

EARTO Analysis of EC Regulation Proposal: Establishing Horizon Europe

10 October 2025

EARTO and its members welcome the European Commission (EC)'s proposal for the [European Competitiveness Fund](#) (ECF), including the Specific Programme for Defence Research & Innovation Activities, as well as the EC's proposal for [Horizon Europe](#) and its dedicated [Specific Programme](#) starting in 2028 onwards. To strengthen such a proposal even further, EARTO has hereby made a detailed analysis of the EC's proposal for Horizon Europe's Regulation.

Such analysis is organised in the following distinctive parts:

- Explanatory Memorandum
- Preamble
- Chapter I – General Provisions
- Chapter II – Excellence Science
- Chapter III – Competitiveness & Society
- Chapter IV – Innovation
- Chapter V – ERA
- Rules for Participation & Dissemination

Please also note that EARTO has made a detailed analysis of all [Horizon Europe](#) and [ECF](#)'s Basic Acts as proposed by the European Commission. For more information, please see the following documents:

- [EARTO Key Recommendations on Establishing the European Competitiveness Fund and Horizon Europe](#)
- [EARTO Analysis of EC Proposal – Establishing the European Competitiveness Fund](#)
- [EARTO Analysis of EC Proposal – Specific Programme implementing Horizon Europe](#)
- [EC Proposal – Establishing the ECF](#)
- [EC Proposal – Establishing Horizon Europe](#)
- [EC Proposal – Council Decision on establishing the Specific Programme implementing Horizon Europe](#)

Regulation on HE Explanatory Memorandum			
Topic	HE Article	Analysis	Text Changes
Introduction	<i>More specifically, Horizon Europe aims to:</i> • <i>increase Europe's excellent knowledge base by focusing on EU added value;</i>	Please add an explicit objective on European technology leadership and the role of collaborative RD&I, which is the core of the FP, which are missing. See EARTO Recommendations .	Add text: Increase Europe's excellent knowledge and technology base, cross-border collaborative research and innovation, and valorisation by focusing on EU added value;
Consistency with Other Union Policies	Competitiveness Coordination Tool (CCT)	We would welcome more detail on how the CCT Tool will function, e.g. composition, decision making, responsibilities, etc. We would also be glad to understand better its connection to the ECF stakeholder board, which we very much hope will also include non-profit technology providers like RTOs and not only focus on industry. We would also be	

		glad to understand what the role of the Observatory for emerging technologies will be linked to the CCT regarding RD&I investments and programming.	
	Moonshots	Though these Moonshot projects are not referred to in the articles. It is unclear if those refer to the EU Missions coming back in the following articles. Accordingly, we do not see how such an article should precede future work programming of the Programme. We understand those are being examples only.	Delete the text: Investing in the European Organisation for Nuclear Research's (CERN) Future Circular Collider, alongside other CERN's participating countries. The objective is to maintain Europe's leadership in particle physics research. The funding (up to 20% of the overall cost) could come from Horizon Europe.
Simplification	Open topic by default	EARTO members have mixed feedback on such a proposal: • Less prescriptive topics may increase oversubscription. The Horizon Europe (HE) interim evaluation report stated that it would be necessary to double the current Horizon Europe budget to fund all the proposals that have been positively evaluated. • The need to adapt the approach for selecting evaluators covering a wider range of knowledge fields would also be necessary. Our members also noted it could be interesting to look at the ESA OSIP approach and see if this and other types of "open topic" approaches could be workable.	
	Use of executive agencies for implementation	EARTO members have mentioned various issues with the use of agencies as it has been managed so far, the key ones being as follows: • There is a need to establish mechanisms to strengthen collaboration with the agencies in order to better align policy with implementation. The feedback on programme implementation, monitoring and policy advising role of the agencies in conjunction with the work of the DGs has to be largely improved. • We have experienced variations in the interpretation of the rules and regulations between the EC DGs vs. the Executive Agencies, which brought undue administrative burden and legal uncertainty. • We experienced a loss of knowledge and expertise on key elements in managing the FP with the expansion of agencies: Member States should reflect on the pressure on administrative costs vs quality and impact of the FP due to proper management expertise.	
Observatory	Observatory of emerging technologies	We would welcome more information on how this observatory would link to work programming and to the CCT. In addition, EARTO members have strong technology foresight capabilities (used for their own strategy making) that should be tapped into, as it is already done via various EU tender frameworks' contracts (similarly done for the Scientific Advisory Mechanism - SAM).	

Budget	(5) Predictability	RD&I investments are essential to strengthen Europe's innovation capacity, competitiveness, and strategic resilience. A balance is needed between predictability, stability and flexibility. Accordingly, MFF flexibility can be useful in exceptional circumstances, but should not become standard practice that undermines core funding for RD&I. As such, flexibility should be used only where it is demonstrably necessary, to avoid it becoming a structural burden on investment in RD&I.	Add the following text: In a rapidly changing economic, social and geopolitical environment, recent experience has shown the need for a more flexible Multiannual Financial Framework and its Union spending programmes. To that effect, and in line with the objectives of the Programme, but without affecting the total budget allocation of the Programme, the funding should duly consider the evolving policy needs and the Union's priorities as identified in relevant documents published by the Commission, European Parliament resolutions and in Council conclusions, while ensuring sufficient predictability for the budget implementation.
	(31) Indicative Figure	Instead of an 'indicative' (financial envelope for Horizon Europe), the Regulation should provide for a total budget for Horizon Europe 2028-2034 and its four pillars that is protected from cuts.	
3% Target	(7) RD&I EU Semester	EARTO welcomed Draghi's report proposal to set up a new RD&I EU semester and is glad to see this recommendation being picked up. See EARTO recent paper on the upcoming ERA Act .	
TRLs	(8) Use of TRLs	As RIA and IA are merged, the TRL initial level and expected level will become more important to ensure that calls cover the whole TRL ladder. Furthermore, it will be important to use a common terminology of the TRLs throughout the Programme: see EARTO Paper on TRLs .	
EIC	(15) ARPA/DARPA approach	The ARPA/DARPA approach may be interesting if it allows building more bridges between the RD&I funded under Pillar II and what is to be financed under the EIC. In addition, the ARPA/DARPA model is based on the US single market, which cannot be replicated today in the EU, so some elements of the ARPA model may be picked, but not all will be fit for the EU context. EARTO members very active in spin-offs creation would be glad to share their experiences to develop further such an approach to ensure it would effectively support their scaling-up efforts. See EARTO success stories .	
Infrastructures	(19) Technology Infrastructures	EARTO very much welcomes the inclusion of the Technology Infrastructures as part of Pillar IV of the Programme. It is an acknowledgement of their importance for the EU technology leadership.	
Risk assessment	(22) Risk assessment	The risk-based approach is welcomed, but we expect this assessment to be carried out by national or European authorities. Moreover, contact points ought to be established	Adapt the following text: ...risks related to research and innovation are identified, assessed by

		to provide advice and legally binding answers to questions from beneficiaries.	national or European authorities as well as addressed through....
Financing	(26) Lumpsums & Unit costs	The lump sum (LS) approach and/or personnel unit cost (PUC) approaches are proposed as standard models. While there is a legitimate demand for simplification, the cost options should provide predictability and sustainability to beneficiaries between the EU programmes and instruments. EARTO foresees that further development of Simplified Cost Options (SCOs, incl. personnel unit cost model) is necessary, since the single daily rate model per organisation (launched in the previous HE) does not fully recognise the statutory costs associated with paid salaries, which are related to employment costs rather than the amounts of paid salaries. It does not adequately account for the anticipated changes, such as inflation, either. Therefore, annual updates to the certified rate and their retrospective adoption to all projects should be the priority for future development. In addition, EARTO foresees that improved simplification measures must be launched as pilots before imposing them as mandatory approaches. The increasing use of simplified cost options, such as lump sum funding, can be a step toward administrative efficiency, but only if implemented in a context-sensitive and practical manner. A one-size-fits-all approach risks undermining participation, efficiency, and risk balance in EU-funded research actions. While lump sum models may reduce complexity for smaller consortia, larger and more complex projects face significant challenges and disproportionate risks, which can lead to discouraging participation in ambitious, higher-risk projects. Additionally, ongoing uncertainty on audits and activity verification continues to impose administrative duplication. The personnel cost model in EU funding programmes should continue to be calculated based on actual hours worked, as recorded through established accounting systems of participating organisations, to ensure a transparent, auditable and beneficiary-validated method to ensure. The accuracy and alignment with national laws and regulations, and institutional processes.	Adapt the following text: <i>Advancing efforts over the previous Framework Programmes to streamline funding rules and minimise errors, the reimbursement of personnel costs should also be further simplified by using personnel costs and providing an option for the use of validated methodologies, which reduces complexity for participants and facilitates reporting.</i>
Valorisation	(28) New support instruments & tools announced <i>the valorisation process, support instruments and tools should be put in place in line with the Commission's valorisation strategy as developed under the European Competitiveness Fund,</i>	In this context, Research Performing Organisations (RPOs) play a crucial role, as they systematically monitor inputs, activities and outputs of collaborative research. The project data collected by RPOs can serve as a basis for new methods to better measure the economic impact of publicly funded research and innovation. Developing a broadly recognised EU-level methodological framework would not only strengthen the valorisation and dissemination of results, but also provide policymakers with concrete evidence on how R&I contributes to competitiveness, economic growth and security. See EARTO recent paper on ERA Act.	

