

EARTO Analysis of EC Regulation Proposal: Establishing the Specific Programme of 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:

- Chapter I – General Provisions
- Chapter II – Excellent Science
- Chapter III – Competitiveness & Society
- Chapter IV – Innovation
- Chapter V – ERA
- Chapter VI – Transitional & Final Provision

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 – Establishing 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 SP of HE Chapter I – General Provisions			
Topic	HE Article	Analysis	Text Changes
Operational Objectives	Art. 2 Objectives <i>2. The Specific Programme has the following operational objectives: (h) foster technology uptake and demonstration of disruptive innovation;</i>	Support technology development and maturation for EU competitiveness, linked to the MFF Heading Competitiveness, is clearly missing.	Add the following text: h) foster technology uptake and demonstration of disruptive innovation supported by excellent collaborative RD&I and Research and Technology Infrastructures
Budget	Art. 3 Budget	EARTO very much welcome 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 2.0). Accordingly, the main evolution is this budget is its distribution between its different parts. EARTO would like to recall that collaborative RD&I is the core of EU	• Delete 'indicative' and replace it with 'dedicated' • Part II to be kept at a minimum of 60% of the programme total budget • Part IV Budget for Research & Technology Infrastructures to be at a minimum doubled to be able to face the investment needs of the whole ecosystems of RTIs.

		added value 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?	
Work Programmes	Art. 4.1(c) A single co-financing rate per action <i>1. The Specific Programme shall be implemented by the work programmes referred to in paragraph 2 of this Article in accordance with Article 110 of Regulation (EU, Euratom) 2024/2509.</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 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 Regulation 2024/2509 Article 191 (a)-(f): General principles applicable to grants.	
	Art. 4.2 WPs via implementing acts <i>The Commission shall adopt separate work programmes, by means of implementing acts</i>	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	

	Art. 4.3 WPs & budget linked to ECF <i>The research and innovation activities referred to under the policy windows described in Chapters IV to VII of Regulation XXX [reference to the European Competitiveness Fund Regulation] shall be included in a specific dedicated part of the work programmes implementing the corresponding specific objectives referred to in Article 3(2), points (a) to (d) of Regulation XXX [reference to the European Competitiveness Fund Regulation]. Those work programmes shall be adopted in accordance with Articles 15 and 84 of Regulation XXX [reference to the European Competitiveness Fund Regulation].</i>	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 HEU 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 HE 2.0 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 HEU 2.0 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, 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.	
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EU Partnerships	Art. 5.1 Lifecycle approach <i>European Partnerships shall follow a clear lifecycle approach, including their selection, implementation and monitoring, and transitioning out of Regulation XXX</i>	For EU partnerships aiming at a better EU Coordination of RDI 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 RDI 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, while understanding that each new FP requires a new decision on partnership creation, continuation or termination, the termination should be the end goal.	Add the following text: European Partnerships shall follow a clear lifecycle approach, including their selection, implementation and monitoring, and transitioning out of Regulation XXX when deemed necessary.
	Art. 5.1(a) Setting up procedure <i>European Partnerships shall be selected following a competitive, open, non-discriminatory, and transparent procedure, on the basis of areas proposed by the Commission. In addition, the requirements set out in Article 11 of Regulation (EU) Regulation XXX [reference to the Horizon Europe Regulation], candidate partnerships shall comply with the following selection criteria:</i> <i>iii. partners' composition: unless duly justified, the participation of public entities from at least five Member States and private entities representing substantial segments of their respective ecosystems is required, ensuring a broad and balanced involvement of key stakeholders;</i>	The European Partnerships under Horizon Europe are fundamentally partnerships between public and private entities; this should be reflected in the text. RTOs have been strong supporter of industries in the PPPs/JUs to define ambitious SRIAs so far, and their participation should be further promoted.	Add the following text: iii. partners' composition: unless duly justified, the participation of public entities from at least five Member States and private and public entities representing substantial segments of their respective ecosystems is required, ensuring a broad and balanced involvement of key stakeholders;

Regulation on SP of HE Chapter II – Excellent Science

Topic	HE Article	Analysis	Text Changes
MSCA	Art.9 <i>1. The Marie Skłodowska-Curie Actions (MSCA) shall focus on investigator-driven research founded exclusively on scientific excellence to support researchers' career, skills development, and mobility at all career stages.</i> <i>2. The MSCA shall be open to any scientific domain under the Treaty on the Functioning of the European Union and the Treaty establishing the European Atomic Energy Community. If specific needs arise, the MSCA may target certain activities in specific thematic priorities, types of research and innovation institutions, or geographical locations to respond to the evolving requirements and needs of the Union regarding skills, research training, career development and knowledge sharing, in pursuit of the Union strategic autonomy.</i> <i>3. The implementation of the MSCA shall:</i> <i>(a) offer attractive conditions and opportunities for career progression, helping to address systemic issues of career instability and precarity in the research sector. The MSCA shall actively support the principles set out in the European Charter for Researchers promoting fair recruitment, transparent procedures, and merit-based advancement;</i> <i>(b) ensure strategic synergies with the European Research Council (ERC) but also with Union instruments that foster innovation, such as the European Innovation Council (EIC) and the activities to foster the integration of the knowledge triangle – higher education, research and innovation, and business – across the Union as well as other Union programmes such as Erasmus+;</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 that 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 moving 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 not possible, then the cost related to making the notification with the help of the external consultant used to complete the required notifications should be approved costs.	

