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COVER NOTE

From: European Economic and Social Committee
date of receipt: 9 December 2025
To: General Secretariat of the Council

Subject: Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on establishing the European Competitiveness Fund ('ECF'), including the specific programme for defence research and innovation activities, repealing Regulations (EU) 2021/522, (EU) 2021/694, (EU) 2021/697, (EU) 2021/783, and amending Regulations (EU) 2021/696, (EU) 2023/588, (EU) [EDIP]
- *Opinion of the European Economic and Social Committee*

Delegations will find attached the opinion adopted by the European Economic and Social Committee on the above proposal.

16636/25

COMPET.1

EN

Other language versions, if needed, will soon be available on the following website: [DM Search v4.6.0 \(europa.eu\)](#).



OPINION

European Economic and Social Committee

Competitiveness fund

Proposal for a Regulation of the European Parliament and of the Council on establishing the European Competitiveness Fund ('ECF'), including the specific programme for defence research and innovation activities, repealing Regulations (EU) 2021/522, (EU) 2021/694, (EU) 2021/697, (EU) 2021/783, repealing provisions of Regulations (EU) 2021/696, (EU) 2023/588, and amending Regulation (EU) [EDIP] (COM(2025) 555 final - 2025/0555 (COD))

INT/1101

Rapporteur: **Milena ANGELOVA**

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| Advisor | Tellervo KYLÄ-HARAKKA-RUONALA (to the rapporteur) |
| Legislative procedure | EU Law Tracker |
| Referral | European Parliament, 12/11/2025 Council of the European Union, 22/9/2025 |
| Legal basis | Articles 43(2), 168(5), 172, 173(3), 175, 182(4), 188, 192(1) and 194(2) of the Treaty on the Functioning of the European Union |
| European Commission documents | COM(2025) 555 final - 2025/0555 (COD) European Competitiveness Fund |
| Relevant Sustainable Development Goals (SDGs) | SDG 8 Decent work and economic growth SDG 9 Industry, innovation and infrastructure SDG 12 Responsible consumption and production SDG 13 Climate action |
| Section responsible | Single Market, Production and Consumption |
| Adopted in section | 14/11/2025 |
| Adopted at plenary session | 3/12/2025 |
| Plenary session No | 601 |
| Outcome of vote (for/against/abstentions) | 197/0/2 |

1. RECOMMENDATIONS

The European Economic and Social Committee (EESC)

- 1.1 **welcomes** the proposed introduction of a European Competitiveness Fund (ECF) as part of the new multiannual financial framework (MFF) and highlights its role as an enabler for many other objectives of the EU, amplified by the synergies with other funds; suggests that the ECF be named the Competitiveness and Security Fund (security in the broadest sense of the meaning), given that a considerable share of the fund is devoted to security and that there are multiple links between competitiveness and the various dimensions of security;
- 1.2 **appreciates** the outcome-oriented and integrative approach of combining several existing programmes into four *policy windows* covering the main common challenges, but calls for proper recognition of the connections and a balance between the windows themselves, to be able to respond to the polycrisis, long-term transformations and rapidly emerging challenges;
- 1.3 **calls for** the definition of transparent *general award criteria* that are common to all windows, stemming from the objective of competitiveness and emphasising excellence, future orientation and economic potential as the leading criteria, to be accompanied by window-specific criteria in line with the expected outcome in the thematic area, while respecting the EU's social market economy model and overall sustainability, including full compliance with existing social and environmental legislation;
- 1.4 **believes** that it is useful to provide *specific and targeted* funding to activities and actors with a crucial role in improving competitiveness and resilience, but calls for clear selection criteria to ensure transparency and sound competition, and highlights the need to avoid distorting the market by picking winners in terms of technologies, companies and value chains, or deepening the disparities between the Member States (MSs); calls for due support for projects of local and regional importance too, particularly in order to respond to security threats faced by the EU's border countries (those bordering Russia and Belarus by land and sea, as well as Greece and Cyprus); calls for dedicated funding to tackle water-related challenges as advocated in the EESC Blue Deal Declaration¹. Strategic investments in water resilience will result in better preparedness and increased competitiveness;
- 1.5 **considers** it crucial to address the needs of all *investment stages* – from research and innovation to upscaling business – in an integrated way, allocating specific funding for investing in worker qualifications and training and promoting decent work; advocates encouraging cross-border innovation and business ecosystems and moving towards equal accessibility to the single market and European value chains from all over the EU;
- 1.6 **supports** the ECF's aim of enhancing its impact by catalysing investment from private and institutional investors, and of increasing flexibility and pooling in the use of *funding tools*, yet encourages the introduction of more ways to mobilise capital (e.g. through market referenda),