Title I - EU FP for R&I			
Regulation on HE Chapter I – General Provisions			
Topic	HE Article	Analysis	Text Changes
Definitions	Art. 2.2 TIs: <i>'technology infrastructures' are facilities, equipment, capabilities and resources required to develop, test, upscale and validate technology - from pre-competitive applied research services up to demonstration and validation;</i>	EARTO welcomes very much the introduction of TIs in HE and the proposed short definition, which builds on the key elements recommended by the European Commission Expert Group on Technology Infrastructures and provides a comprehensive approach to TIs by allowing the dedicated, expedient activities.	
	Art. 2.7 & 2.8 Open Access & Open Science (7)'open access' means online access to results, provided free to the end user; (8)'open science' means an approach to the scientific process that includes early and open sharing of research, open access to and responsible management of results, reproducibility measures, and involving citizens and end users in research and innovation;	The definitions used here for open access and open science should correspond to those used by RD&I actors.	Adapt text: 'open access' means online access, provided free of charge to the end user, to scientific publications and corresponding research data resulting from actions under the Programme.
	Art. 2.11 Background <i>'background' means any data, knowledge or know how whatever its form or nature, tangible or intangible, including any rights such as intellectual property rights, that is held prior to the accession to a given action;</i>	'Background' is too broadly defined; it should only include information required for the EU-funded project. In H2020 and Horizon Europe 2021-2027, the definition of background was narrowed even further to include only the knowledge and data necessary for the project and identified in advance by the grant recipients. Grant recipients should also be clear and agree on what information should serve as background for the project in Horizon Europe 2028-2034.	Adapt text: 'background' means any data, know how or information whatever its form or nature, tangible or intangible, including any rights such as intellectual property rights, that is: (i) held by beneficiaries prior to their accession to a given action; and (ii) identified by the beneficiaries in a written agreement as needed for implementing the action or for exploiting its results;
	NEW Art. 2. 25 Fair and reasonable compensation	The definition of "fair and reasonable conditions" is missing and needs to be reintroduced. Indeed, with the EU legislation increasing compliance obligations for creators and conditions that need to be complied with, a commercialisation of the licence should be an option.	Add the following text: 'fair and reasonable conditions' means appropriate conditions, including possible financial terms, taking into account the specific circumstances of the request for access, for example, the cost for its protection, the actual or potential value of the results or background to which access is requested and/or the scope, duration or other characteristics of the exploitation envisaged
Programme Objectives	Art. 3 <i>2. The specific objectives of the Programme are: - Increase EU-wide and international collaborative research, knowledge sharing and valorisation.</i>	Please add an explicit objective on European technology leadership in strategic areas for societal transitions and EU competitiveness, which is missing. See EARTO Recommendations.	Add the following text: 2. The specific objectives of the Programme are: - Boost Europe's capabilities to create, mature and scale-up new merging

			and critical technologies to ensure Europe's position in the global tech race as well as ensure that future technologies are developed using European values and targeting Europe's societal challenges.
Structure	Art. 4 Programme structure	The overall new structure is welcomed, considering the whole RD&I pipeline. In particular, the existence of a "Part II - competitiveness and society", with its own budget line, and sub-budget lines for R&D on key priority areas => this gives more security on the resources for R&D than if it had been entirely absorbed by the ECF. The integrated governance of the ECF and Horizon Europe Part II on key priority areas is welcomed in principle: it is a way to ensure a better coherence between the EU RD&I and industrial policy instruments, as requested by EARTO in various positions. However, it is unclear how this governance between Horizon Europe and ECF will work in practice: how will R&D be considered in the ECF work programme priority setting? Who will oversee the design of integrated work programmes? What will be the role of the Member States? Which rules for participation will apply to Part II: the ECF or HE ones (c.f. article 1.2.a of HEU regulation)? In addition, within Part II, priority areas have very large scopes and are only very loosely described in the specific programme as well. This brings the following questions: What is the exact range of technologies and scientific fields that may be covered? Furthermore, the proposed structure brings the current HE Cluster 2 as a separate sub-part in Part II: will the same links to ECF apply then to this part? And why decouple the topics from competitiveness? EU Missions are also brought forward again: here, EARTO's position has been to ask for a real evaluation of the instrument before it is continued. Should such evaluation be positive, current EU missions' thematic overlap with the Competitiveness parts (Cancer with health, oceans with bioeconomy...) will continue generating confusion in the proposed split between competitiveness and society parts. The placing of RIs and TIs together in Pillar IV is welcomed; it will allow for a transversal use/recognition of both types of infrastructures in all parts of the programme, including TIs for technology excellence. However, the follow-up of TIs Pilots to be implemented from the current HE requires inclusion of TIs aspect to ECF policy windows to have a direct link with the technology development, testing, demonstration and piloting. In addition, such a structure should still allow for CAPEX financing for TIs should be able to be a combination of various instruments, including ECF,	Correct inconsistencies: Is "Part" intended to be synonymous with "Pillar" that comes back later in the regulation? The same inconsistencies apply to the next HEU: sometimes it is referred to as HEU, HE 2.0 and HEU 2.0. It may be helpful to ensure terminological consistency.

		and not only from part IV budget, which is rather limited for both RIs and TIs. Finally, the structure does not mention how the Observatory for emerging technologies will be embedded in advising the programme's contents/directionality.	
Horizontal Principles	Art. 5 (a) SSH <i>ensure a multidisciplinary approach, where appropriate, and provide for the integration of social sciences and humanities (SSH) across all components under the Programme, including specific calls for proposals on SSH related topics.</i>	Positive that SSH Integration is mentioned and that it will be relevant in all parts of the programme.	
	Art. 5 (b) <i>advance scientific knowledge and contribute to the creation of informed, effective, and responsive public policies across the Union and beyond. The Programme shall actively promote the use of the results of publicly funded research and of scientific evidence in policy-making processes at all levels, fostering stronger links between research, innovation, and the development of evidence-informed public policies. This shall include encouraging collaborative mechanisms, R&I initiatives and science-for policy interfaces connecting policy makers with the scientific community, as well as facilitating the use of research outcomes in shaping future legislative and regulatory frameworks at all levels. Special emphasis shall be placed on ensuring that scientific insights are accessible and relevant to decision makers and citizens, with instruments for the effective use of research results, policy briefs, and recommendations.</i>	We very much welcome the approach again, where the whole RD&I pipeline is covered. What is missing today in the orchestration of the programme is dedicated instruments orchestrating the move of the RD&I actors with their RD&I between the different stages of development and so of the different parts of the programme. There is a need to incentivise collaboration between the different instruments to support the RD&I actors to go up the TRL ladder with their research. We very much welcome the approach connecting project results with policy-making very explicitly. Not to stay a principle only, this should be more embedded in the making of the work programmes.	
	Art. 5 (c) As open as possible, as closed as necessary" principle <i>encourage open science practices including by ensuring open access to peer reviewed scientific publications regarding results, as well as open access to research data and other results following the principle 'as open as possible, as closed as necessary.</i>	We very much welcome the mention of the "As open as possible, as closed as necessary" principle.	
Budget	Art. 6 Budget <i>The indicative financial envelope of the Programme for the period 1 January 2028 to 31 December 2034 shall be EUR 175 002 000 000 in current prices.</i> [...] <i>(b) EUR 75 876 000 000 for Part II 'Competitiveness and Society',</i>	EARTO very much welcomes the EC proposal for a larger budget for RD&I. The total programme budget sounds ambitious; however, EARTO has been calling for a €220bn budget (See EARTO inputs to ERAC on FP10 , EARTO recommendations for the next MFF and EARTO analysis on the budget of HE). Accordingly, the main evolution in this budget is its distribution between its different parts. EARTO would like to recall that collaborative RD&I is the core of EU added value	• Delete 'indicative' and replace by 'dedicated' • (b) Part II to be kept at a minimum of 60% of the programme total budget • (c) Part IV Budget for Research & Technology Infrastructures to be at minimum doubled to be able to

