

Cover note

Joint amendments to the FP10 legal texts

Dated 1 December 2025

Purpose of this note

This cover note introduces the joint amendments prepared by our associations representing research and innovation organisations in relation to the European Commission's proposal for the 10th EU Framework Programme for Research and Innovation (FP10). It provides a concise overview of our shared objectives and highlights the key issues addressed by the amendments. The detailed amendments for the legal text and their rationales are contained in the attached table.

To frame our amendments in their broader context, we recall that the planned increase of the Horizon Europe budget to €175 billion is welcome, though it must be regarded as the minimum required to achieve Europe's ambitions. Additionally, we stress that the proposed European Competitiveness Fund (ECF) regulation is not suitable in its current form and requires substantial revision.

Why we joined forces

We, the undersigned representatives of European research and innovation organisations, are united by a simple, urgent call: enable Europe to move at the speed and scale that the moment demands. The decisions taken in the coming period must show that Europe is markedly stepping up its capacity to lead in cutting-edge research and innovation, in order to accelerate advanced technological and societal development underpinned by the latest scientific breakthroughs. This should be translated into real-world impact for boosting autonomy, competitiveness, prosperity, security, and societal resilience in Europe.

Focus of our amendments

The amendments reflect a shared understanding of FP10's role as the EU's central programme for scientific excellence and early-stage innovation, while ensuring complementarity with other

instruments, notably the ECF. They aim to reinforce clarity, coherence and effectiveness, enabling FP10 to continue delivering maximum European added value.

The amendments focus on the following areas:

- Define clear and autonomous programme objectives, aligning FP10 with its legal basis in the Treaty on the Functioning of the European Union and ensuring it encompasses excellence in research and innovation, talent development, societal impact, sustainability and long-term competitiveness.
- Reinforce what has already made the European Research Council (ERC) and the Marie Skłodowska-Curie Actions (MSCA) successful: their investigator-driven and excellence-focused nature.
- Ensure complementarity with other EU instruments, particularly the ECF, ensuring FP10 reinforces core elements of its identity, mission and governance that have been developed over decades, and are integral to today's highly successful programme. The ECF must build upon and complement the success factors of the recent framework programmes. This implies focusing on what Europe needs to further deploy the most promising innovations developed on the basis of the knowledge created through FP10.
- Reinforce the elements that enable FP10 to attract leading talent and generate the most promising ideas for Europe's long-term competitiveness and prosperity, including by removing from the FP10 legal text the ECF rules that are not suited to funding research. Doing so will ensure that collaborative research linked to the themes of the policy windows focuses on scientifically relevant areas.
- Strengthen definitions and horizontal principles, including updated horizontal principles of research and innovation actions, research and technology infrastructures, open access, open science, valorisation, dissemination, and social innovation; reinforced interdisciplinarity; systematic integration of the social sciences, arts and humanities; and reintroduced principles such as gender equality, international cooperation and co-creation.
- Balance support across the research and innovation continuum, with a strong emphasis on early and intermediate stages, safeguarding FP10's excellence-driven profile and ensuring complementarity with close-to-market and deployment activities, such as those funded through the ECF.
- Establish robust, expert-led governance, including strengthened autonomy of the ERC Scientific Council and EIC Board, the introduction of a dedicated Pillar II board, transparent mechanism for the selection of European Partnerships, and open communication between advisory structures without hierarchy.
- Simplify procedures, and strengthen flexibility and legal clarity, particularly on the appropriate use of funding forms (including lump sum funding, reimbursement of actual costs, simplified cost options), clear and predictable eligibility rules, transparent project termination procedures, and the reinstatement of the current Seal of Excellence.

- Promote openness, excellence-based participation and predictable association, including an open and transparent approach to third-country participation with explicit pathways for association of the UK and Switzerland.
- Implement fair and proportionate widening measures, ensuring that participation instruments remain targeted, effective and supportive of long-term capacity building, while allowing justified flexibility in investment-related conditionality for widening measures.
- Support research and innovation in critical technologies with civil or dual-use potential, ensuring FP10 remains clearly distinct from defence-specific applications. Support for defence-oriented activities can be channelled through other instruments such as the ECF and the successor to the European Defence Fund.

Our offer to European policymakers

We stand ready to support the co-legislators by explaining our proposals in detail and by providing further input as negotiations progress. FP10 is a unique opportunity to reinforce Europe's scientific leadership and innovation potential, underpinned by the talent that makes it possible. The attached amendments are intended to help ensure that the final legal texts enable the programme to meet the needs of the R&I community and to maximise its contribution to Europe's resilience, long-term competitiveness and prosperity.

Signatories

CESAER - <https://www.cesaer.org/>

Coimbra Group - <https://www.coimbra-group.eu/>

EUA - <https://www.eua.eu/>

EU-LIFE - <https://eu-life.eu/>

The Guild - <https://www.the-guild.eu/>

LERU - <https://www.leru.org/>

YERUN - <https://yerun.eu/>

List of supporting organisations:

ALLEA - <https://allea.org/>

Aurora Universities Network - <https://aurora-universities.eu/>

ECIU - <https://www.eciu.eu/>

ISE - <https://initiative-se.eu/>



MCAA - <https://www.mariecuriealumni.eu/>

UNICA - <https://www.unica-network.eu/>

Young Academy of Europe - <https://yacadeuro.org/>

Proposed joint amendments to the FP10 legal texts

by CESAER, Coimbra Group, EUA, EU-LIFE, The Guild, LERU, and YERUN

1 December 2025

General note:

~~Strikethrough~~ for deletions and in **bold** for additions.

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Proposed amendments to the Regulation establishing Horizon Europe, the Framework Programme for Research and Innovation for the period 2028-2034

Recitals

Recital	Amendment	Amendment rationale
(1) It is an objective of the Union to strengthen its scientific and technological bases by strengthening the European research area (ERA) in which researchers, scientific knowledge and technology circulate freely and encouraging it to become more competitive, including in its industry, while promoting all research and innovation (R&I) activities to deliver on the Union's strategic priorities and commitments, which ultimately aim to promote peace, the Union's values and the well-being of its peoples.	(1) It is an objective of the Union to strengthen its scientific and technological bases by investing in excellent research and reinforcing strengthening the European research area (ERA) in which researchers, scientific knowledge and technology circulate freely and encouraging it to become more competitive, including in its industry, while promoting all research and innovation (R&I) activities to deliver on the Union's strategic priorities and commitments, which ultimately aim to promote peace, the Union's values and the well-being of its peoples	This amendment reverts the FP10 draft text to the FP9 formulation by reintroducing the reference to investing in excellent research alongside reinforcing the European Research Area. The change ensures continuity with the established objective and maintains consistency with the current legal framework. It clarifies the scope without altering the substance or intention of the provision.
(2) To deliver scientific, technological, economic, environmental and societal impact and to maximise the added value of the Union's R&I investments, the Union should invest in research and innovation	(2) To deliver scientific, technological, economic, environmental and societal impact and to maximise the added value of the Union's R&I investments, the Union should invest in research and	The amendment restores key objectives present in the FP9 and necessary for maintaining the Union's global research standing. It reintroduces explicit references to

Recital	Amendment	Amendment rationale
through Horizon Europe - the Framework Programme for Research and Innovation for the period 2028-2034 (the 'Programme'), which should strengthen competitiveness, resilience, sustainability, technological leadership, and social cohesion.	innovation through Horizon Europe - the Framework Programme for Research and Innovation for the period 2028-2034 (the 'Programme') which should strengthen competitiveness, resilience, sustainability, scientific and technological leadership, and social cohesion. Horizon Europe shall focus on creation of knowledge, talent attraction and the earlier steps of the research and innovation continuum, with excellence as the sole criterion.	scientific leadership alongside technological leadership and clarifies that excellence is the sole criterion for Union support in the earlier stages of the research and innovation continuum. The additions on the creation of knowledge and talent attraction ensure coherence with the objectives and structure of the existing programme.
(3) The Programme should be tightly connected with Regulation (EU) [XXX]* of the European Parliament and of the Council [European Competitiveness Fund]4 by placing research and innovation at the heart of the Union's economy and investment strategy.	(3) The Programme should be tightly connected with Regulation (EU) [XXX]* of the European Parliament and of the Council [European Competitiveness Fund]4 by placing place research and innovation at the heart of the Union's economy and investment strategy Europe's long-term competitiveness and prosperity, aiming to ensure coherence and complementarity with other Union initiatives, including the European Competitiveness Fund established by Regulation (EU) [XXX].	The amendment clarifies the nature of the relationship between the Programme and the European Competitiveness Fund by replacing the vague reference to being "tightly connected" with a formulation that specifies coherence and complementarity while preserving the Programme's independence. It ensures that research and innovation remain central to Europe's long-term competitiveness and prosperity without implying subordination to other

Recital	Amendment	Amendment rationale
		Union instruments, including the European Competitiveness Fund.
(4) The Union should furthermore aim to eliminate inequalities, and to promote equality, between men and women, as well as to combat discrimination in accordance with Article 8 and Article 10 of the Treaty on the Functioning of the European Union (TFEU) and the Charter of Fundamental Rights of the European Union.	(4) The Union should furthermore aim to eliminate inequalities, to promote equality, diversity and inclusion in all aspects of R&I with regard to age, disability, race and ethnicity, religion or belief, and sexual orientation, as well as to combat discrimination in accordance with Article 8 and Article 10 of the Treaty on the Functioning of the European Union (TFEU) and the Charter of Fundamental Rights of the European Union.	The amendment strengthens the Union's commitment to equality, diversity, and inclusion in all aspects of research and innovation. It goes beyond gender equality to address age, disability, race and ethnicity, religion or belief, and sexual orientation, ensuring a more comprehensive and inclusive approach. This aligns with the TFEU and the Charter of Fundamental Rights, reinforcing the Programme's role in fostering an inclusive and equitable research and innovation ecosystem.
(5) 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, the funding should duly consider the evolving policy needs and Union's priorities as identified in relevant documents published by the Commission, European Parliament resolutions and in	(5) 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, the funding should duly consider the evolving policy needs and Union's priorities as identified in relevant documents published by the	This amendment highlights that predictability is also critical for stimulating excellent research, as frontier research is often a long and high-risk endeavour that requires sustained support.

Recital	Amendment	Amendment rationale
Council conclusions, while ensuring sufficient predictability for the budget implementation.	Commission, European Parliament resolutions and in Council conclusions, while ensuring sufficient predictability for sustaining research efforts, especially at the knowledge frontier, and for the budget implementation.	
(6) The rules for participation and dissemination of the Programme are designed to further simplify access, enhance openness, and maximize the impact of Union funding.	(6) The rules for participation and dissemination of the Programme shall ensure are designed to further simplified access, enhanced openness, and maximized the impact of Union funding.	This change clarifies that the rules for participation and dissemination must deliver simplified access, openness, and maximised impact, rather than merely describing their design intention.
(8) As in Horizon Europe, the OECD definitions regarding technological readiness levels (TRLs) should continue to be taken into account in the classification of technological research, product development and demonstration activities, and in the definition of types of action available in calls for proposals. Grants should not be awarded for actions where activities go above TRL 8. It should be possible for the work programme to allow grants for large-scale product validation	(8) As in Horizon Europe, the OECD definitions regarding technological readiness levels (TRLs) should continue to be taken into account in the classification of technological research, product development and demonstration activities, and in the definition of types of action available in calls for proposals. Grants shall should not be awarded for actions where activities go above TRL 8 and should put particular emphasis on early stages of the research and innovation	FP10 must focus exclusively on research and innovation activities. Activities above TRL8, which are being critical for Europe's competitiveness and prosperity, must be supported via the European Competitiveness Fund, as the last phases before market introduction and then deployment efforts are better supported by instruments other than grants for research activities. Likewise, a particular emphasis should be put on the earliest phases in the R&I

Recital	Amendment	Amendment rationale
and market replication for a given call under the part ‘Competitiveness and Society’.	continuum. It should be possible for the work programme to allow grants for large-scale product validation and market replication for a given call under the part ‘Competitiveness and Society’.	continuum, as they are the most in need of public funding in the form of FP10 grants because of their high risk high reward nature.
(11) EU Missions as set up in the Regulation 2021/695 should enable a transformative and systemic impact for society, by fostering cross-disciplinary, cross-sectoral, cross-policy and cross-border collaboration. They should rely on research and innovation to develop the breakthrough technologies, services, products, and social innovations needed to achieve their ambitious objectives. In turn, EU Missions should accelerate the development, scaling, and deployment of innovative solutions and help create lead markets for new products and services. The Framework Programme should finance the research and innovation activities of the Missions, while the deployment and scaling up should be delivered through other EU programmes and national funding.	(11) EU Missions as set up in the Regulation 2021/695 should enable a transformative and systemic impact for society, by fostering cross-disciplinary, cross-sectoral, cross-policy and cross-border collaboration. They should rely on research and innovation to develop the breakthrough technologies, services, products, and social innovations needed to achieve their ambitious objectives. In turn, EU Missions should accelerate the development, scaling, and deployment of innovative solutions and help create lead markets for new products and services. The Framework Programme will finance solely the research and innovation activities of the Missions, while the deployment and scaling up should be delivered through other EU programmes and national funding.	In the context of EU Missions, Horizon Europe should only fund their research and innovation component.

Recital	Amendment	Amendment rationale
(13) The European Research Council (ERC) should provide attractive and flexible funding, thereby enabling talented and creative individual researchers—with a deliberate emphasis on nurturing early-stage researchers—to pursue the most promising avenues at the frontier of science. This commitment to investigator-driven research, selected through Union-wide competition based solely on the criterion of excellence and open to talent regardless of nationality or origin, is fundamental to attracting the world's brightest minds and further establishing Europe as a world-leading centre for research and innovation.	(13) The European Research Council (ERC) should provide attractive and flexible funding, thereby enabling talented and creative individual researchers with a deliberate emphasis on nurturing early-stage researchers to pursue the most promising avenues at the frontier of science. This commitment to investigator-driven research, selected through Union-wide competition based solely on the criterion of excellence and open to talent regardless of nationality or origin, is fundamental to attracting the world's brightest minds and further establishing Europe as a world-leading centre for research and innovation.	The ERC aims at fostering excellent research no matter the career level, focus on early to mid-career level shall be placed in MSCA.
(14) In a knowledge-based global economy, the Union's long-term competitiveness, technological leadership and capacity to address global challenges should depend notably on its ability to develop, attract and retain a highly skilled and internationally connected research workforce. Strategic investment in excellent researchers, in their training, mobility and career prospects,	(14) In a knowledge-based global economy, the Union's long-term competitiveness and prosperity , technological leadership and capacity to address global challenges should depend notably on its ability to develop, attract and retain a highly skilled and internationally connected research workforce. Strategic	Research ecosystem as a whole beyond higher education sector is key to develop the ERA. Capacity building should include the whole research ecosystem, particularly in the context of MSCA. Support to mentioning University alliances, Erasmus plus etc, but specifically the capacity building for ERA should be global, for all actors.

