Proposal for a Regulation on establishing the European Competitiveness Fund ('ECF')

2025/0555(COD)

The amendments proposed in this document have aim to **improve the effectiveness and functioning of the ECF Regulation**, based on the **knowledge and expertise** of an **EU-wide network** of **National and Regional Promotional Banks and Institutions**.

The amendments are grouped into **thematic clusters**: (1) Open architecture for public pillar-assessed institutions; (2) Indirect management & pre-allocation; (3) Size of the Guarantee & budget continuity; (4) Predictability; (5) Project Advisory; (6) Simplification of reporting requirements; (7) Governance of the ECF and of the ECF InvestEU Instrument; (8) SME Support; (9) Cost Coverage.

These clusters are divided into Tier 1 and Tier 2 amendments, reflecting their respective priority and expected impact on the overall ECF Regulation.

- **Tier 1** amendments focus on elements that are considered **critical to ensure the effective achievement** of the ECF objectives.
- **Tier 2** amendments put forward additional **important elements to facilitate smooth implementation** of the ECF Regulation.

TIER 1 Amendments

1. Open Architecture limited to pillar-assessed institutions with public service mission

Legal reference Proposal for a Regulation (EU) 2025/0555 (COD) (ECF Regulation) **Recital 70**	
Current text	**Proposed Amendment**
To provide implementing partners with broader access to the ECF InvestEU Instrument, the Commission should be able to conclude agreements in indirect management with all the categories of entities listed under Article 62(1), point (c), Regulation (EU, Euratom) 2024/2059. To unlock private capital, bodies established in a Member State, governed by the private law of a Member State or Union law should also be eligible to be exceptionally entrusted, following a positive pillar assessment, with the implementation of financial instruments or budgetary guarantees, including when combined with grants or with other forms of non-repayable support in blending operations, to the extent that such bodies are provided with adequate financial guarantees. Such bodies should be selected taking due account of the nature of the financial instrument or budgetary guarantee to be implemented, the experience and the financial and operational capacity of those bodies, and their rules and procedures for verifying the economic viability of projects of final recipients. The selection should be transparent, justified on objective grounds and should not give rise to a conflict of interests.	To provide implementing partners with broader access to the ECF InvestEU Instrument, the Commission should be able to conclude agreements in indirect management with all the categories of ***pillar-assessed*** entities ***with a public service mission*** listed under Article 62(1), point (c), Regulation (EU, Euratom) 2024/2059~~. To unlock private capital, bodies established in a Member State, governed by the private law of a Member State or Union law should also be eligible to be exceptionally entrusted, following a positive pillar assessment, with the implementation of financial instruments or budgetary guarantees, including when combined with grants or with other forms of non-repayable support in blending operations, to the extent that such bodies are provided with adequate financial guarantees. Such bodies should be selected taking due account of the nature of the financial instrument or budgetary guarantee to be implemented, the experience and the financial and operational capacity of those bodies, and their rules and procedures for verifying the economic viability of projects of final recipients. The selection should be transparent, justified on objective grounds and should not give rise to a conflict of interests.~~
Justification *In line with Article 62 of the Financial Regulation, the open architecture of the ECF InvestEU Instrument should remain limited to pillar-assessed financial institutions with a public service mission. The Commission's proposal for the next MFF would allow commercial and investment banks (if pillar-assessed), and even private actors without pillar assessment (under Global Europe), to manage EU funds. Preserving the current legal framework is essential to ensure a level playing field among implementing partners and safeguard the sound management of taxpayer resources. Institutions with a public service mission are best placed to be implementing partners, given their role in supporting public policy, acting in the general interest, and taking a long-term approach. In contrast, commercial and investment banks operate under fiduciary and profitability constraints, limiting their ability to act in the interest of EU public policy. Expanding the network of implementing partners (even under a pillar assessment requirement) would complicate risk management and increase vulnerability, particularly in times of macro-financial instability. Such a system would lack clarity and coherence, without delivering improved financial leverage. Commercial and investment banks are best positioned as intermediaries, financing projects that have already been de-risked by institutions with a public service mission.*	

