

**AMENDMENTS SUBMITTED BY FICSIMM - Federation for Innovation
and Sustainable Competitiveness in SMEs (Romania)**

to the Draft Report of the Committee on Industry, Research and Energy
on the proposal for a regulation of the European Parliament and of the
Council **establishing the European Competitiveness Fund (ECF)**

PE784.506v01-00 - 20.4.2026

Rapporteurs: Christian Ehler, Dan Nica

Explanatory note:

This document presents **19 amendments proposed by FICSIMM** (Federation for Innovation and Sustainable Competitiveness in SMEs, Romania) to the Draft Report of the Committee on Industry, Research and Energy (ITRE) on the proposal for a Regulation of the European Parliament and of the Council establishing the European Competitiveness Fund (ECF) - Rapporteurs: Christian Ehler and Dan Nica, PE784.506v01-00, 20.4.2026.

FICSIMM amendments are structured around the seven pillars of the FICSIMM position paper on the ECF:

- (1) SMEs as core beneficiaries;
- (2) simplification tested against SME realities;
- (3) seamless investment journey including SMEs;
- (4) SME-ecosystem conditionality in large-scale projects;
- (5) territorial cohesion;
- (6) SME-inclusive green and digital transitions;
- (7) leverage of private capital without disproportionate risk transfer to SMEs.

I. Amendments to recitals

FICSIMM Amendment 1

Draft Report - Proposal for a regulation
Recital 17 a (new)

<i>Text of the ITRE Draft Report</i>	<i>FICSIMM amendment</i>
—	<u>(17a) An excessive concentration of support in a limited number of high-performing regions or sectors risks undermining the long-term competitiveness of the Union as a whole. The design and implementation of the European Competitiveness Fund should therefore</u>

<i>Text of the ITRE Draft Report</i>	<i>FICSIMM amendment</i>
	<u>promote a broad-based participation of enterprises, in particular SMEs, across different regions and industrial ecosystems. Project advisory and business support services under the Fund should include dedicated SME-oriented support, covering project structuring, access to finance, investment readiness, partnership building and scale-up support, with particular attention to SMEs located in less-developed and transition regions.</u>

Justification

A new recital is required to anchor the territorial cohesion dimension of the Fund. The concentration of ECF resources in advanced regions and established industrial hubs risks deepening intra-regional disparities. This recital provides the legal anchor for the corresponding SME-specific and territorial provisions in Articles 7 and 27.

FICSIMM Amendment 2

Draft Report - Proposal for a regulation

Recital 8 a (new)

<i>Text of the ITRE Draft Report</i>	<i>FICSIMM amendment</i>
—	<u>(8a) In the Union, persistent disparities in competitiveness and innovation performance across regions continue to exist. European competitiveness cannot be strengthened without addressing territorial imbalances. The design and implementation of the European Competitiveness Fund should promote broad-based SME participation across all regions, including less-developed and transition regions, ensuring that competitiveness objectives reinforce, rather than undermine, economic, social and territorial cohesion. The European Competitiveness Fund should therefore operate in complementarity with cohesion policy and with the National and Regional Partnership Plans, ensuring meaningful participation of small and medium-sized enterprises (SMEs) across all territories, in particular in less-developed and transition regions.</u>

Justification

European competitiveness cannot be built at the expense of economic, social and territorial cohesion. A new Recital 8a is necessary to anchor explicitly the complementarity between the ECF, cohesion policy and the National and Regional Partnership Plans envisaged under the post-2027 MFF, ensuring SMEs across all regions can contribute to and benefit from Europe's industrial transformation.

