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WK 17627/2025 REV 2

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CONTRIBUTION

From:	General Secretariat of the Council
To:	Working Party on research (Atomic Questions)
N° Cion doc.:	12469/25 + ADD 1 - 3
Subject:	Proposal for a COUNCIL REGULATION establishing the research and training programme of the European Atomic Energy Community for the period 2028-2032, complementing Horizon Europe, the Framework Programme for Research and Innovation, and providing for the Community's contribution to the ITER project, and repealing Regulation (Euratom) 2025/1304 - Member States general comments

Delegations will find attached the Member States general comments on the above-mentioned proposal.

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AT comments

In consistency with our position with regard to earlier Euratom programmes, we would like to stress the following points:

1. Austria emphasises that the utilisation of nuclear fission as a source of energy is neither a viable nor a cost-effective nor a sustainable option for fighting climate change. **Nuclear power is not a renewable or safe energy source.** Austria is therefore neither in favour of allocating EU funds to, nor of creating a favourable European framework for, nuclear fission reactors.
2. In the field of nuclear fission, Austria supports the promotion of measures for research and training to **improve nuclear safety, security measures, radiation protection, innovative applications of radioactive radiation in the medical sector** as well as **decommissioning and waste management**, including strengthening and securing the expertise available in Europe in these areas.
3. Austria advocates that the Euratom programme in the field of nuclear fission should remain focused on the above-mentioned areas and **rejects Euratom taking on an operational role in the technological development of nuclear fission reactor concepts** (such as SMRs or AMRs) as well as in their construction and installation, or that projects in this field be funded by Euratom.
4. Austria is committed to ensuring that long-term operation research (LTO) remains exclusively confined to research and experimental facilities with clear safety, environmental, medical or radiation protection objectives and **does not contribute to extending the service life of commercial power reactors.**
5. **Austria supports the promotion of fusion research**, including in particular the transition to technology, construction and innovation.
6. Austria supports the major international research project under European leadership ‘ITER’, while paying attention in particular to cost efficiency and effective management.

DE comments:

I am sending you the German comments on the proposal below.

- How does the Commission justify the shift in the research focus of the Euratom research and training program in the field of nuclear fission from a primarily safety-oriented approach to one that is more development-, innovation-, and industry-oriented, as provided for in the proposed regulation?
- Against this background, can it be assumed that the share of funding for safety-oriented research in the field of nuclear fission will decrease in the future, and if so, to what extent?
- Will opening up the Euratom work program to additional, combined, and cumulative funding from other EU funding instruments effectively lead to an increase in the total funds available for safety-oriented nuclear fission research?
- How does the Commission ensure that this reorientation and possible increases in funding take adequate account of safety-related areas of research in particular, such as the decommissioning of nuclear facilities, radiation protection, and nuclear waste management?
- Recital 7: What would be the specific effect of the described flexibility on the Programme? What does it mean in this context that the financial envelope is estimated as “indicative”?
- Recital 8: Is the “ECF’s digital framework” a reference to the single gateway?
- Recital 14: What is the relation between the objectives in this recital and the objectives laid down in the tracking and performance framework?

- Article 6: The phrase “or their successors” should be deleted. The MFF from 2035 onwards must not be prejudiced.
- Why does Article 13 (2) refer to the advisory procedure instead of the examination procedure (Art. 11 (1) Council Regulation (Euratom) 2025/1304)?

EE comments:

While the Estonian government’s position on the Euratom proposal is still under development, our general, overall comments on the proposal are as follows:

1. Strengthening Capacity Building for Newcomer Member States (article 3(2)(d))

Estonia strongly supports the Programme's objective to develop, retain, and utilise expertise and competencies in the nuclear field through education and training. However, given that nuclear expertise and experience are currently concentrated in Member States with established nuclear programmes, Estonia emphasizes the need to prioritize the capacity and R&I capabilities of "newcomer states". We propose that the Programme include targeted support mechanisms to ensure that Member States newly embarking on a nuclear energy programme – such as Estonia, which lacks prior operational experience in this field – are guaranteed equitable opportunities in participation and benefit sharing. Such mechanisms should include dedicated support for institutional and human resource capacity development in critical areas (e.g., regulatory framework, safeguards, security, waste management) through:

- Specific knowledge transfer and expert rotation schemes for officials and regulators.
- Funding for the preparation and execution of international audits and expert missions (such as IAEA INIR missions) to support the development of robust national regulatory capability.
- Support for the establishment of specialized higher and vocational education programmes in cooperation with experienced nations, focusing on reactor technology and safety systems.