Legal reference Proposal for a Regulation (EU) 2025/0555 (COD) (ECF Regulation) **Article 25 – Paragraph 3**	
Current text	**Proposed Amendment**
3.In addition to entities referred to in Article 62(1), first subparagraph, point (c), and Article 211(5) of Regulation (EU Euratom) 2024/2029, bodies established in a Member State, governed by the private law of a Member State or Union law may also be exceptionally entrusted, following a positive pillar assessment, with the implementation of a budgetary guarantee or financial instrument, including when combined with non-repayable support in a blending operation, to the extent that such bodies are provided with adequate financial guarantees which may be, for each action, limited to the maximum amount of the Union support. Those bodies governed by private law shall be selected with due account to the nature of the financial instrument or budgetary guarantee to be implemented, the experience and the financial and operational capacity, and their rules and procedures for verifying the economic viability of projects of final recipients. The selection shall be transparent, justified on objective grounds and shall not give rise to a conflict of interests.	*~~3.In addition to entities referred to in Article 62(1), first subparagraph, point (c), and Article 211(5) of Regulation (EU Euratom) 2024/2029, bodies established in a Member State, governed by the private law of a Member State or Union law may also be exceptionally entrusted, following a positive pillar assessment, with the implementation of a budgetary guarantee or financial instrument, including when combined with non-repayable support in a blending operation, to the extent that such bodies are provided with adequate financial guarantees which may be, for each action, limited to the maximum amount of the Union support. Those bodies governed by private law shall be selected with due account to the nature of the financial instrument or budgetary guarantee to be implemented, the experience and the financial and operational capacity, and their rules and procedures for verifying the economic viability of projects of final recipients. The selection shall be transparent, justified on objective grounds and shall not give rise to a conflict of interests.~~*
Justification *In line with Article 62 of the Financial Regulation, the open architecture of the ECF InvestEU Instrument should remain limited to pillar-assessed financial institutions with a public service mission. The Commission's proposal for the next MFF would allow commercial and investment banks (if pillar-assessed), and even private actors without pillar assessment (under Global Europe), to manage EU funds. Preserving the current legal framework is essential to ensure a level playing field among implementing partners and safeguard the sound management of taxpayer resources. Institutions with a public service mission are best placed to be implementing partners, given their role in supporting public policy, acting in the general interest, and taking a long-term approach. In contrast, commercial and investment banks operate under fiduciary and profitability constraints, limiting their ability to act in the interest of EU public policy. Expanding the network of implementing partners (even under a pillar assessment requirement) would complicate risk management and increase vulnerability, particularly in times of macro-financial instability. Such a system would lack clarity and coherence, without delivering improved financial leverage. Commercial and investment banks are best positioned as intermediaries, financing projects that have already been de-risked by institutions with a public service mission.*	

Legal reference Proposal for a Regulation (EU) 2025/0555 (COD) (ECF Regulation) **Article 12 – Paragraph 2**	
Current text	**Proposed Amendment**
2.The ECF shall be implemented in accordance with Regulation (EU, Euratom) 2024/2509, under direct management or under indirect management with entities referred to in Article 62(1), point (c) of that Regulation.	2.The ECF shall be implemented in accordance with Regulation (EU, Euratom) 2024/2509, under direct management or under indirect management with ***pillar-assessed*** entities referred to in Article 62(1), point (c) of that Regulation.
Justification *The purpose of this amendment is to ensure coherence and legal consistency by confirming that the indirect management of EU resources remains strictly limited to the entities referred to in Article 62(1)(c) of Regulation (EU, Euratom) 2024/2509, and only where these entities have successfully undergone a pillar assessment in accordance with Article 157(3) of the same Regulation.*	

Legal reference Proposal for a Regulation (EU) 2025/0555 (COD) (ECF Regulation) **Article 25 – Paragraph 2**	
Current text	**Proposed Amendment**
2.By way of derogation from Article 211(5) of Regulation (EU, Euratom) 2024/2509, and subject to Article 12 of this Regulation, the implementation of a budgetary guarantee or financial instrument, including when combined with non-repayable support in a blending operation, may be entrusted to any entity referred to in Article 62(1), first subparagraph, point (c), of Regulation (EU, Euratom) 2024/2509.	2.By way of derogation from Article 211(5) of Regulation (EU, Euratom) 2024/2509, and subject to Article 12 of this Regulation, the implementation of a budgetary guarantee or financial instrument, including when combined with non-repayable support in a blending operation, may be entrusted to any ***pillar-assessed*** entity referred to in Article 62(1), first subparagraph, point (c), of Regulation (EU, Euratom) 2024/2509.
Justification *The purpose of this amendment is to ensure coherence and legal consistency by confirming that the indirect management of EU resources remains strictly limited to the entities referred to in Article 62(1)(c) of Regulation (EU, Euratom) 2024/2509, and only where these entities have successfully undergone a pillar assessment in accordance with Article 157(3) of the same Regulation.*	