Recital	Amendment	Amendment rationale
within and outside academia, is essential to sustain innovation, economic resilience and societal well-being. In line with the principles of the European Charter for researchers, the Marie Skłodowska-Curie Actions (MSCA) are instrumental in advancing this objective. The Programme should reinforce links between universities and innovation ecosystems, including the private sector. It should enable the completion of the European Research Area, including via development of European higher education sector capacity to compete with global counterparts through collaboration, nurturing and attracting talent and leveraging more private investments, including through higher education initiatives like European Universities Alliances, in synergy with Erasmus+, and in line with the objectives and activities of this Regulation.	investment in excellent researchers, in their training, mobility and career prospects, within and outside academia, is essential to sustain innovation, economic resilience and societal well-being. In line with the principles of the European Charter for researchers, the Marie Skłodowska-Curie Actions (MSCA) are instrumental in advancing this objective. The Programme should support excellent research, while reinforcing links between universities, research performing organisations and innovation ecosystems, including the private sector. It should enable the completion of the European Research Area, including via development of European higher education sector capacity to compete with global counterparts through collaboration, nurturing and attracting talent and leveraging more private investments, including through higher education initiatives like European Universities Alliances, in synergy with Erasmus+,	

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	and in line with the objectives and activities of this Regulation.	
(15) The European Innovation Council (EIC) should stimulate deep tech market-creating innovation. It should identify, develop and deploy these deep tech innovations through its instruments. Through coherent and streamlined support, the EIC should fill the vacuum in public support and private investment for breakthrough technologies and deep tech innovation. The EIC should aim to bridge, integrate and accelerate through its instruments the innovator's journey from research to market and enable the Union to have leading companies in emerging areas of technology to meet its social and economic objectives and avoid dependencies on other regions. The EIC should support high risk, high-potential innovations and companies presenting such technological, scientific, financial, management or market risks that they are not yet considered to be fully bankable and therefore cannot raise the necessary level of investments to be globally competitive from the market. This should incorporate	(15) The European Innovation Council (EIC) should stimulate deep tech market-creating innovation. It should identify and develop and deploy these deep tech innovations breakthrough and disruptive innovation, including deep tech, while also supporting all types of innovation, including social innovation through its instruments. Through coherent and streamlined support, the EIC should fill the vacuum in public support and private investment for breakthrough technologies and deep tech disruptive innovation, with strong support to the early stages of innovation journey where private investment cannot step in. The EIC should aim to bridge, integrate and accelerate through its instruments the innovator's journey from research closer to market and enable the Union to have leading companies in emerging areas of technology to meet its social and economic objectives and avoid	The amendment broadens the EIC's scope to encompass all types of innovation, including social innovation. It also clarifies that the early stages of innovation shall be prioritised regarding utilisation of public funding namely through EIC pathfinder and Transition schemes – since at these stages private investment will realistically not step in. Defence research must remain outside the scope of FP10 and be funded through other instruments such as the ECF and the successor to the European Defence Fund.

Recital	Amendment	Amendment rationale
both an ‘open’ (bottom- up) and a ‘challenge’ driven approach, in close coordination and synergy with the European Competitiveness Fund and its policy windows. It should include a ‘DARPA’-like approach dedicated to supporting defence and dual use startups and their scaling up operating in full complementarity with the ECF InvestEU Instrument and the EU Defence Innovation Scheme (EUDIS) and CASSINI (Space entrepreneurship initiative) activities. The implementation should be done in close synergy and coordination with the European Competitiveness Fund.	dependencies on other regions. The EIC should support high risk, high-potential innovations and companies presenting such technological, scientific, financial, management or market risks that they are not yet considered to be fully bankable and therefore cannot raise the necessary level of investments to be globally competitive from the market. This should incorporate both an ‘open’ (bottom-up) and a ‘challenge’ driven approach, in close coordination and synergy with the European Competitiveness Fund and its policy windows. It should include a ‘DARPA’-like approach dedicated to supporting defence and dual use startups and their scaling up operating in full complementarity with the ECF InvestEU Instrument and the EU Defence Innovation Scheme (EUDIS) and CASSINI (Space entrepreneurship initiative) activities. The implementation should be done in close synergy and coordination with the European Competitiveness Fund.	

Recital	Amendment	Amendment rationale
(18) The Programme should ensure the effective promotion and protection of values and principles of the European Research Area and the Pact for Research and Innovation⁶, notably ethics and integrity in research and innovation, freedom of scientific research, science for policy, gender equality and equal opportunities, non-discrimination, open science and the promotion of attractive research careers and mobility. In particular, the Programme should ensure the effective promotion of equal opportunities for all and the implementation of gender mainstreaming, including the integration of the gender dimension in R&I content. It should aim to address the causes of gender imbalance. Particular attention should be paid to ensuring, to the extent possible, gender balance in evaluation panels and in other relevant advisory bodies such as boards and expert groups. 6. Council Recommendation (EU) 2021/2122 of 26 November 2021 on a Pact for Research and Innovation in Europe, OJ L	(18) The Programme should ensure the effective promotion and protection of values and principles of the European Research Area and the Pact for Research and Innovation⁶, notably ethics and integrity in research and innovation, freedom of scientific research, science for policy, gender equality and equal opportunities, non-discrimination, open science and the promotion of attractive research careers and mobility. In particular, the Programme should ensure the effective promotion of equal opportunities for all and the implementation of gender mainstreaming, including the integration of the gender dimension in R&I content, where appropriate. It should aim to address the causes of gender imbalance. Particular attention should be paid to ensuring, to the extent possible, gender balance in evaluation panels and in other relevant advisory bodies such as boards and expert groups.	While the Programme's commitment to promoting equal opportunities and implementing gender mainstreaming is unequivocal, there are a few specific research and innovation contexts covered in the framework programme where integrating the gender dimension is simply not applicable. In such cases, the principle remains fully intact, but the requirement to include the gender dimension does not logically apply.

Recital	Amendment	Amendment rationale
431, 2.12.2021, p. 1, ELI: http://data.europa.eu/eli/reco/2021/2122/oj		
(19) The Programme should support European research infrastructures and technology infrastructures in driving scientific and technological excellence and industrial competitiveness, by supporting the continuum of the research and innovation cycle from basic to applied research towards societal and market deployment.	(19) The Programme should support European research infrastructures and technology infrastructures in driving scientific and technological excellence and industrial competitiveness , by supporting the continuum of the research and innovation cycle from basic to applied research towards societal impact, with particular emphasis on the early stages of the research and innovation cycle. and market deployment.	The focus of the framework programme should be on research and innovation whereas industrial competitiveness shall be promoted mainly through ECF.
(20) The Programme should implement concrete measures in support of capacity building in widening countries and strengthening collaborative links across the Union enhancing the research and innovation capacity in widening and transition countries, leading to a more cohesive and integrated European R&I system and contributing to the target to invest at least 3% of GDP in research and development. The eligible Member States from the 2021-2027 period should be divided into two groups for the whole	(20) The eligible Member States from the 2021-2027 period should be divided into two groups for the whole duration of the Programme, on the basis of a set of relevant indicators related to a country's R&I performance and influence, and its intellectual assets, including its performance in the Framework Programme. The indicators and methodology used shall ensure continuity with Horizon Europe 2021-2027. In addition, proper consideration shall be especially	The entire set of indicators on which the European Innovation Scoreboard is based on is not an appropriate measure to assess whether a country should be a 'Widening' or 'Transition' country. Indeed, many other indicators included in the scoreboard are not directly relevant to assess a country's participation and performance in the FP, and therefore are not adequate to determine the division between 'Widening' and 'Transition' countries.

Recital	Amendment	Amendment rationale
duration of the Programme , on the basis of the Innovation Scoreboard Index and the relative financial return per Gross National Income (GNI), based on the following criteria: i) ‘Transition countries’, with both an Innovation Scoreboard Index (2023-2025) above 75% of the Union average and positive relative financial return per GNI (2021-2025) under Horizon Europe; ii) ‘Widening countries’, all other Member States eligible under the 2021-2027 period.	given to indicators reflecting each country’s participation in previous Programmes and its position in transnational and multidisciplinary research networks, as recommended by the European Court of Auditors, to decide on the division between ‘Transition countries’ and ‘Widening countries’. the Innovation Scoreboard Index and the relative financial return per Gross National Income (GNI), This division should be based on the following criteria: i) ‘Transition countries’, with the aforementioned indicators above XX% of EU average both an Innovation Scoreboard Index (2023-2025) above 75% of the Union average and positive relative financial return per GNI (2021-2025) under Horizon Europe; ii) ‘Widening countries’, all other Member States eligible under the 2021-2027 period.	According to a European Court of Auditors special report from 2022 ‘Measures to widen participation in Horizon 2020 were well designed but sustainable change will mostly depend on efforts by national authorities’, the analysis used by the European Commission to select widening countries in FP9 did not include the following indicators: a country’s participation in previous FPs and its position in transnational and multidisciplinary research networks. However, the participation in previous FPs is a highly relevant indicator since the widening measures aim to increase participation in the framework programme. Therefore, instead of using an aggregated indicator such as the Innovation Scoreboard Index, the EC should refocus its analysis on indicators that are directly relevant to a country’s R&I capacity and its participation in the FP. The approach used in the FP9 methodology should be

Recital	Amendment	Amendment rationale
		complemented by other relevant indicators, such as the participation in previous FPs. The position in transnational and multidisciplinary research networks is also a relevant indicator showing a country's level of participation in the FP that should be considered in determining the division between non-widening, widening and transition countries.
(21) Acknowledging the benefit derived from international cooperation towards addressing, among others, shared technological, economic, environmental and societal concerns, the Programme, should promote cooperation with third countries. International cooperation should aim to strengthen the Union's competitiveness and excellence in R&I, including its capacity to attract and retain the best talents worldwide. Geo- political considerations including economic security should be at the centre of the approach and varying degrees of cooperation should be considered based on an overall assessment of the benefit that could be derived by the Union towards addressing its priorities and	(21) Acknowledging the benefit derived from international cooperation towards addressing, among others, shared technological, economic, environmental and societal concerns, the Programme, should promote cooperation with third countries. International cooperation should aim to strengthen the Union's Union's competitiveness and excellence in R&I of the Union and its international partners, including by promoting a model of balanced brain circulation its capacity to attract and retain the best talents worldwide. Geo- political considerations including economic knowledge security should be at the	Horizon Europe must contribute to increasing Europe's capacity to attract and retain talent. However, this should not be regarded as an objective of international collaboration. The objectives must be instead to boost the excellence and competitiveness of both sides, i.e. Europe and its international partners and to promote mutually beneficial brain circulation. If Horizon Europe is thought as a means to accelerate brain drain to Europe, this will affect the competitiveness of our neighbours and ours in the long run. Also, explicitly referring to knowledge security instead of economic security ensures that such adjustments remain

Recital	Amendment	Amendment rationale
global challenges while safeguarding the Union's values and interests. Association to all or parts of the Programme should remain the most comprehensive form of cooperation. For EIC defence related activities, only entities established in third countries associated with the European Competitiveness Fund for defence activities should be eligible for funding. The Programme may support activities financed by the Global Europe programme provided they comply with the rules and objectives of this Regulation in line with the provisions on synergies.	centre of the approach and varying degrees of cooperation should be considered based on an overall assessment of the benefit that could be derived by the Union towards addressing its priorities and global challenges while safeguarding the Union's values and interests. Association to all or parts of the Programme should remain the most comprehensive form of cooperation. For EIC defence related activities, only entities established in third countries associated with the European Competitiveness Fund for defence activities should be eligible for funding. The Programme may support activities financed by the Global Europe programme provided they comply with the rules and objectives of this Regulation in line with the provisions on synergies.	narrowly focused and proportionate, without undermining openness or the uptake of results. <i>[copied from the rationale for the amendment to another recital]</i> Moreover, the EIC should not fund R&I activities in the defence sector, as these would receive more appropriate, relevant and fit-for-purpose support via the successor of the European Defence Fund.
(23) In light of increasing risks linked to natural hazards, health emergencies, technological accidents, evolving security threats, and other disruptions, it is essential to enhance the Union's and Member States'	(23) In light of increasing risks linked to natural hazards, health emergencies, technological accidents, evolving security threats, and other disruptions, it is essential to enhance the Union's	Supporting discovery-driven research is essential to sustaining and advancing European excellence. By investing in basic research that is not tied to predetermined outcomes, the

Recital	Amendment	Amendment rationale
capability to anticipate, prepare for, and respond to crises and disasters. The Programme should support research that strengthen disaster risk and crisis management, invest in climate resilience, and enhance the resilience of vital societal functions, and build a more resilient, secure, and prepared Union, in line with the objectives of the EU Preparedness Union Strategy.	and Member States' capability to anticipate, prepare for, and respond to crises and disasters. The Programme should support research that strengthen disaster risk and crisis management, invest in climate resilience, and enhance the resilience of vital societal functions, and build a more resilient, secure, and prepared Union, in line with the objectives of the EU Preparedness Union Strategy. Discovery-driven research must be further supported as a strategic investment in Europe's preparedness against challenges that are still unthinkable.	Union strengthens the capacity of universities and research institutes to generate knowledge, promote brain circulation and build the knowledge base required to address future challenges that cannot yet be anticipated. This long-term investment should therefore be considered as a strategic component of the Union's resilience and preparedness.
(26) Simplification in the Programme's implementation is essential to ensure its accessibility and efficiency, particularly by reducing the administrative burden on beneficiaries and minimising the risk of errors. To this end, the Programme should primarily rely on lump sums as the default form of Union funding. Advancing efforts over the previous Framework Programmes to streamline funding rules and minimise errors, the reimbursement of personnel	(26) Simplification in the Programme's implementation is essential to ensure its accessibility and efficiency, particularly by reducing the administrative burden on beneficiaries and minimising the risk of errors. To this end, the Programme should primarily allow flexibility in the form of Union's funding based on the nature and objectives of the action rely on lump sums as the default form of Union	Lump sum funding can contribute to the simplification of FP10 only in certain circumstances. It is inappropriate for collaborative projects, especially those conducted by large consortia. For this reason, lumpsum funding should not be the funding model by default and must never be associated with personnel unit costs. Likewise, personnel unit costs should never be the sole option

Recital	Amendment	Amendment rationale
costs should also be further simplified by using personnel unit costs, which reduces complexity for participants and facilitates reporting.	funding. Advancing efforts over the previous Framework Programmes, the calls must be less prescriptive to allow for the development of the most promising and innovative ideas to stream-line funding rules and minimise errors, the reimbursement of personnel costs should also be further simplified by using personnel unit costs, which reduces complexity for participants and facilitates reporting.	for calculating personnel expenses. It is indeed a highly simplified way to calculate and report costs, and it undeniably reduces administrative burden and error rates; however, the potential drawbacks of relying exclusively on this method can be substantial, if they consist of one single daily rate for all staff categories and if they are fixed for a period of time longer than a year.
(28) In view of strengthening the Union's competitiveness and maximising the uptake and deployment of the results in general, beneficiaries owning results should manage their results in accordance with their obligations established under this Regulation regarding valorisation and dissemination. Those obligations may be adjusted in the work programme, call conditions or grant agreement where appropriate based on policy considerations, including related to economic security, but should encompass requirements to protect, give access, valorise results and make them public as appropriate and justified, including through	(28) In view of strengthening the Union's competitiveness and maximising the uptake and deployment of the results in general, beneficiaries owning results should manage their results in accordance with their obligations established under this Regulation regarding valorisation and dissemination. Those obligations may be adjusted in the work programme, call conditions or grant agreement where appropriate based on policy considerations, including related to economic knowledge security, but should encompass requirements to protect, give access, valorise results	This amendment clarifies that while beneficiaries should follow clear obligations on protecting, accessing, valorising and disseminating results, limited adjustments in the work programme or grant agreement may still be needed for justified policy reasons. Explicitly referring to knowledge security instead of economic security ensures that such adjustments remain narrowly focused and proportionate, without undermining openness or the uptake of results.

Recital	Amendment	Amendment rationale
open science practices. To facilitate and accelerate 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 and any such support and services provided for in its Chapter III.	and make them public as appropriate and justified, including through open science practices. To facilitate and accelerate 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 and any such support and services provided for in its Chapter III.	
(31) This Regulation lays down an indicative financial envelope for Horizon Europe, the Framework Programme for Research and Innovation for the period 2028-2034.	(31) This Regulation lays down a minimum an indicative financial envelope for Horizon Europe, the Framework Programme for Research and Innovation for the period 2028-2034.	Sustained investment in R&I demands long-term stability and predictability. We therefore urge the European Commission and Member States to set clear minimum budgets for each Horizon Europe instrument and to increase them wherever possible. Furthermore, annual flexibility in budget appropriation should be strictly limited, and the categories of expenditure should be clearly defined and communicated.
<i>Amendment to add new recital</i>	(new) Cooperation with third countries under the Programme should take place only with those that act in full compliance with the values set out in	This amendment reinforces that cooperation with third countries under the Programme must align with the Union's core values, including full

Recital	Amendment	Amendment rationale
	Article 2 of the Treaty on European Union and with the principles laid down in Article 21 thereof, including the full respect for human rights. Such cooperation should ensure that the Union's values and principles are fully upheld and endorsed by third countries when engaging in research and innovation activities supported under the Programme.	respect for human rights, as set out in the TEU. It ensures that Union-funded R&I activities are conducted only with partners that uphold principles compatible with those of the Union.