¹ Principle 12 of the EESC Blue Deal Declaration (October 2023).

while ensuring that support measures are predictable and relevant from the point of view of beneficiaries;

- 1.7 **welcomes** the attention devoted to the general financial and advisory needs of *SMEs* and small mid-caps and to the specific challenges of start-ups and scale-ups in accessing equity and venture capital, but calls for the creation of a network of ‘financial and funding ombudsmen’ and more precise segmenting of *SMEs* to better address the needs of each segment, in close cooperation with *SME* networks and organisations²; suggests that *SME* support schemes be structured at MS level;
- 1.8 **highlights** the need to allow all beneficiaries to benefit from *simplification* evenly and to embed it into all the elements of the ECF, extending from the overall architecture to work programmes and application and award procedures, including a clear connection between application forms and the assessment grid and scoring, supported by robust digital systems and infrastructure;
- 1.9 **deems** it necessary to *facilitate the implementation* of the ECF by means of communication and capacity building, cooperation and joint actions among social partners and a streamlined monitoring framework, emphasising compliance with sustainability rules; calls for clear definitions for the key concepts and explicit and transparent descriptions of the procedures, in order to enable both potential beneficiaries and decision-makers to operate effectively;
- 1.10 **calls for** clear *governance* and proper involvement of the social partners and other civil society actors at EU, national, sectoral and regional level in the preparation, implementation and monitoring of the ECF, and asks for the EESC to be given appropriate membership in the Strategic Stakeholders Board.

2. EXPLANATORY NOTES

Horizontal arguments

- 2.1 The overarching approach of the ECF – to strive for prosperity by enhancing competitiveness, successful and sustainable business and a strong and resilient economy – is highly laudable, as it makes it possible to respond to common EU challenges. Funding is thus rightly aimed at enhancing innovation, skills, technological capacity and overall productivity, as well as access to resources, market uptake and upscaling, but it should also target clean technology value chains where the EU can develop comparative advantages. In this regard, the EESC stresses the urgent need for targeted funding to strengthen resilience, ensure security of supply and reduce external dependencies in critical raw materials, which are essential for Europe’s industrial and economic security. This focus must be strictly and consistently maintained in the allocation of funding throughout the ECF. Furthermore, the ECF must be accompanied by private funding and an overall operating environment that encourages innovation, investment and trading.

²

[OJ C 486, 21.12.2022, p.1, pt. 1.1, pt. 2.12](#); [OJ C 194, 12.5.2022, p. 7, pt. 4.5](#); [OJ C 429, 11.12.2020, p. 210](#), pt. 2.2; OJ C, C/2025/3189, 2.7.2025, ELI: <http://data.europa.eu/eli/C/2025/3189/oj>; OJ C, C/2025/4212, 20.8.2025, ELI: <http://data.europa.eu/eli/C/2025/4212/oj>, pt. 3.2.1.

- 2.2 Competitiveness must be developed in a sustainable manner, i.e. by coupling economic, social and environmental aspects. The Letta report rightly argues that the effectiveness and acceptability of State aid instruments rely on using public funds strategically in order to achieve common policy objectives.
- 2.3 As the single market is a foundation of the EU's competitiveness and economic security, and given that the ECF is a next-generation support instrument that is designed for a fluid and operational single market, unnecessary market barriers that still exist need to be identified and removed through a process involving the social partners³ to enable the smooth utilisation of the Fund.
- 2.4 Cooperation with foreign partners is an element of both economic and overall security. However, particular caution needs to be exercised when opening up the ECF to third countries' enterprises and investment projects, with such access being strictly anchored in partnership agreements and proportional to their contributions, to safeguard the interests of the EU. For the same reason, the requirement for beneficiaries to refrain from relocating abroad (Article 10, EU Preference) is welcome. Moreover, the ECF should not be used to finance any protectionist measures of other economies⁴.

