acts in the field of cybersecurity, including the Cyber Solidarity Act, the Cyber Resilience Act, and the Cybersecurity Act were already mentioned here. This reference seemed to be missing, as funding from the existing Digital Europe Programme has been used to assist in the implementation of NIS2. Member States also highlighted the need for support in implementing especially cyber legislation in their comments. Furthermore, at the end of this new recital a new reference to the Digital Decade Policy Programme 2030 has been included. A stronger reference to the Digital Decade Policy Programme in relation to the implementation of the Digital Leadership window was requested by several Member States during the working party meeting on 17 September 2025.
Recital (28b)	This new recital is based on the third and fourth sentence in the original recital 28. In addition to what was already listed in recitals 28 and 26, detailed examples of technologies, infrastructure and services from Articles 3(2)(c), 39(1), 39(2)(b), 39(2)(c), and corresponding wishes from member states, also to article 39(3), have been moved to this recital, to ensure that the articles are more future proof and easier to read. A more detailed explanation of this approach can be found in the reasoning behind the changes made to Article 3(2)(c). The aim of this exercise is to collect the many examples in one place and avoiding several potential diverging lists of examples in the articles of the Digital Leadership window. The list contains many 'unfiltered' examples from articles, preambles and wishes to be included by member states. The list serves primarily to illustrate the logic in moving these to the preamble instead, and may contain overlaps and/or require further categorization.
Recital (28c)	This new recital is based on the fifth, sixth and seventh sentence in the original recital 28.

	One minor change has been made in the beginning of the sentence to align with the new wording of "key digital areas' used in the updated Article 3(2)(c) and recital 28b. The seventh and final sentence of the original recital 28 has been deleted to avoid repetition, as the same point is included in recital 29.
Recital (28d)	New recital reflecting the activities supported by the Digital Leadership window, in line with the updated Article 3(2)(c).
Recital (29)	The latter part of this recital has been moved to the new recital 29b. The first part remains unchanged apart from a correction of a typo. In this manner this recital has a clear focus on the possibility to support digitalisation across sectors.
Recital (29a)	New recital to better reflect that the ECF should enhance cybersecurity both by incorporating the cybersecurity-by-design principle in the ECF as well as promoting an innovative and competitive cybersecurity industry.
Recital (29b)	New recital based on the latter part of the original recital 29.
Recital (32)	Wording has been added to emphasise, that innovation is fostered by both solidifying and streamlining the path from medical breakthroughs to marketable solutions.
Recital (33a)	A new recital for biotechnology has been added to align with the changes made in Article 3(2)(b)(2), where biotechnology is now defined broader than just health.
Recital (36)	Adjustments to align with agreed language, in particular in the context of EDIP.
Recital (37)	Additional policy areas have been included. Some moved from Article 3(2)(d)(3).
Recital (40)	Change made to better reflect the concept of dual use.
Recital (46)	Amendment is in line with amendments in Article 11.
Recital (47)	Amendments to clarify projects under NZIA, CRMA, CMA and other future industrial policy acts are specified as strategic and eligible for the Competitiveness Seal as provided for in Article 8.
Recital (48)	Wording has been added to highlight, that Union support should focus on European added value, in order to accommodate Member States' comments.
Recital (50)	Wording has been introduced in order to reflect the new Article 9a on award criteria. The recital also specifies when award criteria are relevant.
Recital (50a)	New recital introduced in order to reflect the content of Article 15(2a) regarding the Commission's obligation to describe how the work programmes aim to support SMEs.
Recital (51)	Wording has been introduced in order to align the recital with Article 3(1)(c) regarding the objective of crowding in private capital.
Recital (52a)	For clarity in terms of complementarities between the European Innovation Council's work and the objectives and activities of the ECF.
Recital (54)	Wording has been introduced emphasising (1) the strengthening the European Union's industrial base as key for enhancing resilience and economic security, which is based on the Commission's technical note on the ECF industrial tools (WK 12726/2025), (2) the objective on crowding in private capital in line with Article 3(1)(c) and (3) cross-border value chains in the single market in order to accommodate Member States' requests to prevent distorting the Single Market.
Recital (56)	Amendment in order to correct and clarify the language.
Recital (56a)	New recital introduced in order to reflect Article 13a establishing the ECF General Committee. The recital addresses Member States' comments, in-

	cluding highlighting the Committee's role of providing strategic input, guidance and advice, that shall be taken into account in the development and implementation of work programmes.