Articles

Article number	Proposed FP10 article	Proposed amendment	Amendment rationale
Article 2 (1) - Definitions	(1) 'research infrastructures' are facilities that provide resources and services to conduct research and foster innovation in their fields;	(1) 'research infrastructures' are facilities, equipment, capabilities, collections, archives, scientific data infrastructures and resources that provide resources and services to conduct research and foster innovation in their fields, with the primary purpose of pursuing scientific excellence.	The amendment aligns both definitions of research infrastructures and technology infrastructures with the European RTI Strategy.
Article 2 (2) - Definitions	(2) 'technology infrastructures' are facilities, equipment, capabilities and resources	(2) 'technology infrastructures' are facilities, equipment, capabilities and resources, including test beds, pilot	The amendment aligns both definitions of research infrastructures and

Article number	Proposed FP10 article	Proposed amendment	Amendment rationale
	required to develop, test, upscale and validate technology - from pre-competitive applied research services up to demonstration and validation;	lines, pilot plants, demonstration facilities, cleanrooms and living labs, required to that enable the development, testing, upscaling and validation of technologies -from pre-competitive applied research services up to demonstration and validation; to advance them towards societal and market adoption, with the primary purpose of accelerating technological innovation and industrial competitiveness;	technology infrastructures with the European RTI Strategy.
Article 2 (7) - Definitions	(7) 'open access' means online access to results, provided free to the end user;	(7) 'open access' means the practice of granting universal and online access, free of charge, to research outputs and to results, provided free to the end user; ensuring that both producers and users can participate in a system with no barriers to access or re-use;	The amendment updates and broadens the definition of open access compared to FP9 by ensuring universal and free access, removing barriers not only for users but also for producers of knowledge. It aligns FP10 with the principles of open science and FAIR, supporting both accessibility and re-use of research outputs while reinforcing Europe's leadership in responsible and transparent research.

Article number	Proposed FP10 article	Proposed amendment	Amendment rationale
Article 2 (8) - Definitions	(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.	(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 research information and results, reproducibility measures, and involving citizens and end users in research and innovation	The amendment clarifies that open science encompasses not only research results but also the underlying data, methods, and tools necessary for transparency, reproducibility, and responsible knowledge sharing (in alignment with the Barcelona Declaration).
Article 2 (11) - Definitions	(11) '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;	(11) '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. Access to background shall be subject to identification in a written agreement as needed for implementing the action or for exploiting its results;	In the current wording it might appear as all background should be open to the beneficiaries, which would be undesirable.
Article 2 (12) - Definitions	(12) 'valorisation' means the use of results in further activities other than those covered by the action concerned, including commercial deployment;	(12) 'valorisation' means the the use of results in further activities other than those covered by the action concerned, including commercial deployment; process of creating social and economic value	The current definition of valorisation limits its scope primarily to commercial deployment. This approach overlooks the broader societal dimension of

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		from knowledge by linking different areas and sectors and by transforming data, know-how, and research results into sustainable products, services, solutions, and knowledge-based policies that benefit society.	research and innovation. The amended definition recognises valorisation as a process that generates both social and economic value. This broader framing aligns FP10 with the Union's overarching objectives of addressing societal challenges and ensuring that research and innovation deliver impact and benefits for European citizens.
Article 2 (13) - Definitions		(new) (13) 'dissemination' means the public disclosure of results by any appropriate means, including by scientific publication, open access repositories, or other communication channels, to make knowledge available to society and stakeholders beyond the project consortium, while safeguarding intellectual property and confidentiality obligations.	The addition of a definition of dissemination complements the definition of valorisation and ensures coherence with Article 32, which addresses both. It clarifies that dissemination concerns the sharing of knowledge, while valorisation concerns the creation of value from that knowledge. This distinction is essential for universities and public research organisations, which play a

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			key role in both open knowledge dissemination and downstream value creation.
Article 2 (23) - Definitions	(23) ‘innovation ecosystem’ means an ecosystem which brings together at Union level organisations whose functional goal is to enable technology development and innovation and which encompasses relations between material resources (such as funds, equipment, and facilities, including research and technology infrastructures), institutional entities (such as higher education institutions and support services, research and technology organisations, companies, investors - including venture capitalists - and financial intermediaries) and national, regional and local policy-making and funding entities.	(23) ‘innovation ecosystem’ means an ecosystem which brings together at Union level organisations a setting where organisations contribute to the creation, dissemination, absorption and application of economically and socially relevant knowledge. whose functional goal is to enable technology development and innovation and which. This setting encompasses relations between material resources (such as funds, equipment, and facilities, including research and technology infrastructures), institutional entities (such as higher education institutions and support services, research and technology organisations, companies, investors - including venture capitalists - and financial intermediaries) and national, regional and local policy-making and funding entities.	The amendment clarifies the definition by avoiding circular wording (“an innovation ecosystem is an ecosystem”) and providing a more precise description of what constitutes an innovation ecosystem. It also broadens the scope beyond the current, narrowly technological focus. The goal of innovation ecosystems, as demonstrated in many cases supported at Union level, is not only to enable technology development and innovation. It is also crucial to acknowledge other dimensions of their contribution, which are reflected in the proposed amendment.

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Article 2 (24) - Definitions	(24) 'knowledge triangle' means the creation of networks between education institutions, research organisations and business with the aim to create innovation ecosystems that cater for the creation of an innovation pipeline from the inception of innovation through entrepreneurial education to the creation of startups and the growth of scale-ups.	(24) 'knowledge triangle' means the creation of networks between education institutions, research organisations and business with the aim to create innovation ecosystems that cater for the creation of an innovation pipeline from the inception of innovation through entrepreneurial education to the creation of startups and the growth of scale-ups.	The amendment improves clarity and precision by removing redundant wording, as the knowledge triangle refers to the networks themselves rather than to their creation.
Article 2 (25) - Definitions		(new) (25) 'Seal of Excellence' means a quality label which shows that a proposal submitted to a call for proposals exceeded all of the evaluation thresholds set out in the work programme, but could not be funded due to lack of budget available for that call for proposals in the work programme and might receive support from other Union or national sources of funding;	This amendment reinstates the "Seal of Excellence", as foreseen in the amended FP Regulation Articles 8(3–4) and 23(2).
Article 2 (26) - Definitions		(new) (26) 'research and innovation action' means an action primarily consisting of activities aiming to establish new knowledge and,	Reintroducing the definition of RIAs in FP10 ensures clarity and consistency across the regulation regarding the

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		where applicable, to explore the feasibility of a new or improved technology, product, process, service or solution. Aiming mainly at early stages of the research and innovation continuum, this may include basic and applied research, technology development and integration, testing, demonstration and validation on a small-scale prototype in a laboratory or simulated environment;	nature and scope of activities supported under this category. RIAs focus on the early to intermediate stages of the research and innovation continuum, encompassing fundamental and applied research, and technology development. This definition guarantees that early-stage collaborative research, including under Pillar II, remains a core component of FP10, maintaining balance across all stages of innovation and continuity with previous framework programmes.
Article 2 (27) - Definitions		(new) (27) ‘innovation action’ means an action primarily consisting of activities directly aiming to produce plans and arrangements or designs for new, altered or improved products, processes or services, possibly including prototyping, testing and demonstrating their	Reintroducing the definition of IAs provides conceptual clarity and continuity with the previous Framework Programme, ensuring a consistent understanding of the middle to the later stages of the R&I process. Activities relating to market deployment

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		performance in relevant environments.	and commercialisation shall fall under the remit of the ECF. However, both FP10 and the ECF derive strength from the active participation of beneficiaries engaged in IAs. Maintaining coherence and complementarity between the two programmes, without establishing a rigid division of beneficiaries, supports a consistent R&I continuum, thereby accelerating Europe's scientific and technological progress and enhancing its global competitiveness.
Article 2 (28) - Definition		(new) (28) 'social innovation' means an innovation that addresses complex social, cultural, and political challenges, enhance public value and contribute to systemic transformations, supporting participatory approaches involving citizens, civil society, public institutions and relevant stakeholders, and facilitating the testing, validation,	This amendment introduces a definition of social innovation to stress that FP10 must not focus exclusively on technological innovations, including deep tech. Instead, it must adopt a comprehensive approach, supporting all forms of innovation that will contribute to boosting Europe's

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		and scaling of such innovations across sectors and communities	prosperity, competitiveness and societal resilience.
Article 3 (1) - Programme objectives	1. In line with the general and specific objectives of the European Competitiveness Fund, the Programme shall strengthen the EU's competitiveness, scientific technological base, and address global challenges based on excellent research and innovation.	1. In line with the general and specific objectives of the European Competitiveness Fund, The general objective of the Programme shall strengthen the EU's competitiveness, is to deliver scientific, technological, economic, societal and environmental impact from the Union's investments in R&I, and create new knowledge, so as to strengthen scientific technological base, bases of the Union, foster the Union's long-term competitiveness and prosperity in all Member States including in its industry, deliver on the Union's strategic priorities, and address global challenges based on excellent research and innovation. on the basis of excellent research and innovation and contribute to the achievement of Union objectives and policies. The Programme shall maximise Union added value by focusing on objectives and activities that cannot be effectively	The proposed amendment restores the clarity and autonomy of FP10's objectives by aligning them with EU primary law (articles 179 and 182 TFEU), which define the aims of the Framework Programme independently of other instruments. The current reference to alignment (" <i>in line with</i> ") with the ECF risks creating ambiguity, suggesting subordination of FP10 to the ECF, which is inconsistent with treaty provisions and the established role of the FP10 as the Union's central R&I programme. The amended wording reintroduces the comprehensive framing from FP9, updated to reflect current priorities such as

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		realised by Member States acting alone, but only through cooperation at Union level or with Associated Countries and other international partners. The European Competitiveness Fund shall complement the objectives of the Programme.	sustainability, global challenges and long-term prosperity, while also explicitly including these concepts alongside competitiveness. It ensures that FP10 objectives stand on their own, while still recognising that they may complement but are not dependent on the ECF. This approach provides greater legal certainty, preserves the integrity of the Framework Programme and reflects the Union's strategic commitments.
Article 3 (2) - Programme objectives	2. The specific objectives of the Programme are: - Create high-quality knowledge, skills and attractive careers for researchers and support the realisation of the European Research Area (ERA). - Increase EU-wide and international collaborative	2. The specific objectives of the Programme are: — Create high-quality knowledge, skills and attractive careers for researchers and support the realisation of the European Research Area (ERA). — Increase EU-wide and international collaborative	This amendment clarifies the complementary roles of the Framework Programme and the European Competitiveness Fund (ECF) in supporting Europe's research and innovation landscape. By framing FP10 as covering activities from fundamental research to

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	research, knowledge sharing and valorisation. - Align EU, national and regional priorities to create a pan-European research and innovation ecosystem. - Reduce national and regional disparities in research and innovation capacity, skills, and talent to strengthen innovation ecosystems. - Improve the Union's position in innovation, with a specific focus on strategic technologies and disruptive innovation, facilitate the diffusion of innovative solutions through standardisation activities to foster competitiveness and address key societal challenges. - De-risk and mobilise more private research and innovation financing, particularly for supporting deep tech and the scaling up	research, knowledge sharing and valorisation. — Align EU, national and regional priorities to create a pan-European research and innovation ecosystem. — Reduce national and regional disparities in research and innovation capacity, skills, and talent to strengthen innovation ecosystems. — Improve the Union's position in innovation, with a specific focus on strategic technologies and disruptive innovation, facilitate the diffusion of innovative solutions through standardisation activities to foster competitiveness and address key societal challenges. — De-risk and mobilise more private research and innovation financing, particularly for supporting deep tech and the scaling up of innovative startups and SMEs. — Contribute to increasing public and private investment in research	early-stage innovation, it reinforces FP10's focus on scientific discovery and knowledge creation, while ensuring coherence with later-stage activities for scale-up and deployment under the ECF. The objective is to: Strengthen complementarity and avoid duplication between FP10 and the ECF; Provide political clarity on how the two programmes work together across the research and innovation spectrum; Maintain FP10's identity as Europe's main programme for scientific excellence and early-stage innovation, distinct yet connected to industrial and deployment goals under the ECF. This narrative framing supports the overall coherence of EU funding and

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	of innovative startups and SMEs. - Contribute to increasing public and private investment in research and innovation in Member States, thereby contributing to reach an overall expenditure of at least 3% of Union Gross Domestic Product ('GDP') in research and development.	and innovation in Member States, thereby contributing to reach an overall expenditure of at least 3% of Union Gross Domestic Product ('GDP') in research and development. 2. The Programme has the following specific objectives: - To develop, promote, and advance scientific excellence and frontier research, thereby reinforcing the foundations for transformative discoveries and breakthrough innovations, and strengthening the Union's position as a global leader in scientific research. - To advance research and innovation across the entire continuum of knowledge creation and technological development, from fundamental research to early-stage innovation thereby fostering competitiveness and addressing	reflects the common understanding among stakeholders that TRLs offer a practical way to communicate complementary roles between FP10 and the ECF without introducing rigid legal thresholds.

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		key societal challenges. In this context, the Programme will focus on activities at lower to mid-levels of maturity, ensuring coherence and complementarity with the European Competitiveness Fund, which will target later-stage development, scale-up and deployment. - To support the promotion of attractive research careers; to attract and retain talent at all levels; and to ensure the full engagement of the Union's talent pool in actions supported under the Programme; - To foster innovation and strengthen Europe's global position in innovation, with a particular emphasis on strategic and emerging technologies as well as disruptive innovation, including in social innovation. - To facilitate technological development, knowledge and technology transfer, and the	

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		deployment, exploitation and diffusion of innovative solutions, including through standardisation activities. - To optimise the Programme's delivery to increase the implementation of the European Research Area (ERA), facilitate collaborative links within the European research and innovation landscape, and foster excellence-based participation from all Member States, including those with lower R&I performance. - To contribute to increasing public and private investment in research and innovation in Member States, thereby contributing to reach an overall expenditure of at least 3% of Union Gross Domestic Product ('GDP') in research and development.	
Article 5 (a) - Horizontal principles	The Programme shall: (a) ensure a multidisciplinary approach, where	The Programme shall: a) ensure a multidisciplinary approach, where appropriate, and	This amendment strengthens the Programme by explicitly promoting multi-, inter-, and

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	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.	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. promote and ensure multi-, inter- and transdisciplinary approaches as essential drivers of major scientific progress, fostering the integration of diverse scientific perspectives to address complex scientific, societal, and policy challenges.	transdisciplinary approaches as foundational to scientific excellence and R&I's societal relevance. Research cultures still do not fully enable these approaches, hence the strengthening of the text with the addition of 'promote' rather than merely 'ensure'.
Article 5 (b) - Horizontal principles		NEW (b) promote the systematic and comprehensive integration of Social Sciences, Arts and Humanities (SSAH) perspectives across the Programme. The Programme shall, where appropriate, develop proportionate mechanisms to monitor and assess the contribution and integration of SSAH and interdisciplinarity across the Programme, including through qualitative and quantitative indicators. The findings of these assessments shall be made	The amendment reinforces the importance of integrating SSAH perspectives throughout the Programme while ensuring proportionality and flexibility in implementation. It promotes a culture of interdisciplinarity and transparency by encouraging the Commission to monitor and assess SSAH integration without imposing additional administrative obligations. The provision

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		publicly available and may be taken into account in the preparation of subsequent work programmes and in the allocation of funding.	contributes to including the paramount societal relevance factor and impact of research and innovation.
Article 5 (c) - Horizontal principles	c) 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'.	c) encourage open science as an approach to the scientific process based on cooperative work and diffusing knowledge , including by ensuring open access to peer-reviewed scientific publications regarding results, research outputs , as well as open access to research data and other results following the principle 'as open as possible, as closed as necessary'. Responsible management of research data shall be ensured in line with the principles 'findability', 'accessibility', 'interoperability' and 'reusability' (the 'FAIR principles'). Attention shall also be paid to the long-term preservation, security, and exploitability of data.	The amendment clarifies that open science is a broader approach to the scientific process based on cooperation and knowledge sharing, extending beyond open access to publications and data. It adds references to research outputs and aligns the text with current open science practices. By introducing the FAIR principles, it reinforces responsible data management and improves the accessibility and reusability of results. The reference to long-term preservation, security, and exploitability ensures that research investments deliver lasting value.