Legal reference Proposal for a Regulation (EU) 2025/0555 (COD) (ECF Regulation) **Article 74 – Paragraph 3**	
Current text	**Proposed Amendment**
3.By way of derogation from Article 62(1) of the Financial Regulation and subject to the Commission's assessment of the protection of the Union's interests, tasks entrusted under indirect management to the Agency, or its successors, may be further entrusted by the Agency to bodies referred to in Article 62(1), point (c), of Regulation (EU, Euratom) 2024/2509 under the conditions of indirect management applying to the Commission.	3.By way of derogation from Article 62(1) of the Financial Regulation and subject to the Commission's assessment of the protection of the Union's interests, tasks entrusted under indirect management to the Agency, or its successors, may be further entrusted by the Agency to ***pillar-assessed*** bodies referred to in Article 62(1), point (c), of Regulation (EU, Euratom) 2024/2509 under the conditions of indirect management applying to the Commission.
Justification *The purpose of this amendment is to ensure coherence and legal consistency by confirming that the indirect management of EU resources remains strictly limited to the entities referred to in Article 62(1)(c) of Regulation (EU, Euratom) 2024/2509, and only where these entities have successfully undergone a pillar assessment in accordance with Article 157(3) of the same Regulation.*	

2. Indirect Management and Pre-Allocation

<table>
<tr><td colspan="2">Legal reference
Proposal for a Regulation (EU) 2025/0555 (COD) (ECF Regulation)
Article 21 – Paragraph 3a [NEW]</td></tr>
<tr><td>Current text</td><td>Proposed Amendment</td></tr>
<tr><td>[…]</td><td>3a. When delivering Union support through the ECF InvestEU Instrument, the Commission shall avoid an excessive concentration of resources, defined as more than 70 % of total allocations, in a single implementing partner or in implementing partners belonging to the same group.</td></tr>
<tr><td colspan="2">Justification
This amendment supports the original Commission's proposal for indirect management without pre-allocated resources, which favours performance-based/competitive allocation of funds at the national, regional, and local level. While recognising the crucial role played by the EIB Group as an implementing partner of the European Commission, excessive concentration to only one Implementing Partner or Implementing Partners belonging to the same group must be avoided for all resources under indirect management, including those currently outside the scope of the European Competitiveness Fund (ECF) InvestEU Instrument, such as the EU Facility, the Innovation Fund and the EIC Fund. A balanced distribution of responsibilities among Implementing Partners promotes competitive allocation, strengthens geographical coverage, and supports the development of diverse and high-quality project pipelines across Member States.</td></tr>
<tr><td colspan="2">EACM does not support this amendment and welcomes the European Commission's proposal, which does not provide for a pre-allocation of the ECF InvestEU Instrument resources between the EIB Group and other implementing partners.</td></tr>
</table>