2. Ensuring Adequate Funding for Fission Research and SMR Safety (article 3(2)(c))

Estonia recognizes the critical role of the Euratom Programme in supporting Fusion research, including the Community's contribution to the ITER project. Nevertheless, considering the long-term strategic energy objectives of the Union, we stress the necessity of ensuring sufficient and flexible funding for Fission research. For Member States seeking to introduce nuclear energy, such as Estonia, research related to Small Modular Reactors (SMRs), nuclear safety, and radiation protection is strategically paramount in the near-term. Given the significant budgetary allocation to the ITER project, we must ensure that the Programme's support for SMR fuel cycles, safety analyses, and R&D into innovative materials remains robust and is not overshadowed by Fusion funding, allowing the EU to maintain its technological leadership in both Fission and Fusion.

3. Promoting Research Excellence and Reducing Administrative Burden (articles 2, 7, 9, 12)

Estonia fully supports the alignment of the Euratom Programme with the rules of participation and dissemination of Horizon Europe, aiming for greater simplicity and flexibility, especially to reduce administrative burden. We welcome the proposed extensive use of simplified cost options, including lump sum funding as the default form of Union contribution and the use of personnel unit costs. This move towards simplified financing mechanisms is crucial for fostering broader participation, particularly from newcomers and smaller entities, while preserving sound financial management and control.

However, Estonia emphasizes that the implementation of lump sum funding and personnel unit costs must be designed to ensure flexibility and avoid creating any detriment or disadvantage to applicants, especially those with limited administrative capacities. While simplification is vital, it must not compromise the equitable access to funding for all beneficiaries, regardless of their experience level. The application of these simplified cost options should be implemented in a

manner that truly facilitates participation and reduces bureaucratic hurdles, thereby enabling faster and more strategic utilization of EU funds.

4. Open Access to Knowledge and Research Infrastructure (articles 3(2)(d), 11)

We support the commitment to provide open and equitable access to nuclear research data, knowledge, and best practices across the EU. The continued support for European research infrastructures, including those operated by the JRC, and making them available through **open access schemes** is vital. This provision is particularly crucial for smaller Member States and their regulatory bodies, which often lack the financial resources or national infrastructure to conduct expansive experimental research independently. The utilization and sharing of the JRC's expert knowledge in areas like nuclear data, measurements, and modelling must be maximized to support science-based policy advice throughout the Union.

SI comments:

The Republic of Slovenia welcomes the proposal for the Euratom Regulation 2028-2032. We believe that it covers all of Slovenia's key needs.

As a nuclear country, Slovenia with a significant proportion of its electricity is generated by the Krško Nuclear Power Plant and the recent adoption of the Resolution on the long-term peaceful use of nuclear energy in Slovenia, "Nuclear Energy for the Future of Slovenia," in 2024, it appears that the Republic of Slovenia will further increase its activities in this area. Every country with a nuclear and radiation program must maintain sufficient expertise to be able to ensure the highest level of nuclear and radiation safety at all times and in all circumstances. This is part of the international obligations of the Republic of Slovenia (e.g., EU Council Directive 2009/71/Euratom, amended by Council Directive 2014/87/Euratom, EU Council Directive 2011/70/Euratom, Convention on Nuclear Safety, Joint Convention on the Management of Spent Fuel and Radioactive Waste, Euratom Treaty, etc.). The Republic of Slovenia considers the management of spent nuclear fuel to be one of the key issues and supports all efforts of the Euratom program towards international solutions.

The Republic of Slovenia advocates that the Euratom program for the period 2028-2032 should be more ambitious in supporting the development of nuclear technologies in the field of fission, including the development of small modular reactors. The latter would, in our view, contribute to greater European competitiveness in this field. The Republic of Slovenia is active in all areas of indirect activities under the Euratom program. In the field of fission, the Republic of Slovenia is active in various projects and in all active partnerships. In the field of fusion, development is moving towards a new energy and industrial sector, so it is crucial that the Republic of Slovenia can also become involved in this field through the incentives provided by the programme in question. Through the Slovenian Fusion Association, the Republic of Slovenia is successfully involved and active within the framework of the co-financed EUROfusion partnership.