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Article 5 - Horizontal principles	Note on the absence to the civil clause in the FP10 proposal.		We take note of the absence of a civil clause in the FP Regulation, compared to the FP9 Regulation. This omission opens the door to dual-use activities but provides no clarity on how such projects would be implemented, under which parts of the Programme, or with what safeguards. Given the potential implications, this matter requires careful consideration and consultation with all relevant stakeholders across the research and innovation ecosystem. Any expansion towards dual use research could have unintended consequences for academic freedom, international cooperation, the openness of the Programme, and the assessment of research careers (particularly regarding

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			publications and dissemination requirements). Moreover, it could result in additional costs and security requirements for participating institutions.
Article 5 - Horizontal principles	<i>Amendment to add more provisions (d)-(e):</i>	NEW (d) ensure the effective promotion of equal opportunities for all and the implementation of gender mainstreaming, including the integration of the gender dimension in R&I content. Particular attention shall be paid to ensuring gender balance in evaluation panels and other advisory bodies. NEW (e) ensure the effective promotion and integration of cooperation with third countries and international organisations and initiatives, based on mutual benefit, Union interests, international commitments and, where appropriate, reciprocity.	The current FP10 text includes valuable principles (multidisciplinarity and SSH integration, science-for-policy and open science) but leaves out several important horizontal principles that were included in FP9. The amendment of adding additional provisions restores those principles to ensure continuity and coherence, while also reflecting today's priorities. Specifically, the amendment reintroduces international cooperation to maintain the Union's global leadership in R&I, restores commitments to gender equality and equal opportunities, adds climate

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		NEW (f) contribute to the Union's climate objectives by ensuring that actions under the Programme integrate climate considerations into R&I content and make a substantial contribution to climate mainstreaming, where appropriate. NEW (g) promote co-creation and co-design through the engagement of citizens and civil society and ensure transparency and accountability of public funding in R&I projects.	mainstreaming, reaffirms co-creation, transparency and accountability, which are essential for public trust and impact of Union R&I investments. By adding these provisions, the amendment broadens the scope of the horizontal principles, aligns FP10 with the commitments of FP9, and strengthens its contribution to Union objectives and global challenges.
Article 6 (1) - Budget	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.	The minimum 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. Annual appropriations shall not amount to less than 12% of the total financial envelope of the Programme.	R&I activities require an ambitious and stable budget. The European Commission's proposal will fall short of boosting breakthrough research, because the proposed budget is lower than what Mario Draghi explicitly recommended to boost EU's future competitiveness (€ 200 billion). Therefore, the budget should be open to additional

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			resources, e.g. from the European Competitiveness Fund. Moreover, budget flexibility should not result in increased uncertainty in the EU's investment in R&I. Such an uncertainty will have a deterring effect and disincentive researchers to carry out high risk research that may deliver impact only in the long run. For this reason, we suggest limiting the flexibility in annual budget appropriations.
Article 6 (2) - Budget	The indicative distribution of the amount referred to in paragraph 1 of this Article for the Specific Programme referred to in Article 1(2)(a), shall be: (a) EUR 44 079 000 000 for Part I 'Excellent Science', of which EUR 2 600 000 000 for non-nuclear direct actions of Joint Research Centre (JRC).	The indicative distribution of the amount referred to in paragraph 1 of this Article for the Specific Programme referred to in Article 1(2)(a), shall be: (a) EUR44 079 000 000 for Part I 'Excellent Science', of which i. EUR x xxx xxx xxx for the European Research Council; ii. EUR x xxx xxx xxx for Marie Skłodowska-Curie Actions;	The proposed amounts represent only the bare minimum required for the programme to achieve its objectives. In reality, higher funding levels are essential to ensure that the EU maintains its global leadership in research and innovation. Sustained investment in R&I demands long-term stability

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	(b) EUR 75 876 000 000 for Part II ‘Competitiveness and Society’, of which: EUR 68 270 000 000 for ‘Competitiveness’ of which: EUR 25 331 000 000 for collaborative research and innovation activities under Chapter IV ‘Clean Transition and Industrial Decarbonisation’ of the European Competitiveness Fund; EUR 19 650 000 000 for collaborative research and innovation activities under Chapter V ‘Health, Biotech, Agriculture and Bioeconomy’ of the European Competitiveness Fund; EUR 16 854 000 000 for collaborative research and innovation activities under Chapter VI ‘Digital Leadership’ of	iii. EUR 2 600 000 000 for non-nuclear direct actions of Joint Research Centre (JRC). (b) EUR 75 876 000 000 for Part II ‘Competitiveness and Society’, of which: i. EUR 68 270 000 000 for ‘Competitiveness’ of which: EUR 25 331 000 000 for collaborative research and innovation activities under Chapter IV ‘Clean Transition and Industrial Decarbonisation’ of the European Competitiveness Fund; EUR 19 650 000 000 for collaborative research and innovation activities under Chapter V ‘Health, Biotech, Agriculture and Bioeconomy’ of the European Competitiveness Fund; EUR 16 854 000 000 for collaborative research and innovation activities under Chapter VI ‘Digital Leadership’ of the European Competitiveness Fund;	and predictability. We therefore urge the European Commission and Member States to set clear minimum budgets for each Horizon Europe instrument and to increase them wherever possible. Furthermore, annual flexibility in budget appropriation should be strictly limited, and the categories of expenditure should be clearly defined and communicated. There needs to be a clear and sensible capping of annual appropriations, hence the new sentence proposed. In addition, the Framework Programme should prioritise early- and mid-stage research and innovation, where EU added value is greatest and where the pipeline for future competitiveness is built.

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	the European Competitiveness Fund; EUR 6 435 000 000 for collaborative research and innovation activities under Chapter VII ‘Resilience and Security, Defence Industry and Space’ of the European Competitiveness Fund. EUR 7 606 000 000 for ‘Society. (c) EUR 38 785 000 000 for Part III ‘Innovation’. (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.	EUR 6 435 000 000 for collaborative research and innovation activities under Chapter VII ‘Resilience and Security, Defence Industry and Space’ of the European Competitiveness Fund. ii. EUR 7 606 000 000 for ‘Society, of which EUR x xxx xxx xxx for global societal challenges EUR x xxx xxx xxx for EU Missions EUR x xxx xxx xxx for the New European Bauhaus Facility. (c) EUR 38 785 000 000 for Part III ‘Innovation’, of which i. EUR x xxx xxx xxx for the European Innovation Council ii. EUR x xxx xxx xxx for innovation ecosystems. (d) EUR 16 262 000 000 for Part IV ‘European Research Area’, of which i. EUR x xxx xxx xxx for reforming and enhancing the European R&I system;	Establishing clear limits on the share of funding dedicated to high-maturity, near-market activities will prevent the displacement of upstream research. High-maturity scale-up activities can be more appropriately supported through complementary instruments such as the European Competitiveness Fund. Likewise, Partnerships are structurally costly endeavours and should not absorb an excessive share of Pillar II funding, so that sufficient resources remain available for open, policy-window calls.

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		ii. EUR x xxx xxx xxx for research and technology infrastructures; iii. EUR 5 387 000 000 for widening participation and spreading excellence. For each of these instruments, the annual appropriations shall not amount to less than 12% of the amount specified in this article, provided that at least the total amount is spent over the time period of the Programme. The following limitations shall apply within the amounts set out in this Article: (a) Within Part II ‘Competitiveness’, the Union contribution allocated to European Partnerships shall not exceed half of the total budget of Part II ‘Competitiveness’. (b) Within Part III ‘Innovation’, the Union contribution allocated to EIC Accelerator shall not exceed one third of the total budget of the European Innovation Council.	

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Article 7 (1) - Additional resources	Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or other third parties, may make additional financial or non-financial contributions to the Programme. Additional financial contributions shall constitute external assigned revenue within the meaning of Article 21(2), points (a), (d), or (e) or Article 21(5) of Regulation (EU, Euratom) 2024/2509.	Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or other third parties, may make additional financial or non-financial contributions to the Programme. Such contributions shall be without prejudice to, and shall not replace or reduce, the budget established under Article [X] of this Regulation. They must add value to the Programme's specific objectives and shall not substitute Union funding commitments. Additional financial contributions shall constitute external assigned revenue within the meaning of Article 21(2), points (a), (d), or (e) or Article 21(5) of Regulation (EU, Euratom) 2024/2509.	Amendment stresses principle of additionality: contributions from MS or others must add value, not replace core FP funding.
Article 8 (1) - Alternative, combined and cumulative funding	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	The rules of the relevant Union programme shall apply to the corresponding its contribution to all actions under other programmes or a single set of rules may be applied to all contributions and a single legal commitment may be concluded.	The FP10 rules must apply to all investments made from the FP10 budget, either in an FP10 action or in another action outside the FP10. This is crucial to safeguard the integrity of the framework

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	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 calculated on a pro-rata basis in accordance with the documents setting out the conditions for support.		programme, and to ensure that the budget of the framework programme is not afterwards depleted to fund other priorities or instruments.
Article 8 (3) Alternative, combined and cumulative funding	Under this programme, in addition to the conditions set out in Article 8(1) and (2) of 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.	Under this programme, in addition to the conditions set out in Article 8(1) and (2) of Regulation (EU) XXX [European Competitiveness Fund], a Competitiveness A Seal of Excellence shall be awarded only to high-quality excellent actions that have not been financed under the Programme due to budgetary constraints. Such actions shall comply with the following	The name of the Seal should reflect that its recipients have been evaluated based on the scientific excellence of their proposals, in line with the FP10 rules. In addition, it should indicate that the Seal applies to several components of the Programme (e.g. as is currently the case for the ERC

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		conditions: (i) they have been assessed in a call for proposals under the Programme; (ii) they comply with the minimum quality requirements of that call for proposals.	Proof of Concept), and not only to activities linked to the policy windows in the ECF. The proposed change therefore restores the name ‘Seal of Excellence’, as used under Horizon Europe, to better reflect its purpose and scope.
Article 8 (4) Alternative, combined and cumulative funding	The Member States may finance actions to which a Competitiveness Seal was awarded.	The Member States or another Union source of funding outside the Framework Programme may finance actions to which a Competitiveness Seal of Excellence was awarded.	The Seal of Excellence should also give access to other EU funding, e.g. under MFF heading 1 (national and regional partnership plans).
Article 9 (1) - Third countries associated to the Programme	The Programme may be opened to the participation of the following third countries through full or partial association, in accordance with the objectives laid down in Article 3 and in accordance with the relevant international agreements or any decisions adopted under the framework of those agreements and applicable to: a) members of the European Free Trade Association which are	The Programme may shall be opened to the participation of the following third countries through full or partial association, in accordance with the objectives laid down in Article 3 and in accordance with the relevant international agreements or any decisions adopted under the framework of those agreements and applicable to: a) members of the European Free Trade Association which are members	The use of “may” introduces uncertainty, which risks undermining predictability and transparency for potential partners. The Union’s external action, as well as its research and innovation policy, must be consistent with and promote the values enshrined in Article 2 of TEU, including respect for human rights.

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	members of the European Economic Area, as well as European micro-states; b) acceding countries, candidate countries and potential candidates; c) European Neighbourhood Policy countries; d) other third countries.	of the European Economic Area, as well as European micro-states; b) acceding countries, candidate countries and potential candidates; c) European Neighbourhood Policy countries; d) the UK and Switzerland; e) other third countries.	There are very strong and long-standing ties of scientific and institutional cooperation between the EU, the UK and Switzerland. These partnerships have consistently demonstrated mutual benefit, high scientific performance and alignment with the objectives and values of the Union. To preserve and build upon this record of excellence, it is essential to provide both countries with a clear and accessible pathway to association under the Framework Programme. Facilitating easier and more predictable access and participation will ensure continuity of collaboration and promote the Union's global research and innovation leadership objectives.

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Article 9 - Third countries associated to the Programme	<i>Amendment to add extra paragraph</i>	9 (6a) (new): For the UK and Switzerland the Commission shall establish a simplified and expedited procedure for renewing their association. This procedure shall ensure continuity of participation for legal entities established in such countries, minimising administrative disruption to ongoing and future collaborations.	This paragraph aims to enable long-standing partner countries that have demonstrated sustained commitment to joint research and innovation with the Union to benefit from a simplified and expedited association process. The UK and Switzerland have a long and productive record of collaboration with the EU's framework programmes and have made substantial contributions to Europe's scientific excellence, innovation capacity and global competitiveness. Ensuring a streamlined and predictable renewal procedure for their association will safeguard the stability of collaborative networks, prevent administrative hurdles and reinforce Europe's attractiveness as a

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			destination for world-class research and innovation.
Article 10 (4) - Implementation and forms of Union funding	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. Where it is necessary to enable other sources of funding including co-investments with national resources subject to State aid rules, funding shall be provided in the form of actual eligible cost reimbursement or simplified cost options.	Where Union funding is provided in the form of a grant, funding shall be provided as financing not linked to cost, or as in one of the following forms: i. Reimbursement of actual eligible costs: - As registered in the accountant system of the beneficiary or calculated based on the costs actually incurred using the method of Horizon Europe, or; - as simplified cost options in particular through lump sums as well as, including unit costs for personnel and other cost-based estimations, in accordance with Regulation (EU, Euratom) 2024/2509; ii. Financing not linked to cost, such as lump sums or payments based on predefined outputs or	The original text was unclear, potentially creating ambiguities and misunderstandings. Lumpsum funding could contribute to simplification in some actions under the FP10. However, it may also be irrelevant or have drawbacks for other actions, hence our recommendation not to make it a default option. It is also critical not to associate lumpsum funding and unit costs, as this could seriously affect the financial attractiveness of FP10.

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		milestones, which shall not include unit costs for personnel. Funding may be provided in the form of actual eligible cost reimbursement only where the objectives of an action cannot be achieved otherwise. The choice of funding form shall be based on the nature and objectives of the action. Where it is necessary to enable other sources of funding including co-investments with national resources subject to State aid rules, funding shall be provided in the form of actual eligible cost reimbursement or simplified cost options.	
Article 10 (5) - Implementation and forms of Union funding	For the purposes of Article 153(3) of Regulation (EU, Euratom) 2024/2509, the evaluation committee may be composed partially or fully of independent external experts.	For the purposes of Article 153(3) of Regulation (EU, Euratom) 2024/2509, the evaluation committee may shall be composed partially or fully of independent external experts.	The evaluation of proposals must be done exclusively by independent experts.
Article 11 (2) (a) - European Partnerships	European Partnerships shall be based on a Memorandum of Understanding, agreed and signed between the partners, stipulating:	[...] (a) the research and innovation results to be delivered, which shall be clear, measurable, time-bound;	Clarification added to underline that partnerships are an R&I instrument used to overcome some specific challenges that cannot be

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	(a) the results to be delivered, which shall be clear, measurable, time-bound;		addressed through topics in a given area.
Article 11 (5) (b) - European Partnerships	5. European Partnerships shall: ... (b) be established for the purpose of addressing challenges that require a critical mass of resources and a unified and coordinated approach, both in terms of programming and implementation, across actors.	(b) be established for the purpose of addressing research and innovation challenges that require a critical mass of resources and a unified and coordinated approach, both in terms of programming and implementation, across actors.	Partnerships funded under FP10 must be true R&I efforts. Funding should not be diverted to activities that are not clearly aimed at improving science and innovation capacity in the EU.
Article 11 (5) (d) - European Partnerships	5. European Partnerships shall: ... (d) be selected in a competitive manner based on a set of quantifiable lifecycle criteria and a strong portfolio approach, resulting in a coherent set of initiatives.	(d) be selected in a competitive and transparent manner based on a set of quantifiable lifecycle criteria and a strong portfolio approach, resulting in a coherent set of initiatives.	Transparency guarantees fairness and accountability in partnership selection.
Article 11 (6) - European Partnerships	6. Contributions from Partners other than the Union shall take the following forms: (a) financial contributions to the operational budget of the initiative; (b) co-financing by the Partners of their own participation, or that	6. Contributions from Partners other than the Union shall take the following forms: (a) in-cash financial contributions to the operational budget of the initiative; (b) in-kind contributions through co-financing by the Partners of their own participation, or that of their	This amendment clarifies that the partners can also make in-kind contribution. Otherwise, limiting to in-cash contribution will make the participation in partnerships less attractive for non-academic entities, including companies and other for-