FICSIMM Amendment 3

Draft Report, Amendment 3 - Proposal for a regulation

Recital 4

<i>Text of the ITRE Draft Report</i>	<i>FICSIMM amendment</i>
(4) This requires that Union funding opportunities can offer support to businesses and projects along the entire investment journey. This journey encompasses all stages of developing and manufacturing strategic technologies, products and services in Europe, from applied research, through all forms of innovation, scale-up, industrial deployment, to manufacturing and market deployment, including the necessary investment and operational costs support, infrastructure and skills. The investment journey is not linear as all stages feed each other, and ideas for new products or services might arise at any stage. European funding needs to cater for this non-linear reality with increased flexibility of providing support while preserving predictability for funding. To ensure that the Union can effectively turn its excellence in research into global economic leadership, a tight connection with clear pathways from innovation to the real economy between the ECF and Horizon Europe is essential.	(4) This requires that Union funding opportunities can offer support to businesses and projects along the entire investment journey. This journey encompasses all stages of developing and manufacturing strategic technologies, products and services in Europe, from applied research, through all forms of innovation, scale-up, industrial deployment, to manufacturing and market deployment, including the necessary investment and operational costs support, infrastructure and skills. The investment journey is not linear as all stages feed each other, and ideas for new products or services might arise at any stage. European funding needs to cater for this non-linear reality with increased flexibility of providing support while preserving predictability for funding. <u>The effectiveness of Union support depends on the administrative and organisational capacity of beneficiaries. Given the specific constraints faced by SMEs, the design and implementation of the European Competitiveness Fund should take into account the need to strengthen SME capacity to access, manage and implement funded actions, including through proportionate procedures and accompanying support measures.</u> To ensure that the Union can effectively turn its excellence in research into global economic leadership, a tight connection with clear pathways from innovation to the real economy between the ECF and Horizon Europe is essential, <u>accompanied by bridging</u>

<i>Text of the ITRE Draft Report</i>	<i>FICSIMM amendment</i>
	<u>instruments ensuring continuity of support for SME-led projects from research and innovation to industrial deployment and market uptake.</u>

Justification

The ITRE rapporteurs rightly strengthen the Horizon Europe - ECF connection. This amendment complements that connection with the recognition that a seamless investment journey for Europe must not become a fragmented obstacle course for SMEs: bridging instruments between grants, guarantees and equity are essential to prevent SME-led innovations from being lost in the "valley of death" or acquired prematurely by non-Union actors.

FICSIMM Amendment 4

Draft Report - Proposal for a regulation

Recital 14 a (new)

<i>Text of the ITRE Draft Report</i>	<i>FICSIMM amendment</i>
—	<u>(14a) When mobilising private and institutional capital, the European Competitiveness Fund should ensure that financial risk is not disproportionately transferred to small and medium-sized enterprises (SMEs), through the use of appropriate risk-sharing mechanisms, guarantees and blended finance instruments tailored to SME needs, while ensuring predictability, legal certainty and the avoidance of additional tax or compliance burdens for SMEs. Competitiveness cannot be sustainably financed by overloading the most vulnerable segment of the European economy.</u>

Justification

The ITRE Draft Report rightly emphasises the leverage potential of the ECF. However, poorly designed leverage mechanisms can transfer risk disproportionately to smaller firms, which often lack the balance-sheet strength, collateral capacity and financial buffers available to large corporations. This new recital provides the interpretative anchor for the corresponding operative provision in Article 13.

FICSIMM Amendment 5

Draft Report - Proposal for a regulation
Recital 16 a (new)

Text of the ITRE Draft Report	FICSIMM amendment
—	<u>(16a) Monitoring and reporting under the European Competitiveness Fund should include specific indicators on SME participation, territorial distribution of support and SME access to financial instruments, enabling the assessment of the Fund's contribution to inclusive, balanced and sustainable European competitiveness.</u>

Justification

Without specific SME and territorial indicators, the assessment of the Fund's contribution to inclusive and territorially balanced competitiveness cannot be properly carried out. This recital anchors the corresponding provisions in the Performance Regulation referenced in Recital 83 and in Article 21 on monitoring.

FICSIMM Amendment 6

Draft Report, Amendment 13 - Proposal for a regulation
Recital 18

Text of the ITRE Draft Report	FICSIMM amendment
(18) The ECF should operate through four policy windows that mirror Union's key policy priorities: Energy Infrastructure, Industrial Decarbonisation and Clean Technology; Digital Infrastructure and Agile Digital Leadership; Health, Biotechnology, and Sustainable Prosperity; Critical Raw Materials, Security, Defence industry and Space.	(18) The ECF should operate through four policy windows that mirror Union's key policy priorities: Energy Infrastructure, Industrial Decarbonisation and Clean Technology; Digital Infrastructure and Agile Digital Leadership; Health, Biotechnology, and Sustainable Prosperity; Critical Raw Materials, Security, Defence industry and Space. <u>In order to ensure inclusive and effective competitiveness, the European Competitiveness Fund should enable SMEs to participate directly as project leaders and main beneficiaries, and not only through large consortia or integrated projects dominated by large undertakings. Proportionate access conditions should be ensured across policy windows and thematic interventions.</u>

Justification

The ITRE amendment usefully restructures the four policy windows. However, no wording ensures that SMEs can act as project leaders rather than junior partners in consortia dominated by large undertakings. This complement is essential to prevent the Fund's resources from being captured predominantly by large-scale, capital-intensive projects.