The Republic of Slovenia notes that the proposed regulation no longer includes the possibility of participating in the MSCA program, which operates within the Horizon Europe program and is also planned for the period 2028-2034. Accordingly, the Republic of Slovenia will request clarification regarding the exclusion of Euratom participation in the MSCA program in the proposed regulation for 2028-2032. The Republic of Slovenia also wishes to receive clarification as to why the draft regulation does not break down budgetary resources by indirect activities in the field of fusion and fission and direct activities of the JRC, as was the case in previous programs. The Republic of Slovenia understands that one of the objectives of the proposed regulation is to allocate the aforementioned funds, and therefore intends to raise questions related to the procedures and timeline for determining the aforementioned allocation.

At the same time, the Republic of Slovenia notes that, with the exception of areas related to security, the proposal does not include research for the development of fission nuclear reactors and does not support European competitiveness in this field.



Paris, 16 décembre 2025

COMMENTAIRES DES AUTORITES FRANCAISES

Objet : Prochaines étapes concernant le programme Euratom & ITER : Réponse des autorités françaises à la demande de commentaires généraux par la Présidence chypriote

Ref. : Mail de la Présidence chypriote du 2 décembre 2025

En réponse à la demande de la Présidence chypriote de commentaires généraux concernant le programme de recherche et formation Euratom & ITER, les autorités françaises souhaitent partager les observations suivantes :

Les autorités françaises saluent la proposition ambitieuse de la Commission concernant le programme de recherche et formation Euratom 2028-2032 (ci-après le « programme Euratom »), tant sur les objectifs que le budget proposé, qui témoigne d'une **volonté affirmée d'intégrer le nucléaire dans les priorités stratégiques de l'UE**, en particulier pour le renforcement de la compétitivité et de la décarbonation de l'Union.

Elles **se félicitent des synergies attendues avec le fonds européen de compétitivité (FEC) et le programme Horizon Europe (HE), en application du principe de respect de la neutralité technologique**. Les discussions relatives au programme Euratom et à ITER seront étroitement liées aux négociations concernant ces deux instruments.

Les autorités françaises soulignent **l'importance de maintenir un budget suffisant pour le programme Euratom dédié à la fission nucléaire**, dont les applications répondent aux défis énergétiques actuels et à moyen terme, tout en assurant un équilibre adéquat avec la fusion, dont les perspectives prometteuses restent plus lointaines.

Les autorités françaises se félicitent que **la construction et l'exploitation d'ITER soient considérées comme prioritaires et estiment que le niveau de la contribution d'Euratom au financement du projet devrait être sanctuarisé dans le règlement**.

À ce stade, les autorités françaises sont en train d'examiner la proposition de règlement de manière approfondie et conservent une réserve générale d'examen. En première relecture, elles notent les points d'attention suivants :

- si les objectifs généraux du programme Euratom, du FEC et de HE convergent, avec des priorités ambitieuses telles que le renforcement de la compétitivité de l'Union et la décarbonation, **les autorités françaises s'interrogent sur la portée limitée du soutien prévu par le programme**

Euratom dans le domaine de la fission nucléaire et demandent notamment l'intégration de l'innovation dans les objectifs spécifiques du programme, comme c'est le cas pour l'énergie de fusion ;

- l'absence dans le règlement de répartition budgétaire indicative entre la recherche en matière de fission, la recherche sur la fusion, les actions directes du JRC et le projet ITER ainsi que les modalités d'implication des États membres dans le processus de réaffectations potentielles ;
- les différentes configurations du comité institué à l'article 14, notamment en ce qui concerne les sujets communs à l'énergie de fission et de fusion (par exemple, l'enseignement et la formation, les matières nucléaires, la gestion des déchets) ;
- les modifications proposées à la procédure de comitologie aux articles 13 et 14 de la proposition de règlement. En particulier, les autorités françaises estiment que **les programmes de travail doivent être adoptés après une procédure d'examen** en comitologie, en application de l'article 5 du règlement (UE) n° 182/2011 du 16 février 2011, et ce, conformément à la pratique constante des règlements antérieurs relatifs aux programmes de recherche et de formation d'Euratom ;
- l'impact pour le financement Euratom au projet ITER du changement de cadre juridique, qui évolue d'une décision du Conseil dédiée à cette proposition de règlement commune avec le programme Euratom recherche et formation et, en conséquence, l'évolution de la période couverte par le financement (qui passe de 7 à 5 ans) ;
- les questions de sécurité de la recherche doivent être systématiquement prises en considération lors de l'association de pays tiers au programme Euratom. Il est désormais nécessaire de nous doter des moyens de choisir avec qui collaborer et de quelle manière ;
- la simplification des règles de participation, qui doit profiter avant tout aux bénéficiaires. Le recours systématique à un financement en sommes forfaitaires (« *lump-sums* ») pourrait simplifier la gestion de projet mais doit tenir compte de certains cas particuliers (par exemple, les grands consortiums où des partenaires pourraient manquer à leurs obligations).