	(d) EUR 16 262 000 000 for Part IV 'European Research Area', of which EUR 5 387 000 000 for widening participation and spreading excellence.	in R&D of the programme and that to keep up with future emerging critical technology, large investments are needed in EU tech capabilities. This is unfortunately not reflected in the budget division of the programme. In addition, with new needs clearly defined in Defence RD&I and space, the Competitiveness Part of the programme should, at a minimum, maintain its 60% share as in the current programme to be able not only to improve its coverage of the TRL scale, as well as cover new needs. In addition, the budget allocated to research & technology infrastructures is far too low looking given the need for both types of infrastructures. To have a significant impact on technology capabilities in new technologies for competitiveness: AI, Quantum, Energy Cost reduction techs, Defence techs, Mobility techs, etc. The budget should reflect the appropriate and proportionate investment needs for technology infrastructures in the coming years. In addition, in the MFF, the ECF overall budget includes the budget for HE 2028-2034, whereas in the Regulation for the HE 2028-2034 and ECF Regulation, the two financial envelopes are kept separate. How is the interplay of the two intended? And which budget flexibility regarding shifts of budget from HE to ECF is foreseen?	face the investment needs of the whole ecosystems of RTIs.
Synergies of Funds	Art. 8.1 Single Set of Rules/ Cumulative Funding <i>The Programme shall be implemented in synergy with other Union programmes. An action that has received a Union contribution from another programme may also receive a contribution under this Programme. The rules of the relevant Union programme shall apply to the corresponding contribution or a single set of rules may be applied to all contributions and a single legal commitment may be concluded. If the Union contribution is based on eligible costs, the cumulative support from the Union budget shall not exceed the total eligible costs of the action and may be EN 26 EN calculated on a pro-rata basis in accordance with the documents setting out the conditions for support.</i>	EARTO very much welcome the integration of all programmes under one Single Rule Book, which may provide easier funding for larger initiatives and actions (e. g. pilot lines). EARTO is in favour of a single set of rules versus various rules applicable to each sub-programme. However, EARTO members have also taken note of the increased level of ambition of EU initiatives in addressing global challenges and finding innovative solutions fast, which necessitates also specific set of skills, expertise and competencies in participating organisations carrying out these demanding tasks. RD&I activities require principally grants, and action-based grants (project-based grants), knowing that combining RD&I grants into a single rule book should be feasible, but may impose challenges when combining the national funds and EU funds into the same action. The novelties in the formulation compared to the current HE Regulation 2021/695 are the deletion of the part "provided that the contribution does not cover the same costs" and "rules of the relevant Union programme shall apply to the corresponding contribution to the action". The proposed formulation paves the way <u>to single set of rules, lump sums and flat rates</u> while it addresses that "If the Union contribution is based on eligible costs, <u>the cumulative support from the Union budget</u> shall not exceed the total eligible costs of the action and may be calculated on a pro-rata basis in accordance with the documents setting out the conditions for support." With this, we understand that there	Delete text: The rules of the relevant Union programme shall apply to the corresponding contribution or a single set of rules should be applied to all contributions, and a single legal commitment should be concluded. Add reference to the relevant parts of the Regulation 2024/2509 Article 191 (a)-(f): General principles applicable to grants: <i>Grants shall be subject to the principles of:</i> (a) equal treatment; (b) transparency; (c) co-financing; (d) non-cumulative award and no double financing; (e) non-retroactivity; (f) no-profit. Harmonisation of EU and national funding rules and regulations may be possible in the case of co-funding by Member States.

		will be many fewer actions with actual eligible costs, which should not be the case. There should not be two rulebooks applicable to one action. If an action receives funding under two programmes, harmonising the rules for grants should be the aim, making one rulebook applicable. This also means that grants based on actual costs should always be an option under Horizon Europe, since not all MS and national funding programmes under direct management of MS can provide funding based on lump sums. To make one single set of rules a reality requires harmonisation of EU and national funding rules and regulations, especially for those programme parts, where co-funding from Member States is needed. The other aspect to be considered is the state aid. The beneficiaries should not be affected by the different interpretations of the state aid rules for the same action when the activities for collaborative R&I in the EU actions are designed based on the EU call conditions and requirements. The Framework Programme EU Funding is not subject to State aid rules, while the national co-funding can fall under the SAR depending on the interpretations of the national authorities. This increases the administrative hurdle and sets the participants in unequal positions from the perspective of the rules. Furthermore, there is no reference to relevant parts of the Regulation 2024/2509 Article 191 (a)-(f): General principles applicable to grants.	
	Art. 8.2 Award procedures <i>Award procedures under the Programme may be jointly conducted under direct or indirect management with Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or other third parties, provided the protection of the financial interests of the Union is ensured. Such procedures shall be subject to a single set of rules and lead to the conclusion of single legal commitments.</i>	The text raises the following questions regarding the realisation of a real single rule book and its application to co-funding and/or combined financed actions: Who decides on the applicable rules? And with different HE and ECF rules, how many sets of rules will we have? In addition, the delegation of the budget implementation to entities, bodies and agencies listed in the regulation 2024/2509 already imposes a risk for different reporting requirements. The single set of rules should have a clear simplification measure/impact on beneficiaries and their admin burden, and this needs to be secured. EARTO would see great benefits of having this article providing real simplification for beneficiaries, e.g. by facilitating the use of the same rules and funding for separate contributions if, e.g. EU, national and other EU instruments when they are combined into the same action, using one legal commitment/grant agreement. This should also come in with no separate applications for other instruments and/or separate reporting requirements, and it should not translate into a general lowering of funding rates.	Add the following text: Award procedures under the Programme may be jointly conducted under direct or indirect management with Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or other third parties, provided the protection of the financial interests of the Union is ensured. Such procedures shall be subject to a single set of rules and lead to the conclusion of a single legal commitment. Such a single set of rules shall guarantee fair conditions between all beneficiaries.
	Art. 8.3-4 Competitiveness Seal <i>3. Under this programme, in addition to the conditions set out in Article 8(1) and (2) of</i>	This article means that the Competitiveness seal will be awarded to actions receiving a score above a given threshold in the evaluation. It seems to be a kind of consolation prize	Add the following text: The Commission shall actively promote coordination mechanisms with

	<i>Regulation (EU) XXX [European Competitiveness Fund], a Competitiveness Seal shall be awarded only to high-quality actions that have not been financed under the Programme due to budgetary constraints.</i> <i>4. The Member States may finance actions to which a Competitiveness Seal was awarded.</i>	for high-quality proposals not being funded, with the hope of receiving funding from MS or other sources. However, it fails to explain the value of the competitiveness seal, while we expect as many of our members' proposals to receive it. To ensure such a seal would actually have value, this article should be complemented to ensure an easier journey to new sources of regional and national funding for the sealed projects. This article should be linked to other regulations to ensure the possibility of funding the Competitiveness Sealed projects in National & Regional Partnerships of the new MFF. This also requires that the flexibility of the terms of the use of the national/regional budget/funding authorities' rules be ensured so that national/regional funds could be used without organising a separate call and evaluation procedure (with eligibility requirements).	Member States to establish national or regional co-funding programmes for proposals awarded the Competitiveness Seal. These proposals, having successfully passed the evaluation thresholds under the Framework Programme, should be eligible for complementary funding through national or structural funds without requiring a new scientific evaluation. Furthermore, the recognition of the Competitiveness Seal as an eligibility criterion shall be binding for such national or regional programmes, unless duly justified.
Third Countries	Art. 9.5 Risks vs Third Countries <i>The scope of association of each third country to the Programme shall take into account an analysis of the risks, notably those likely to affect the Union's public order and security in relevant policy areas, including economic and research security, as well as benefits and the broader objective of driving economic growth and competitiveness of the Union through innovation. Accordingly, with the exception of EEA members, acceding countries, candidate countries and potential candidate countries, third countries may be excluded from parts of the Programme in accordance with this Regulation or the association agreement itself.</i>	EARTO welcomes this article, having its members also located in third countries and supporting further international collaboration within its membership. We support that EEA members, in accordance with the EEA Agreement, are not considered for exclusion from parts of the programme. The EEA Agreement states that the EEA EFTA States shall have access to all parts of the EU programmes in which they participate. EARTO welcome the possibility for the EU to protect its interests as needed, especially with technologies becoming increasingly strategic economic assets.	
Forms of Funding	Art. 10. 2-4 Forms of Funding: <i>2. Union funding may be provided in any form in accordance with Regulation (EU, Euratom) 2024/2509, in particular through grants, prizes, procurement, non-financial donations, and financial instruments.</i> <i>3. With the exception of financial instruments under the EIC (Fund) where Union support is provided in the form of a budgetary guarantee or a financial instrument including where combined with non-repayable support in a blending operation, it shall be exclusively provided through the European Competitiveness Fund InvestEU Instrument and implemented in accordance with the applicable rules of the European Competitiveness Fund InvestEU Instrument through the contribution or guarantee agreements concluded for that purpose. Where the Programme makes use of the ECF InvestEU Instrument, it shall provide</i>	EARTO very much welcome the fact that grants are kept as the main funding form under the HE programme and that blending and indirect finance will be managed via the EIB. Generally, RTOs cannot use blending finance or lending instruments. However, while we are positive on the grants being the instruments, we have comments on how the grants will be distributed. Indeed, with the lump sums to become the standard form and the announced flat funding rates, <u>grants based on actual eligible costs would only be possible if the action cannot be implemented in other way.</u> This could mean that only "Chips Act"-types of pilot line set up actions, where there are procurements for equipment and, operational work related to set up of the pilot lines or other similar type of big facilities with a joint ownerships, the reimbursement of actual eligible costs could be the relevant justification to monitor the actual costs and fulfilment of procurement rules/conflict of interest, etc. EARTO Members foresee that the concept of financing not linked to costs remains unclear. The Financial Regulation	Add the following text: 4. Where Union funding is provided in the form of a grant, funding shall be provided through lump sums or based on simplified cost options or actual eligible costs or financing not linked to cost. Funding may be provided in the form of actual eligible costs based on the usual accounting practices of the beneficiary. Beneficiaries may use their usual accounting practices to identify and declare the costs incurred in relation to an action in compliance with all terms and conditions set out in the grant agreement, in accordance with this Regulation and Article 188 of Regulation (EU, Euratom) 2024/2509. Where it is necessary to enable other sources of funding, including coinvestments with national resources

