



EPoSS
European Technology Platform
on Smart Systems Integration

AENEAS, ARTEMIS-IA and EPoSS, the three private members of the ECSEL Joint Undertaking (JU), very much welcome the Commission's proposal to extend the scope of the General Block Exemption Regulation ("GBER") to "co-funded projects independently evaluated and selected following transnational calls under the Horizon Europe programme".

In the tri-partite institutionalised European Partnership on Key Digital Technologies 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. Clarify that the proposed GBER extension also applies to the case of joint undertakings, in line with points 9, 45, 54, 59 and 83 of the Framework for State aid for research and development and innovation (2014/C 198/01). Unfortunately, it is not clear from the wording of recital (5) on p. 2 and article 25b on p. 12 in the consultation document whether the proposed modification pertains only to "co-fund" projects (i.e. the specific 'co-fund' instrument within Horizon Europe serving as the basis for co-funded European Partnerships), or also to co-funded projects (in the general sense of co-financing) as implemented in the current ECSEL JU under Horizon 2020 and foreseen for the new institutionalised European Partnership on Key Digital Technologies under Horizon Europe.
2. Allow also for regional funding (not only for national funding), as currently being provided in several of the ECSEL Participating States.
3. Lower the minimum percentages of financing from Horizon Europe prescribed in article 25b.5 of the consultation document (at least 30% of the eligible costs for experimental development (TRL 5-8) and at least 35% of the eligible costs for fundamental research (TRL1) or industrial research (TRL2-4)), because otherwise the proposed institutionalised European Partnership on Key Digital Technologies¹ may not qualify for the envisaged extension of the GBER.

¹ 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) 20% for large enterprises, 25% for SMEs and 35% for universities/others (not for profit).



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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

Your reply to info@aeneas-artemis-eposs.eu will be forwarded automatically to each of the three associations.