3. Size of the Guarantee & budget continuity

<table>
<tr><td colspan="2" align="center">Legal reference
Proposal for a Regulation (EU) 2025/0555 (COD) (ECF Regulation)
Article 4 – Paragraph 2(a)</td></tr>
<tr><th>Current text</th><th>Proposed Amendment</th></tr>
<tr><td>(a) EUR 11 000 000 000 for activities contributing to the general objectives referred to Article 3, as implemented in particular through cross-cutting activities such as non-thematic support of the ECF InvestEU Instrument, referred to in Chapter II, Section 2; Project Advisory, SME Collaboration, skills development and Access to Funding, referred to in Chapter III;</td><td>(a) EUR <s>11</s> 22 500 000 000 for activities contributing to the general objectives referred to Article 3, as implemented in particular through cross-cutting activities such as non-thematic support of the ECF InvestEU Instrument, referred to in Chapter II, Section 2; Project Advisory, SME Collaboration, skills development and Access to Funding, referred to in Chapter III;</td></tr>
<tr><td colspan="2"> Justification The minimum amount of Union support from the ECF delivered through the ECF InvestEU Instrument, before additional contributions from thematic work programmes, should not fall below the current level of the InvestEU guarantee adjusted for inflation, i.e. €40 billion, following the adoption of the Omnibus II proposal. A reduced guarantee risks undermining the Instrument’s capacity to mobilise private capital and support strategic investments.
In the current Commission proposal for the next MFF, the minimum budget allocated to the ECF InvestEU Instrument is €11 billion, distributed as follows: (i) €1 billion for Project Advisory; and (ii) €10 billion for the ECF InvestEU Instrument. Of these €10 billion, €3 billion represent an indicative allocation for fully funded financial instruments, while the remaining €7 billion are allocated to the provisioning of the budgetary guarantee. With a 50% provisioning rate, these €7 billion translate into a maximum budgetary guarantee of €14 billion. This brings Union support from the ECF delivered through the ECF InvestEU Instrument to €17 billion, which is €23 billion below the current InvestEU guarantee adjusted for inflation(€40 billion).
We propose to allocate a minimum budget of €22,5 billion to the ECF InvestEU Instrument, distributed as follows: (i) €1 billion for Project Advisory; and (ii) €21,5 billion for the ECF InvestEU Instrument. Of these €21,5 billion, €3 billion would be an indicative allocation for fully funded financial instruments, while the remaining €18,5 billion would be allocated to the provisioning of the budgetary guarantee. With a 50% provisioning rate, these €18,5 billion translate into a maximum budgetary guarantee of €37 billion. This brings Union support from the ECF delivered through the ECF InvestEU Instrument to €40 billion (€3 billion for fully funded financial instruments, and €37 billion for the budgetary guarantee provisioned at 50%).</td></tr>
</table>

<table>
<tr><td colspan="2" align="center">Legal reference
Proposal for a Regulation (EU) 2025/0555 (COD) (ECF Regulation)
Article 21 – Paragraph 4</td></tr>
<tr><th>Current text</th><th>Proposed Amendment</th></tr>
<tr><td>4. The minimum amount of the Union support from ECF delivered through ECF InvestEU Instrument shall be EUR 17 000 000 000 bn, to be used in support of the general and specific objectives set out in Article 3. This minimum amount shall be increased by the contributions from the work programmes set out in Article 15. The contributions shall be a favoured</td><td>4. The minimum amount of the Union support from ECF delivered through ECF InvestEU Instrument shall be at least EUR <s>17</s>40 000 000 000 <s>bn</s>, to be used in support of the general and specific objectives set out in Article 3. This minimum amount may operate through the four policy windows set out in Article 8(1), points (a), (b), (c) and (d) of the Regulation (EU)</td></tr>
</table>

means of implementation under the ECF and used for provisioning of the budgetary guarantee or financing of the financial instruments.	***2021/523.*** *This minimum amount shall be increased by the contributions from the work programmes set out in Article 15.* ***These contributions shall be at least 10% of the Union support from the ECF allocated in Article 4 to the specific objectives referred to in Article 3(2), and shall operate through the ECF policy windows*** *The contributions shall be a favoured means of implementation under the ECF and used for provisioning of the budgetary guarantee or financing of the financial instruments.*

Justification

The minimum amount of Union support from the ECF delivered through the ECF InvestEU Instrument, before additional contributions from thematic work programmes, should not fall below the current level of the InvestEU guarantee adjusted for inflation, i.e. €40 billion, following the adoption of the Omnibus II proposal. A reduced guarantee risks undermining the Instrument's capacity to mobilise private capital and support strategic investments.

In the current Commission proposal for the next MFF, the minimum budget allocated to the ECF InvestEU Instrument is €11 billion, distributed as follows: (i) €1 billion for Project Advisory; and (ii) €10 billion for the ECF InvestEU Instrument. Of these €10 billion, €3 billion represent an indicative allocation for fully funded financial instruments, while the remaining €7 billion are allocated to the provisioning of the budgetary guarantee. With a 50% provisioning rate, these €7 billion translate into a maximum budgetary guarantee of €14 billion. This brings Union support from the ECF delivered through the ECF InvestEU Instrument to €17 billion, which is €23 billion below the current InvestEU guarantee adjusted for inflation(€40 billion).

