

## Amendments

# Helsinki-Uusimaa Region on the Future Framework Programme for Research and Innovation (Horizon Europe - FP10)

March 2026

Helsinki-Uusimaa welcomes the proposed increase in the FP10 budget as a necessary investment in Europe's long-term competitiveness and scientific leadership. However, this ambition must be matched by clear safeguards: FP10 must remain an independent, excellence-driven programme with a protected budget dedicated to research and innovation. Currently, almost half of Finland's Horizon Europe Fund beneficiaries are located in Helsinki-Uusimaa. As Finland's leading innovation region and home to Europe's high-performance research institutions and a vibrant deep-tech innovation ecosystem, Helsinki-Uusimaa underscores that Europe's competitiveness is built on strong, place-based innovation ecosystems that combine research excellence, talent, and real-world deployment capacity.

## Our key messages and proposed amendments

### 1. Keep Horizon Europe independent and Excellence-driven

**FP10 must remain in a self-standing Framework Programme under Article 182 TFEU, with independent governance, programming, and evaluation.** Its credibility and global attractiveness depend on maintaining excellence as the primary funding criterion across all pillars. We therefore propose amendments to **recital 3** accordingly.

At the same time, further safeguards are needed to ensure **that FP10's governance and programming remain clearly separated from the ECF.** This includes maintaining independent decision-making structures and avoiding any shift of the programme towards short-term industrial or political priorities. In this context, we proposed amendment to **Recital 87** and **Article 15.**

### 2. Safeguard Research, Development, and Innovation as the Core of the Fund

**P10 must keep research, development and innovation at its core and support the full R&I value chain, from frontier research to collaborative and applied innovation.** A strong and continuous pipeline is necessary for Europe to translate scientific excellence into economic and societal value. Helsinki-Uusimaa proposes **increasing the FP10 budget to EUR 220 billion** and reinforcing excellence, academic freedom, and open competition as guiding principles for funding allocation.

These elements are essential to ensure that FP10 remains globally competitive and capable of attracting top talent.

Helsinki-Uusimaa supports the proposed structure of Pillar II, including the **establishment of a Global Societal Challenges Window**, ensuring that research and innovation contribute directly to Europe's strategic objectives. To strengthen this approach, the explicit inclusion of societal challenges in **Article 3(1)**, as proposed in our amendments, is necessary to ensure they are addressed as a core objective of the programme.

### 3. Strengthen place-based innovation and territorial relevance within FP10

Europe's competitiveness depends on its ability to address societal challenges such as climate change, health, resilience, and inclusion. These challenges are largely tackled in urban and regional contexts, where innovation is tested, deployed, and scaled.

Helsinki-Uusimaa underlines the importance of place-based approaches in delivering impact. The proposed change to **Recital 29 on innovation ecosystem** and the new **Recital 29a on Smart Specialisation (S3)** provides a strong basis for linking EU priorities with regional innovation ecosystems and ensuring that investments build on territorial strengths. In this context, FP10 should **more explicitly support implementation in urban and regional environments**, where the majority of societal challenges are addressed and where solutions can be scaled effectively.

**Mission-driven research and innovation should be reinforced as a core delivery approach within FP10** for which we proposed amendments to paragraph 5 of Article 15. It provides an important framework for innovation ecosystems to align research, innovation, and deployment around shared objectives and offers a structured way to connect different actors and funding streams, and to support the scaling of solutions in real-world environments.

Helsinki-Uusimaa further emphasises that all relevant actors in the innovation ecosystem must be able to participate in FP10. This includes universities, research organisations, companies, and public authorities. The proposed changes to **Article 5** on European Partnerships and strengthen the participation of regional authorities and other ecosystem actors, which is essential for effective implementation. At the same time, clarity is needed regarding the scope of activities supported under FP10 in relation to **dual-use research**, for which we proposed changes to **Article 16** accordingly.