Recital (68)	Wording has been introduced to reflect Article 21(3a), according to which the EIB Group shall be granted a share of the EU guarantee under the ECF InvestEU Instrument EU compartment. The wording is based on recital (50) in current InvestEU Regulation.
Recital (74a)	For clarity in terms of where rules are set related to MS compartments, contribution agreements, and how MS could be a part of the Policy Review Dialogues, as is current practice.
Recital (81)	Amendment in order to correct and clarify the language.
Recital (85)	Wording has been added in order to align the recital with Article 21(5).
Recital (87)	Amendments in order to reflect Article.15(1a), according to which the Commission will adopt the work programmes implementing the ECF Regulation including acts implementing activities under Chapter IV-VII in accordance the examination procedure referred to in Article 83(3), with exception of work programmes implementing space systems conditions pursuant to Article 69(4).
Recital (88)	Wording has been removed to reflect the deletion of Article 15(5).
Article 2(1)(4a)	Definition of defence products from EDIP included.
Article 3(1)(b)	Several Member States have requested to reflect circular economy and recycling of raw materials, which is in coherence with Chapter VII, Section 1.
Article 3(1)(c)	The objective of ensuring additionality is consistent with ECF Recitals (13), (51), (53) and (68) and Article 13. The wording on avoiding crowding out private or public investors has been clarified in accordance with the Financial Regulation Article 212(1)(b).
Article 3(1)(e)	Several Member States have requested to emphasise the role of innovation and research activities in strengthening the European industry and manufacturing. The amendment entails, that the scope of the ECF's objectives includes fostering research and innovation activities in support of Europe's economy.
Article 3(1)(f)	Several Member States have requested to include water infrastructure as critical infrastructures essential for competitiveness.
Article 3(2)(a)	A number of clarifications were made to improve readability.
Article 3(2)(b)(1)	Deleted 'a' and 'approach' as they did not provide added benefit to the text.
Article 3(2)(b)(2)	The previous formulation has been deleted to avoid unnecessary limitations. The new wording *"biotechnological solutions'* has been introduced to broaden the scope, as requested by many MS, and to ensure flexibility for future technological developments.
Article 3(2)(b)(3)	"Bio-based solutions' have been added to reflect Member State requests and to expand the scope. "Sustainable' was not included to avoid narrowing eligibility of the bioeconomy sector as a whole. This is also the case for Article 37(1)(f).
Article 3(2)(b)(4)	In order to ensure consistency between the formulations in the specific objectives and the specific activities, the majority of the text has been moved from this paragraph to article 37, 1(g). A new sentence was added to keep the scope of the objective ("and their role in the transition to…') as prepared in the Commission proposal.
Article 3(2)(c)	The overall aim of the changes to this article is to clarify, future-proof, improve readability, and ensure consistency with the language and structure of the articles on the window (Article 38-39).

	Sovereignty has been included as a specific objective, in light of its prominence throughout the window, corresponding comments from Member States, and its political priority and broad relevance. The scope has been concretised by integrating the original Article 39(1) albeit in a shortened version. The text seeks to find a balanced 'comprehensive and strategic' approach, considering the requests from some Member States to have a more strategic approach, while still maintaining a broad and future-proof window, encompassing 'the entire scope of the digital sector and digital value chains'. The key digital areas have been made more overarching and encompassing, while a more detailed list of examples based also on Member States comments has been moved to recital 28b. The list of 'dimensions' has been streamlined and shortened according to the changes made to Articles 39(2)(a-d) and 39(3). A reference to 'trans-European digital networks' has been included to ensure the correct legal base for the integration of CEF Digital, which was missing in the Commission's proposal. Reference to the AgoraEU programme has been moved to the horizontal part in Article 7, as this is not only relevant for the Digital Leadership window.
Article 3(2)(d)(3)	Many of the policy areas are moved to recital 37. Text added to emphasise that services should be based on user needs. Text added to emphasise the need to foster the uptake of space information, data and services.
Article 3(2)(d)(4)	Editorial changes – objectives split into sub-paragraphs to improve readability.
Article 7	The amendment in Article 7(3) ensures, that ECF shall be implemented in synergy with other programmes.
Article 8	Point 3 amended to mention the Competitiveness Seal explicitly.
