



AENEAS, ARTEMIS-IA and EPoSS, the three private members of the ECSEL Joint Undertaking (JU), very much welcome the Commission's clarification in its updated proposal for the extension of the General Block Exemption regulation (GBER) that also national contributions to institutionalised European Partnerships may be eligible, albeit under certain conditions. In the tri-partite institutionalised European Partnership on Key Digital Technologies (KDT) foreseen to succeed ECSEL as of 2021, such extension of the GBER would facilitate a seamless combination of funding from the European Union and Participating States, simplify and clarify the applicable rules, cut red tape and allow for well-defined projects to go ahead as fast as possible.

However, to ensure that the proposed GBER extension is fully applicable to the forthcoming institutionalised European Partnership on Key Digital Technologies, we recommend the following:

1. The requirement that the evaluation, ranking and selection of projects will be carried out by independent experts may not very realistic, as national authorities will want to have at least some say on how their national funding is spent. In ECSEL, and probably also in the KDT partnership, the ranking and selection of proposals are not decided by independent experts, but by the Public Authorities Board, consisting of representatives from the European Commission and the Participating States. Also aid provided on the basis of such joint decisions by the European Commission and all national authorities involved in an institutionalised European Partnership should qualify for exemption.
2. It should be clarified that also regional aid implemented under a European institutionalised Partnership would qualify for exemption.
3. The minimum percentage of 30% of project financing from Horizon 2020 or Horizon Europe prescribed in article 25c.5 of the updated proposal should be lowered or entirely removed, because otherwise the proposed institutionalised European Partnership on Key Digital Technologies<sup>1</sup> may not qualify for the envisaged extension of the GBER.
4. To avoid potential misunderstandings, it should be clarified that the new article 25c would complement the existing article 25, not replace it.

<sup>1</sup> For comparison, in the current ECSEL Joint Undertaking the EU funding levels in Innovation Actions (with centre of gravity at TRL 5-8) are 20% for large enterprises, 25% for SMEs and 35% for universities/others (not for profit), and in Research & Innovation Actions (with centre of gravity at TRL 3-4) 25% for large enterprises, 30% for SMEs and 35% for universities/others (not for profit).

The logo for Aeneas, featuring the word "Aeneas" in a blue sans-serif font. The letter "e" is stylized with a green dot and a blue line that loops around it.

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

**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)

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