FICSIMM Amendment 7

Draft Report, Amendment 15 - Proposal for a regulation

Recital 21

<i>Text of the ITRE Draft Report</i>	<i>FICSIMM amendment</i>
(21) [...] The ECF should contribute to supporting the development of a skilled workforce equipped with the specific skills needed in the strategic investment areas of the Fund, through life-long learning, education, training projects and apprenticeships, and the creation of attractive quality jobs and by accompanying ECF investments with skills investment where relevant.	(21) [...] The ECF should contribute to supporting the development of a skilled workforce equipped with the specific skills needed in the strategic investment areas of the Fund, through life-long learning, education, training projects and apprenticeships, and the creation of attractive quality jobs and by accompanying ECF investments with skills investment where relevant. <u>Addressing skills shortages and workforce transformation is essential for European competitiveness. The European Competitiveness Fund should therefore support access for SMEs to upskilling and reskilling measures, in particular in relation to digitalisation, clean technologies and industrial modernisation, ensuring that skills support is accessible beyond large-scale projects and major industrial players.</u>

Justification

Skills shortages disproportionately affect SMEs, which lack dedicated HR infrastructure and training budgets. This amendment ensures that skills support under the Fund is accessible to SMEs, rather than being captured predominantly by large industrial players and their supply chains.

II. Amendments to articles

FICSIMM Amendment 8

Draft Report, Amendment 64 - Proposal for a regulation

Article 3 – paragraph 1 – introductory part

<i>Text of the ITRE Draft Report</i>	<i>FICSIMM amendment</i>
1. The general objective of the ECF is to increase European competitiveness through activities that have a Union added value, by:	1. The general objective of the ECF is to increase European competitiveness through activities that have a Union added value, by: <u>In doing so, the Fund shall ensure that small and medium-sized enterprises (SMEs), including start-ups and scale-ups, are explicitly recognised as core beneficiaries of Union support, with funding instruments, implementation modalities and eligibility conditions proportionate to their size, capacity and regional context.</u>

Justification

The general objective of the Fund must include the explicit recognition of SMEs as core beneficiaries. Without this legal anchor in Article 3(1), downstream SME-protective provisions in implementing acts, work programmes and evaluation criteria would lack interpretative authority.

FICSIMM Amendment 9

Draft Report, Amendment 70 - Proposal for a regulation

Article 3 – paragraph 1 – point e

<i>Text of the ITRE Draft Report</i>	<i>FICSIMM amendment</i>
(e) enabling the scaling, commercialisation, uptake and diffusion of results of research and innovation policy in industrial policy to translate the Union's research excellence into Union industrial strength and productivity on global markets, and incentivising innovative companies to remain and grow in the Union, therefore strengthening its industrial competitiveness and manufacturing base;	(e) enabling the scaling, commercialisation, uptake and diffusion of results of research and innovation policy in industrial policy to translate the Union's research excellence into Union industrial strength and productivity on global markets, and incentivising innovative companies, <u>including SMEs, start-ups and scale-ups,</u> to remain and grow in the Union, therefore strengthening its industrial competitiveness and manufacturing base, <u>while ensuring a continuous and coherent investment journey for SME-led projects, from applied research and innovation to scale-up, industrial deployment and market uptake, including through bridging instruments</u>

<i>Text of the ITRE Draft Report</i>	<i>FICSIMM amendment</i>
	<u>between grants, guarantees and equity, and by avoiding implementation models that de facto exclude SMEs due to collateral or balance-sheet constraints;</u>

Justification

The ITRE wording rightly strengthens research-to-industry translation. To avoid the "valley of death" and premature acquisition of SME-led innovations by non-Union players, continuity of support for SME-led projects must be guaranteed along the entire investment journey through appropriate bridging instruments.

FICSIMM Amendment 10

Draft Report - Proposal for a regulation

Article 7 – paragraph 2 a (new)

<i>Text of the ITRE Draft Report</i>	<i>FICSIMM amendment</i>
—	<u>2a. Implementation of the Fund shall be subject to systematic SME-testing, ensuring that administrative requirements, reporting obligations, timelines and audit mechanisms are proportionate and adapted to SME realities, taking into account the size, administrative capacity and risk profile of beneficiaries. In particular, the Commission shall prioritise the use of lump sums, flat rates, simplified cost options and accelerated evaluation and contracting procedures for SME-led actions.</u>

Justification

Simplification cannot remain declarative. A systematic SME-test, applied horizontally to all Fund instruments before calls are published, is necessary to ensure that administrative requirements are proportionate to project size and risk. The prioritised use of lump sums, flat rates and simplified cost options for SME-led actions is a concrete, measurable simplification step that reduces audit exposure and cash-flow pressure for smaller firms.