#### For more information, please contact

Innovation Manager, Venla Virkamäki, [venla.virkamaki@uudenmaanliitto.fi](mailto:venla.virkamaki@uudenmaanliitto.fi)

Senior EU Advisor, Christine Chang, [Christine.chang@uudenmaanliitto.fi](mailto:Christine.chang@uudenmaanliitto.fi)



## I. Proposed Amendments to the FP10 Regulation (2025/543 (COD))

### Amendment 1

#### Proposal for a regulation

##### Recital 3

###### *Text proposed by the Commission*

(3) The Programme should be tightly connected with Regulation (EU) [XXX]\* of the European Parliament and of the Council [European Competitiveness Fund]<sup>4</sup> by placing research and innovation at the heart of the Union's economy and investment strategy.

###### *Amendment*

(3) The Programme *is* tightly connected **to** Regulation (EU) [XXX]\* of the European Parliament and of the Council [European Competitiveness Fund]<sup>3</sup> by placing research and innovation at the heart of the Union's economy and investment strategy. ***The European Competitiveness Fund will strengthen the Union's innovative capacity by providing support to the roll-out of the most successful and needed outcomes of projects funded by the Programme, or its predecessors. This also requires that all comitology related to Work Programmes under this Regulation have to be set up under this Regulation exclusively, while joint meetings of comitology committee configurations from the Programme and European Competitiveness Fund working on similar topics should take place regularly to ensure appropriate coordination.***

###### *Justification*

This amendment aims to clarify the relationship between Horizon Europe and the European Competitiveness Fund by replacing the vague reference “tightly connected” with a formulation that specifies coherence and complementarity while preserving the Programme's independence. *We support MEP Ehler's position in his report that Horizon Europe should be a fully self-standing programme with its own independent programming. However, strong coordination between the two programmes remains essential for effective spending of Union funds. Without strong coordination, it will be less likely that ECF can support the deployment of Horizon results.*

### Amendment 2

#### Proposal for a regulation

##### Recital 29

###### *Text proposed by the Commission*

Support measures are needed to strengthen and better connect innovation ecosystems. Such measures should support organisations and innovators to create competitive, robust

###### *Amendment*

Support measures are needed to strengthen and better connect innovation ecosystems. Such measures should support **public authorities**,

and connected innovation ecosystems and improve framework conditions through cooperation and knowledge exchange. They should help connect national, regional, and local ecosystems by removing barriers in the single market such as market fragmentation, limited capital access and segmented national capital markets, slow innovation uptake and the underutilisation of innovation procurement.

organisations and innovators to create competitive, robust and connected innovation ecosystems and improve framework conditions through cooperation and knowledge exchange. They should help connect national, regional, and local ecosystems by removing barriers in the single market such as market fragmentation, limited capital access and segmented national capital markets, slow innovation uptake and the underutilisation of innovation procurement.

#### *Justification*

It is important to recognise and support the potential of public authorities to orchestrate innovation ecosystems. Moreover, the [ESIR Report](#) “Combining regional strengths to narrow the EU innovation divide” underlines the importance of facilitating connections between innovation hubs and smaller ecosystems. The results of innovative projects should be spread to benefit the whole ecosystem.

### **Amendment 3**

#### **Proposal for a regulation Recital 29 a (new) – Smart Specialisation**

##### *Text proposed by the Commission*

##### *Amendment*

Industrial and technological capabilities, which are key to Europe's competitiveness, are territorially embedded, and Europe's strength lies in the coordination of its diverse regional specialisations. Smart Specialisation Strategies (S3) provide the only EU-wide methodology capable of aligning regional strengths with EU strategic priorities, supporting diversification into related technologies, and enabling structured interregional cooperation based on complementarity rather than duplication. Therefore, S3 priorities should be systematically recognised and used across EU funding instruments to bridge top-down EU strategic goals with bottom-up regional innovation, integrating local strengths into Europe's industrial value chains.

#### *Justification*

Smart Specialisation should be treated as a core delivery engine for innovation. S3 can ensure that place-based innovation remains central to Europe's twin transitions and strategic autonomy. The proposed multi-level approach would bridge top-down EU strategic goals with bottom-up regional innovation, integrating local strengths into Europe's competitiveness.



