

Position of Union of Entrepreneurs and Employers on the Proposal for a Regulation Establishing the European Competitiveness Fund (ECF)

- The ECF should explicitly ensure technological neutrality, avoiding implicit or explicit preference for selected clean technologies;
- Nuclear energy must be fully recognized as a strategic contributor to EU competitiveness, energy security, and decarbonisation;
- The regulation should explicitly include 5G mobile infrastructure as a key infrastructure eligible for support;
- The ECF should ensure coherence across the Multiannual Financial Framework (MFF) and related legislative instruments;
- Funding mechanisms must cover regulatory obligations imposed on critical infrastructure operators, including those arising from digital and cybersecurity frameworks.

The proposal for a Regulation establishing the European Competitiveness Fund (ECF) represents a central instrument for strengthening the European Union's economic resilience, technological leadership, and strategic autonomy in the post-2027 Multiannual Financial Framework.

Given the breadth of sectors covered, ranging from energy and defence to digital infrastructure, it is essential that the ECF framework is designed in a coherent, inclusive, and technologically neutral manner, ensuring that all relevant technologies contributing to EU objectives are adequately supported.

This position highlights key areas requiring clarification or adjustment to ensure the effectiveness of the ECF.

1. Technological Neutrality and Energy Policy Coherence

The ECF should be grounded in a technology-neutral approach, allowing Member States to pursue decarbonisation pathways best suited to their national contexts.

Nuclear energy plays a unique and indispensable role as a stable, dispatchable, and low-emission energy source. Its contribution to energy security and climate objectives

should be consistently recognised across EU funding frameworks. As highlighted by stakeholders, it is essential to avoid provisions that could indirectly disadvantage certain clean technologies, including nuclear, through selective eligibility criteria or prioritisation mechanisms.

Moreover, consistency must be ensured between the ECF and other elements of the MFF legislative package, particularly in relation to budget tracking and performance frameworks that already foresee the inclusion of nuclear energy.

2. Recognition of Nuclear Energy in Competitiveness Policy

The ECF should explicitly acknowledge nuclear energy as a strategic asset for European competitiveness, particularly in the context of:

- energy system stability,
- industrial decarbonisation,
- long-term cost efficiency, and
- geopolitical resilience.

A failure to do so risks undermining investments in large-scale infrastructure projects critical for achieving EU climate targets and reducing dependency on external energy sources.

3. Inclusion of 5G Infrastructure as Key Infrastructure

The current proposal identifies certain digital infrastructures as “key infrastructures” but omits mobile public 5G networks, which constitute a foundational layer of Europe’s digital economy.

This omission should be corrected. 5G networks are not only critical for current connectivity needs but also represent a necessary bridge toward the deployment of 6G technologies. Their explicit inclusion would ensure that investment, innovation and performance requirements related to:

- network quality,
- resilience, and
- cybersecurity

are fully reflected in the ECF framework.

4. Financing of Regulatory Obligations for Critical Infrastructure

To ensure practical effectiveness, the ECF should clearly state that funding may support compliance with EU regulatory obligations imposed on operators of critical infrastructure.

This includes obligations stemming from:

- cybersecurity frameworks (e.g. CSA/CSA2),
- digital infrastructure legislation (including the forthcoming Digital Networks Act),
- resilience and security requirements.

Without such clarification, there is a risk that the financial burden of regulatory compliance could limit investment capacity, thereby weakening the intended impact of the ECF.

5. Ensuring Strategic Coherence Across EU Instruments

The ECF must operate within a consistent and integrated policy ecosystem, aligning with:

- industrial policy,
- climate and energy frameworks,
- digital transition strategies, and
- defence and security objectives.

Fragmentation or inconsistencies across instruments could reduce the efficiency of EU spending and create regulatory uncertainty for investors.

Conclusion and Recommendations

To maximise the effectiveness of the European Competitiveness Fund, the Regulation should be amended to:

- Guarantee full technological neutrality, ensuring equal treatment of all low-emission technologies, including nuclear Energy;

- Explicitly recognise nuclear energy as a strategic contributor to EU competitiveness, energy security, and decarbonisation;
- Include 5G mobile networks as key infrastructure eligible for ECF support;
- Clarify eligibility of funding for regulatory compliance costs borne by critical infrastructure operators;
- Ensure coherence across the MFF legislative package, avoiding inconsistencies that could distort investment signals.

Adopting these adjustments will strengthen the ECF's ability to deliver on its core objectives: enhancing Europe's competitiveness, accelerating the green and digital transitions, and reinforcing strategic autonomy.