Arguments for 1.1 (Fund)

- 2.5 The proposed establishment of the ECF to enhance competitiveness is highly welcome, considering that competitiveness contributes to achieving many other objectives such as quality job creation, provision of services of general interest (in particular, sustainable and affordable energy, water and housing) and upward convergence and cohesion, as well as overall sustainable growth across the EU. The central role of the ECF therefore must be recognised when allocating the MFF.
- 2.6 The ECF resources would be about a fifth of the total MFF budget and about half of the new national and regional partnering fund dedicated to cohesion and agriculture⁵. Moreover, a significant proportion of the ECF would be allocated to security, which would justify naming it a Competitiveness and Security Fund. The EESC underlines that comprehensive security encompasses several dimensions, including not only defence capacity but also civil, industrial and societal preparedness, the many facets of economic security, as well as social, health, food and environmental security.
- 2.7 It is also important to increase policy coherence and boost synergies between various funds. For example, national and regional infrastructure partnerships, as well as international economic partnerships, are crucial for both competitiveness and security. The EESC's proposal for a Blue

³ EESC opinion on '[Single Market Strategy](#)' (not yet published in the Official Journal); EESC opinion on '[Strengthening enforcement of Single Market Rules: revision of current tools and framework](#)' (not yet published in the Official Journal); OJ C, C/2025/2004, 30.4.2025, ELI: <http://data.europa.eu/eli/C/2025/2004/oj>.

⁴ For example, to pay for the commitments to buy LNG and chips from the US.

⁵ https://commission.europa.eu/topics/budget/eu-budget-2028-2034-explained_en, https://commission.europa.eu/publications/multiannual-financial-framework_en.

Deal Transition Fund⁶ could also help achieve this objective by providing a single thematic access point for different types of financing towards a water-resilient economy, covering skills, research and the uptake of water-efficient technologies to foster Europe's water security and competitiveness. This would contribute to developing a water-smart economy across Europe, where sustainable water use, innovation and investment underpin industrial strength, environmental protection and social well-being.

Arguments for 1.2 (policy windows)

- 2.8 The proposed outcome-oriented and integrative architecture, accompanied by simplification, is a useful approach to decreasing fragmentation and improving effectiveness. The four focus areas, or 'windows', which combine several current programmes, are well structured and address topical common challenges, from the clean and digital transitions, through health and bio economy, to space and defence issues.
- 2.9 However, the windows themselves seem to be primarily considered as silos, with detailed descriptions of the activities to be supported under each window, which may blur, for example the economy-wide potential of deep technologies and of dual-use infrastructure, technologies and products. An integrative cross-window approach is necessary to make sure that the main focus is maintained and that predictability for beneficiaries is safeguarded, making it possible to respond to the polycrisis, long-term transformational challenges and rapidly changing situations and needs.

Arguments for 1.3 (award criteria)

- 2.10 While the ECF proposal refers to award criteria sporadically under various topics, it should also define common criteria to guide the allocation of funding in all thematic areas, in order to ensure consistency throughout various funding decisions. Common award criteria should stem from the ECF's objective of improving competitiveness and therefore emphasise excellence, future orientation and economic potential as the leading criteria, while window-specific criteria would refer to the outcome to be expected in the window's thematic area. At the same time, the ultimate purpose of competitiveness, i.e. improving quality of life, must be fully respected.
- 2.11 The proposal should also be accompanied by methodological guidance on how the contribution to the EU's overall competitiveness is to be evaluated. Clear and relevant award criteria, together with well-defined assessment and scoring methodologies, are cornerstones of predictability and transparency, which are crucial for potential beneficiaries.