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	of their members, in projects funded through the initiative.	members, in projects funded through the initiative.	profit organisations, civil society organisations etc. This would affect collaboration across sectors, whereas this should be one of the core objectives of partnerships.
Article 12 (1) - European Research Council	1. The European Research Council shall provide attractive and flexible funding to enable talented and creative individual researchers, with an emphasis on early- stage researchers, and their teams to pursue the most promising avenues at the frontier of science, regardless of their nationality and country of origin and on the basis of competition based solely on the criterion of excellence.	1. The European Research Council shall provide attractive and flexible funding to enable talented and creative individual researchers, with an emphasis on early- stage researchers, and their teams to pursue the most promising avenues at the frontier of science, regardless of their nationality and country of origin and on the basis of competition based solely on the criterion of excellence.	While supporting early-stage researchers is important, such emphasis should not be embedded in the regulation itself.
Article 12 (2) - European Research Council	2. The ERC shall attract the most talented researchers from all over the world and establish the Union as a world-leading centre for research and innovation.	2. The ERC shall contribute to attract and retain the most talented researchers from all over the world and establish the Union as a world-leading centre for research and innovation.	Strengthens the ERC's role in both attracting and retaining top talent, reflecting the importance of keeping excellent researchers in Europe as well as drawing in global talent. It also balances

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			ERC's commitment to openness with safeguards for research integrity and security, ensuring that the ERC remains non-discriminatory and state-agnostic while addressing legitimate concerns around research security.
Article 13 (1) - Marie Skłodowska-Curie Actions	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.	The Marie Skłodowska-Curie Actions shall support the research career at all stages, with particular emphasis on early-career researchers, as well as 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."	In comparison with other instruments, MSCA have already demonstrated their success in supporting research careers, especially at the early stage. This amendment re-asserts this particularity, giving MSCA a crucial and unique role in FP10. It is also important to align our understanding of research careers with the European Framework of Research Careers adopted by the Council in 2023. Research careers must be understood as including research

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			managers too, hence the relevance of the MSCA Staff Exchange instrument. Finally, in line with the cross-cutting principle of research security, it is not needed to highlight security considerations in the MSCA provisions. In line with the simplification in the framework programme, there must be no specific security rules for MSCA. These considerations must remain at the level of the Framework Programme.
Article 13 (2) - Marie Skłodowska-Curie Actions	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 well as science outreach. The	The MSCA shall fund excellent actions doctoral networks, post-doctoral fellowships, across career stages through networks, fellowships and 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	The MSCA shall fund excellent actions across career stages through networks, fellowships and R&I staff exchanges.

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	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.	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, and on the basis of competition based solely on the criterion of excellence. It shall support to establish the Union as a leading destination for researchers talent.	
Article 15 (1) - Collaborative research	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	Collaborative research, in particular at early stages of the R&I continuum, 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 excellent 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	To ensure the long-term impact and strategic relevance of FP10, it is essential to strengthen especially investment in the early stages of the R&I continuum. Public funding plays a unique role in supporting such early stages and high-risk research that industry alone is unlikely to undertake. In light of the envisaged link with the European Competitiveness Fund, it is crucial that early-stage collaborative research

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	developing and supporting Union policies.	impact of research in developing and supporting Union policies.	is not sidelined in favour of near-market activities. Comparisons with global competitors should take account of different investment structures and policy priorities. In the US for example, a large share of experimental development is funded through defence R&I, while civilian agencies such as the National Science Foundation devote about 85% of their budgets to basic research. Excluding defence, the US profile is in fact closer to the EU's. As the EU does not fund defence R&I to the same extent, maintaining strong support for early-stage and collaborative research is both justified and essential to Europe's long-term competitiveness.

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Article 15 (2) - Collaborative research	2. Activities shall be carried out in a balanced manner between lower and higher Technology Readiness Levels, thereby covering the whole value chain.	2. Activities shall be carried out in a balanced manner between lower and higher Technology Readiness Levels, thereby covering the whole value chain focus on research and innovation at early to intermediate stages of development, covering them in a balanced manner in order to ensure a strong foundation of frontier research and collaborative innovation. The Programme shall operate in full complementarity with the European Competitiveness Fund, which focuses on later-stage development, scale-up and deployment. 2a. The Commission shall regularly monitor the balance of activities across different levels of development and take appropriate measures in the work programmes to ensure that low- and mid-level Technology Readiness Levels activities remain adequately supported.	In order to maximise complementarities between FP10 and the ECF, they should focus on different types of activities. While the ECF puts emphasis on deployment of new technologies and scaling up innovative companies, FP10 must support knowledge creation and technology development, hence its necessary focus on early to intermediate stages in the R&I continuum. Furthermore, it is important to concentrate public investments in these stages which are less attractive to private investment because of their high-risk nature. To ensure that the European Commission strikes an appropriate balance in its investment via FP10, it should regularly monitor FP10-funded projects in terms of

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			TRL. This monitoring should induce no additional administrative burden on beneficiaries (in line with the efforts for simplification). It must rely, as much as possible, on the knowledge of the Commission's project officers on the different projects they oversee.
Article 15 (3) - Collaborative research	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 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].	3. This Programme shall include collaborative research and innovation activities of the policy windows under the Chapters IV to VII of the Regulation (EU) XXX European Competitiveness Fund. These collaborative research and innovation activities will be included in dedicated work programmes addressing each of the policy windows shall be adopted in accordance with Article 15 4 of the Regulation (EU) XXX [European Competitiveness Fund Regulation] the Specific Programme.	The modification clarifies that the collaborative research and innovation activities under the policy windows of the European Competitiveness Fund (ECF) should be governed in line with the rules, principles and mechanisms of the Framework Programme (FP10). These activities should be implemented through dedicated work programmes addressing each of the policy windows, in accordance with Article 4 of the Specific Programme.

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			Separate work programmes are necessary when the objectives and nature of actions differ, as is the case between FP10 and the ECF. While FP10 focuses on fostering excellence, scientific quality and knowledge generation, the ECF will primarily address scaling-up, deployment and market uptake. Distinct governance and programming therefore ensure that the core values of Pillar 2 – excellence, impact and quality of implementation – are preserved, while enabling coordination between both instruments. Synergies between FP10 and the ECF in view of a smooth and transparent investment journey can be ensured through advisory mechanisms and evidence-

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			informed policy feedback loops, in particular by monitoring results and impacts from Pillar 2 that are ready for further scale-up and deployment under the ECF. This approach provides a clear division of labour, avoids duplication, and strengthens the coherence and effectiveness of the EU's research and innovation funding landscape.
Article 15 (5) - Collaborative research	5. 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 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.	5. 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 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. The contribution of the Programme to EU Missions shall focus exclusively	The part of the missions in FP10 should be solely on the research and innovation level and this must be spelled out

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		on the research and early innovation stages of the EU Missions.	
Article 16 (1) - EIC	1. The EIC shall identify, develop and scale up deep tech and disruptive innovation from research to scale-up. It shall be implemented mainly through open bottom-up calls for proposals while ensuring a balanced portfolio of actions across thematic areas. This shall be complemented by targeted thematic and 'Challenge' calls in areas of potential strategic interest in close coordination	1. The EIC shall identify, develop and scale up deep tech breakthroughs and disruptive innovations within the scope of the Framework Programme, covering the full R&I continuum. It shall be open to all types of innovators, including individuals, universities, research organisations, and companies (SMEs, including start-ups, and, in exceptional cases, small mid-caps), as well as single beneficiaries and multidisciplinary consortia.	This amendment restores the FP9 provision ensuring openness to all types of innovators, including universities and research organisations, and specifies that synergies with the ECF should be limited to governance coordination to avoid funding overlap. This provides legal clarity, safeguards FP10's excellence-driven mission,

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	and synergy with the ECF policy windows, in particular with the ECF InvestEU Instrument.	It shall be implemented mainly through open bottom-up calls for proposals while ensuring a balanced portfolio of actions across thematic areas. This shall be complemented by targeted thematic and ‘Challenge’ calls in areas of potential strategic interest in close coordination and synergy with the ECF policy windows, in particular with the ECF InvestEU Instrument, limited to governance coordination without overlap in research and innovation funding.	and maintains the EIC’s bottom-up and inclusive nature.
Article 16 (2) - EIC	2. The EIC may in particular provide the following types of support: (a) Pathfinder grants for high-risk research, including proof of concept and prototyping; (b) Transition grants to develop pathways to commercial development for research results, including the creation of spin-offs and start-ups;	2. The EIC shall in particular provide the following types of support: (a) Pathfinder grants for high-risk research, including for early career researchers, and proof of concept and prototyping ; (b) Transition grants to develop pathways to commercial and further development of for research results, including the creation of spin-offs and start-ups;	This article establishes the scope of the EIC, which shall be clearly defined, not kept open to other types of support. On (a): the Pathfinder focusses per definition on lower (TRL 1-4) high risk breakthrough research. It is not suitable and unnecessary to refer to prototyping in this context.

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			On (b): the current definition is only focusing on the business part, but the needed scientific and technological development is not clearly addressed here.
Article 16 (3) - EIC	3. The types of support referred to in paragraph 2 shall be combined flexibly in EIC Challenges developed and overseen by EIC Programme Managers. EIC Challenges shall be implemented using a portfolio approach where actions are selected based on their complementarities to achieve defined objectives and interact with each other under the supervision of EIC Programme Manager.	3. The types of support referred to in paragraph 2 shall be combined flexibly in EIC Challenges developed and overseen by EIC Programme Managers. EIC Challenges shall be implemented using a portfolio approach where actions are selected based on the award criteria defined in Article 25 as well as their complementarities to achieve defined objectives and interact with each other under the supervision of EIC Programme Manager. The portfolio approach shall not prejudice the bottom-up nature of Pathfinder and Transition instruments, nor allow the termination of duly signed grants without due process, thereby safeguarding project stability and beneficiaries' commitments.	The amendment clarifies that the portfolio approach must be consistent with the award criteria of Article 25 and shall not undermine the bottom-up nature of the Pathfinder and Transition instruments. It further ensures that duly signed grants cannot be terminated without due process, safeguarding legal certainty, project stability, and the careers of researchers engaged in EIC projects.

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Article 16 (5) - EIC	5. The EIC may support innovation in critical technologies with focus on defence applications in close coordination with the ECF policy window ‘Resilience and Security, Defence Industry and Space’. In those cases, Articles 51 and 52 of the Regulation (EU) XXX [European Competitiveness Fund] shall apply.	5. The EIC may support innovation in critical technologies with focus on defence applications in close coordination with the ECF policy window ‘Resilience and Security, Defence Industry and Space’ . In those cases, Articles 51 and 52 of the Regulation (EU) XXX [European Competitiveness Fund] shall apply. civil or dual-use potential, while remaining clearly distinct from defence-specific applications. Support for defence-oriented activities shall be channeled through the European Competitiveness Fund, with coordination limited to governance alignment.	This amendment clarifies the delineation between the European Innovation Council (EIC) and the European Competitiveness Fund (ECF) in supporting innovation in critical technologies. While coordination between the two instruments is important to ensure coherence and avoid duplication, the EIC’s scope must remain focused on civil and dual-use innovations with clear societal and economic benefits. Defence-specific applications must be supported through the dedicated ECF policy window on ‘Resilience and Security, Defence Industry and Space’ and the successor of the European Defence Fund, which already provide the appropriate and relevant funding, framework and guidance to manage such activities. The security

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			considerations for defence research are so unique that introducing them into a primarily civil research programme, like FP10, would induce complexities, going against the effort to simplify. Furthermore, expanding the scope of the EIC towards defence technologies is not budget neutral, as the development of these technologies is very onerous. This scope expansion will therefore be at the detriment of non-defence technologies, which could have nevertheless a significant impact on Europe's competitiveness, prosperity and societal resilience. Our amendment preserves the EIC's core focus on transformative innovations for societal progress and competitiveness, while ensuring effective alignment

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			with broader EU resilience and security objectives.
Article 18 (2) - European Research Area and infrastructures	2. The Programme shall ensure the effective promotion and protection of values and principles of the ERA and the Pact for research and innovation, notably ethics and integrity in research and innovation, freedom of scientific research and gender equality and equal opportunities, and the promotion of attractive research careers and mobility. The funding of the Research and Technology Infrastructures shall contribute to equip the Union with a strong and coherent ecosystem of world-class sustainable facilities and services, building on prioritised pan-European infrastructures and complementary state-of-the-art national capacities and using funding instruments, including European partnerships. The Programme shall contribute up	2. The Programme shall ensure the effective promotion and protection of values and principles of the ERA and the Pact for research and innovation, notably ethics and integrity in research and innovation, freedom of scientific research and gender equality and equal opportunities, and the promotion of attractive research careers and mobility. The funding of the Research and Technology Infrastructures shall contribute to equip the Union with a strong and coherent ecosystem of world-class sustainable facilities and services, building on prioritised pan-European infrastructures and complementary state-of-the-art national capacities and using funding instruments, including European partnerships. The Programme shall contribute up to 20% of the building costs of critical new world-class capacities of European research and technology infrastructures.	Horizon Europe is, above all, a research and innovation programme. Its funding must remain focused on supporting scientific excellence, collaborative research, and innovation activities — not on covering the building costs of new infrastructures. While strengthening Europe's research and technology infrastructure base is a strategic priority, other Union instruments are better suited to finance such capital investments. The proposed amendment therefore restores the focus of the programme on enabling access to and use of world-class facilities and services and ensuring their sustainable life-cycle funding. Construction and major infrastructure

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	to 20% of the building costs of critical new world-class capacities of European research and technology infrastructures.	2a. The funding of the Research and Technology Infrastructures shall contribute to equip the Union with a strong and coherent ecosystem of world-class sustainable facilities and services, building on prioritised pan-European infrastructures and complementary state-of-the-art national capacities and using funding instruments, including European partnerships. The Programme shall contribute up to 20% of the building costs of critical new world-class capacities of European research and technology infrastructures.	investments should continue to be supported through complementary instruments such as the European Competitiveness Fund (ECF), the Strategic Management of Research Infrastructures (SMRI), the Structural and Investment Funds, and InvestEU. The general usage of EU funding should focus on European value-add, and the specific usage of FP10 funding should be restricted to where there is substantial scientific value-add, e.g. to support sustainable financial life-cycle of infrastructures of highest scientific and European value. For construction of new infrastructures where boosting competitiveness is the main objective, ECF seems the best instrument. For construction of new infrastructures to support

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			regional development, structural funds seem the best instrument.
Article 19 (2) - Widening	2. 'Transition countries' are Cyprus, Estonia, Greece, Malta, Portugal and Slovenia, for the purposes of funding the actions under paragraph 5, point b).		We welcome the introduction of the 'Transition' category as it demonstrates the progress made by some countries in reinforcing their ability to engage in excellent research and to access competitive calls. However, the division between 'Widening' and 'Transition' countries should not be based on the Innovation Scoreboard Index as it contains many indicators that are not directly relevant to decide on a country's performance in the FP. The EC should ensure that in addition to the indicators used in the methodology for Horizon Europe 2021-2027 (gross national income below 90% of the EU average; percentage of scientific publications of researchers which rank

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			amongst the top 10% citations; number of patent applications per million inhabitants below the EU average), are taken into consideration relevant indicators on R&I performance related to 1) a country's participation in previous FPs and 2) its position in transnational and multidisciplinary networks, as recommended by the European Court of Auditors in the report ' Measures to widen participation in Horizon 2020 were well designed but sustainable change will mostly depend on efforts by national authorities '.
Article 19 (7) - Widening	7. From 2030 onwards access to capacity building measures is restricted to those widening countries that have increased their real expenditure of public investment in research and development in the latest known	7. From 2030 onwards access to capacity building measures is restricted to those widening countries that have increased their real expenditure of public investment in research and development in the latest known year compared to the	While the conditionality introduced in this provision aims to promote sustained national investment in research and innovation, it should be applied with flexibility to avoid