Regulation on SP of HE Chapter III – Competitiveness & Society			
Topic	HE Article	Analysis	Text Changes
Collaborative RDI	Art. 11(a) Part Competitiveness via ECF <i>Collaborative research activities referred to in Chapter I of Regulation XXX [reference to the Horizon Europe Regulation] shall cover, in particular, the following research and innovation activities:</i> <i>(a) under 'Competitiveness', research and innovation activities of the policy windows described in Chapters IV to VII of the European Competitiveness Fund</i>	See comments made for Art 4.2 & 4.3.	
	Art. 11(b) Part 2 on Society – EU Missions <i>(ii)EU Missions: activities supporting EU Missions referred to in Article 15(5) of Regulation XXX [reference to the Horizon Europe Regulation].</i> <i>(iii) activities in the context of the New European Bauhaus (NEB) Facility, established with the Horizon Europe Strategic Plan 2025-2027, shall deliver on the objectives of the New European Bauhaus, in particular supporting activities to foster the development and scaling up of innovative research solutions for the transformation of neighbourhoods into sustainable, inclusive and beautiful places</i>	The 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. 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 as value with their attached budget into current EU partnerships when applicable.	With no evaluation available on the quality or value of the instrument, we advocate for the Deletion of this article: (ii)EU Missions: activities supporting EU Missions referred to in Article 15(5) of Regulation XXX [reference to the Horizon Europe Regulation].

Regulation on SP of HE Chapter IV – Innovation			
Topic	HE Article	Analysis	Text Changes
EIC Board	Art.5 EIC Board Composition: <i>5. The members of the EIC Board shall be appointed by the Commission, following an open call for nominations or for expressions of interest, and taking into account the need for balance in expertise, gender, age and geographical distribution</i>	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.	Add the following text: 5. The members of the EIC Board shall be appointed by the Commission, following an open call for nominations or for expressions of interest, and taking into account the need for balance in expertise, gender, age and geographical distribution and representativity of the key stakeholders active in deep-tech ventures (among others, incl. RPOs).
Innovation Ecosystems	Art.13(c) SMEs support <i>(a) programmes to support innovative SMEs, start-ups and scale-ups to expand and access international markets through market viability studies, place-based innovation tools, collaborative research and innovation, exchange of talents, tailored mentorship, access to global investor networks, regulatory guidance, localized marketing support, and soft-landing services in target countries;</i>	This text should be adapted to the new ambitions set in the new EC Communication on RTIs , also aiming at supporting access by SMEs to RTIs.	Add the following text: c) programmes to support innovative SMEs, start-ups and scale-ups to expand and access international markets through market viability studies, place-based innovation tools, collaborative research and innovation, exchange of talents, tailored mentorship, access to research and technology infrastructures and facilities , access to and global investor networks, regulatory guidance, localised marketing support, and soft-landing services in target countries;

Regulation on SP of HE Chapter V – ERA			
Topic	HE Article	Analysis	Text Changes
Reforming	Art.14 Reforming <i>To support the realisation of the European Research Area (ERA), the Specific Programme shall assist Member States in achieving the objectives set out in the Pact for Research and Innovation in Europe, by supporting actions aligned with ERA objectives and priority areas for joint action, and by promoting upholding ERA values and principles, as established in the Pact.</i>	The EC should encourage stronger commitment from the Member States, as simple assistance as provided today by the PSF is not enough. In addition, considering the heavier orientation of R&I toward Competitiveness, the future revised governance structure of ERA should be reconsidered to better represent the entire value chain from research to market.	Add the following text: To support the realisation of the European Research Area (ERA), the Specific Programme shall assist and encourage Member States in achieving the objectives set out in the Pact for Research and Innovation in Europe, by supporting actions aligned with ERA objectives and priority areas for joint action, and by promoting the upholding of ERA values and principles, as established in the Pact.
Research Infrastructures	Art. 16.2(a) 20% Financing for building <i>Research infrastructures activities shall focus on: developing, consolidating and streamlining the Union landscape of research infrastructures, including coordination between the Union and national capacities and contributing up to 20% of the building costs of critical new world-class capacities;</i>	Here, text alignment is needed with Art. 18.2 of the Horizon Europe 2.0 regulation. 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).	Add and change the following text: Research and technology infrastructures activities shall focus on: developing, consolidating and streamlining the Union landscape of research and technology infrastructures, including coordination between the Union and national capacities and contributing up to 20-50% of the building costs of critical new world-class capacities;
Technology Infrastructures	Art. 17 Technology Infrastructures <i>1. The Specific Programme shall improve technology infrastructure capacities in the Union and facilitate access to the integrated services of such infrastructures for innovative companies, including start-ups and scale-ups. 2. Activities shall focus on: Development of new technology infrastructure capacities (a) Improving the visibility and uptake of technology infrastructure services; (b) Access programme for SMEs, start-ups and scale-ups to technology infrastructures across the Union; (c) Collaboration and networking among the infrastructures, training and upskilling of their staff. (d) Reinforcing the European technology infrastructure policy.</i>	EARTO welcomes very much the introduction of TIs in the HE 2.0. This text should be adapted to the new ambitions set in the new EC Communication on RTIs, also aiming at supporting further investments in TIs.	Add the following text: (d) Reinforcing the European technology infrastructure policy and promoting further investments in those infrastructures.

Regulation on SP of HE Chapter VI– Transitional & Final Provisions			
Topic	HE Article	Analysis	Text Changes
Comitology	Art. 18 Committee Procedure 2. <i>The committee may convene in the following configurations...:</i> Research & Technology Infrastructures	See comments made for Art 4.3. In addition, the latest EC Communication on RTIs described the way forward in terms of governance to be separated between Ris and Tis at first: this may require a different Committee Procedure or meetings then.	

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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