Article 9a	Language clarified to indicate that award criteria shall be set in work programmes with reference to the general and specific objectives in Article 3 in the cases when award criteria are needed. The application of award criteria depends on whether the award procedure includes grants, procurement, prizes, non-financial donations, budgetary guarantees or financial instruments in the work programmes. Award criteria are tailormade to the action according to the Financial Regulation. In this regard, Article 9a(1)(a), (b) and (c) of the ECF regulates the common principles upon which the award criteria in a given award procedure in the work programme, must be based, where applicable. Point 2 has been deleted as it is redundant following the insertion of recital 10 on the ECF's links to Horizon Europe.
Article 12(4)	The amendments clarify that when an award procedure apply and relates to more than one specific objective, the work programme may specify, that the rules of the specific objectives in Chapter IV to VII, the general rules on award criteria and eligibility in Chapter I and II and the Financial Regulation apply. Thus, the amendment is introduced to improve legal clarity of which rules may apply, when more than one specific objective is pursued in an award procedure.

Article 12(11a)	Mentioning of Multi Country Project moved from Chapter VI to allow the use of this instrument across the policy windows.
Article 13	Amendments proposed by the Council Security Committee. See separate justifications.
Article 13a	Amendments proposed by the Council Security Committee. See separate justifications.
Article 13b	Article number changed from Article 13a. Points (2) and (3) are added to specify the Committee's rules of procedure.
Article 13b(1)(a)	'Strategic' added to indicate the nature of the advice given by the ECF General Committee to the Commission.
Article 13b(2-3)	Added to specify the Committee's rules of procedure
Article 14(2)	In Article 14(2) wording has been introduced in order to accommodate Member States' requests on emphasising strategic technologies and sectors, involving SME representatives and ensuring the independence of the ECF Strategic Stakeholders Board.
Article 14(4a)	Article 14(4a) has been introduced to ensure, that advice provided by the ECF Strategic Stakeholders Board will be shared with the ECF General Committee in its role referenced in Article 13a.
Article 14a	New article for the thematic platforms, which are separate from the ECF General Committee and the ECF Strategic Stakeholders Board.
Article 14b(5)	From the current InvestEU Regulation. For the paragraph numbering in Article 14b, the Presidency is aware that the numbering starts at 5. This is due to a technical guideline at the GSC and will be amended in the final text.
Article 14b(6)	To broaden the focus on technologies and areas of expertise, that need to be taken into account. And additions to highlight the importance of independence. Text reused from current InvestEU regulation.
Article 14b(7)	To emphasise importance of particular attention paid to market failures, leverage and multiplier effects and additionality. Similar provisions in InvestEU regulation.
Article 14b(7a)	Copied from paragraph 9 but written here to highlight the difference in terms of which rules the Commission shall establish.
Article 14(8)	Introduction of EIB as vice chair as is current practice in InvestEU regulation. Coherent with introduction of a stronger role for EIB Group in provisions on the ECF InvestEU Instrument.
Article 14(9)	Similar to 14(7a) but with deletion of those elements that are not relevant for the Advisory Board. Together with 14(3a) these adjustments create clarity in terms of which provisions apply to the different entities.
Article 14(10)	To make it clearer, that the Commission will establish Policy Review Dialogues with each Implementing Partner regularly, as is current practice. See recital 74a for the potential role for MS in these Policy Review Dialogues.
Article 15	Point 1a has been added, moving and points 3 and 4 and specifying that the examination procedure applies to all work programmes adopted under the ECF.

	Point 2 amended to specify the reference of the Horizon Europe component of the work programmes. This is to accommodate requests from several Member States on clarification of the alignment between ECF and HE in terms of funding collaborative research and innovation activities. The amendment provides a cross-empowerment, whereby the Commission has the power to, by means of implementing acts, adopt work programmes implementing collaborative research and innovation activities under the ECF and under Horizon Europe according to Article 15(3) in Horizon Europe.
Article 16	More content has been added in order to accommodate Member States' requests to reflect the wording from the Commission's technical note on Industrial Policy tools. The amendment clarifies the link the between Article 16 and Article 3(1). In parallel, recital (54) has been adjusted to reflect the content in the technical note on Industrial Policy tools.
Article 17(1)	Wording has been introduced to allow for the possibility that SMEs are project partners and not just suppliers.
