



**EPoSS**  
European Technology Platform  
on Smart Systems Integration

### **Reply to the public consultation on State aid framework for R&D&I**

AENEAS, ARTEMIS-IA and EPoSS are the three private members of the ECSEL Joint Undertaking and of the Key Digital Technologies Joint Undertaking (KDT JU) that is envisaged to succeed ECSEL later this year. According to the Commission's [proposal for the Single Basic Act](#), the overarching objective of this new European Partnership under Horizon Europe is to support the digital transformation of all economic and societal sectors, make the transformation work for Europe and support the European Green Deal.

In view of the objective of the KDT JU we can only very much welcome that according to the press release the new State aid framework for Research, Development and Innovation (R&D&I) "may need to be aligned to the Commission's new strategic priorities, such as the European Green Deal and the EU's Digital Strategies". As our constituencies are active in the digital domain, we also support the proposal to improve and update the existing definitions of research and innovation activities eligible for State aid, "in particular to clarify their applicability with respect to digital technologies and activities related to digitalisation". We also appreciate the "new provisions to enable public support for technology infrastructures", because these are quite relevant for many of our members, either as users or as suppliers, service providers, investors, operators or owners.

Nevertheless, we have some comments on definitions and classifications:

- For the definition of Key Enabling Technologies (KETs) in point 14, footnote 13 refers to the [2012 EC Communication](#), which identified six KETs. However, in 2018, the [High Level Group on Industrial Technologies](#) updated the list of KETs to better reflect digital technologies such as Artificial Intelligence. The new list of six KETs is displayed on the official [KET website](#) of the European Commission. Footnote 13 needs to be adapted accordingly.
- According to footnote 20, Digital Innovation Hubs (DIHs) may qualify as innovation clusters, defined in point 17(t). Such DIHs feature prominently in the [Digital Europe Regulation](#), which also mentions Testing and Experimentation Facilities (TEFs), in particular in the context of Artificial Intelligence. However, it is not clear how these TEFs should be classified:
  - a. as part of the activities of DIHs (as suggested by the Digital Europe Regulation in its article 16.1(a) and in the description of Specific Objective 2 in its Annex I and Annex II), which may qualify as innovation clusters, or
  - b. as innovation support services, which according to their definition in point 17(u) include "experimentation" and "testing", or
  - c. as technology infrastructures, which according to their definition in point 17(II) include "facilities required to test technology".



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The classification of TEFs needs to be clarified, because according to Annex II the applicable maximum aid intensity amounts to 50% (and even 65% in certain assisted regions) for innovation clusters (case a), but only to 25% for technology infrastructures (case c). The maximum aid intensity for innovation support services (case b) is not specified anywhere.

- The definition of technology infrastructures in point 17(II) is not consistent with their definition in footnote 21 of the [Council conclusions](#) of December 1, 2020 on the New European Research Area. To avoid misunderstandings, this inconsistency should be resolved.

**AENEAS** is an Association, established in 2006, providing unparalleled networking opportunities, policy influence & supported access to funding to all types of R&D&I participants in the field of micro and nanoelectronics enabled components and systems. See <https://aeneas-office.org>

**ARTEMIS Industry Association** strives for a leading position of Europe in Embedded Intelligence. The multidisciplinary nature of the membership provides an excellent network for the exchange of technology ideas, cross-domain fertilisation, as well as for large innovation initiatives. See <https://artemis-ia.eu>

**EPoSS**, the European Technology Platform on Smart Systems Integration, is an industry-driven policy initiative, defining R&D and innovation needs as well as policy requirements related to Smart Systems Integration and integrated Micro- and Nanosystems. See [www.smart-systems-integration.org](http://www.smart-systems-integration.org)

Your reply to [info@aeneas-artemis-eposs.eu](mailto:info@aeneas-artemis-eposs.eu) will be forwarded automatically to each of the three associations.