	<i>the provisioning for the budgetary guarantee and the financing to financial instruments, including when combined with nonrepayable support in the form of a blending operation.</i> <i>4. Where Union funding is provided in the form of a grant, funding shall be provided as financing not linked to cost, or as simplified cost options in particular through lump sums as well as unit costs for personnel, in accordance with Regulation (EU, Euratom) 2024/2509. Funding may be provided in the form of actual eligible cost reimbursement only where the objectives of an action cannot be achieved otherwise.</i> <i>Where it is necessary to enable other sources of funding including coinvestments with national resources subject to State aid rules, funding shall be provided in the form of actual eligible cost reimbursement or simplified cost options.</i>	does not define it sufficiently to be applied without further design. The ECF Regulation sets it as the standard default funding methodology, and Art. 10 IV HE 2028-2034 Regulation refers to it as the first default funding method for its grants. The Financial Regulation indicates in its recitals that it is a form of funding that is based on results, and payments are triggered by reaching set milestones and targets. In view of positive cash flow for implementation and to compare the funding gap and/or needs for additional own-resources or matching funding from the national level, EARTO Members request further clarification in which part of the HE programme, ECF and other are intended to be implemented via actual eligible costs. And to which part of the programmes is it possible to apply for ex-ante assessments? Compared to forms of funding in Regulation EU, Euratom 2024-2509, and the wide spectrum in it, it is also reasonable to ask how well the intended flat rates will cover the eligible costs actually incurred, compared to the Horizon Europe cost models. Increased ambition of the EU programme should not lead to the lowered cost reimbursement in forms of funding other than actual eligible costs. EARTO members would also request further clarification whether there will be new flat rates, e.g. within lump sum grants, or will the current rates be extended also other parts of the programmes and calls (not just MSCAs under Pillar I)? Regarding the option financing not linked to costs (FNLC), it should be also noted that the Regulation EU, Euratom 2024/2509 (205) says that "In order to ensure legal certainty, it is necessary to clarify that, where a grant takes the form of financing not linked to costs, the provisions on an estimated budget, co-financing and no double funding do not apply since they cannot be applied in a case where the amount to be reimbursed is linked to defined conditions or results and is decoupled from the underlying costs.". – This needs to be considered in the eligibility rules of work programmes and EC ex-post audits, as well as the terms of national funding decisions for combined funding and co-financed actions. The actions financed in the form of "financing not linked to costs" cannot be audited in a similar way to the cost-based projects, and these audits should not include features of these financial audits. Only the results can be audited based on the substance of the action. Audit plans and evaluation criteria need to follow the substance/result-based audit, and not verification of costs incurred. This is a learning curve for auditors and funding authorities, both EU and national, and lessons learned from the Recovery and Resilience Facility (RRF) verification mechanisms and related European Court of Auditors audit findings should be taken into account.	subject to State aid rules, funding shall be provided in the form of actual eligible cost reimbursement or simplified cost options, including costs based on validated methodologies. The EC will prepare a dedicated guide to support beneficiaries in the preparation of audits and technical reviews of Lump Sum projects (input-based funding) and provide also further guidance for financing not linked to costs projects (output or result-based funding with milestones and targets ex-ante) in accordance with the Article 125, Article 184, Article 186 and Article 189 of the Regulation (EU, Euratom) 2024/2509.
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		From the beneficiaries point of view, the mechanism for such FNCL verifications needs to be stable and in place from the beginning of the action to avoid additional administrative burden related to requests for records and supporting documents linked to the achievement of the targets or milestones, and they should be limited for the purposes of ex post checks or audits, including those by the Court of Auditors. Based on unclear practices, financing not linked to costs is a major cause for concern for EARTO Members. It is perfectly fit for narrow and certain changes for which you can measure the expected results, financial return and then award this short-term return to a project implementing such changes. This carries the risk of turning into performance-based financing without having considerations for other forms of funding. This additional form of funding may decrease the cost of project management and administrative workload of the Commission and agencies, but carries significant financial risk for ambitious and expensive projects implementation by bringing an additional layer of uncertainties around the payment of the EU contribution. In addition, it is not clear how the EU, Euratom 2024/2509 Article 125/2 'potential recipients' interest and accounting method" will be considered when deciding on the forms of funding.	
	Art. 10.5 Evaluation <i>the evaluation committee may be composed partially or fully of independent external experts.</i>	While scientific excellence must remain a key criterion for evaluation. Evaluation must continue to be conducted by independent experts to ensure objectivity and rigour. However, the evaluation panels should not only include gender & diversity in the experts appointed but also be balanced in terms of representativity of the different RD&I actors, including RPOs and industry.	Add the following text: the evaluation committee may be composed partially or fully of independent external experts, ensuring a balanced representation of all RD&I actors in the evaluation panels in all parts of the programme (incl. ERC), including RPOs & industry.
	ADD NEW ARTICLE Art. 10. 6 Redress	Beneficiaries must have the opportunity to ask for a redress procedure regarding the evaluation of their proposals.	Add the following text: An applicant may request an evaluation review of procedural aspects of an evaluation of its proposal or prize application within 30 days after the communication of evaluation results. The evaluation of the merits of a proposal shall not be the subject of an evaluation review. An evaluation review committee shall provide an opinion on the review request within 2 months and may recommend one of the following: (a) A full or partial re-evaluation of the proposal to be carried out without involvement of evaluators who were linked to the procedural error identified; or

			(b) confirmation of the initial evaluation. The evaluation review referred to in the first subparagraph shall not delay the grant signature for proposals or prize awards that are not the subject of that review.
EU Partnerships	Art. 11.2 (a) Based on an MoU OR (b) art 185 and 187 <i>European Partnerships shall be based on a Memorandum of Understanding, agreed and signed between the partners, stipulating:</i> <i>(a) the results to be delivered, which shall be clear, measurable, time-bound;</i> <i>(b) reporting requirements;</i> <i>(c) the related commitments from all partners;</i> <i>(d) governance arrangements with a mechanism for partners to discuss and agree on the partnerships' programming and activities.</i>	First of all, we gladly note that most partnerships are now also processed centrally via the Participant Portal (administratively and financially). It is important to maintain this for the future HE partnerships. There should be no exceptions allowed: Institutionalised partnerships (initiatives under Art. 185/Art. 187) should also use the Participant Portal from the proposal stage onwards. In addition, EARTO welcomes the reduction to only 2 forms of partnerships based on work-programmed partnerships, which will be the new default setting. The article also defines tighter control on delivery/impact, which is welcome. On the reporting requirements, we would like to point out that the future KPIs/requirements will be the same in the new Horizon Europe and under the ECF to avoid the extra reporting requirements from the JU (e.g. to avoid the additional information requests for yearly reports to JUs, which are an extra admin burden to beneficiaries, not financed and duplicates the reporting requirements)	Add the following text: European Partnerships shall be based on a Memorandum of Understanding, agreed and signed between the partners, stipulating: (a) the results to be delivered, which shall be clear, measurable, time-bound; (b) a single set of reporting requirements; (c) the related commitments from all partners; (d) governance arrangements with a mechanism for partners to discuss and agree on the partnerships' programming and activities. The Commission will ensure that reporting requirements for partnerships will be streamlined under the various EU programmes financing those partnerships.
	Art. 11.4 Proportionate funding <i>For European Partnerships established pursuant to paragraphs 2 and 3 of this Article, support from the Programme shall be conditional upon efficient use of Union financing, a proportionate financial contribution from other partners at least matching the Union contribution and voting rights for the Union in the governing bodies ensuring protection of the interests of the Union in the partnership. For that purpose, EN 29 EN Joint Undertakings shall be established through a single establishing act ensuring harmonised rules.</i>	EARTO welcomes the one set of rules for JUs. However, the current article is unclear on financing and brings the following questions: does this mean 50-50% financing or other % depending on the number of participating consortium partners (other than Union)? How is this seen from the lifecycle perspective? Do harmonised rules also mean a similar structure for their financing? Does the term financial contribution also entail in-kind contributions, or is it limited? Clarifications would be appreciated.	Adapt the following text: For European Partnerships established pursuant to paragraphs 2 and 3 of this Article, support from the Programme shall be conditional upon efficient use of Union financing, a proportionate proportional financial contribution from other partners at least matching the Union contribution and voting rights for the Union in the governing bodies ensuring protection of the interests of the Union in the partnership.
	Art. 11.5(f) Lifecycle approach <i>(e) be based on ex ante, long-term and formal commitments from all partners to contribute financially to the resources of the European Partnership, which shall be centrally managed, except in duly justified cases.</i> <i>(f) require a clear lifecycle approach, including an upfront plan for the implementation of the initiative with a strategy for gradually or fully phasing out from Union funding.</i>	For EU partnerships aiming at a better EU Coordination of RD&I developments for ensuring EU positioning in key critical technologies, the request for an upfront plan for gradual or full phasing out of EU funding is simply not appropriate. EU Partnerships supporting key strategic technology areas, like, for e.g. hydrogen, semiconductors, etc., require long-term RD&I investments: the strategic planning and EU coordination of those investments require adaptation according to the developments over the years, this does not require having an end date on the EU coordination effort. So,	Add the following text: e) be based on ex ante, long-term and formal commitments from all partners to contribute financially or via in-kind contributions to the resources of the European Partnership, which shall be centrally managed, except in duly justified cases. (f) require a clear lifecycle approach, including an upfront plan for the

		while understanding that each new FP requires a new decision on partnership creation, continuation or termination, the termination should be the end goal.	implementation of the initiative with a strategy for further impact/scale-up or gradually or fully phasing out from Union funding.
	Art. 11.1+6 Financing 1. Where necessary to achieve the objectives set out in Article 3, activities under this Regulation may be implemented through European Partnerships, by default through the work programmes. 6. <i>Contributions from Partners other than the Union shall take the following forms:</i> (a) <i>financial contributions to the operational budget of the initiative;</i> (b) <i>co-financing by the Partners of their own participation, or that of their members, in projects funded through the initiative.</i>	Where is the simplification for beneficiaries in this article? Not only does the individual financial calculation of funding rates and co-financing represent a considerable additional burden for all participants, but so does the contractual aspect. 1. EU: Processing from proposal to GA Declaration, Grant Agreement, Consortium Agreement, and accounting 2. National: separate national applications, processing, grant notifications, and accounting 3. Industry: additional co-financing agreements, accounting 4. Compliance with non-profit rules Section 1 does not explain how the co-financing will be organised (whether from a clean table or not) and would require precision. In addition, section 6 with a) and b) together allow the continuation of collecting membership fees as well as provisions to take part in granted actions. JUs have today different models to calculate these. Consequently, beneficiaries must adapt to the multiple models of JUs' membership fees. These different mechanisms should be streamlined and harmonised for the sake of transparency, openness and programming. EARTO welcomes the possibility that in-kind contributions by partners are maintained.	Add the following text: (b) cofinancing, in cash or in kind , by the partners of their own participation, or that of their members, in projects funded through the initiative