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	year compared to the year prior to it.	year prior to it. This requirement shall not apply in duly justified circumstances that temporarily affect a country's capacity to increase such investment.	disproportionate or unintended effects. Allowing for justified exceptions in situations where broader fiscal or economic pressures temporarily constrain public investment ensures that countries are not unfairly penalised for circumstances beyond their control. Without such flexibility, the measure could unintentionally penalise the programme's beneficiaries for national budgetary decisions, making them bear the consequences of fiscal adjustments or crisis responses. This would undermine the EU's aim to strengthen capacity and reduce disparities, as it could withdraw support precisely from institutions most in need of assistance. This could also prevent excellent proposals from being funded despite

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			their demonstrated excellence. Moreover, short-term fluctuations in national R&I expenditure are not always a reliable reflection of commitment or performance, as they often depend on wider macroeconomic or fiscal conditions. The introduction of a general clause for duly justified exceptions therefore preserves the intention of encouraging investment while upholding proportionality, fairness, and legal certainty, and maintaining access to capacity-building measures in times when support is most critical.
Article 20 ECF rules	1. Article 10(2), 10(3) on EU Preference, Article 13 on Application of the rules on classified information and sensitive information and Article 20 on Accelerated and Targeted	Only Article 10(2), 10(3) on EU Preference, Article 13 on Application of the rules on classified information and sensitive information and Article 20 on Accelerated and Targeted Action for Competitiveness of	The rules on EU preference and accelerated and targeted actions are not relevant for the FP10. Even worse, they will undermine its critical components and success

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	Action for Competitiveness of Regulation (EU) XXX [European Competitiveness Fund] shall apply for the purpose of this Regulation, unless otherwise specified.	Regulation (EU) XXX [European Competitiveness Fund] shall apply for the purpose of this Regulation, unless otherwise specified.	factors. The ECF EU preference rules are not well aligned with the FP10 provisions on collaboration with non-EU entities, generating legal uncertainties and limiting its openness to the world. Because the accelerated and targeted actions allow for reducing competition, they will undermine the principle of excellence, even though it is the backbone of the FP10. Maximizing complementarities between FP10 and ECF does not mean reducing their singularities. It is instead about building upon their necessary idiosyncrasies to generate higher impact.
Article 21 (3) Eligibility	3. Except when the work programme otherwise provides, to be eligible for participation in grant actions legal entities shall form a consortium that includes	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	FP10 will be even more effective in boosting Europe's industrial competitiveness if it supports research with the best researchers and

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	as beneficiaries three legal entities independent of each other and each established in different countries as follows: (a) at least two legal entities established in different Member States; and (b) at least one other legal entity established in another Member State or an associated country.	entities independent of each other and each established in different countries as follows: a) at least one two legal entities established in different Member States; and (b) at least two one other legal entities established in <u>different</u> another Member States or an associated countriesy.	research institutions, including those located outside the EU. The present proposal of the European Commission limits the participation of associated countries, even though they may bring in promising ideas for Europe's prosperity and societal resilience. For this reason, we recommend allowing for increased participation of associated countries, in line with current FP9 practices.
Article 21 (10) Eligibility	10. 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.	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 for duly justified scientific or technological reasons. The Commission shall undergo a	The amendment ensures that termination of actions remains an exceptional and well-justified measure. Requiring that termination must be based on duly justified scientific or technological reasons provides clarity and prevents decisions driven by changing political priorities or perceived policy relevance.

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		<u>procedure with the action coordinator and with independent external experts, before deciding to terminate an action.</u>	Involving the action coordinator and independent external experts guarantees that any termination is grounded in sound evidence and fair consultation, therefore safeguarding legal certainty and trust between the Commission and beneficiaries.
Article 21 (11) Eligibility	11. 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.	11. Where appropriate and duly justified, t 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.	Policy considerations are irrelevant for deciding on the eligibility rules for research projects. This will be especially detrimental to Pillar 1 instruments that are fully bottom-up. There needs to be more solid and transparent grounds than “policy considerations” to revise eligibility criteria.
Article 22 (2) Ethics and research integrity	2. For award procedures identified in the work programme, legal entities participating in an action shall fulfil all the following requirements:	2. For award procedures identified in the work programme, legal entities participating in an action shall fulfil at the following requirements as appropriate: [...]	The addition of provision (f) ensures that the use of AI within actions and research activities adheres to high standards of research integrity and ethical conduct.

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	[...].	(new) (f) ensure the responsible use of generative artificial intelligence (AI) in research activities, in line with applicable Union legislation and ethical standards, by upholding principles of integrity, transparency, accountability, human oversight, data protection, fairness and environmental responsibility. Action participants shall reflect these measures in their ethics self-assessment and ensure ongoing monitoring of compliance throughout the duration of the action.	By embedding the principles of transparency, accountability, human oversight, data protection, fairness and environmental responsibility, the provision aligns the Programme with the Artificial Intelligence Act and the European Code of Conduct for Research Integrity. It reinforces safeguards against misuse of AI-generated content and ensures that technological tools are employed responsibly and in full respect of Union values and fundamental rights.
Article 23 (2) Calls for proposals	2. The work programme shall specify calls for proposals for which Competitiveness Seals may be awarded. Information concerning the application and the evaluation may be shared with interested financing authorities, subject to the conclusion of confidentiality	2. The work programme shall specify calls for proposals for which Competitiveness Seals may be awarded. Proposals may be awarded a Seal of Excellence in accordance with 8(3) of this Regulation. Information concerning the application and its evaluation may be shared with interested financing	The name of the Seal should reflect that its recipients have been evaluated based on the scientific excellence of their proposals, in line with the FP10 rules. The proposed change therefore restores the name ‘Seal of Excellence’, as used under the current

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	agreements unless explicitly objected by the applicant.	authorities for the purpose of facilitating alternative funding, subject to confidentiality agreements, unless the applicant explicitly objects.	Horizon Europe, to better reflect its purpose and scope. In addition, awarding the Seal of Excellence to proposals submitted to all components of the Programme will enhance the impact of this measure, especially if the uptake of such proposals is enabled not only through funding from other organisations and the ESIF, but also from other EU funding sources.
Article 31 (2)	Two or more beneficiaries shall own results jointly if they have jointly generated them and it is not possible to: (a) establish the respective contribution of each beneficiary; or (b) separate the results when applying for their protection. They shall agree in writing on the allocation and terms of exercise of their joint ownership. Unless	2. Two or more beneficiaries shall own results jointly if they have jointly generated them and it is not possible to: (a) establish the respective contribution of each beneficiary; or (b) separate the results when applying for, obtaining or maintaining their protection. They shall agree in writing on the allocation and terms of exercise of	For 2(b) The current wording of FP9 offers a more adequate phrasing for protection. added "at least 45 days" to ensure predictable timelines for granting licences between joint owners. Encourage flexibility for consortium-level arrangements—45 days may be a default unless otherwise agreed.

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	otherwise agreed, each joint owner may grant non-exclusive licences to third parties to valorise the jointly owned results (without any right to sub-licence), if the other joint owners are given advance notice and fair and reasonable compensation. The joint owners may agree in writing to apply another regime than joint ownership.	their joint ownership. Unless otherwise agreed, each joint owner may grant non-exclusive licences to third parties to valorise the jointly owned results (without any right to sub-licence), if the other joint owners are given at least 45 days of advance notice and fair and reasonable compensation. The joint owners may agree in writing to apply another regime than joint ownership.	
Article 31 (3)	If third parties involved in the action (including personnel) have rights to the results, the beneficiaries shall ensure that those rights can be exercised in a manner compatible with their obligations regarding those results.	(3a) Beneficiaries shall ensure that third-party agreements respect background ownership and joint-ownership provisions established under this Regulation.	Access rights and confidentiality terms for external contributors (e.g. subcontractors, visiting researchers, students) should be clearly defined in the consortium or employment agreements to prevent future IP conflicts.
Article 31 (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	Transfer of ownership may be subject to national regulations and conditions as set out in the work programme, call conditions or grant agreement, including a requirement to pass on any obligations regarding	This amendment specifies that the transfer of ownership must be decided only for the purpose of valorising research results and in case it is the most effective means. It

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	on any obligations regarding the results.	the results. The transfer shall be decided only if it is the most appropriate means to valorise research results. It requires financial transactions to the project beneficiaries to pay back any costs related to the protection and valorisation of the research results (if not covered by the grant) and the value of the intellectual asset.	is also essential to provide the project beneficiaries, from which the ownership is transferred, with fair compensation for any possible costs for valorisation.
Article 32 (1) (b) – Valorisation and dissemination	(b) grant access to their results and background if needed for implementing action tasks or for valorising results, including for commercial deployment;	(b) grant access to their results and background if needed by another beneficiary for implementing actions tasks or for the valorisation of results obtained during the action.	It is essential to limit access to background only to cases such an access is necessary for knowledge valorisation. Otherwise, the provision may undermine ownership and protection of past research results.

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Article 32 (1) (c) – Valorisation and dissemination	(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;	(c) up to four years after the completion of the project , 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 three years after the completion of the project , 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 may use to facilitate the valorisation of those results;	To provide future beneficiaries with clarity on their valorisation obligation, it is essential to specify the period during which they must demonstrate best efforts. Based on our experience, it is usually during the three years after the end of a research project that valorisation activities may be carried out. For this reason, we suggest that it is relevant that the Commission intervenes only after this time period.
Article 32 (1) (e) – Valorisation and dissemination	(e) adhere to open science practices, including by: (i) ensuring open access to all peer-reviewed scientific publications regarding the results; (ii) managing responsibly the research data in the action and other results in line with the principles ‘findability’,	(e) adhere to where results have no commercial or security constraints as defined in (a), beneficiaries shall ensure open access to publications and research data in line with open science practices for knowledge dissemination , including by: (i) ensuring open access to all peer-reviewed scientific publications regarding the results;	In practice, it is challenging for the universities to comply with both their open science and knowledge valorisation obligations. The present amendment suggests a stepwise approach, inviting the beneficiaries to adhere to the open sciences practices for knowledge dissemination and where such practices do

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	‘accessibility’, ‘interoperability’ and ‘reusability’ (the FAIR principles) as well as ensuring open access thereto unless doing so would be against legitimate interests, including commercial interests, or other constraints.	(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 thereto unless doing so would be against legitimate interests, including commercial interests, or other constraints (iii) ensuring that the beneficiaries or the authors retain sufficient copyright and related rights to share their work openly and comply with their open access requirements.	not constrain knowledge valorisation. We also recommend adding the principles of secondary publishing rights among the open science practices.
Article 32 (1) (g) – Valorisation and dissemination	(g) grant free access to their results for developing, implementing and monitoring their policies or programmes to the following entities: (i) to Union institutions, bodies, offices or agencies; (ii) to Member States’ national	(g) grant, upon request, free access to their results for developing, implementing and monitoring their policies or programmes to the following entities: (i) to Union institutions, bodies, offices or agencies; (ii) to Member States’ national	This amendment specifies that the beneficiaries should not systematically grant free access to their results to support policymaking. Such an access must be requested by the listed authorities.

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	authorities, where provided in the work programme, call conditions or grant agreement.	authorities, where provided in the work programme, call conditions or grant agreement.	
Article 34 (1) - European Innovation Council specific rules	1. In accordance with Article 20(2)(a)(i) of Regulation (EU) XXX [European Competitiveness Fund], EIC Transition grants may be awarded without calls for proposals for the purpose of follow up funding for results generated by actions funded by the Programme and Horizon Europe Regulation No 695/2021.	In accordance with Article 20(2)(a)(i) of Regulation (EU) XXX [European Competitiveness Fund], Every year, a limited number of EIC Transition grants may be awarded without simplified simplified calls for proposals for the purpose of follow up funding for the valorisation of clearly identified results generated by actions funded by the Programme and Horizon Europe Regulation No 695/2021. The proposals must be evaluated based on the award criteria defined in Article 25.	In line with a previous amendment, we suggest deleting the reference to Article 20 of the ECF regulation. While we welcome better synergies between EIC (especially the Transition grants) and other actions under FP10, we highlight that the proposed mechanism needs further clarifications, including measures to ensure monitoring and transparency. Our amendment also suggests simplified calls for proposals – as the best guarantee that the most excellent projects are selected – and re-asserts the award criteria in Article 25 (especially, excellence and impact).

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Article 34(2)	2. The EIC Accelerator shall support only single beneficiaries and single investees who are SMEs, including startups, and small mid-caps.	The EIC Accelerator shall support only single beneficiaries and single investees who are SMEs, including, startups, such as university spin offs, as well as small mid-caps.	Explicitly including spin-offs ensures that the full range of potential applicants and beneficiaries of the EIC Accelerator is covered, reflecting the diverse pathways through which disruptive innovation emerges.
Article 34 (3)	3. Proposals for EIC Accelerator actions may be submitted by one or more legal entities intending to establish or support a potential recipient, with the prior agreement of that recipient. If the selected for funding, the grant and investment agreement shall be signed only with that recipient.		Further clarification is required regarding the term “recipient.” It is unclear whether it refers only to a legal entity (e.g., a limited company) established in a Member State or associated country, or whether it covers a broader group of actors. This ambiguity affects implementation. Eligibility rules also differ between recipients in Member States and in associated countries—especially regarding access to grants versus equity. Without a clear definition, these

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			distinctions may be applied inconsistently, creating legal uncertainty for applicants and administering bodies. Clarifying the term in the Regulation would improve legal certainty, ensure consistent eligibility, and support transparent and predictable access to funding.
Article 34 (10)	10. The EIC Fund may award follow-on investments: (a) if needed to protect the Union's strategic assets, interests, autonomy or security; or (b) if subsequent funding rounds would not proceed or would proceed at significantly less favourable terms without EIC follow-on investment.		The wording “follow-on investments only in one of the two following cases” introduces a limitation without providing sufficient clarity on how these exceptions will be applied in practice. The provision does not explain the implementation logic or the justification for adding such restrictions. Further clarification is needed to ensure transparent, consistent, and predictable

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			application of follow-on investment rules.

Proposed amendments to the Council Decision on establishing the Specific Programme implementing Horizon Europe – the Framework Programme for Research and Innovation for the period 2028-2034

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Article 2 (2) (a) Operational objectives	foster the production of high-quality scientific research and world-leading research institutions;	(a) to strengthen excellent basic and frontier research; to reinforce and spread excellence, including by fostering wider participation throughout the Union foster the production of high-quality scientific research and world-leading research institutions;	The objective of boosting research excellence must be pivotal.
Article 2 (2) NEW Operational objectives		(aa) Support the establishment, consolidation and long-term strengthening of world-leading research institutions and infrastructures;	FP10 should support the establishment but also the further development of world-leading research institutions
Article 2 (2) (b) Operational objectives	(b) support the mobility and training and career development of researchers;	(b) support the mobility and training and career development of research career at all stages, with particular attention to early-career researchers and cross-disciplinary capacity building;	FP10 should put emphasis on early-stage researchers as they are the most vulnerable.