Arguments for 1.4 (specific targeting)

- 2.12 In addition to lacking general award criteria, the proposal includes several ambiguous characterisations of specific support targets. The absence of clear criteria opens space for arbitrary decisions and favours lobbying-based advantages. On the other hand, it is important to avoid 'picking the winners' and classifying businesses and sectors in a way that leads to distortions in

⁶ Actions 14 and 15 of the EESC Blue Deal Declaration (October 2023).

competition and the functioning of the market. The ECF should thus be guided by the principle of moving towards a level playing field across the EU and between economic actors.

- 2.13 While the proposals on the single market value chain builders (Article 16) and EU tech frontrunners (Article 17) are welcome, it is unclear how they would be selected and how the State aid rules would be applied to their funding. The process for selecting production ramp up actions (Article 18) for support is also unclear, as is how symmetrical opportunities will be guaranteed in all MSs. Moreover, the mechanism for Accelerated and Targeted Actions for Competitiveness (Article 20) has the potential to result in biased and risky decisions in the absence of a clear assessment methodology.
- 2.14 The top ups for Important Projects of Common European Interest (Article 19) provide a good tool for ensuring that the MSs have equal opportunities to participate and to promote cooperation and synergy between them⁷, in order to avoid undermining certain MSs as is the case with some current EU programmes⁸. They can be combined with a market referendum requirement – an obligation for an applicant to mobilise a certain share of private funding on financial/capital markets to be eligible for EU topping up.
- 2.15 It is essential to take into account regional disparities and promote convergence by supporting projects of local and regional importance, not only large, centralised initiatives. Additional funding should be specifically directed to the EU's border countries that face military and non-military threats, in order to strengthen their economic, social and security resilience.
- 2.16 When it comes to the participation of third parties and third countries, it is crucial to have consensus about the selection criteria and a common risk assessment mechanism to prevent mistakes and losses and keep a clear focus on promoting European competitiveness.
- 2.17 The EESC reiterates its call for action to boost water resilience under the Blue Deal as a key enabling resource for competitiveness, and considers water to be a strategic priority⁹ for funding, which needs to be reflected in the Competitiveness Fund.

Arguments for 1.5 (investment stages)

- 2.18 Given that 'the investment journey is not linear as all stages feed each other'¹⁰, it is necessary to take an integrative approach that considers the needs of all the investment stages, from research and innovation to full-scale business. Specific attention should be paid to the 'mediating' stages, such as setting up technology infrastructure to facilitate the testing and piloting of new technologies and, at a later stage, mobilising capital to enable the upscaling of business.

⁷ COM(2025) 555 final – 2025/0555 (COD), recitals (70), (73) and (77).

⁸ OJ C, C/2024/6874, 28.11.2024, ELI: <http://data.europa.eu/eli/C/2024/6874/oj>; OJ C 62, 15.2.2019, p. 33, OJ C 34, 2.2.2017, p. 66.

⁹ Principle 12 of the EESC Blue Deal Declaration (October 2023) and Initiative for water resilience (September 2025).

¹⁰ COM(2025) 555 final – 2025/0555 (COD), recital (4).

- 2.19 Investment in the development of skills and competences must be aligned accordingly, from the promotion of top talent to dedicated support for the upskilling and reskilling of workers, promoting vocational education and training and lifelong learning, taking into account not only current but also future labour market needs. This is crucial for responding to the changing needs of labour markets and coping with major transformations. A ring-fenced amount of ECF funding should be allocated to social investments such as reskilling and upskilling workers and adapting their competences, provided that these instruments are jointly managed by the social partners.
- 2.20 The special attention devoted to the ‘collaboration between small and large companies, universities, research institutions, [and] infrastructure providers’¹¹ is welcome. To make full use of the EU’s potential, the ECF should encourage the creation of cross-border innovation partnerships and European business ecosystems and value chains that comprise diverse businesses in different locations. On top of investment in high-level innovation infrastructure, this calls for investment in physical infrastructure and for equal accessibility to the single market, even from distant areas, including by providing targeted support for additional transport costs and giving bonus evaluation points, to help re-shore value chains within the EU.