FICSIMM Amendment 11

Draft Report - Proposal for a regulation

Article 7 – paragraph 3 (new)

Text of the ITRE Draft Report	FICSIMM amendment
—	<u>3. The Fund shall ensure territorially balanced access for small and medium-sized enterprises (SMEs), including, where appropriate, higher aid intensities and dedicated technical assistance for enterprises located in less-developed and transition regions, in line with the objectives of economic, social and territorial cohesion and in complementarity with cohesion policy instruments and with the National and Regional Partnership Plans.</u>

Justification

SMEs in convergence and less-developed regions face structural disadvantages that merit-based competitive calls cannot correct on their own. Higher aid intensities and dedicated technical assistance are necessary instruments of territorial fairness, in line with the Union's core principle of cohesion as a foundation of long-term competitiveness.

FICSIMM Amendment 12

Draft Report - Proposal for a regulation

Article 7 a (new)

Text of the ITRE Draft Report	FICSIMM amendment
—	<u>Article 7a</u> <u>SME ecosystem integration in large-scale projects</u> <u>1. For actions and projects above a financial threshold to be defined in the work programme, the granting of support under the European Competitiveness Fund shall be conditional upon / incentivized by demonstrable commitments to the integration of SMEs and start-ups into the supported industrial or innovation ecosystem, including through structured subcontracting, innovation partnerships or value-chain cooperation, without prejudice to Union competition and procurement rules.</u>

Text of the ITRE Draft Report	FICSIMM amendment
	<u>2. Applicants shall submit, as part of the application, an SME Integration Plan including measurable commitments regarding:</u> <u>(a) the involvement of SMEs and start-ups in the value chain or innovation activities of the project;</u> <u>(b) the qualitative role of SMEs in core project activities, ensuring their involvement in innovation, engineering, deployment, digitalisation and services, and not merely in peripheral or low-value-added tasks;</u> <u>(c) long-term cooperation mechanisms, including framework agreements, innovation partnerships, co-development arrangements or technology transfer schemes;</u> <u>(d) specific incentives for the participation of SMEs from less-developed and transition regions, reinforcing territorial cohesion alongside competitiveness.</u> <u>3. The commitments contained in the SME Integration Plan shall be taken into account in the evaluation of the application, in the funding conditions and in the monitoring and reporting of the supported action. The Commission shall establish dedicated scoring criteria for SME and start-up integration, and may provide for higher aid intensity or more favourable financing terms for projects demonstrating strong, credible SME ecosystem commitments.</u> <u>4. Monitoring and reporting obligations under this Article shall focus on outcomes (number of SMEs involved, contract value, regional spread) and shall not impose excessive administrative burden on beneficiaries.</u>

Justification

Without such structural provisions, large-scale projects risk absorbing a disproportionate share of Fund resources without generating sufficient spillover effects for SMEs and start-ups. A performance-based conditionality (not rigid quotas) aligned with the Fund's results-oriented philosophy ensures that public investment at EU level shapes market behaviour and incentivises inclusive supply-chain structures, consistent with the Competitiveness Compass, the Clean Industrial Deal and the Single Market agenda.

FICSIMM Amendment 13

Draft Report - Proposal for a regulation

Article 13 – paragraph 2 a (new)

<i>Text of the ITRE Draft Report</i>	<i>FICSIMM amendment</i>
—	<u>2a. When mobilising private and institutional capital, the Fund shall ensure that financial risk is not disproportionately transferred to SMEs, through the use of risk-sharing mechanisms, guarantees and blended finance instruments tailored to SME needs, while ensuring predictability, legal certainty and the avoidance of additional tax or compliance burdens for SMEs.</u>

Justification

In practice, poorly designed leverage mechanisms can result in risk being transferred disproportionately to smaller firms. This paragraph ensures that the ECF InvestEU Instrument is designed to de-risk investment for SMEs, enabling them to engage confidently in innovation, reindustrialisation / industrial renewal and transition processes, while preserving financial stability and fair risk allocation. It should be read in conjunction with the work of the European Association of Guarantee Institutions (AECM) and the Network of European Financial Institutions for SMEs (NEFI).