Regulation on HE Chapter II – Excellence Science

Topic	HE Article	Analysis	Text Changes
MSCA	Art. 13 1. <i>The Marie Skłodowska-Curie Actions shall support the career at all stages, skills development, and mobility of researchers from all over the world subject to security considerations. MSCA shall foster research excellence, attract and retain excellent research talents, and support sustainable research careers in the Union with the aim to increase the Union's competitiveness in research and innovation.</i> 2. <i>The MSCA shall fund excellent doctoral networks, post-doctoral fellowships, R&I staff exchanges, as well as support mechanisms to foster sustainable careers in view of attracting and retaining the most promising talents. A strong focus shall be put on international, inter-sectoral and inter-disciplinary cooperation as</i>	The Marie Skłodowska-Curie Actions should also clearly target supporting EU technology capabilities thanks to enhancing skills available for technology creation and maturation within the RPOs and industry. This will pass by having a stronger focus on intersectoral mobility between the knowledge triangle actors, being academics, RPOs and industry. Too often now, actions are looked at simply between universities and industry, forgetting the role of RPOs in hosting PhDs, who will then migrate to industry. In addition, hurdles to the researcher mobility should be removed to ensure competitiveness and collaboration within the EU area. Accordingly, a researcher's movement across EU borders due to an EU-funded project should be considered exempt from the posted worker's notification requirements per EU directives (2014/67/EU & 2018/957/EU), as this cannot be considered a service provision. If that is not possible, then the cost related to making the notification with	Add the following text: The Marie Skłodowska-Curie Actions shall support the career at all stages, skills development, and mobility of researchers from all over the world, subject to security considerations. MSCA shall foster research excellence, attract and retain excellent research talents, and support and support sustainable research careers, including in industry and research performing organisations to foster intersectoral mobility, including in applied and industrial research. 2. The MSCA shall fund excellent doctoral networks, post-doctoral fellowships, reintegration , R&I staff exchanges, as well as support mechanisms to foster sustainable careers in view of attracting

	<i>well as science outreach. The funding shall support cutting edge research and focus on developing research talent, with targeted support for early career researchers. It shall support to establish the Union as a leading destination for researchers.</i>	the help of the external consultant used to complete the required notifications should be approved costs.	and retaining the most promising talents. A strong focus shall be put on international, inter-sectoral and inter-disciplinary cooperation as well as science outreach. The funding shall support cutting-edge research and focus on developing research talent, with targeted support for early career researchers, including in applied and industrial research . It shall support the establishment of the Union as a leading destination for researchers.
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Regulation on HE Chapter III – Competitiveness & Society

Topic	HE Article	Analysis	Text Changes
Collaborative RD&I	Art. 15.1 Collaborative research <i>Collaborative research shall support the creation of transnational research and innovation cooperation networks, bringing together entities of different disciplines, to support the development and swift diffusion of high-quality results in favour of the Union's industrial competitiveness, space, security, clean transition, preparedness and resilience, and addressing societal challenges, including culture and creativity, and to strengthen the impact of research in developing and supporting Union policies.</i>	As a general remark, collaborative research should not be limited to the second part of Horizon Europe's "Competitiveness and Society" but should be embedded in all parts of HE. Moreover, the focus should be on cross-border collaboration and not necessarily on different scientific disciplines.	Adapt text: Collaborative research shall support the creation of transnational research and innovation cooperation networks, bringing together entities of different disciplines across borders to find solutions for societal challenges and , to support the development and swift diffusion of high-quality results in favour of the Union's industrial competitiveness, space, security, clean transition, preparedness and resilience, and addressing societal challenges, including culture and creativity, and to strengthen the impact of research in developing and supporting Union policies.
	Art. 15.2 Balance TRLs <i>Activities shall be carried out in a balanced manner between lower and higher Technology Readiness Levels, thereby covering the whole value chain.</i>	EARTO welcome the ability to support collaborative research and innovation activities at different TRL levels. This will be an important marker to be kept in the programming under the Part Competitiveness in the future ECF work programmes.	
	Art. 15.3 Link to ECF <i>3. This Programme shall include the collaborative research and innovation activities in a specific dedicated part of the work programmes adopted under Chapters IV to VII EN 31 EN of the Regulation (EU) XXX European Competitiveness Fund. Those work programmes shall be adopted in accordance with Article 15 of the Regulation (EU) XXX [European Competitiveness Fund Regulation].</i>	See the comments made for Art 4.	
	Art. 15.5 EU Missions <i>The Programme shall contribute to EU Missions notably through the identification of priority actions for R&I funding for the development of new knowledge, technologies, services, and products in view of their goals. Funding for the</i>	EU Missions are also brought forward again: here, EARTO's position has been to ask for a real evaluation of the instrument before it is continued. Should such evaluation be positive, current EU missions' thematic overlap with the Competitiveness parts (Cancer with health, oceans with	With no evaluation available on the quality or value of the instrument, we advocate for the Deletion of this article 15.5 + Art. 15.6

	<i>EU Missions established under Article 8 of the Regulation (EU) 2021/695 shall be awarded on the basis of work programmes covering up to the budgetary year 2030.</i>	bioeconomy...) will continue generating confusion in the proposed split between competitiveness and society parts. Considering current activities, the EU missions so far seemed to be: 1) Financing the implementation of already existing solutions by regions and cities which could very well be financed by the structural funds (i.e. with no RD&I component) and divert EU funds that should be better focussed on RD&I activities, 2) Or looking at the coordination of efforts that could be better done by already existing instruments avoiding unnecessary duplication of instruments, such as the EU partnerships (by e.g. by supporting different partnership's coordination via financing well-though CSAs providing stakeholders with the proper means to organise such coordination' efforts). EARTO asks then for the discontinuation of the instrument and the rebalancing of the very specific activities seen of value with their attached budget into current EU partnerships when applicable.	
Regulation on HE Chapter IV – Innovation			
Topic	HE Article	Analysis	Text Changes
EIC	Art. 16.1-2 Instruments <i>2. The EIC may in particular provide the following types of support:</i> <i>(a) Pathfinder grants for high-risk research, including proof of concept and prototyping;</i> <i>(b) Transition grants to develop pathways to commercial development for research results, including the creation of spin-offs and start-ups;</i> <i>(c) Accelerator blended finance and investment-only support for single companies to develop, and bring to market their innovations;</i> <i>(d) Incentives to procurers to test and provide first customers for deep tech and disruptive innovations;</i> <i>(e) Business Accelerator Services to complement EIC funding by providing access, in complementarity and coordination with the Project Advisory referred to in Chapter III of the of the Regulation (EU) XXX [European Competitiveness Fund], to deep-tech expertise, coaching and mentoring, match making with investors, procurers, corporates and other innovation partners.</i>	EARTO welcome the strengthening of the Transition instrument and the linking of the EIC priorities to the ECF. However, it should be clear that the EIC should not tap any budget from the Part Competitiveness of Horizon Europe. In addition, the EIC instruments should develop stronger links to EU RPOs' own ventures and technology infrastructures. This effort has been too limited so far. Key RPOs' venture managers should be invited to the EIC Board to that effect Furthermore, EIC grantees' links to EU technology infrastructures (under Part IV) should be further supported and promoted under the EIC instruments.	Add the following text: The EIC instruments referred to in paragraph 2 will encourage and facilitate access and use of RIs and TIs with financial support.

Regulation on HE Chapter V – ERA			
Topic	HE Article	Analysis	Text Changes
Infrastructures	Art. 18.2 ERA & RTIs <i>2. The Programme shall contribute up to 20% of the building costs of critical new world-class capacities of European research and technology infrastructure.</i>	EARTO welcomes very much the introduction of TIs in the HE and very much appreciates the very welcome financial support for building costs of new technology infrastructures. However, if the total budget planned for Part IV on RTIs is only used for the CERN new collider tunnel, this article would not have the intended effects: the budget has to match this. Accordingly, see our comments on the very much needed doubling of RTIs' budget under Article 4. In addition, for technology infrastructures, EU co-investments like in EUROHPC and the EU Chip Acts pilot lines have already gone up to 50%, so the 20% figure should be corrected to up to 50% to allow the needed investments to be made when seen appropriate. Furthermore, there should be a possibility to include upgrades and improvements for TIs to the ECF actions, which are directly linked to technology development and improvements to development, testing, demonstration and piloting facilities (= financial support for upgrades).	Adapt the following text: 2. The Programme shall contribute up to 50% of the building costs of critical new world-class capacities of European research and technology infrastructure.
	Art. 18.3 PSF <i>The Policy Support Facility shall provide Member States and Associated Countries with practical expert support to design, implement and evaluate reforms that enhance the quality of their research and innovation investments, policies and systems. It shall contribute to building stronger and more effective national research and innovation systems and a more robust European Research Area.</i>	This article does not link the PSF work with the future National and Regional Plans mentioned under the MFF regulation. The efforts under the PSF should also aim at looking with the interested MS to accelerate the possibilities of Technology Infrastructures' investments.	Add the following text: The PSF efforts shall be linked to the EU Semester's discussions held under National and Regional Plans, as well as aim at supporting further technology infrastructure investments
Widening	Art. 19.3 Limited Eligibility <i>3. Only legal entities established in widening countries or transition countries shall be eligible as coordinators under the 'widening participation and spreading excellence' component of the 'Strengthening the ERA' part of the Programme.</i>	The article does not provide information on how the possibility of a change in the status of an individual Member State during the validity of the Programme will be managed, and so this eligibility criterion. In addition, the Innovation Score Board Index cannot be the only verification mechanism for such checks.	Delete the distinction between the two groups of MS. All MS under 19.1 and 19.2 shall be labelled as Widening countries.