Arguments for 1.6 (funding tools)

- 2.21 The ECF strives to amplify its impact by catalysing private and institutional capital. This is crucial, given the huge investment needs in all the thematic areas of the ECF. In this context, it would be useful to introduce various ways of mobilising capital, including linking the funding from the ECF to the funding raised on financial/capital markets by the applicant’s proposal (market referendum). The mobilisation of private and institutional capital flows also contributes to integrating the capital markets and creating a Savings and Investment Union. The role of business organisations in facilitating the process is important.
- 2.22 The ECF covers a wide range of financial tools, and it aims to facilitate the most suitable funding for each case, through pooling and increased flexibility. While more flexibility in the use of funding tools is welcome, beneficiaries should have a greater say in choosing the final funding recipe to ensure that it fits with their actual needs. This requires more agile, interactive and open decision-making processes. Seamless cooperation, synergy and demarcation between the ECF and related, self-standing funds are also imperative.

Arguments for 1.7 (SMEs)

- 2.23 While the proposed ECF would not include a specific SME funding line, all windows and the ECF InvestEU Instrument refer to SMEs, start-ups and scale-ups, and the ECF also includes SME services. It is, however, the implementation that determines how well the needs of these enterprises will be met. Therefore, it is important to anchor the SME promotion schemes at MS level.

¹¹ [COM\(2025\) 555 final – 2025/0555 \(COD\), recital \(5\)](#).

- 2.24 The special attention devoted to SMEs¹² and further inclusion of small mid-caps is positive as a general approach, but better and more precise segmentation is needed to respond to the specific needs of each segment of SMEs¹³.
- 2.25 The dynamism and rapid growth of start-ups and scale-ups is accompanied by several challenges in accessing resources, not least in terms of equity and venture capital. The specific measures to encourage these enterprises to stay in the EU and upscale here are important for the overall development of productivity and growth.
- 2.26 To better protect SME interests in access to funding, a network of ‘financial and funding ombudsmen’ should be created in MSs, accompanied by EU-level coordination. The project advisory (Article 26) needs to be designed in close cooperation with the SME Envoy network and the representative SME organisations, at both EU and national level. In this context, it is not clear what kind of added value the creation of a new ‘EU for Business Network’ would offer over the abovementioned players.

Arguments for 1.8 (simplification)

- 2.27 While the merging of several programmes contributes to the simplification of the funding processes, it is also important to embed simplification as a main principle into the design of any elements of the ECF. For example, simplification should ensure that the content of work programmes is unambiguous and that procedures and documents are streamlined at all stages of funding, from application to award. A clear connection should also be established between the application forms and the assessment grid, including the possibility of calculating the scores. Robust digital systems and infrastructure are needed to support simplification efforts and mitigate language differences.
- 2.28 The introduction of a single rulebook significantly relieves the burden on applicants, but it also creates a risk of multiplying errors, if it is not designed properly in line with the different needs and situations of the potential beneficiaries. The rulebook should therefore be drawn up in close cooperation and consultation with the relevant stakeholders and representative SME and other business organisations at EU and national level.
- 2.29 Instead of only ‘simplify[ing] and accelerat[ing] the implementation of Union support for certain important projects’¹⁴, simplification should be applied to all eligible projects, thereby avoiding uneven treatment of beneficiaries.

Arguments for 1.9 (facilitating implementation)

- 2.30 To ensure that the implementation of the ECF is smooth, effective and inclusive, it must be supported by awareness-raising and communication on the opportunities it offers and on the

¹² [COM\(2025\) 555 final – 2025/0555 \(COD\) recitals \(78\)–\(82\)](#).

¹³ [OJ C 486, 21.12.2022, p.1](#), pt. 1.1, pt. 2.12; [OJ C 194, 12.5.2022, p. 7](#), pt. 4.5; [OJ C 429, 11.12.2020, p. 210](#), pt. 2.2; [OJ C, C/2025/4212, 20.8.2025, ELI: <http://data.europa.eu/eli/C/2025/4212/oj>](#), pt. 3.2.1.