Article 17(2)	Wording has been introduced to accommodate several Member States' requests on indicating, that calls for expression of interest shall be open, competitive and transparent
Article 17(3)	The text has been amended to reference the award criteria introduced in Article 9a.
Article 18	Several Member States are sceptical of Article 18, while some Member States suggest to limit the scope to exceptional circumstances. In order to accommodate the comments, the Presidency proposes to add the wording in "duly justified exceptional cases' in accordance with Article 196(2)(a) of the Financial Regulation, which allows to add such specification in the basic act as an exception to the Financial Regulation.
Article 20	In Article 20(2)(d)(2) a reference to Article 9a is added following the mentioning of common award criteria.
Article 21	In Article 21(1) it has been clarified, that "financial instrument' refers to the definition in Article 2(9) and Article 2(30) of the Financial Regulation, since comments from Member States indicate, that the term "financial instrument' appears unclear.
Article 22	Several Member States have requested a general clarification of Article 22, including the definition of a scale-up. In order to accommodate these requests, it is suggested that the title is changed to "Scale Up Facility' and to consistently refer to "scaleups' throughout the Article in order to clarify that Article 22 establishes a Startup Facility aiming to ensure that the particular needs of startups developing or deploying innovative technologies will receive financial support through the ECF InvestEU Instrument at all stages.
Article 24	In Article 24(1) it has been clarified, that EU compartments and Member States compartments may be used in a complementary manner.

	Furthermore, contributions from third countries are possible according to Articles 211(2) and 221(2) of the Financial Regulation. This amendment is in line with InvestEU Regulation.
Chapter III	New title in line with the wording Commission uses in Article 15 for the activities in Chapter III. Improved the structure of the chapter by deleting unnecessary section-titles.
Article 26	Title changed in order to specialise the scope in line with the idea of the former InvestEU Advisory Hub. Changes in structure to clarify, that the services delivered by ECF Project Advisory are of specialised nature, and to avoid duplication of scope between ECF Project Advisory and Business support in Article 28. The Presidency has added "specialised' to focus the scope and to have clear distinction between Article 26 (specialised and centralised) and Article 28 (general support and decentralised).
Article 27	Change in structure by dividing content of Article 27(1) into Article 27(1a) and (1b) in line with other articles "establishing' a structure, e.g. Article 14.
Article 28	Insertion of '...taking into account existing structures and work', to align with national or other EU structures, to avoid duplication of structures or work.
Article 32	Clarification on the corresponding point in Article 4 regarding Clean Transition and Industrial Decarbonisation.
Article 33	The overall aim of the proposed changes is to clarify questions related to technologies within the scope of Article 33, including the relation to other financing instruments. At the same time, the changes made aim to limit the listing of specific examples of activities in order to keep flexibility in the relevant points (a-o), as not to create an uneven focus on specific sectors over others. Specifically, questions from Member states, including in particular in relation to the scope of LIFE activities, the uptake of technologies, CCUS and infrastructure, have been addressed to clarify the scope. Furthermore, wording on transport activities have been streamlined.
Article 37(1)(a)	The text is streamlined while adding innovation. AMR and rare diseases are explicitly included, as these were requested by several Member States. The list is further simplified to avoid duplication and "global health initiatives' replaces "international health initiatives' as this is more in line with current policy terminology. Autism is removed as it is not a disease.
Article 37(1)(b)	The paragraph was clarified to strengthen the focus on public health systems and innovation. A new reference to *clinical trials, including multi-country trials*, was added to highlight the importance of this area to the EU's competitiveness in life sciences. The phrase *"developing and implementing Union health legislation, also by use of digital technologies'* was deleted to avoid duplication, as support for Union legislation is already covered under paragraph (h) and EHDS is already mentioned in the article itself. This ensures thematic clarity and prevents overlap between provisions.
Article 37(1)(c)	'Critical medicinal products' and 'advanced therapies' were added to reinforce preparedness and competitiveness. The scope was broadened to include industrial deployment and equitable access to key health technologies.

Article 37(1)(ea)	The biotechnology support paragraph was renumbered to (ea) in order to place health security policies together with the other health initiatives, so it follows directly after other health initiatives, ensuring thematic consistency.
Article 37(1)(f)	The scope was broadened by adding *food waste* and clarifying biotechnology areas. The phrase *"from agriculture and forestry"* was deleted to avoid narrowing the scope of bioeconomy support.