Title II - Rules for Participation & Dissemination			
Rules for Participation on HE – Chapter I General Provisions			
Topic	HE Article	Analysis	Text Changes
Eligibility	Art. 21.3 Grant consortia <i>3. Except when the work programme otherwise provides, to be eligible for participation in grant actions legal entities shall form a consortium that includes as beneficiaries three legal entities independent of each other and each established in different countries as follows:</i> <i>(a) at least two legal entities established in different Member States; and</i> <i>(b) at least one other legal entity established in another Member State or an associated country.</i>	EARTO welcomes the adaptation to the third consortium member being possibly from an associated country.	
	Art. 21.4 Grant consortia <i>4. ERC frontier research actions, EIC actions, research and training actions and actions that involve or have as their primary aim the implementation of pre-commercial procurement or procurement of innovative solutions</i>	It is unclear which research and training actions can be combined. See Art. 2 definitions (19) “research and training action’ means an action geared towards the improvement of the skills, knowledge and career prospects of researchers, promoting mobility between countries, sectors or disciplines.	
	Art. 21.10 Uneligibility	From our members’ practical experience, we have found that clauses relating to the ineligibility of activities “already fully funded” by other public or private sources—while understandable from the perspective of sound financial management — often lead to recurring problems of interpretation and application, especially during project evaluation, auditing, or monitoring phases. This is due to several factors: • Lack of clear criteria to define when an 'activity' is considered identical to another that has already been funded. • Ambiguity in the distinction between complementary co-financing (allowed) and duplication (forbidden). • Uncertainty regarding the compatibility of European funds (e.g., ERDF + FP) or private funds (industrial contributions). • Insecurity when justifying costs that are partially covered by other sources (e.g., regional funding in projects with indirect costs not covered 100%). This situation generates legal and financial risk for beneficiaries, and it can discourage their participation or limit their capacity for strategic planning in the combined use of funds. For all these reasons, to strengthen legal certainty, we propose to introduce the following mechanisms: (i) a binding official interpretive guide, including a definition of fully funded activity, case studies, and examples, (ii) systems of binding consultation ex ante, and others.	Add the following text: Introduce the following mechanisms: (i) a binding official interpretive guide, including a definition of fully funded activity, case studies, and examples, (ii) systems of binding consultation ex ante, and others.

		In addition, early termination of an action should be the exception to the rule. This clause should apply to challenge-driven (actions of the EIC) only. Staff working on EU actions should be granted the security that their employment contract will not be cancelled because a pre-set target has not been met in the given timeframe.	
	Art. 21.11 Termination at will <i>In addition to the grounds set out in Article 132 of Regulation (EU, Euratom) 2024/2509, award procedures and resulting legal commitments shall allow for termination where the objectives of the action are unlikely to be achieved at all or within the set timelines, or the action has lost its policy relevance.</i>	This article expands the possibility of a project's termination by allowing the Commission to cancel a project if it loses political relevance, even if there is no breach. This introduces greater discretion in decision-making for the European Commission, with less legal certainty for beneficiaries. Especially since all projects are being thoroughly evaluated, it seems an unnecessary limitation of beneficiaries' legal certainty.	Delete the following text: In addition to the grounds set out in Article 132 of Regulation (EU, Euratom) 2024/2509, award procedures and resulting legal commitments shall allow for termination where the objectives of the action are unlikely to be achieved at all or within the set timelines, or the action has lost its policy relevance, or where incorrect performance of the action is detected and verified.
	Art. 21.12 WPs <i>12. The work programme or the documents related to the award procedure may specify the eligibility criteria set out in this Regulation or set additional eligibility criteria for specific actions including to take into account specific policy requirements.</i>	There is a tendency all along the proposed regulation to push the final formulation of the eligibility criteria and additional eligibility criteria to the future work programmes and calls. This is not seen as a simplification; it will bring a further multiplication of possibilities that beneficiaries will have to face. We would also advise deleting the word "including" as it introduces unnecessary breadth and uncertainty. Replacing it with precise language ensures that any additional criteria are clearly justified, transparent, and proportionate. We would also welcome the introduction of stability safeguards in future WPs: Consider a requirement that additional criteria set in the work programme are maintained for a minimum period (e.g., one or more award cycles) unless justified by significant policy or legal changes, providing predictability for applicants.	Delete the following text: The work programme or the documents related to the award procedure may specify the eligibility criteria set out in this Regulation or set additional eligibility criteria for specific actions including taking into account specific policy requirements.
Ethics Research Integrity	Art. 22.1(b) Highest standards of research integrity <i>(b) ethical principles, including the highest standards of research integrity.</i>	This article should be amended as in its present formulation creates uncertainty, as such standards stay undefined: here, mentioning already existing EU code made by ALLEA would be an elegant solution. Please bear in mind that such code evolves so therefore the wording should be kept flexible.	Add the following text: (b) ethical principles, including generally acknowledged standards of research integrity, e.g. as promoted by the ALLEA code of conduct.
	Art. 22.2 Ethics Screening at evaluation <i>(a) provide an ethics self-assessment relating to the objective, implementation and likely impact of the activities, including a confirmation and description of compliance with paragraph 1;</i> <i>(e) obtain all approvals or other mandatory documents from the relevant national, local ethics committees or other bodies, such as data protection authorities, before the start of the relevant activities</i>	With Article 22.2a, does this mean that participants will have to provide an Ethics plan, just like the Gender Equality Plan? This would be seen as an extra administrative burden. The article 22.2e is too vague and should be deleted or at least restricted to the committees or bodies regulated by laws, and should specify more what approvals are meant as i.e. export law licences cannot be gotten beforehand, as they take up to 2 years, but might be part of research integrity regarding dual-use technologies. We have had experiences in which, after the grant, the implementation of an ethics advisor and specific deliverables were requested, following the ethics self-assessment. Could	Add the following text: any suggestion? (e) obtain all approvals or other mandatory documents from the relevant national, local ethics committees or other bodies, such as data protection authorities, before the start of the relevant activities

		these requirements be clarified further in article 22.2, and in point (e), whether these approvals are to be implemented as one approval per all applications, or if it is project project-specific? Lastly, we would suggest having such an obligation at the project level and not at the proposal level, as it would increase the administrative burdens of all parties, including the public authorities, and the timeframe wouldn't be able to be propelled by all parties, as the national authorities may have different timeframes.	
Evaluation	NEW articles on Evaluation & Evaluation review procedure	The detailed parts on evaluation and the possible complaint procedure are deleted entirely in the EC proposal for Horizon Europe 2028-2034. To safeguard transparency, equal treatment and redress possibilities for the applicants, additional Articles or sub-paragraphs to Art.10 (V) should be added.	Add the following text: Articles or sub-paragraphs to Art.10 (V) of previous FP regulation should be added.

Rules for Participation on HE - Chapter II Grants

Topic	HE Article	Analysis	Text Changes
Calls for Proposals	Art. 23.1 Exceptions for EC no to have a call <i>1. A call for proposals is not required for coordination and support actions which: (a) are to be carried out by legal entities identified in the work programme; and (b) do not fall within the scope of a call for proposals, in accordance with Article 198, point (e), of Regulation (EU, Euratom) 2024/2509.</i>	There should be clear limitations, rules and procedures for this exception to ensure full transparency in the awarding of funding without a call for proposals in exceptional cases.	Add the following text: "2. Where grants are awarded without a call for proposals, the work programme shall: (a) specify the justification for the direct award, including reference to the relevant provisions of the basic act; (b) identify the criteria and process used to select the beneficiary; (c) ensure that the selection respects transparency, equal treatment, and absence of conflicts of interest; and (d) provide sufficient documentation to allow ex-post verification and audit."
Financial Capacity of Applicants	Art. 24.1 + 2 + 4 Financial capacity Checks: <i>1. In addition to the exceptions mentioned in Article 201(5) of Regulation (EU, Euratom) 2024/2509, the financial capacity shall be verified only if the requested funding from the Union for the action is equal to or greater than EUR 1.000 000. 2. Notwithstanding paragraph 1, if there are grounds to doubt the financial capacity of an applicant, or if there is a higher risk due to the participation in several ongoing actions funded by Union R&I programmes, the financial capacity of other applicants, or of coordinators even where the requested funding is below the threshold referred to in paragraph 1 shall also be verified.</i>	Article 24.1 can be read that the financial capacity of all beneficiaries will be checked in actions where the EU funding will exceed €1M. In the current HE Regulation, the financial capacity of the coordinator was checked in actions where the EU funding request exceeded €500k. If this is extended to all beneficiaries, what is the procedure for these checks and who will do the checks? How to tackle the delays in the grant preparation phase due to these checks? The same questions apply to the Art. 24.2, which has no changes compared to the current HE: How is this checked and when? Regarding the Art. 24.4 (which has also been kept the same as in the current HE), how has this worked in the current Horizon Europe programme? Any examples of conditional provisions in collaborative projects? What about startups and scaleups as consortium members or individual recipients of	Add the following text: 1. In addition to the exceptions mentioned in Article 201(5) of Regulation (EU, Euratom) 2024/2509, the financial capacity shall be verified only if the requested funding of the beneficiary from the Union for the action is equal to or greater than EUR 1.000 000. The European Commission will develop a new definition to cover startups and scaleups to better acknowledge their role and eligibility for EU funding to support their participation in HE and ECF actions.