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Article 2 (2) (c) Operational objectives	(c) attract and retain excellent researchers in Europe;	(c) attract and retain excellent talent in Europe, by providing favourable conditions for research, innovation, and collaboration;	FP10 must contribute to improving research working conditions in order to help attract and retain research talents in Europe
Article 2 (2) (d) Operational objectives	(d) foster collaboration and multidisciplinary, including with Social Sciences and Humanities (SSH) to generate new knowledge;	(d) ensure foster effective collaboration across disciplines and sectors and multidisciplinary, including the systematic and comprehensive participation of with Social Sciences, Arts and Humanities (SSAH) perspectives to generate new knowledge, inform evidence-based policymaking, and address societal challenges;	Cross-disciplinary and – sectoral collaboration is larger than multidisciplinary. It is also important to highlight that SSAH integration contributes to more than knowledge generation.
Article 2 (2) NEW Operational objectives		(da) develop, where appropriate, mechanisms to monitor and assess the comprehensive integration of SSAH and interdisciplinarity across the Programme.	It is important to have transparent monitoring mechanism in place to assess that the European Commission comply with the horizontal principle of SSAH integration.
Article 2 (2) (e) Operational objectives	(e) enhance knowledge valorisation;	(e) enhance knowledge valorisation, ensuring the effective translation of research results into economic, social, cultural, and policy impact;	This amendment elaborates on knowledge valorisation and its aims

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Article 2 (2) (f) Operational objectives	(f) connect and develop research and technology infrastructures across the European Research Area (ERA) to provide transnational access;	(g) connect, and develop and strengthen research and technology infrastructures across the European Research Area (ERA), guaranteeing open and to provide transnational access;	It is important that FP10 also contributes to improving existing infrastructures.
Article 2 (2) (g) Operational objectives	(g) support the creation and scale-up of deep tech and innovative start-ups;	(h) support the development of innovations, including creation and scale-up of deep tech and social innovation. innovative start-ups.	FP10 should support all kinds of innovation, but place special attention to those that are aligned with its broader objectives.
Article 2 (2) (h) Operational objectives	(h) foster technology uptake and demonstration of disruptive innovation;	(h) foster technology uptake and demonstration of disruptive innovation;	These activities are out of the scope of FP10 and should be supported via the ECF
Article 2 (2) (i) Operational objectives	(i) increasing the participation of research organisation from the widening countries and transition countries referred to in Article 19 of Regulation XXX [reference to the Horizon Europe Regulation] ;	(i) (h) increasing the participation of research organisation from the widening countries and transition countries referred to in Article 19 of Regulation XXX [reference to the Horizon Europe Regulation] strengthening research excellence in Europe and the ERA as a whole;	It is essential to highlight that widening support contributes to Europe's scientific leadership and the development of the European Research Area
Article 2 (2) NEW Operational objectives		(hb) to promote equality, diversity and inclusion in all aspects of R&I with regard to age, disability, race and ethnicity, religion or belief, and sexual orientation, and strengthen	FP10 must ensure equality, diversity and inclusion across all aspects of research and innovation, enabling equitable participation regardless of

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		the gender dimension across the Specific Programme;	age, disability, race or ethnicity, religion or belief, or sexual orientation. In addition, FP10 should systematically strengthen the gender dimension in research content and processes to enhance the quality and relevance of Europe's R&I outcomes.
Article 2 (2) NEW Operational objectives		(hc) to strengthen international cooperation;	FP10 must be implemented such that it fosters international academic collaboration
Article 3 (1) Budget	1. In accordance with Article 6(1) of Regulation XXX [reference to the Horizon Europe Regulation], the indicative financial envelope for the implementation of the Specific Programme for the period 2028 to 2034 is set at be EUR 175 002 000 000 in current prices.	1. In accordance with Article 6(1) of Regulation XXX [reference to the Horizon Europe Regulation], the minimum indicative financial envelope for the implementation of the Specific Programme for the period 2028 to 2034 is set at be EUR 175 002 000 000 in current prices.	The budget amount put forward by the European Commission will fall short of the ambition to put R&I at the heart of Europe's economy. The increase compared to FP9 is modest, if the inflation rate is taken into account. Also, it is critical that Europe invests more in FP10 to attract and retain the researchers with the most promising ideas. The previous framework

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			programmes have already suffered from insufficient budget limiting their capacity to support all excellent proposals and ultimately affecting Europe's industrial competitiveness and societal resilience. For these reasons, it is important to specify that the proposed amount is a minimum and that it can be increased by additional resources.
Article 4 (1) (e) Work programmes	(e) actions to which specific rules apply, in particular on ownership of results, valorisation and dissemination, transfer and licensing as well as access rights to results.	(e) actions to which specific rules apply, in particular on ownership of results , valorisation and dissemination, transfer and licensing as well as access rights to results , in accordance with national rules.	For the sake of simplification, it is essential that the rules for ownership and access rights stay the same over the time period of the framework programme and, in other words, do not change between work programmes. Flexibility in this regard may affect the capacities of universities to conduct the most appropriate knowledge valorisation activities and reduce the attractiveness of

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			FP10 to finance the most promising and innovative ideas.
Article 4 (2) Work programmes	The Commission shall adopt separate work programmes, by means of implementing acts, for the implementation of actions under the following components, as set out in Article 1(3): (a) the European Research Council (ERC), for which the draft work programme shall be established by the ERC Scientific Council under Article 7(9)(a)(ii), in accordance with Article 18(3). The Commission shall depart from the draft work programme established by the ERC Scientific Council only in accordance with Article 7(4), second subparagraph; in that case, the Commission shall adopt the work programme by means of an implementing act in accordance with Article 18(4); the	The Commission shall adopt separate work programmes, by means of implementing acts, for the implementation of actions under the following components, as set out in Article 1(3): (a) the European Research Council (ERC), for which the draft work programme shall be established by the ERC Scientific Council under Article 7(9)(a)(ii), in accordance with Article 18(3). The Commission shall depart from the draft work programme established by the ERC Scientific Council only in accordance with Article 7(4), second subparagraph; in that case, the Commission shall adopt the work programme by means of an implementing act in accordance with Article 18(4); the Commission shall duly motivate that;	In comparison with the instrument listed in (c), MSCA have distinct features that are essential for their effectiveness: their “focus on investigator-driven research founded exclusively on scientific excellence” (Article 9.1). Because of these specificities, MSCA should have their dedicated work programme. This would be in line with European Commission's efforts for simplification, as bundling MSCA with other instruments implies lengthy work programmes in FP9, because they need long annexes to account for MSCA specificities. Our proposed solution does not change the governance and comitology for MSCA.

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	Commission shall duly motivate that; (b)the European Innovation Council (EIC), for which the work programme shall be prepared following the advice of the EIC Board under Article 12(1)(b), in accordance with Article 18(4); (c)Marie Skłodowska-Curie Actions (MSCA), global societal challenges, EU Missions, New European Bauhaus Facility, innovation ecosystems, reforming and enhancing the European R&I system, research and technology infrastructures, widening participation and spreading excellence, in accordance with Article 18(4); (d)the JRC, for which the multi-annual work programme shall take into account the opinion provided by the Board of Governors of the JRC referred to	(ba) Marie Skłodowska-Curie Actions (MSCA) in accordance with Article 18(4); (bb) Collaborative research and innovation activities of the policy windows described in Chapters IV to VII of the European Competitiveness Fund. The work programme shall be prepared with the advice of the Strategic Stakeholders Board for Pillar II, composed of experts from universities, research performing organisations, industry and other stakeholders. The Commission shall adopt the work programme by means of an implementing act in accordance with Article 18(4). (b) the European Innovation Council (EIC), for which the work programme shall be prepared following the advice of the EIC Board under Article 12(1)(b), in accordance with Article 18(4);	The work programmes of the collaborative research and innovation activities of the ECF policy windows shall be prepared with the advice of a Stakeholders Strategic Board for Pillar II, composed of experts from universities, research performing organisations, industry and other R&I stakeholders, following the model of Expert Advisory Groups under FP7. The Pillar 2 work programmes must be adopted following the examination procedure in Regulation (EU) No 182/2011 to ensure co-design and co-ownership also with the European Commission and the EU Member States.

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	in Commission Decision 96/282/Euratom.	(c) Marie Skłodowska-Curie Actions (MSCA), Global societal challenges, EU Missions, New European Bauhaus Facility, innovation ecosystems, reforming and enhancing the European R&I system, research and technology infrastructures, widening participation and spreading excellence, in accordance with Article 18(4); (e) (d) the JRC, for which the multi-annual work programme shall take into account the opinion provided by the Board of Governors of the JRC referred to in Commission Decision 96/282/Euratom.	
Article 5 (1) (a) European Partnerships	1. European Partnerships shall follow a clear lifecycle approach, including their selection, implementation and monitoring, and transitioning out of Regulation XXX [reference to the Horizon Europe Regulation] on the basis of the following:	1. European Partnerships shall follow a clear lifecycle approach, including their selection, implementation and monitoring, and transitioning out of Regulation XXX [reference to the Horizon Europe Regulation] on the basis of the following: (a) European Partnerships shall be selected following a competitive, open, non-discriminatory, and	This amendment makes the “limited number of partnerships” approach, currently mentioned only in the recitals, a binding principle to help reduce fragmentation and administrative overhead. It also ensures that partnerships remain centred

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	(a) European Partnerships shall be selected following a competitive, open, non-discriminatory, and transparent procedure, on the basis of areas proposed by the Commission.	transparent procedure, on the basis of areas proposed by the Commission. The portfolio shall remain limited in number and strategically focused in research and innovation. All relevant stakeholders shall be consulted in the process of proposing new partnerships. 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:	on research and innovation, while activities focused on scale-up or standardisation should be addressed under the European Competitiveness Fund. Furthermore, by requiring consultation of all relevant stakeholders when proposing new partnerships, the amendment strengthens transparency, inclusiveness, and accountability. Given that partnerships represent substantial and long-term budgetary commitments, it is essential that experts from all sectors are involved from the outset.
Article 6 (4) European Research Council	The ERC President shall be appointed by the Commission following a transparent recruitment process involving an independent dedicated search committee. The recruitment process and the candidate selected shall have the approval	The ERC President shall be appointed by the Commission following a transparent recruitment process involving an independent dedicated search committee. The recruitment process and the candidate selected shall have the approval of the ERC Scientific Council. The term of office	It is in the Programme's best interest to maintain an ERC President with a strong and stable mandate, as is currently the case. This has contributed significantly to the ERC's success and international reputation.

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	of the ERC Scientific Council. The term of office of the ERC President shall be limited to two years, extendable once for up to two years.	of the ERC President shall be limited to two four years, extendable once for four additional years for up to two years. The ERC President shall reside in Brussels for the duration of the appointment and devote in principle at least 80% of their working time to ERC business. The ERC President shall be remunerated at a level commensurate with the Commission's top management and shall be provided by the ERC dedicated implementation structure with the necessary support to carry out his or her functions.	There is no reason to change what has proven valuable and works well. Preserving the longer mandate ensures continuity, attracts the very best candidates, and safeguards the ERC's standing as a world-leading research body. Reintroducing the complementary FP9 provisions is essential to make that mandate effective in practice. These operational conditions ensure that the ERC President can fully dedicate themselves to ERC business and remain accessible to the Commission, European Parliament, stakeholders, and staff, enabling consistent and effective strategic leadership.
Article 6 (6) European Research Council	The President shall be assisted by three Vice-Presidents chosen by the Scientific Council from among its members.	The President shall be assisted by three Vice-Presidents chosen by the Scientific Council from among its members.	The ERC Vice-President position must be reinforced to help them carry out their mandate in the interest of the ERC.

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		Support shall be provided to the three Vice-Presidents to ensure adequate local administrative assistance at their home institutes.	
Article 6 (7) European Research Council	The ERC shall operate according to its core principles which are scientific excellence, open science, autonomy, efficiency, effectiveness, transparency, accountability and research integrity, while respecting the corporate policies of the European Commission. It shall ensure continuity with ERC actions conducted under Council Decision (EU) 2021/764.	The ERC shall operate according to its core principles which are scientific excellence, open science, autonomy, efficiency, effectiveness, transparency, accountability and research integrity, while respecting the corporate policies of the European Commission. It shall ensure continuity with ERC actions conducted under Council Decision (EU) 2021/764.	It is unclear what the corporate policies consist of. Also, these seem very irrelevant for the ERC's missions, which do not allow for any policy steering.
Article 6 (8) European Research Council	Through its activities, the ERC shall support, in a bottom-up manner, frontier research carried out across all fields by principal investigators and their teams in competition at European level, including early-stage career researchers.	Through its activities, the ERC shall support, in a bottom-up manner, frontier research carried out across all fields by principal investigators and their teams in competition at European level, including early-stage career researchers. It shall develop simple and transparent procedures	A common rule book across the FP and the European Competitiveness Fund is a danger to the ability to implement the ERC actions according to the specific objectives of the programme. The authority of the Scientific Council to decide on simple and transparent implementation

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		tailored for the needs of frontier research, led by the ERC Scientific Council.	mechanisms suitable for the aims of the ERC should be strengthened.
Article 6 (10) European Research Council	The Commission shall ensure that the implementation of ERC actions is in accordance with the principles set out in paragraph 7 of this Article as well as with the overall strategy for the ERC, referred to in Article 7(4)(a), established by the ERC Scientific Council.	The Commission shall ensure that the implementation of ERC actions is in accordance with the principles set out in paragraphs 7 and 8 of this Article as well as with the overall strategy, procedures and positions of for the ERC, referred to in Article 7(4)(a), established by the ERC Scientific Council.	See rationale above
Article 7 (2) ERC Scientific Council	The term of office for members of the ERC Scientific Council shall be up to four years, extendable once by up to two years, based on a rotating system which shall ensure the continuity of the work of the ERC Scientific Council.	The term of office for members of the ERC Scientific Council shall be up to four years, extendable once for four additional by up to two years, based on a rotating system which shall ensure the continuity of the work of the ERC Scientific Council.	Considering the complexity and the multi-layered nature of the European research systems and the EU R&I policy, it is important to have an ERC Scientific Council with a mandate long enough to be able to navigate these complexities and defend the ERC and its model accordingly.
Article 7 (4) (b) ERC Scientific Council	(b) the draft work programme for the implementation of the ERC activities;	(b) the draft work programme for the implementation of the ERC activities;	The core mission of the ERC Scientific Council is to safeguard the ERC's focus on excellence and curiosity-

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			driven research. For this, it requires full autonomy in establishing the ERC work programmes.
Article 7 (4) (d) ERC Scientific Council	(c) its position on any matter which from a scientific perspective may enhance the achievements and impact of the ERC and the quality of the research carried out;	its position on any matter which from a scientific perspective may enhance the achievements and impact of the ERC and , the quality of the research carried out, and the implementation of ERC actions, including model documents, guidelines, IT systems, manuals, and instructions;	A common rule book across the FP and the European Competitiveness Fund is a danger to the ability to implement the ERC actions according to the specific objectives of the programme. The authority of the Scientific Council to decide on simple and transparent implementation mechanisms suitable for the aims of the ERC should be strengthened.
Article 7 (6) ERC Scientific Council	The ERC Scientific Council and the Commission shall meet at least twice a year to have a broad and timely exchange of views in the context of the development of the ERC's strategy and the Commission's policy making.	The ERC Scientific Council and the Commission shall meet at least twice a year to have a broad and timely exchange of views in the context of the development of the ERC's strategy and the Commission's policy making.	The Scientific Council already engages in regular and constructive exchanges with the European Commission while independently defining the ERC's strategy and Work Programme. Introducing formal coordination obligations could

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			unintentionally alter this balance by creating expectations of alignment with policy priorities. Preserving the Scientific Council's autonomy is essential to maintain the ERC's scientific integrity.
Article 7 (7) ERC Scientific Council	7. The ERC Scientific Council is the guarantor of the quality of the activity from the scientific perspective and has full authority over decisions on the type of research to be funded.	7. The ERC Scientific Council is the guarantor of the quality of the activity from the scientific perspective and has full authority over decisions on the type of research and grants schemes to be funded.	The ERC Scientific Council must also have full autonomy and authority in deciding on how – through which types of grants schemes – it allocates funding to the most promising and excellent ideas.
Article 7 (9) (a) (i) ERC Scientific Council	(a) as regards scientific strategy: i. establish the overall scientific strategy for the ERC, in the light of scientific opportunities and European scientific needs;	(a) as regards scientific strategy: i. establish the overall scientific strategy for the ERC, in the light of scientific opportunities and European scientific needs ;	The ERC's mission is to advance frontier research based on scientific excellence, not to respond to predefined "European scientific needs." The reference to such needs risks introducing political or thematic directionality into the Scientific Council's mandate, which could undermine the ERC's

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			independence and its focus on curiosity-driven research.
Article 8 (1) ERC dedicated implementation structure	The ERC dedicated implementation structure shall be responsible for the administrative implementation and execution of this component of the Specific Programme. It shall, in particular, implement the evaluation procedures, peer review and selection process in accordance with the strategy established by the ERC Scientific Council and shall ensure the financial and scientific management of the grants. The ERC dedicated implementation structure shall support the ERC Scientific Council in the conduct of all of its tasks as set out in Article 7 including the development of its scientific strategy, its monitoring of the operations and its review and assessment of the ERC's achievements as well as its	The ERC dedicated implementation structure shall be responsible for the administrative implementation and execution of this component of the Specific Programme. It shall, in particular, implement the evaluation procedures, peer review and selection process in accordance with the strategy established by the ERC Scientific Council and shall ensure the financial and scientific management of the grants. The ERC dedicated implementation structure shall support the ERC Scientific Council in the conduct of all of its tasks as set out in Article 7 including the development of its scientific strategy, its monitoring of the operations and its review and assessment of the ERC's achievements as well as its outreach and communications activities. The ERC dedicated implementation structure shall also provide access to	It is essential that the ERC dedicated implementation structure has the capacities, experience and expertise to support the implementation of ERC in full respect to its specificities. The staff of this structure must limit its intervention to the administrative aspects, leaving the scientific aspects to the ERC Scientific Council only.