Article 37(1)(g)	As explained in Article 3(2)(b)(4), we have moved the more specific parts of Article 3(2)(b)(4) into this article. At the same time, we have added "*including food and feed systems*' as many Member States wanted to add either "agri-food' or "food systems'.
Article 39(1)	This article has been deleted and its main elements integrated in Article 3(2)(c), as noted above. The aim is to avoid duplicating provisions related to the scope and to ensure consistency with the structure of other policy windows, where no such article exists.
Article 39(2)	'Digital Leadership' in capital letters, referring to the title of the window and the objective article 3(2)(c). Across the activities (Article 39(2)(a-e)) the Presidency has tried to clarify the scope, improve readability, reduce overlaps and focus on activities, moving more overall objectives to article 3(2)(c) while those already included in article 3, including 3(2)(c), have been deleted to avoid duplicating language.
Article 39(2)(a)	Text has been deleted to avoid duplicating Article 3, including article 3(2)(c). Additional changes have been made to simplify the text and emphasize 'developing and shaping sustainable core digital technologies that reflect Union values' as the actual activity, moving this to the beginning of the article.
Article 39(2)(b)	Text has been deleted to avoid duplicating Article 3, including 3(2)(c). Changes have been made to emphasize digital ecosystems as subject matter and delineate the twofold focus of (1) supporting companies so that they stay and expand in the EU and (2) ensuring the security of supply chains. Additional changes include deleting mentioning of infrastructure to avoid duplicating 39(2)(c) and avoiding repetitions (i.e., skills now mentioned only once in this article).
Article 39(2)(c)	Text has been deleted to avoid duplicating Article 3, including article 3(2)(c). Reference to 'trans-European digital networks' and 'across borders' has been included to ensure the correct legal base for the integration of CEF Digital. List of examples and according additions by Member States has been moved to recital 28b. 'Made in Europe' changed to a reference to Article 10 on 'EU preference' to ensure clarity and given that it's a delicate discussion of high political relevance. As requested by Member States the text on national investments has been clarified. Reference to Multi Country Projects including Joint Undertakings has been moved as a horizontal provision in Article 12(11a) given their relevance across all of the Digital Leadership chapter and all of the ECF.
Article 39(2)(d)	Text deleted to avoid duplicating Article 3, including Article 3(2)(c). The text has been simplified and kept more general. Support across the ECF for digital transformation is already included horizontally in recital 29, and mentioned across windows. The Presidency has decided to delete the last sentence, to avoid the impression that this is only relevant for article 39(2)(d).

Article 39(3)	'Innovation' and 'products' have been added, as it is important to develop innovative products within the framework of digital transformation. The term 'situational picture' is too narrow and technical, and has been replaced by 'situational awareness' - the term which is used consistently across EU legislation, Council conclusions etc. 'Develop' has been replaced with 'further strengthen' because the EU already has several initiatives – some in place since 2016 – to enhance the Union's situational awareness, such as the Cybersolidarity Act, the CSIRTs Network, and CyCLONe. Using the term 'develop' could imply that the EU currently lacks initiatives in this area.
Article 40(2)	Changed from wording from 'section' to 'chapter' as the budget line will apply to the entire chapter VII.
Article 41	Change in wording to reflect the wording used in the respective sections for space and defence. The change in subpoint is to correlate to the correct cross reference legally.
Section 1 (title)	The Presidency has decided to change the title of the section, is it was misleading to call it "resilience' only, when resilience is a general objective of the whole ECF. It is now instead "Resilient Raw Material Value Chains', as the proposal from the Commission is intended to focus solely on this, and we believe the title should reflect this more clearly. The working party can only amend the section title, not the chapter, as the chapter titles are bracketed in Article 1.
Article 42(1)	Changed the title to reflect new section title. Paragraph 1 has been deleted as it was a mentioning of the general objectives, and not adding anything to the text. It was also the only section to have this "introduction' paragraph.
Article 42(2)(a)	Added 'recovering, reusing' as activities under this section, as these can also strengthen the resilience of our supply chains and therefore support the goal of the ECF.
Article 42(2)(c)	Redundant to mention further criteria to support already appointed strategic projects – if already deemed strategic, it should be able to receive funding also from the ECF, also taking into consideration the limited scope of this section.