	4. In the case where the financial capacity of an applicant is weak, the participation of the applicant may be made conditional on provision of a declaration on joint and several liability by an affiliated entity.	EU funding (e.g. in EIC actions)? Are there exemptions and derogations to this article since their financial status may not be stable in the proposal phase or by the grant preparation phase, but they can be crucial members of consortia in HE actions and ECF, as well as potential recipients of single EIC grants?	
Time to Grant	Art. 26.1 Timing 1. By way of derogation from the first subparagraph of Article 197(2) of Regulation (EU, Euratom) 2024/2509, the following periods shall apply: (a) for informing all applicants of the outcome of the evaluation of their application, a maximum period of five months from the final date for submission of complete proposals; (b) for signing grant agreements with applicants, a maximum period of seven months from the final date for submission of complete proposals.	Reducing time-to-grant to 7 months is a very welcome plan. However, EARTO members' experience shows that FP's reduction in time to grant is very much dependent on a corresponding reduction in complexity planned by the Commission services and well-running IT tools from the start of the programme. The change proposed in this article, compared to the current situation, is that the grant preparation is done faster, from 3 to 2 months. Accordingly, this will require various GAP processes to be adapted, such as, for example, automated validation, administration, improved communication with the Project Officer in charge, etc. In the current FP, experiences show that 3 months is very often not enough. With simplified financing methods such as LS and FNLC, we can expect the GAP phase to be even more crucial and a sensitive time for project set-up, esp. in large consortia. Time To Grant reduction should be driven by faster evaluation and better tools, leaving ample room for dialogue between consortia members and authorising officers	Add the following text: The European Commission will evaluate the GAP process and improve the automated validations to shorten the time to grant throughout the EU programmes to facilitate the fast-track option for a starting date.
Funding Rates	Art. 27.1 Rates setting	The same funding rate throughout the whole programme and instruments would have been a real simplification, but if the maximum is defined at the action level (per call and per work programme), then it may still vary within the programme and per work programme. - If the text in the regulation is written like this to protect the different funding rate per action in ECF, where certain activities have a 50% or 20% funding rate, it should be framed that HE related research and innovation actions are financed up to 100% from eligible costs throughout the HE, ECF. (CEF Regulation itself does not include specific articles for funding rates). - What is the lowest possible funding rate in research and innovation activities, if the maximum will be decided on WP level? We understand that the aim is to secure that the call can be organised also in cases where there is less funding available from the EU budget for the specific part of the programme, e.g. due to delayed payments from Member States. It is unclear in which programmes the Commission has the flexibility to decide whether they go for project-based grants based on actual eligible costs, and which parts are fixed only for lump sums. In addition, it is mentioned in many parts that the forms of funding are flat rates, and the question is how	

		well these flat rates reflect the eligible costs actually incurred in implemented projects/actions. - To maintain the EU programmes attractive for RTOs, and to secure a sufficient level of cost coverage, the simplified cost option model developed by the European Commission (SCO) for <u>personnel unit costs</u> must be developed further to make it more sustainable, predictable and feasible for large organisations participating in multiple EU actions. E.g. annual updates to rates as a first step and retroactive corrections to ongoing actions. The fixed rate in the grant preparation phase for the 2-3 years' period would not reflect enough the changes in personnel costs during the implementation phase of the action (e.g. salary raises set in collective agreements and negotiated by the trade unions). <i>An alternative to be proposed under the SCO is the validated methodology for personnel costs on a voluntary basis.</i> - In view of predictability, simplification and sustainability, the personnel cost model cannot be different in different parts of the programme/ work programme/call. - More clarity is also requested to know in which direction the lump sum grant cost categories will be developed and whether the personnel costs in lump sum actions will be replaced with the SCO personnel unit cost model (single daily rate on organisation level calculated with Wizard). In addition, it is important to know in which parts of the programmes, HE and ECF, the co-funding from MS is needed to see the materialisation of the aimed single set of rules throughout the EU programmes.	
	Art. 27.2 Rates <i>2. Up to 100 % of total eligible costs of an action under the Programme may be reimbursed, except for for-profit legal entities where up to 70% of the total eligible costs may be reimbursed. By way of exception, SMEs shall be eligible for a funding rate of up to 100% of the total eligible costs.</i>	EARTO members very much welcome the 100 % of total eligible costs rate to be kept for non-profit organisations across all actions and parts of the programme, also those included under the ECF work programmes, independently of the TRL levels required.	
Indirect Costs	Art. 28.1 Rates <i>1. Indirect eligible costs shall be 25% of the total direct eligible costs, excluding direct eligible costs for subcontracting, financial support to third parties and any unit costs or lump sums which include indirect costs. Where appropriate, indirect costs included in unit costs or lump sums shall be calculated using the flat rate referred to in the previous sentence.</i>	The direct costs of infrastructures shall not be covered through indirect costs included in the indirect costs of the actions. Current funding rates for Research Performing Organisations (RPOs) in general are positive, but significant gaps remain, in particular for acceptance of research and technology infrastructure costs in infrastructure-intensive research areas (e.g. clean rooms). This funding shortfall is a major barrier affecting organisations' participation in certain programmes.	

		Indeed, as mentioned earlier, the same flat rate of 25% for indirect costs throughout the programmes and instruments is very welcome. It was time to get rid of the 7% for indirect costs, as it complicated the budgeting of the actions while stressing the share of own funding for the actions in some strategic initiatives. However, one big question remains concerning the operational costs/use of RD&I infrastructures in granted actions if the internally invoiced goods and services option is not provided to create the continuum between the programmes or if replaced by a possible flat-rate option. The infrastructure costs should be considered as eligible in the collaborative research action based on the organisation's cost allocation principles. We still need these costs as eligible costs of the actions, to be covered based on the actual costs.	
	Art. 28.2 Rates Setting <i>2. Notwithstanding paragraph 1, if provided for in the work programme, indirect costs may be declared in the form of a lump sum or unit costs.</i>	The management measures mentioned in the Annexe part of the HE Regulation (page 55/71) mention "certificates on the financial statements above a certain threshold, and certification on methodologies to calculate unit costs or ex-ante assessment on Large Research Infrastructure on a voluntary basis;" → needs to be extended to cover unit costs of Large Research Infrastructure and Technology Infrastructure. This option should apply to all parts of the programme, not only certain types of actions, e.g. IPCEIs or activities, building or setting up of infrastructures. EARTO members prioritise the development, testing and piloting of technologies. The EU actions involve infrastructure-intensive work, which incurs significant costs. Therefore, it is important that reimbursement should accurately reflect these expenses, feasibly and practically.	Add the following text: <i>2. Notwithstanding paragraph 1, if provided for in the work programme, indirect costs may be declared in the form of a lump sum unit costs or actual costs. In addition, an option for certification on methodologies to calculate unit costs or ex-ante assessment on Large Research Infrastructure and [Technology Infrastructures] shall be provided on a voluntary basis.</i> In addition to the revision of the Art. 28.2 text, the following amendment to management measures part of the Regulation (page 55/71): "certificates on the financial statements above a certain threshold, and certification on methodologies to calculate unit costs or ex-ante assessment on Large Research Infrastructure and [Technology Infrastructures] on a voluntary basis;".
Eligible Costs	Art. 29.1 In-kind contributions <i>1. By way of derogation from Article 193(2) of Regulation (EU, Euratom) 2024/2509, costs of resources made available by third parties by means of in-kind contributions shall be eligible up to the direct eligible costs of the third party.</i>	The text of the article is not very clear in terms of the eligibility of in-kind contribution costs and would require adding a definition of in-kind contributions (i.e. personnel costs, e.g. salaries of the Professors paid by the Ministries and not the university they work for). This may also include civil service, refugees, etc., whose salary is covered by another entity.	Add the following text: In-kind contributions shall be clearly defined as to their type, method of valuation and comparability with actual costs, and shall not confer disproportionate rights or advantages upon third parties.
Mutual Insurance Mechanism	Art. 30.1 Beneficiaries contribution to MIM <i>2. The MIM shall be managed by the Union, represented by the Commission acting as executive agent. Specific rules for the operation of the MIM shall be set out by the Commission by means of an implementing act.</i>	In general, the proposal for MIMs is appreciated and that defence research is now also covered by the MIM (not the case currently in the EDF). In the current FP, this is framed to be 5% for the beneficiaries of the Union funding for the action, and there was an option for the EC to increase that contribution up to 8 % or reduce it to under 5 %. It was also set in a way that the contribution	Add the following text: <i>3. Beneficiaries shall make a contribution of 5 % of the Union funding for the action to be offset against the initial pre-financing and paid back to the beneficiaries at the payment of the balance. Based on periodic transparent</i>