¹⁴ [COM\(2025\) 555 final – 2025/0555 \(COD\), recital \(66\)](#).

criteria to be used, as well as by capacity-building of MSs and stakeholders to enable them to navigate the funding procedures. Moreover, the EESC welcomes the fact that the ECF regulation states that recipients of ECF funding must provide retention and employment guarantees by not relocating all or part of their business to third countries for five years. Access to funding under the ECF should be linked to innovation, but also to social and environmental objectives and incentives for companies to respect collective agreements signed by the most representative social partners according to national labour law and practice and comply with relevant labour and social regulation.

- 2.31 While it is important to monitor and evaluate the effectiveness and impact of the ECF, it is also necessary to keep the indicators and processes streamlined and align them with existing monitoring and reporting frameworks with a view to striving for high social performance. The Corporate Sustainability Reporting Directive and related ESRS standards provide a relevant framework for making companies' overall sustainability performance transparent.
- 2.32 Proper definitions are also crucial for the development, implementation and evaluation of the ECF. However, the proposal lacks definitions for many key concepts, and the definitions included in the proposal (Article 2) are not quite clear and leave room for subjective interpretation. This applies, for example, to 'imperative public interest' and 'investment journey'.
- 2.33 In addition to clarifying the meaning of key concepts, it is necessary to explain further how they are used in the course of funding processes. While the ECF would support 'certain actions of strategic and economic importance'¹⁵, more clarity is needed on how such actions are deemed eligible, bearing in mind the long list of acts that guide such decisions. The same concerns apply to those cases where 'certain check should be conducted only after the provision of funding'¹⁶ and for the 'inducement intervention mechanism'¹⁷.

Arguments in support of recommendation 1.10 (governance)

- 2.34 Relevant stakeholders, such as the social partners, SME, business and innovation organisations and NGOs, should be properly involved in the development and implementation of the ECF at all levels. This is crucial not only to be able to respond to real-life needs but also because close and constant contact and consultation with them can help anticipate future changes and shape the best responses. Monitoring should ensure full transparency in the use of public resources.
- 2.35 Given that the EESC represents the diverse organised civil society of the whole of the EU and stands ready to be a proactive and supportive partner in the development of the ECF, it should be given appropriate membership in the Strategic Stakeholders Board, and social partners and civil society organisations should be properly represented in line with the partnership principle and best practices.

¹⁵ [COM\(2025\) 555 final – 2025/0555 \(COD\), recital \(62\).](#)

¹⁶ [COM\(2025\) 555 final – 2025/0555 \(COD\), recital \(63\).](#)

¹⁷ [COM\(2025\) 555 final – 2025/0555 \(COD\), recital \(64\).](#)

- 2.36 To enhance the clarity of decision-making, the roles and cooperation mechanisms between the Commission and MSs, in both the development and implementation of the ECF, need to be set out explicitly. This is important for all parties, including potential beneficiaries. While the use of delegated acts or implementation acts is a useful way to accelerate decision-making, it must be strictly limited to defining practical details or other non-political issues.
- 2.37 The role and use of the Competitiveness Coordination Tool in the context of the ECF requires more clarity. The social partners should be involved in the coordination process as well, including whenever public-private partnership decisions are made. Moreover, clear roles and selection mechanisms need to be devised for the various committees and advisory boards.
- 2.38 To get the best out of the new approach of the agile and forward-looking architecture of the ECF, a new mindset is needed within the administration. It will be a critical factor in the successful implementation of the ECF, together with proper involvement of stakeholders.