FICSIMM Amendment 14

Draft Report - Proposal for a regulation

Article 13 – paragraph 3 a (new)

<i>Text of the ITRE Draft Report</i>	<i>FICSIMM amendment</i>
—	<u>3a. Project advisory under the ECF InvestEU Instrument shall include dedicated SME-oriented support, covering project structuring, access to finance, investment readiness, partnership building and scale-up support, with particular attention to SMEs located in less-developed and transition regions. The implementation of project advisory shall be subject to systematic SME-testing in accordance with Article 7(2a).</u>

Justification

Project advisory is the principal gateway through which SMEs interact with InvestEU. A dedicated SME-oriented advisory stream, anchored in territorial fairness, is essential to translate the Fund's financial instruments into actual SME uptake, particularly in less-developed and transition regions where advisory capacity is structurally thinner.

FICSIMM Amendment 15

Draft Report, Amendment 146 - Proposal for a regulation

Article 14 b (new) – paragraph 2

<i>Text of the ITRE Draft Report</i>	<i>FICSIMM amendment</i>
2. The task of the Stakeholder Group shall be to support the Commission in the preparation and design of calls for proposals under this Regulation. It shall provide non-binding advice to the Commission at an early stage of call preparation, with a view to ensuring that funding conditions, eligibility requirements, evaluation criteria, and administrative procedures are proportionate, clear, and aligned with market realities.	2. The task of the Stakeholder Group shall be to support the Commission in the preparation and design of calls for proposals under this Regulation. It shall provide non-binding advice to the Commission at an early stage of call preparation, with a view to ensuring that funding conditions, eligibility requirements, evaluation criteria, and administrative procedures are proportionate, clear, and aligned with market realities, <u>and that the systematic SME-testing referred to in Article 7(2a) is carried out. To that end, the Stakeholder Group shall assess draft calls against SME realities, in particular as regards administrative burden, reporting obligations, timelines, audit mechanisms and the use of simplified cost options for SME-led actions, and shall report annually to the European Parliament and the Council on the outcomes of that assessment.</u>

Justification

The creation of a Stakeholder Group proposed by the ITRE rapporteurs is welcome and provides the institutional vehicle for a systematic SME-test of calls. The amendment explicitly links the Stakeholder Group's mandate to the SME-testing obligation introduced in Article 7(2a), and ensures transparent accountability through annual reporting to the co-legislators.

FICSIMM Amendment 16

Draft Report, Amendment 146 - Proposal for a regulation

Article 14 b (new) – paragraph 3

<i>Text of the ITRE Draft Report</i>	<i>FICSIMM amendment</i>
3. The Stakeholder Group shall comprise representatives of relevant industry sectors, small and medium-sized enterprises, financial institutions, investors, research and technology organisations, social partners, representatives of regional and local authorities, and other	3. The Stakeholder Group shall comprise representatives of relevant industry sectors, <u>with balanced representation of</u> small and medium-sized enterprises, <u>start-ups and scale-ups, including SME representatives from less-developed and transition regions</u> , financial institutions, investors, research and technology

Text of the ITRE Draft Report	FICSIMM amendment
relevant market actors, selected on the basis of expertise, balance, and transparency.	organisations, social partners, representatives of regional and local authorities, and other relevant market actors, selected on the basis of expertise, balance, and transparency, <u>with a minimum share of SME representatives ensuring that the Stakeholder Group is not dominated by large industrial players.</u>

Justification

Without specific safeguards, the Stakeholder Group risks reproducing the representational asymmetry observed in the stakeholder consultations supporting the ITRE report, where large industrial federations and individual large companies dominate. A balanced composition, including SMEs from convergence regions, is essential to ensure that the Group's advice reflects the full diversity of the European enterprise base.

FICSIMM Amendment 17

Draft Report, Amendment 182 - Proposal for a regulation

Article 27 – paragraph 1 – point (h)

Text of the ITRE Draft Report	FICSIMM amendment
(h) promote balanced regional participation, including by ensuring targeted outreach and support for businesses located in less developed regions and the outermost regions of the Union, and by facilitating cross-regional cooperation, knowledge exchange and the strengthening of regional innovation ecosystems;	(h) promote balanced regional participation, including by ensuring <u>preferential access, higher aid intensities where appropriate, targeted outreach and dedicated technical assistance and</u> support for businesses, <u>in particular SMEs,</u> located in less developed regions, <u>transition regions</u> and the outermost regions of the Union, and by facilitating cross-regional cooperation, knowledge exchange and the strengthening of regional innovation ecosystems. <u>The activities under this point shall be implemented in complementarity with cohesion policy instruments and with the National and Regional Partnership Plans;</u>

Justification

The ITRE amendment establishes balanced regional participation but limits itself to outreach. To make this substantive, preferential access and higher aid intensities for SMEs in less-developed and transition regions are required, together with an explicit complementarity clause with cohesion policy instruments. Without this, the provision risks remaining declaratory.