	3. Beneficiaries shall make a contribution to be offset against the initial pre-financing and paid back to the beneficiaries at the payment of the balance.	should not exceed the amount of the initial pre-financing. (please see the Regulation 2021/695 Art. 37.3). Therefore, some limits should be included in the text. Beneficiaries need to know this in advance, already in the proposal phase and submission phase. Also, the first granted actions from HE should not be in a different position compared to the last calls and grants in view of MIM. We advise keeping the same formulation as in the current HE. There should not be joint liability in any parts – it must be limited.	evaluations, the Commission may increase that contribution up to 8 % or reduce it to under 5 %. The contribution of the beneficiaries to the Mechanism shall be offset against the initial pre-financing and paid to the Mechanism on behalf of the beneficiaries. That contribution shall not exceed the amount of the initial pre-financing
Ownership of Results	Art. 31.4 Transfer of ownership: 4. Transfer of ownership may be subject to conditions as set out in the work programme, call conditions or grant agreement, including a requirement to pass on any obligations regarding the results.	We acknowledge the rationale behind 31.4, as there might be a need to regulate the transfer of ownership of results due to reasons of economic security, knowledge security or European strategic autonomy. However, such measures should be balanced against the requirements of valorisation, also with spin-offs and scale-ups, and the EU RD&I ecosystem.	
Valorisation & Dissemination	Art 32.1 (b) Access to Background: (b) grant access to their results and background if needed for implementing action tasks or for valorising results, including for commercial deployment;	The whole IP section seems extremely short and condensed in comparison to the current FP. We would advise adding similar text as in the current FP.	Change the following text: (b) grant access to their results and background if needed for implementing action tasks or for valorising their own results, including for commercial deployment; Add the following text: Access rights: 1. Requests to exercise access rights and the waiver of access rights shall be in writing. 2. Unless otherwise agreed with the grantor, access rights shall not include the right to sub-license. 3. Before acceding to the grant agreement, the beneficiaries shall inform each other of any restrictions on granting access to their background. 4. If a beneficiary is no longer involved in an action, this shall not affect its obligations to grant access. 5. If a beneficiary defaults on its obligations, the beneficiaries may agree that that beneficiary no longer has access rights. 6. Beneficiaries shall grant access to: (a) their results on a royalty-free basis to any other beneficiary in the action that needs them to implement its own tasks; (b) their background to any other beneficiary in the action that needs it to implement its own tasks,

			subject to any restrictions referred to in paragraph 3; that access shall be granted on a royalty-free basis, unless otherwise agreed by the beneficiaries before their accession to the grant agreement; (c) their results and, subject to any restrictions referred to in paragraph 3, to their background to any other beneficiary in the action that needs them to valorize its own results; that access shall be granted under fair and reasonable conditions to be agreed upon. 7. A request for access for valorisation purposes may be made up to one year after the end of the action, unless the beneficiaries agree on a different time limit.
Art 32.1(c) Valorisation Best Efforts: <i>(c) undertake best efforts to valorise their results, either directly or indirectly, including through transfer or licensing; if results are not valorised within a given period, the Commission may identify instruments and tools, such as those serving the valorisation strategy set out in Chapter III of Regulation (EU) XXX [European Competitiveness Fund], that the beneficiaries concerned shall use to facilitate the valorisation of those results;</i> <i>(d) make the results public in an appropriate manner as soon as feasible, while keeping results confidential if needed due to the protection of intellectual assets, security concerns or legitimate interests;</i>	Art. 32.1 (c) adds burdens that seem questionable and are too unclear. There is a risk of overly prescriptive IP valorisation ‘duties’ for RTOs, given the framework of state aid regulations and different business models of RTOs. Accordingly, parts of the article should be clarified and parts deleted: - Define “given period” = at least 24–36 months post-project for public-research results; make the Commission’s intervention advisory-first (beneficiary chooses from a menu of tools or justifies an alternative plan). Recognise scientific reuse, research tools, data reuse and standardisation outputs as valid valorisation, not only commercialisation. - Add that “valorisation includes creation of spin-offs/start-ups, equity or revenue-sharing with inventors, standard-setting and open-source strategies”. Allow limited eligible costs for incorporation, IP packaging, due diligence and regulatory pre-work when a beneficiary is a public research organisation - Even though the “dissemination” is used in the title, we have neither found a definition nor an explicit reference, not even in article 32.1(d)	Add or delete the following text: <i>(c) undertake best efforts to valorise their results, either directly or indirectly, e.g. through transfer, licensing or publication; if results are not valorised within a given period, the Commission may identify instruments and tools, such as those serving the valorisation strategy set out in Chapter III of Regulation (EU) XXX [European Competitiveness Fund], that the beneficiaries concerned shall use to facilitate the valorisation of those results;</i>	
Art. 32.1e(i) Open access <i>(e) adhere to open science practices, including by:</i> <i>(i) ensuring open access to all peer-reviewed scientific publications regarding the results;</i>	In the case of Dual Use, open access publication is not possible, as in most countries, one cannot get a license for the world but only for specific countries.	Add the following text: <i>e) adhere to open science practices, when legally possible, including by:</i>	
Art. 32.1e(ii) FAIR <i>(ii) managing responsibly the research data in the action and other results in line with the principles ‘findability’, ‘accessibility’, ‘interoperability’ and ‘reusability’ (the FAIR principles) as well as ensuring open access</i>	Still needs a time frame for how long research data needs to be kept online (as it costs money and needs room)		

	<i>thereto unless doing so would be against legitimate interests, including commercial interests, or other constraints.</i>		
	Art. 32.1(f) Data management plan <i>(f) unless otherwise provided for in the work programme or call conditions, develop and regularly update a plan to manage their results, including data;</i>	Please define “regularly” as “at least once a year” to avoid an extra administrative burden for beneficiaries. It would also be beneficial to include clearer indications on how many iterations or deliverables are required as part of a call, and at what stages of the project implementation.	Add the following text: <i>(f) unless otherwise provided for in the work programme or call conditions, develop and regularly once a year update a plan to manage their results, including data;</i>
	Art. 32.1(g) Free access <i>(g) grant free access to their results for developing, implementing and monitoring their policies or programmes to the following entities:</i> <i>(i) to Union institutions, bodies, offices or agencies;</i> <i>(ii) to Member States’ national authorities, where provided in the work programme, call conditions or grant agreement.</i>	Free access for “implementing policies” is overly broad. What if a body office or agencies use it beyond the defined scope? What would be the consequences? There should be safeguards that access means without the right to give to third parties or sublicense, and in case of breach, a possibility to have actions in place. Any user rights for the granting body or third parties in exchange for the grant funding are, in principle, against the funding nature, which means no obligations other than fulfilling the funding goals by fuelling the economy through successful valorisation, creation of jobs, etc. Such user rights should consequently be kept to a minimum (i.e. not more than the current FP already foresees)! If we grant free access for implementation, this might lead to a distortion of competition.	Delete the following text: <i>(g) grant free access to their results for developing, implementing and monitoring their policies or programmes to the following entities:</i>
Pre-commercial procurement	Art. 33 PCP <i>the contractors shall own at least the intellectual property rights to the results they generated, while the procurers shall obtain at least free access to the results for their own use as well as free access to the results for their current and future contractors to use the results for the procurers</i>	PCP has been for many RPOs very cumbersome. The current PCP application is confusing, not transparent, complex, and lacks legal certainty. This article suggests that procurement will be more intensively used; to be successful, this article requires modifications. In practice, the public procurers may either require the RTD performer to open source the results OR to acquire all IP. These are the main reasons why PCP is not suitable for RTOs. In addition, it would be valuable to: ○ Define “fair and reasonable” explicitly as FRAND (add non-discriminatory) and oblige transparent, objective pricing benchmarks. ○ Define the “given period” (e.g., 24 months after PCP end, extendable for deep-tech with milestones). ○ Add an academic safeguard: publication rights preserved (with reasonable delay for protection); “free access for own use” must not be interpreted as a right to publish confidential know-how. ○ Require impact assessment before triggering (4)(b)/(4)(c), and a right for contractors to cure (submit a credible exploitation plan) before ownership transfer. ○ Clarify the documentation requested and justification of the costs that the European Commission is requesting from beneficiaries.	Add the following text: <i>“the contractors shall own at least the intellectual property rights, including the full exploitation rights, to the results they generated. In deviation of this, the procurers shall obtain free access to the results for their own use as well as free access to the results for their current and future contractors to use the results for the procurers, but limited to use within the context of the procured services, goods or works”.</i>

EARTO and its experts remain ready to further discuss these recommendations with the European Institutions' representatives.

EARTO - European Association of Research and Technology Organisations

Founded in 1999, EARTO promotes RTOs and represents their interest in Europe. EARTO network counts over 350 RTOs in more than 32 countries. EARTO members represent 228,000 highly-skilled researchers and engineers managing a wide range of technology infrastructures.

RTOs - Research and Technology Organisations

From the lab to your everyday life. RTOs innovate to improve your health and well-being, your safety and security, your mobility and connectivity. RTOs' technologies cover all scientific fields. Their work ranges from basic research to new products and services' development. RTOs are non-profit organisations whose core mission is to produce, combine and bridge various types of knowledge, skills and infrastructures to deliver a range of research and development activities in collaboration with public and industrial partners of all sizes. These activities aim to result in technological and social innovations and system solutions that contribute to and mutually reinforce their economic, societal and policy impacts.

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