Les autorités françaises souhaitent également partager les éléments suivants qui devront être clarifiés dans les futures discussions :

- la coordination entre le programme Euratom, le FEC et HE, et la manière dont la Commission prévoit de mettre en œuvre ces synergies afin d'élaborer une politique européenne d'approvisionnement couvrant l'ensemble de la chaîne de valeur nucléaire et du cycle du combustible, et de promouvoir l'utilisation innovante des rayonnements ionisants, notamment dans le secteur médical, pour les applications maritimes et spatiales, l'hydrogène bas carbone, etc.
- la manière dont le programme Euratom complètera l'action d'Horizon Europe pour le développement du « *Moonshot* » sur la fusion, dont l'objectif est de surmonter les défis scientifiques, techniques et technologiques pour le déploiement de l'énergie de fusion sur le réseau électrique de l'UE ;
- la manière dont le règlement pourrait mieux prendre en compte la diversification croissante des applications nucléaires (par exemple pour des usages autres que la production électrique, pour les activités maritimes et spatiales, etc.) ;
- le sens de l'objectif spécifique 3.1 (e), en particulier ce qui est envisagé en termes de standardisation et de modélisation ;
- la durée des programmes de travail : suivront-ils le même schéma que pour la période 2021-2027 (2 ans + 3 ans + 2 ans) ?

Les autorités françaises soutiendront de toute initiative de la Présidence chypriote visant à progresser sur ce sujet et restent à sa disposition.

Traduction de courtoisie en langue anglaise :

In response to the CY Presidency's call for general comments regarding the Euratom research and training programme & ITER, the French authorities would like to share the following observations:

The French authorities welcome the Commission's ambitious proposal for the 2028-2032 Euratom research and training programme (the 'Euratom programme'), both in terms of objectives and the proposed budget, which demonstrates a **clear commitment to integrating nuclear energy into the EU's strategic priorities**, particularly for strengthening the Union's competitiveness and decarbonization.

They also **strongly support the anticipated synergies with the European Competitiveness Fund (ECF) and the Horizon Europe (HE) programme, in application of the principle of technological neutrality**. The discussions regarding the Euratom programme and ITER will be closely linked to the negotiations around these two instruments.

The French authorities emphasise the **importance of maintaining a sufficient budget for the Euratom programme dedicated to nuclear fission**, whose applications respond to energy challenges both now and in the medium term, while ensuring an adequate balance with fusion, whose promising prospects remain more distant.

The French authorities **welcome the fact that the construction and operation of ITER is listed as a priority and consider that the level of Euratom's contribution to the funding of the project should be secured in the regulation**.

At this stage, the French authorities are still reviewing the regulation proposal and retain a general scrutiny reservation. After a first review, they note the following points of attention:

- while the general objectives of the Euratom programme, the ECF and HE are aligned, with ambitious priorities such as strengthening the Union's competitiveness and decarbonization, **the French authorities question the limited scope of the planned support of the Euratom programme in the field of nuclear fission and ask in particular for the inclusion of innovation in the specific objectives of the programme**, as it is the case for fusion energy;
- the lack of indicative allocation of budget in the regulation between fission research, fusion research, direct actions of the JRC and the ITER project and the involvement of Member States in the process of potential reallocations;
- the different configurations of the committee set up in Article 14, in particular as regards subject matters common to fission and fusion energy (e.g. education and training, nuclear materials, waste management);
- the proposed changes to the comitology procedure in Articles 13 and 14 of the regulation proposal. In particular, the French authorities consider that **the work programmes have to be adopted after an examination procedure** in comitology, as provided for in Article 5 of Regulation 182/2011 of 16 February 2011, in accordance with the consistent practice in previous regulations relating to Euratom research and training programmes;
- the impact on Euratom's funding for the ITER project of the change in the legal framework, which evolves from a dedicated Council decision to this regulation proposal and, consequently, the change of the period covered by the funding (from 7 to 5 years);
- Research security issues should be systematically taken into account for associating third countries to the Euratom programme. It is now necessary to equip ourselves with the means to choose with whom to collaborate, and in what manner;

- Simplification of participation rules must primarily benefit the beneficiaries. The default use of lump-sum funding could simplify project management but must take into account certain specific cases (e.g., large consortia where partners might default).