FICSIMM Amendment 18

Draft Report, Amendment 184 - Proposal for a regulation

Article 29 – paragraph 1

<i>Text of the ITRE Draft Report</i>	<i>FICSIMM amendment</i>
1. Each policy window and the ECF InvestEU Instrument shall support dedicated, sector-specific actions targeting start-ups, scale-ups, SMEs and small mid-cap companies in the ECF policy windows with a view to fostering innovation, business acceleration, commercialisation and scaling up. This includes actions to improve access of SMEs to technology capabilities and infrastructures.	1. Each policy window and the ECF InvestEU Instrument shall support dedicated, sector-specific actions targeting start-ups, scale-ups, SMEs and small mid-cap companies in the ECF policy windows with a view to fostering innovation, business acceleration, commercialisation and scaling up. This includes actions to improve access of SMEs to technology capabilities and infrastructures. <u>Work programmes shall ensure that SMEs, start-ups and scale-ups can participate as project leaders and main beneficiaries, and not only as junior partners in consortia dominated by large undertakings. Proportionate access conditions, including eligibility requirements, project size thresholds and co-financing rates, shall be defined with a view to enabling direct SME participation across all policy windows.</u>

Justification

The ITRE amendment rightly provides for SME-dedicated sectoral actions. This complement specifies that SMEs must be able to participate as project leaders and primary beneficiaries, not only as junior partners. Without proportionate access conditions, dedicated SME actions risk being de facto reserved for the SME partners of already-funded large consortia.

FICSIMM Amendment 19

Draft Report - Proposal for a regulation

Article 29 – paragraph 1 a (new)

<i>Text of the ITRE Draft Report</i>	<i>FICSIMM amendment</i>
—	<u>1a. The implementation of the Clean Transition and Industrial Decarbonisation window, the Digital Infrastructure and Agile Digital Leadership window, and, where relevant, other windows, shall include dedicated SME-oriented instruments, including targeted support for energy efficiency, retooling, industrial modernisation and digital transformation of SMEs, ensuring their effective participation as</u>

<i>Text of the ITRE Draft Report</i>	<i>FICSIMM amendment</i>
	<u>actors and co-creators of the green and digital transitions, and not merely as passive adopters of standards and technologies defined elsewhere. These instruments shall operate in coordination with the Innovation Fund and, where established, the Industrial Decarbonisation Bank.</u>

Justification

Without dedicated SME-specific instruments, the green and digital transitions risk becoming excessively capital-intensive, unevenly distributed and socially regressive. Many SMEs - particularly in manufacturing, processing and other energy-intensive sectors - face structural barriers that limit their ability to participate on equal terms with large, well-capitalised actors. A dedicated SME envelope for energy efficiency, retrofitting / retooling and industrial modernisation is essential to ensure that Europe's transitions are economically viable, territorially balanced and socially sustainable.

Annex - Traceability: FICSIMM pillars and amendments

The 19 FICSIMM amendments are anchored in the seven pillars of the FICSIMM Position on the European Competitiveness Fund:

Pillar	Topic	FICSIMM Amendments
Pillar 1	SMEs as core beneficiaries, not residual actors	AM 8
Pillar 2	Simplification real, measurable and SME-tested	AM 10, AM 15, AM 16
Pillar 3	Seamless investment journey including SMEs	AM 3, AM 9, AM 14
Pillar 4	SME-ecosystem conditionality in large-scale projects (flagship proposal)	AM 12
Pillar 5	Territorial cohesion and SME competitiveness	AM 1, AM 2, AM 5, AM 11, AM 17
Pillar 6	Green and digital transitions SME-inclusive by design	AM 6, AM 7, AM 18, AM 19
Pillar 7	Leverage of private capital without disproportionate risk transfer to SMEs	AM 4, AM 13

FICSIMM stands ready to engage constructively with the ITRE rapporteurs, shadow rapporteurs and the Committees providing opinions (REGI, EMPL, ECON, IMCO) to advance these amendments during the remaining legislative phases.