Article 43	Deleted, as it was unclear what the meaning was. Instead, it has been introduced in Article 20(3), as this was the intent behind the article.
Article 44(ea)	EUDIS turned into point (ea) and content moved to new Article 49a to ensure a proper articulation with the other types of activities under the section. A new para 4 added to stress the coherence with the broader efforts on capability development based on agreed text from EDIP.
Article 45	EDPCI article updated to reflect agreed text from EDIP and the possible continuation of projects identified under EDIP in the context of the ECF.
Article 46	A new paragraph 2 replaces provisions previously placed in Article 51(15).
Article 47	Article updated to align with agreed text on industrial reinforcement in EDIP context. Article 47(2) paragraph turned into Article 47(fa) and updated to align with EDIP agreement, including reference to SEAPs. A new paragraph 5 is added to replace provisions previously placed in Article 54(2)(e).
Article 48	Article 48(1)'s structure has been updated. New paragraph 1a and 1b introduced to replace provisions previously placed in Article 51(15) and (17) respectively. Article 48(3) and (4) aligned with EDIP agreement.

	New Article 48(4a) introduced to replace provisions previously placed in Article 54(2)(f).
Article 49a	New Article introduced to reflect EUDIS. Content based on previous Article 44(2).
Article 50	Further clarifications introduced.
Article 51	Updated to reflect EDIP agreement. Article 51(3-7) integrated into one paragraph as in SAFE or EDIP. New paragraph 8 introduced from EDIP. For paragraphs 9-13 the references to EDPCIs are deleted as the eligibility provisions would depend on the type of activity undertaken by the EDPCI based on the EDIP logic (see new paragraph 4b in Article 45). Paragraph 15 and 17 have been deleted and their content introduced in other Articles.
Article 52	Small editorial changes in paragraph 8.
Article 53	Introduction of defence readiness and resilience under criteria.
Article 54	Specified that the Article relates to results generated under Article 46. Paragraph 2 points (e) and (f) moved to their corresponding Articles.
Article 56	Deletion of the Board.
Article 57	Editorial changes.
Article 58(1)(a)	Improving readability to clarify relationship with Horizon.
Article 59(1)(a)	Description of Galileo and EGNOS added. More clear references to geographic coverage are now included.
Article 59(2)(d)	Reworded to make clear that international cooperation in the pursuit of interoperability is an objective rather than an activity.
Article 59(3)(l)	Complementary PNT services could be terrestrial.
Article 59(4a)	New paragraph to better explain the geographical coverage of PNT services
Article 59(5)	Specifies that access policy of the PNT components, including that it would be possible to change the free of charge policy. Ensures consistency with other implementing acts with the other components in this section by changing advisory to examination procedure.
Article 60	The Presidency chose not to redraft the text on the Earth Observation Governmental Service. In line with many of the Member States comments, the presidency finds that the Council needs more information before it deals with the proposed initiative. Technical discussions on EOGS are currently taking place in a working group with the Member States and the Commission and further information as to developments of other initiatives needs to be clarified.
Article 60(1)	The article is reduced to an introduction to the subcomponents.
Article 60(1a)	Delivers a more detailed description with text from Article 60(1).
Article 60(4a)	To add a clear reference to Copernicus User Forum.
Article 60(5)	Provides a reference to the core users as a basis for reference in Article 60(4).
Article 60(5)(a)	Gives a more flexible mandate by also including future capacities.
Article 60(5)(c)	Clarifies that the European Green Deal Space and Digital Twins are data-related initiatives.
Article 60(5)(ca)	Moved from Article 67 as text specifically relates to the task of Copernicus.
Article 61(1)	To streamline the text and for consistency with other components of this section, Secure Connectivity is separated into two sub-components, IRIS2 and GOVSATCOM. Treating them individually also allows for a more precise description of the two sub-components.

Article 61(1)(d)	The paragraph is kept as it is necessary for the legal basis of the article and because it was the result of lengthy discussion during the negotiations of Secure Connectivity.
Article 61(ea)	The end of para 1 has been moved to follow the streamlining logic of other components.
Article 61(3)(a)	The paragraph is split to clarify the differences between the governmental and the commercial infrastructure.
Article 61(3)(c)	Changed to "may host', because at the moment there is nothing to host.
Article 61(3)(d)	Clarify the role of the GOVSATCOM Hub.