The French authorities also wish to share the following questions and points to be clarified in the future discussions:

- details on the strengthened coordination between the Euratom programme, the ECF and HE, and on how the Commission intends to operationalize these synergies to develop a European supply policy across the entire nuclear value chain and fuel cycle and to enhance the innovative use of ionising radiation, including in the medical sector, for maritime and space applications, low-carbon hydrogen, etc.
- details on how the Euratom programme will complement HE's action for the development of the proposed 'Moonshot Fusion', aimed at overcoming the scientific, engineering and technological challenges to the deployment of fusion energy on the EU grid;
- how the regulation could better address the increased diversification of nuclear applications (e.g. for uses beyond electricity generation, for maritime and space activities, etc.);
- the meaning of specific objective 3.1 (e), in particular what is envisaged under standardisation and modelling;
- the duration of the work programmes: will they follow the same pattern as for the 2021-2027 period (2 years + 3 years + 2 years)?

The French authorities support any initiative by the CY Presidency to progress on this subject and remain at its disposal.

Proposal for a COUNCIL REGULATION establishing the research and training programme of the European Atomic Energy Community for the period 2028-2032

IE comments

1. Under **Article 3 (2)(d)**, one of the programme's specific objectives is to "develop, retain and utilise experience and competencies in the nuclear field". No specific reference is made to knowledge management or transfer - there is a lot of knowledge and experience in the EU already but unless sufficient knowledge management systems are put in place this is in danger of being lost; it is suggested that further detail is provided under this Article to ensure that all aspects of knowledge management are reflected.
2. With regards to the **Annex**:
 - Under specific objective 2 (c) (i), reference is made to alternative fuels; it would be useful to provide clarification on whether this includes accident tolerant fuels and HALEU fuel.
 - Under specific objective 2 (c) (vi), it is important that novel fuels from AMRs be mentioned here as significant R&I is required in this area if fuels such as molten salt are to be used in reactors in the near future.
 - Under specific objective 2 (d) (iv), reference is made to the development of nuclear skills but this should include radiological skills as well as these are required to support the nuclear industry and this would provide more context for support from non-nuclear MS, such as IE.
3. IE noted the following under the presentation addressing the Euratom Research and Training Programme (2028 - 2032) and the subject areas:
 - Under Fusion energy for EU competitiveness, no specific mention is made of the use of AI in the development of Fusion technologies; this is an emerging field that has the potential to yield significant results.
 - Under Nuclear Technologies and Skills:
 - When dealing with innovative nuclear systems safety, security and safeguards and fuel cycles, reference should be made to accident tolerant fuels as outlined under the EU Green Taxonomy; and
 - In addition to addressing innovative fuels and materials some proposals in relation to HALEU (High Assay Low Enriched Uranium) enrichment would be useful.

Poland's general comments on the proposal for a Council Regulation establishing the research and training programme of the European Atomic Energy Community for the period 2028-2032, complementing Horizon Europe, the Framework Programme for Research and Innovation, and providing for the Community's contribution to the ITER project, and repealing Regulation (Euratom) 2025/1304.