## Amendment 4

### Proposal for a regulation

#### Recital 87

##### *Text proposed by the Commission*

Although work programmes and other acts implementing this Regulation concern specific budget implementation tasks which do not require a conferral of implementing powers and which should not normally fall within the scope of implementing acts referred to in Regulation (EU) No 182/2011, the advisory procedure should be used for the adoption of certain acts as defined in this Regulation, including work programmes implementing activities for clean transition, health, biotech, agriculture and bioeconomy, and digital leadership, resilience and security, defence industry and space, given that those acts should be fully supported and create synergies with national and shared management activities conducted by the Member States.

##### *Amendment*

Although work programmes and other acts implementing this Regulation concern specific budget implementation tasks which do not require a conferral of implementing powers and which should not normally fall within the scope of implementing acts referred to in Regulation (EU) No 182/2011, the advisory **(for the Horizon Europe part an examination procedure will be applied)** procedure should be used for the adoption of certain acts as defined in this Regulation, including work programmes implementing activities for clean transition, health, biotech, agriculture and bioeconomy, and digital leadership, resilience and security, defence industry and space, given that those acts should be fully supported and create synergies with national and shared management activities conducted by the Member States.

##### *Justification*

Ensuring that examination procedures are applied for the approval of the work programmes.

## Amendment 5

### Proposal for a regulation

#### Article 3 – Point 1

##### *Text proposed by the Commission*

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.

##### *Amendment*

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 **societal** challenges based on excellent research and innovation.

##### *Justification*

It is important to mention explicitly that the programme will tackle societal challenges.



## Amendment 6

### Proposal for a regulation Article 6 - paragraph 1

#### *Text proposed by the Commission*

4. 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.

#### *Amendment*

4. The indicative financial envelope of the Programme for the period 1 January 2028 to 31 December 2034 shall be EUR **220 000 000 000** in current prices.

#### Justification

Draghi called for the doubling of the budget of Horizon Europe. Heitor called for 220 billion

## Amendment 7

### Proposal for a regulation Article 15 – Paragraph 3

#### *Text proposed by the Commission*

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].

#### *Amendment*

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.**

#### Justification

The modification clarifies that collaborative research and innovation activities under the policy windows of the European Competitiveness Fund (ECF) should be governed in accordance with the rules, principles, and mechanisms of the Framework Programme (FP10).



## Amendment 8

### Proposal for a regulation

#### Article 15 – Paragraph 5

##### *Text proposed by the Commission*

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.

##### *Amendment*

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. **The Programme shall ensure the continuity, evolution and adequate resourcing of mission-driven approaches throughout the period 2028–2034**, building on the experience of the EU Missions established under Article 8 of Regulation (EU) 2021/695. Funding shall be awarded on the basis of work programmes covering the full duration of the Programme.

##### Justification

Strengthening mission-oriented approaches in FP10 will support better coordination across instruments, including synergies with the European Competitiveness Fund, while maintaining FP10's role in funding the knowledge and innovation base underpinning these missions.

## Amendment 9

### Proposal for a regulation

#### Article 16 – Paragraph 5

##### *Text proposed by the Commission*

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.

##### *Amendment*

5. The EIC may support innovation in critical technologies with a focus on **dual-use** 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.

##### Justification

All defence research is to be funded under the ECF. The existing experience of the EIC to implement disruptive innovation programmes makes the EIC an effective and efficient vehicle for the implementation of those funds, but this should not come at the expense of our civilian and dual-use projects.

## Amendment 10

### Proposal for a regulation Article 17 – Paragraph 1

#### *Text proposed by the Commission*

1. The Programme shall support organisations to create competitive, robust and connected innovation ecosystems and framework conditions. Synergies with Union, national and regional programmes shall be pursued to this end.

#### *Amendment*

1. The Programme shall support **public authorities, including local and regional authorities, and various** organisations to create competitive, robust and connected innovation ecosystems and framework conditions. **Ecosystem collaboration across value chains and common challenges, as well as** synergies with Union, national and regional programmes shall be pursued to this end.