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	outreach and communications activities. The ERC dedicated implementation structure shall also provide access to the necessary documents and data in its possession and keep the ERC Scientific Council informed of its activities. To ensure an effective liaison with the ERC dedicated implementation structure on strategy and operational matters, the leadership of the ERC Scientific Council and the Director of the ERC dedicated implementation structure shall hold regular coordination meetings.	the necessary documents and data in its possession and keep the ERC Scientific Council informed of its activities. To ensure an effective liaison with the ERC dedicated implementation structure on strategy and operational matters, the leadership of the ERC Scientific Council and the Director of the ERC dedicated implementation structure shall hold regular coordination meetings. The management of the ERC will be carried out by staff recruited for that purpose including, where necessary, officials from the Union institutions, and will cover only the real administrative needs in order to assure the stability and continuity necessary for an effective administration.	

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Article 8 (2) ERC dedicated implementation structure	The Commission shall ensure that the ERC dedicated implementation structure follows strictly, efficiently and with the necessary flexibility the objectives and requirements of the ERC alone. To fulfil its responsibilities as set out in Articles 6 and 7 and in this Article, in the context of its own responsibilities for budget execution, the Commission shall: (a) ensure the continuity and renewal of the ERC Scientific Council and provide support for a standing Identification Committee for the identification of future ERC Scientific Council members; (b) ensure the continuity of the ERC dedicated implementation structure and the delegation of tasks and responsibilities to it,	The Commission shall ensure that the ERC dedicated implementation structure follows strictly, efficiently and with the necessary flexibility the objectives and requirements of the ERC alone. To fulfil its responsibilities as set out in Articles 6 and 7 and in this Article, in the context of its own responsibilities for budget execution, the Commission shall: [...] (b) ensure the continuity of the ERC dedicated implementation structure and the delegation of tasks and responsibilities to it, taking into account the views of the ERC Scientific Council; following the guidance of the Scientific Council; [...] (d) appoint the Director and the members of the management of the ERC dedicated implementation structure, taking into account the views of following a transparent and non-discriminatory selection procedure agreed with the ERC Scientific Council;	The amendment strengthens the role of the ERC Scientific Council by requiring the Commission to act in line with its guidance, thereby safeguarding the independence of the ERC and ensuring that strategic decisions reflect its scientific leadership. They also urge the European Commission to regularly involve the Member States representatives in order to keep them informed on the ERC implementation and on any issues that may raise. For point (d) It is essential that the ERC dedicated implementation structure has the capacities, experience and expertise to support the implementation of ERC in full respect to its specificities.

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	taking into account the views of the ERC Scientific Council; (c) ensure that the ERC dedicated implementation structure carries out the full range of its tasks and responsibilities; (d) appoint the Director and the members of the management of the ERC dedicated implementation structure, taking into account the views of the ERC Scientific Council; (e) ensure the timely adoption of the ERC work programme, the positions regarding implementing methodology and the necessary implementing rules including the ERC rules of submission and the ERC model grant agreement, taking into account the views of the ERC Scientific Council and the Commission's corporate policies implemented	(e) ensure the timely adoption of the ERC work programme, the positions regarding implementing methodology and the necessary implementing rules including the ERC rules of submission and the ERC model grant agreement, taking into account the views of the ERC Scientific Council and the Commission's corporate policies implemented through the Specific Programme; [...] (g) regularly and in a timely manner inform and consult the Programme Committee on the implementation of the ERC activities;	

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	through the Specific Programme; (f) monitor, as responsible for the overall implementation of the Programme, the ERC dedicated implementation structure and evaluate its performance.		
Article 9 (1) Marie Skłodowska-Curie Actions	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.	1. The Marie Skłodowska-Curie Actions (MSCA) shall focus on investigator-driven research founded exclusively on scientific excellence to support research careers, skills development, and mobility, with particular emphasis on early career researchers, while remaining open to at all career stages.	The focus of the MSCA programme should be (and must remain) on early career researchers. (See FP10 regulation art.13.1)
Article 9 (2) Marie Skłodowska-Curie Actions	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,	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	Introducing directionality into MSCA would undermine its core bottom-up character, which is central to its success as an internationally esteemed reference programme for research talent acquisition and training. MSCA is one of the Union's

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	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.	the evolving requirements and needs of the Union regarding skills, research training, career development and knowledge sharing, in pursuit of the Union strategic autonomy.	most sought-after programmes and has proven to be an excellent incubator for bottom-up novel ideas and consecutive innovations, precisely because of its open, curiosity-driven approach. As such directionality is not only unnecessary but could also be detrimental to its appeal and capacity to support the very best of early career Researchers.
Article 9 (3) (a) Marie Skłodowska-Curie Actions	The implementation of the MSCA shall: 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.	The implementation of the MSCA shall: (a) offer attractive conditions and opportunities for career progression, especially for early career researchers , 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.	The MSCA has traditionally been the EU's main instrument to support early-stage researchers. Hence our recommendation to put a particular emphasis on early-career researchers in the additional text.

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Article 9 (3) (b) Marie Skłodowska-Curie Actions	The implementation of the MSCA shall: [...] 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+;	b) promote ensure strategic synergies with the European Research Council (ERC) and with Union instruments that foster innovation, such as the European Innovation Council (EIC), as well as with activities to foster integration of the knowledge triangle – higher education, research and innovation, and business – across the Union, and with other Union programmes such as Erasmus+, while preserving the MSCA's core bottom-up nature ;	The synergies will first need to be defined. It is then important that it is not only MSCA seeking synergies. The efforts should come from all instruments, while safeguarding the specificities of each of them. This means for MSCA to not alter its bottom-up nature.
Article 11 (b) (iii) Collaborative research	(iii) activities in the context of the New European Bauhaus (NEB) Facility, established with the Horizon Europe Strategic Plan 2025-2027 ⁸ , 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	(iii) research and innovation activities in the context of the New European Bauhaus (NEB) Facility, established with the Horizon Europe Strategic Plan 2025-2027 ⁸ , 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.	Only research and innovation activities should be funded under FP10. Other NEB-related initiatives should be supported through separate programmes or parts of the MFF. Within Pillar 2 activities should focus on research and innovation solution but not on the scale up dimension of it.

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	sustainable, inclusive and beautiful places.		
Article 11a (new article) - Strategic Stakeholders Board for Pillar II		1. A Strategic Stakeholders Board for Pillar II is established. 2. It shall provide advice on the overall direction for Pillar II of Horizon Europe, advice on long-term R&I trends in the areas covered by the Pillar, and where necessary, aim at ensuring coherence and complementarity with relevant Union initiatives and instruments, including the European Competitiveness Fund. 3. The Strategic Stakeholders Board is composed of members with recognised experience and expertise in research and innovation, including experts from universities, research performing organisations, and public and private R&I stakeholders.	The creation of a Stakeholders Board for Pillar II of the Framework Programme will ensure that strategic guidance for the collaborative research and innovation activities under Competitiveness and Society components of Pillar II are informed by scientific excellence and R&I expertise. While the ECF Strategic Stakeholder Board will provide advice at the level of the European Competitiveness Fund, its composition and mandate are expected to reflect broader industrial and economic policy perspectives. A dedicated Pillar II board will bring together experts from the research and innovation community to advise on the specific objectives, implementation, and

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		4. The members of the Strategic Stakeholders Board shall be appointed by the Commission, following an open call for nominations or for expressions of interest, or both, taking into account the need for a balanced representation in terms of sector, organisation type, including academia and private sector, size, expertise, gender, age, and geographical distribution. 5. Their term of office shall be limited to four years, renewable once for four additional years. 6. The Commission shall establish detailed rules on selection and composition, remuneration, rules of procedure, conflicts of interest and confidentiality for the Strategic Stakeholders Board. Members shall be bound by these terms.	direction of the research programme. This structure will help maintain the integrity of the Pillar II and its excellence-driven focus, while promoting effective coordination, interdisciplinarity and regular exchanges between both boards to ensure overall coherence between industrial policy and research and innovation policy within the MFF.

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		7. The Commission shall ensure that the advice provided by the Strategic Stakeholders Board is duly considered in the preparation and revision of work programmes of Horizon Europe. The Commission shall regularly report to the European Parliament and the Council on how its recommendations have been taken into account. 8. The Board shall regularly engage with the ECF Strategic Stakeholders Board to exchange views and ensure coordination of activities where appropriate.	
Article 12 (2) (c) The European Innovation Council Board	(c) programming in other parts of the Specific Programme.	(c) programming in other parts of the Specific Programme.	FP10 relies on the sensible mix of different instruments/ Each of them has their own rationales, target groups and objectives, so that they are not substitutable. The EIC Board was established to advise on the EIC, but it has

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			no expertise nor legitimacy to intervene in the programming of other instruments. We fully support the search for greater synergies within the framework programme, however, these synergies should not be sought at the detriment of the specificities of each instrument. Therefore, it does not make any sense to give the EIC Board the power to intervene in the programming of any other instrument than the EIC. Synergies must respect these idiosyncrasies.
Article 12 (4) The European Innovation Council Board	4. The EIC Board shall be composed of 15 to 20 independent high-level individuals drawn from various parts of Europe's innovation ecosystem, including entrepreneurs, corporate leaders, investors, innovation experts and innovative researchers and technology	4. The EIC Board shall be composed of 15 to 20 independent high-level individuals drawn from various parts of Europe's innovation ecosystem, including entrepreneurs, corporate leaders, investors, innovation experts and innovative researchers and technology transfer knowledge valorisation experts. The EIC Board shall contribute to outreach actions	We recommend better specifying the profiles of the EIC Board members. The concept of 'innovative researchers' is misleading, as it may be interpreted as meaning that some researchers are not innovative, whereas all research is. Also, it is

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	transfer experts. The EIC Board shall contribute to outreach actions and its members shall strive to enhance the prestige of the EIC brand.	and its members shall strive to enhance the prestige of the EIC brand.	essential that the EIC remains open to a large scope of researchers to be as comprehensive as possible in terms of innovation. Furthermore, we suggest aligning this article with the new focus in EU R&I policy on knowledge valorisation, which includes technology transfer and many other activities that can result in generating impacts from research outcomes.
Article 12 (5)	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.	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 representation of the different parts of the innovation ecosystem.	All parts of the innovation ecosystem, including universities and businesses, should be appropriately represented and have the opportunity to contribute to the work of the EIC Board in a balanced manner.
Article 12 (6) The European Innovation Council Board	6. Their term of office shall be limited to two years, renewable twice.	6. Their term of office shall be limited to two four years, renewable twice once for four additional years.	Given the complexity of the EU innovation ecosystem, EIC Board members also require a longer mandate to effectively

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			contribute to the EIC's strategic direction and ensure continuity in governance. Extending their term strengthens the Board's capacity for long-term planning and aligns the mandate with that of the EIC Board President and the ERC President and Scientific Council members, ensuring coherence across the Programme's leadership structures.
Article 12 (7) The European Innovation Council Board	7. The EIC Board shall have a President who shall be a high-profile public figure linked to the world of innovation, with a solid understanding of developing innovations from research to market and scale-up.	The EIC Board shall have a President who shall be a high-profile public figure linked to the world of innovation, with a solid understanding of developing innovations from research to market and scale-up the full knowledge continuum, from frontier research to the development and scale up of innovations.	In order to be able to maximise the impact of research results, the EIC Board must leverage expertise of the full research and innovation consortium. The EIC will provide the most appropriate support, if it complements research support and addresses the needs of researchers willing to further develop their ideas.

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Article 12 (8) The European Innovation Council Board	8. The EIC Board President shall have the status of an independent special adviser and shall be appointed by the Commission following a transparent recruitment process. The term of office of the EIC Board President shall be limited to a maximum of two years, extendable once for up to 2 years.	The EIC Board President shall have the status of an independent special adviser and shall be appointed by the Commission following a transparent recruitment process. The term of office of the EIC Board President shall be limited to a maximum of two four years, extendable once for up to 2 years four additional years .	Given the complexity of the EU innovation ecosystem, the EIC Board President requires a longer mandate to effectively fulfil their strategic and leadership responsibilities. Extending the term to four years, renewable once, ensures continuity, strengthens the EIC's governance. Moreover, this would align the mandate with that of the ERC President, ensuring coherence across the Programme's leadership structures.
Article 13 - Innovation Ecosystems	The Specific Programme shall support: [...] (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,	The Specific Programme shall support: [...] (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 global investor networks, regulatory guidance,	The activities described in the proposed Article 13 (c) go beyond the scope of R&I activities and focus instead of scale-up and further market development. For this reason, these should be funded instead by the ECF.

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	tailored mentorship, access to global investor networks, regulatory guidance, localized marketing support, and soft-landing services in target countries; (d) other actions to support the development of innovation ecosystems and connectivity including studies, benchmarking, mutual learning between innovation actors and coordination of innovation policies.	localized marketing support, and soft-landing services in target countries; (d) (c) other actions to support the development of innovation ecosystems and connectivity including studies, benchmarking, mutual learning between innovation actors and coordination of innovation policies.	
Article 16 (1) - Research infrastructures	1. The Specific Programme shall support the construction, development and integration of research infrastructures of European Union interest.	1. The Specific Programme shall support the construction , development and integration of research infrastructures of European Union interest with the primary purpose of pursuing scientific excellence and enabling frontier research.	Support for infrastructures under FP10 must directly aim at the creation of excellent knowledge and the development of promising technologies. Otherwise, support for infrastructure to achieve other objectives (other than excellent R&I) must be provided by the European Competitiveness Fund, the regional development fund and others.

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Article 16 (2) - Research infrastructures	2. Research infrastructures activities shall focus on: (a) 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; [...]	2. Research infrastructures activities shall focus on: (a) 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; [...]	See Regulation's Article 18 (2) rationale.
Article 16 (2) - Research infrastructure	2. Research infrastructures activities shall focus on: [...] (b) reinforcing transnational access to research infrastructures across domains and sectors, and adapting to new emerging user communities; [...]	2. Research infrastructures activities shall focus on: [...] (b) reinforcing transnational access to research infrastructures across domains and sectors, and adapting to new emerging user communities through flexible and simplified implementation; [...]	P10, Specific Programme, Art. 2.2(f) sets as an objective to “ <i>connect and develop research and technology infrastructures across the European Research Area (ERA) to provide transnational access.</i> ” While in favor of the principle of transnational access, the current implementation is too inflexible and burdensome. Therefore, it is suggested to add: “through flexible and simplified implementation”.

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Article 18 (2) - Committee procedure	2. The committee may convene in the following configurations, having regard to the subject matter to be discussed: • General configuration: overview of the implementation of the Specific Programme; • ERC; • MSCA; • Global societal challenges, EU Missions, New European Bauhaus Facility; • EIC and innovation ecosystems; • Research and technology infrastructures; • Reforming and enhancing the European R&I system and widening participation and spreading excellence.	2. The committee may convene in the following configurations, having regard to the subject matter to be discussed: • General configuration: overview of the implementation of the Specific Programme; • ERC; • MSCA; • Collaborative research and innovation activities of each of the ECF policy windows; • Global societal challenges, EU Missions, New European Bauhaus Facility; • EIC and innovation ecosystems; • Research and technology infrastructures; • Reforming and enhancing the European R&I system and widening participation and spreading excellence.	This addition aligns the committee configurations with the structural changes introduced in the Regulation, ensuring that the governance framework reflects the integration of the ECF and its four policy windows. Including an addition dedicated to collaborative research and innovation activities of the ECF policy windows ensures consistency and effective coordination across the Programme's implementation.