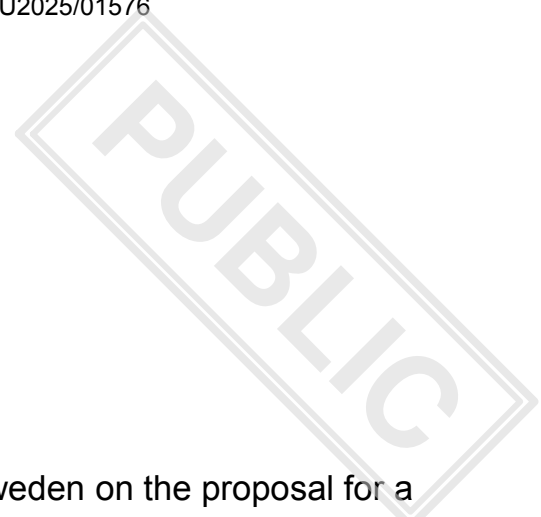
- Poland supports the continuation of activities under subsequent Euratom programs, while also highlighting the need to ensure a balance between safety concerns and the development of nuclear energy in research funding, particularly in the area of fission energy, including by improving nuclear technologies, nuclear safety, and radiation protection, as well as developing new technologies and new applications in this field. Poland plans to implement modern nuclear energy and is advancing research into advanced reactor technologies.
- The program significantly supports nuclear safety and radiation protection in the EU, helping to ensure that Europe meets the highest standards in these areas. At the same time, the program contributes to the transformation of the EU energy system towards a competitive and low-emission economy, complementing renewable energy sources by providing a knowledge base and solutions for the long-term operation of existing nuclear power plants. The program also supports the development of knowledge and technologies necessary for the development of fusion energy and safe advanced systems for new nuclear reactors.
- Thanks to the implementation of the Program in recent years, significant progress has been made in improving the state of the art in key areas of safety at existing nuclear power plants, future concepts, and decommissioning.
- The Program will also continue to contribute to improving the quality of life of European citizens through nuclear medicine and radiation protection. Among other things, the Program will explore innovative applications of ionizing radiation (for example, medical radionuclides) to improve treatments and optimize therapies for cancer and other diseases.
- The Program plays a significant role in maintaining key skills and capabilities in the nuclear sector. Euratom projects ensure the exchange of ideas and the training of a new generation of researchers. The previous stigmatization of nuclear technologies has led to a significant decline in nuclear expertise and the EU's global leadership in nuclear technologies. Europe has lost competence in the nuclear industry. Rebuilding these competences therefore requires the creation of stable working conditions in this sector, which means ensuring the long-term development of nuclear energy, which this Program will support.
- Moreover, Poland believes that the Euratom Programme should focus more on addressing key issues and risks in nuclear fusion research to advance the engineering design of a future fusion power plant. The government believes that fission technologies are key technologies in decarbonization efforts.
- We commend the significant increase in the EU budget for nuclear R&D. Poland welcomes the information from the Commission on the proposal on the Euratom Research and Training Programme for 2028- 2034, and providing for the Community's contribution to ITER.
- Poland declares its readiness to actively participate in the program, contributing through national research institutes, the private sector and international cooperation, under the condition that the program will ensure stability, access to resources and real support for research and innovation.
- Poland understands significance of scientific research for the development of nuclear fusion energy.
- However, we question the reason for this significant difference between fusion and fission R&D, citing the potential for fission to quickly achieve a tangible impact on reducing emissions, unlike fusion, whose commercial applications extend well beyond 2050.

- We would like to emphasize that fission technologies must occupy an appropriate place in R&D activities, having in mind, among other things, their key importance in supporting the energy transition.
- In addition, the Euratom support to fusion technologies is provided through the contribution to the international ITER project, as well as through funding of own research.
- Given that the EU is funding the ITER fusion demonstrator EU should also consider financing the Generation IV fission technology demonstrator.

PUBLIC



Ministry of Education and Research



General, overall comments from Sweden on the proposal for a Council regulation on establishing the research and training programme of the European Atomic Energy Community for the period 2028-2032

Sweden welcomes the approaches taken by the Commission in the proposal. We are keen to ensure that research and innovation within Euratom continues and develops in order to contribute to targets related to competitiveness and climate/energy transition.

Sweden is also positive towards putting nuclear safety and radiation protection at a central position in the program, in order to protect humans and the environment. The program should include support to further development of secure fission technology such as for small modular reactors.

At the same time, the proposed increase in collaboration with private actors is welcomed, not least considering the need to go from basic research to applications in e.g. fusion research.

The involvement of Member States in the programming through fit-for-purpose committee procedures is crucial for ensuring synergies between European, national and regional research programmes, and for ensuring excellence.

Europe needs to become better at research valorisation. Sweden supports further work with simplification and measures that make the program available to more actors and enhances the conditions for participation of

academia, companies and other societal actors. Sweden underlines that the program needs to be attractive to private companies.

Sweden has a budget-restrictive stance, and we think that this should be reflected also in unbracketed provisions, where relevant.

The government is currently consulting national stakeholders on the Commission's proposal.

We will seek clarity regarding in what aspects the rules and procedures of the Euratom program should differ from those of the 10th framework programme of research and innovation (Horizon Europe), and look forward to hearing how the incoming Presidency intends to proceed on both files.

We will also seek clarity regarding the Commission's plans for a strategy for fusion research, and how the Presidency intends to deal with it, as the annex explains that this strategy is intended to set the scope for actions on fusion research.