#### Justification

A stronger emphasis on connecting territorial R&I ecosystems across Europe is of critical importance to ensure European competitiveness. A dedicated long-term investment should be ensured to this end, including a clear framework and portfolio of funding instruments.



## Proposed amendments to the Council Decision on establishing the Specific Programme implementing Horizon Europe (2025/544 (CNS))

### Amendment 11

#### Proposal for a regulation

##### Article 2 – Paragraph 2

###### *Text proposed by the Commission*

(d) foster collaboration and multidisciplinary, including with Social Sciences and Humanities (SSH) to generate new knowledge;

(g) support the creation and scale-up of deep tech and innovative start-ups;

###### *Amendment*

(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**;

(h) support the **development of innovations**, **including** creation and scale-up of deep tech and **social innovation.innovative start-ups.**

###### *Justification*

Cross-disciplinary and – sectoral collaboration is larger than multidisciplinary. It is also important to highlight that SSAH integration contributes to more than knowledge generation.

FP10 should support all kinds of innovation, but place special attention to those that are aligned with its broader objectives.

### Amendment 12

#### Proposal for a regulation

##### Article 4 – Paragraph 2

###### *Text proposed by the Commission*

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

###### *Amendment*

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

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;

(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 in Commission Decision 96/282/Euratom.

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;

(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); the Commission shall duly motivate that: **(b) 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);

**(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.

#### *Justification*

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 the 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.

The work programmes for 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.

## Amendment 13

### Proposal for a regulation

#### Article 5

##### *Text proposed by the Commission*

...

iii. partners' composition: unless duly justified, the participation of public entities from at least five Member States and private entities representing substantial segments of their respective ecosystems is required, ensuring a broad and balanced involvement of key stakeholders;

...

vii. openness and transparency: partnerships shall demonstrate openness and transparency regarding the identification of priorities and objectives – including expected results and impacts – and the engagement of partners and stakeholders across the entire value chain and from diverse sectors, backgrounds, and disciplines, including relevant international ones without affecting European competitiveness;

...

ix. internal transparent governance arrangements and internal rules, including codes of conduct, that ensure their functioning in an open and transparent manner;

##### *Amendment*

...

iii. partners' composition: unless duly justified, the participation of public entities, **including national and regional authorities**, from at least five Member States and private entities representing substantial segments of their respective ecosystems is required, ensuring a broad and balanced involvement of key stakeholders **within their decision-making structures**;

.....

vii. openness and transparency: partnerships shall demonstrate openness and transparency regarding the identification of priorities and objectives – including expected results and impacts – and the engagement of partners and stakeholders across the entire value chain and from diverse sectors, backgrounds, and disciplines **beyond existing partnership compositions**, including relevant international ones without affecting European competitiveness;

...

x. internal transparent governance arrangements and internal rules, including codes of conduct, that ensure their functioning in an open and transparent manner **involving all partner stakeholders, including regional authorities and smaller stakeholders such as SMEs and startups**;

### *Justification*

Economic development is often a regional competence, and regions play an important role in mobilising R&I stakeholders around strategic sectors and value chains - linked with high societal impact. At the same time, the current Partnership models do not always allow regional participation and make it difficult for smaller actors to take part in the European Partnerships.

The tripartite approach proposed should not limit the participation of public authorities to Member States only, but also include regional authorities.

In order to ensure the impacts of the European Partnerships, mobilising regional governments and local stakeholders, including SMEs and startups, is crucial to reinforce regional representation in Partnerships' governance structures, improve coordination across EU, national, and regional levels to enhance policy coherence and better coordinate funding, tap into territorial R&I ecosystems, and actively engage regional stakeholders in the European Partnerships

## **Amendment 14**

### **Proposal for a regulation**

#### **Article 18 – paragraph 2**

##### *Text proposed by the Commission*

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.

##### *Amendment*

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.

### *Justification*

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.