Article 61(6) Article 61(7)	A reference to future implementing acts is necessary to ensure the evolution of the component.
Article 61(10)	Correction as implementing acts are only referred to in paragraphs 6 to 9 of this Article.
Article 61(15)	The amendment follows similar wording from the Secure Connectivity regulation.
Article 62(1)(f)	Reworded to leave a hook for activities in relation to the EU space act, but without specific mentioning of the act.
Article 62(2)	Changes are expected to EUSST partnership. It is unnecessary to address the transformation here.
Article 62(3)	Reworded to better follow the amendments in Article 63(4).
Article 62(4)	Reworded to make the tasks of the EUSST partnership services clearer. It is not legal to supplement within an implementing act.
Article 62(6)	Commission needs to provide more information on what they envision.
Article 62(7)	Order of when the article applies has been changed. Article has been moved to Article 63(9a).
Article 62(8)	Moved to paragraph 10a.
Article 62(11)	Many Member States asked for more flexibility for the participation of other countries, but the Presidency has not implemented the requested flexibility changes. Many of the sensors in the EUSST partnership are military sensors. The Commission believes that opening up for participation in the EUSST partnership to other countries than Norway will make the MoDs of the Member States unwilling to keep sharing data. The Presidency encourages Member States to consult with their MoD colleagues whether they share that concern or if they indeed want a more flexible approach.
Article 64(3)	The article does not seem to refer to any specific service. Hence, the text is limited to the Space domain. Further elaboration from the Commission on the envisioned services could be beneficial.
Article 65(2)	By adding 'cooperative', the role of collaboration with ESA is highlighted. More explicit reference to ESA is covered in Article 69(4) and Article 75.
Article 65(5)	Specifies that the article only encompasses Union space assets that are subject to security accreditation instead of 'governmental infrastructure'.
Article 66(2)(f)	Amended to leave a hook for potential activities in relation to the EU space act, but without specific mentioning.
Article 67	Only minor changes. Relationship between ECF and Horizon Europe has been clarified elsewhere in the ECF, e.g., in recital 10 and recital 53.
Article 68	Title has been changed to better match the content of the article.
Article 68(2)	Deleted because paragraph is not necessary with the addition in Article 68(1) and Article 68(4a).

Article 69(4)	Advisory procedure for the implementing acts is chosen to ensure ease of implementation as Member States has differing regimes that can be difficult.
Article 69(6)	Reworded to make the provision clearer.
Article 70(2)(b)	To avoid an exception within an exception.
Article 70(2a)	Exception moved to here. Clear exclusion of programs not fully financed by the Union.
Article 71(1)	Deleted as a number of Member States question that the Commission and EUSPA can be excluded for any responsibility. EU citizens must be ensured the right to pursue legal action in case of accidents.
Article 72	Many Member States have asked for changes to this paragraph, going in different directions (in particular geographic balance and SMEs). The Presidency is concerned that too detailed provisions will make competitive tendering difficult.
Article 72(1)	Reference to EU's autonomy as it is not necessary considering the subject of the provisions. 'Regulation' is replaced with 'paragraph' because the 30% requirement is only mentioned here.
Article 72(1a)	The Commission shall deliver information to MS on the fulfilment of the 30%-target. Under the current regulations, MS have continuously requested this information, which has never been provided.
Article 75(1)	Several Member States find wording too harsh in placing obligations on Member States. 'Where appropriate and possible' stems from the current EU Space Programme regulation (2021/696)
Article 75(5)	It is difficult to carry out the presented process in this paragraph with an examination procedure. The Presidency finds that advisory procedure is preferable in this case of an application process, as the examination procedure would entail voting.
Article 76(1)	Text has been amended to clarify which assets are covered.
Article 77(2)(d)	Reference has been added to Article 74 and tripartite agreement.
Article 77(3)	A lot of the wording is taken from regulation 2021/696.
Article 78	Deleted as it is redundant.
Article 79	Amended to reflect the correct budget-reference. Remaining points deleted to streamline text with other policy areas in the Regulation.
Article 80(1)	Actions added according to Member State requests and to improve scope of the policy area.
Article 80(2)	Deleted as it overlaps with other horizontal elements of the Regulation and does not follow the approach used in other windows and sections.
Article 83(2)	Advisory procedure is reintroduced as it is proposed to be used for certain technical elements in the space window for instance in Article 69(4).