3. PROPOSED AMENDMENTS TO THE LEGISLATIVE PROPOSAL OF THE EUROPEAN COMMISSION

Amendment 1

linked to recommendation 1.1

At all relevant places in the proposal, starting from the title:

| Text proposed by the European Commission | EESC amendment |
|--|--|
| European Competitiveness Fund (ECF) | European Competitiveness <i>and Security</i> Fund (ECSF) |

| Reason |
|-------------------------|
| See points 1.1 and 2.5. |

Amendment 2

linked to recommendation 1.2

Additional paragraph to Article 4, after current paragraph 2:

| Text proposed by the European Commission | EESC amendment |
|--|---|
| | <i>3. The indicative distribution of the ECF resources shall be implemented in a way that considers the requirements of cross-window initiatives and other connections between the windows, as well as rapidly changing situations.</i> |

| Reason |
|----------------|
| See point 2.8. |

Amendment 3

linked to recommendation 1.3

Additional article, after current Article 7:

| Text proposed by the European Commission | EESC amendment |
|--|---|
| | <p>Article 8</p> <p><i>General award criteria</i></p> <p><i>To support the general objectives of the ECF (Article 3, paragraph 1), the following criteria, related to the overall EU competitiveness, are considered as the leading award criteria throughout all windows: 1) excellence, 2) future orientation, 3) economic potential. The general criteria are accompanied by window-specific criteria, following the window-specific objectives (Article 3, paragraph 2).</i></p> |

Reason

See points 2.1 and 2.9.

Amendment 4

linked to recommendation 1.4

Additional article, after current Article 8 (which would be Article 9 due to Amendment 3):

| Text proposed by the European Commission | EESC amendment |
|--|--|
| | <p>Article 10</p> <p><i>Level playing field</i></p> <p><i>The decisions regarding funding to specific targeted purposes (Articles 16-20), are to be guided by the principle of enhancing a level playing field across the EU and economic actors.</i></p> |

Reason

See points 2.11, 2.17 and 2.26.

Amendment 5

Additional point (e) in paragraph 2 of Article 10:

| Text proposed by the European Commission | EESC amendment |
|--|--|
| <p>Article 10</p> <p>EU Preference</p> <p>1. The ECF support shall target development manufacturing and exploitation in the Union of</p> | <p>Article 10</p> <p>EU Preference</p> <p>1. The ECF support shall target development manufacturing and exploitation in the Union of</p> |

| | |
|--|--|
| <p>strategic technologies and sectors, in line with Union law and international commitments. The award procedures may apply any of the conditions set out in paragraph 2 to protect Union's strategic and economic security interests, as well as security and critical assets and the services they provide.</p> <p>2. The work programme, the investment guidelines or the documents related to the award procedure may set out eligibility conditions to ensure the competitiveness of the Union, including protection of economic interests and autonomy of the Union where necessary and appropriate, including through preferential conditions such as restrictions or incentives for Union entities, while limiting distortion of the single market. Those eligibility conditions may take the form of:</p> <p>[...]</p> <p>(d) control restrictions requiring recipients of ECF funding to acquire and/or hold the ability to decide, without restrictions imposed by ineligible entities, on the creation and use of results, including the legal authority and practical capability to modify, substitute, or remove components of results that are subject to restrictions imposed by ineligible entities or third countries. The work programme or the documents related to the award procedure may set out further details on the application of these design authority restrictions;</p> | <p>strategic technologies and sectors, in line with Union law and international commitments. The award procedures may apply any of the conditions set out in paragraph 2 to protect Union's strategic and economic security interests, as well as security and critical assets and the services they provide.</p> <p>2. The work programme, the investment guidelines or the documents related to the award procedure may set out eligibility conditions to ensure the competitiveness of the Union, including protection of economic interests and autonomy of the Union where necessary and appropriate, including through preferential conditions such as restrictions or incentives for Union entities, while limiting distortion of the single market. Those eligibility conditions may take the form of:</p> <p>[...]</p> <p>(d) control restrictions requiring recipients of ECF funding to acquire and/or hold the ability to decide, without restrictions imposed by ineligible entities, on the creation and use of results, including the legal authority and practical capability to modify, substitute, or remove components of results that are subject to restrictions imposed by ineligible entities or third countries. The work programme or the documents related to the award procedure may set out further details on the application of these design authority restrictions;</p> <p><i>(e) respect of the right to collective bargaining and compliance with relevant labour and social regulation and applicable collective agreements signed by the most representative social partners according to national labour law and practices;</i></p> |
|--|--|

Brussels, 3 December 2025.

The president of the European Economic and Social Committee
Séamus BOLAND