We propose to allocate a minimum budget of €22,5 billion to the ECF InvestEU Instrument, distributed as follows: (i) €1 billion for Project Advisory; and (ii) €21,5 billion for the ECF InvestEU Instrument. Of these €21,5 billion, €3 billion would be an indicative allocation for fully funded financial instruments, while the remaining €18,5 billion would be allocated to the provisioning of the budgetary guarantee. With a 50% provisioning rate, these €18,5 billion translate into a maximum budgetary guarantee of €37 billion. This brings Union support from the ECF delivered through the ECF InvestEU Instrument to €40 billion (€3 billion for fully funded financial instruments, and €37 billion for the budgetary guarantee provisioned at 50%). Moreover, to ensure budget continuity and avoid a time gap in investment support during the transition to the new thematic windows proposed under the ECF, the minimum amount of non-thematic support allocated to the ECF InvestEU Instrument should be channelled through the existing InvestEU policy windows.

Finally, to preserve its effectiveness and leverage, the financial allocation to the ECF InvestEU Instrument must reflect the EU's strategic ambitions. Given the scale of the investment gap (estimated at nearly €1,200 billion/year for the period 2025–2031, as highlighted by Professor Draghi), a substantially larger budget is essential to promote EU competitiveness. Therefore, incentives should be put in place to ensure that ECF thematic work programmes contribute additional resources to the ECF InvestEU Instrument. These additional resources should be channelled through the new ECF thematic windows, allowing the EU budget for strategic projects to be multiplied, catalysing both private and public investments and ensuring a high crowding-in and leverage effect.

Legal reference Proposal for a Regulation (EU) 2025/0555 (COD) (ECF Regulation) **Article 21 – paragraph 10 [NEW]**	
Current text	**Proposed Amendment**
[…]	***10. Without prejudice to the timely selection for new implementing partners, the Commission may rely on and reuse in full or in part the agreements with implementing partners concluded under Regulation (EU) 2021/523, and on assessments made by itself or other entities in the context of agreements under that Regulation.***
Justification *In accordance with Recital 69, to ensure sound financial management, a faster roll-out and simplification to entrusted entities, the implementation of the ECF InvestEU Instrument should build on existing agreements, templates for legal and contractual arrangements, as well as established monitoring and reporting tools. This would also ensure budget continuity and reduce the risk of a time gap in investment support (the so-called "cliff-edge scenario") during the transition to the new ECF InvestEU Instrument.*	

4. Predictability

Legal reference Proposal for a Regulation (EU) 2025/0555 (COD) (ECF Regulation) **Article 12 – Paragraph 1**	
Current text	**Proposed Amendment**
1.The ECF shall be implemented through work programmes in accordance with Article 110 of Regulation (EU, Euratom) 2024/2509.	1. The ECF, ***with the exception of the ECF InvestEU Instrument***, shall be implemented through work programmes in accordance with Article 110 of Regulation (EU, Euratom) 2024/2509.
Justification *As far as financial instruments are concerned, long-term programming is essential to provide predictability, catalyse private investment, and support strategic projects. Annual programming is ill-suited to the nature of financial instruments, which require a stable multi-year horizon and sufficiently large budgets to justify tailored financial engineering. Therefore, the ECF InvestEU Instrument should not be implemented through work programmes.* *While the Commission's desire for flexibility is understandable, it must be reconciled with the stability and visibility required for the effective deployment of financial instruments. Flexibility can be ensured within the ECF InvestEU Instrument through regular or continuously open calls for expressions of interest, enabling implementing partners to select the most appropriate instruments based on context and needs, and allowing the objectives of specific products to be adjusted. Overly prescriptive and short-term work programmes risk undermining this flexibility and fragmenting implementation.*	

Legal reference Proposal for a Regulation (EU) 2025/0555 (COD) (ECF Regulation) **Recital 50**	
Current text	**Proposed Amendment**
The ECF should be implemented through work programmes as set out in this Regulation. Work programmes could be adopted under an annual or multi-annual format. The latter could in particular be considered for the purposes of Union support provided for budgetary guarantees and financial instruments, with a view to provide predictability to implementing partners. The designated mode of implementation reflects the identified needs for directionality, flexibility, predictability and efficiency, required to meet the objectives of the Regulation. In accordance with Regulation (EU Euratom) 2024/2059, the work programmes and the call documents will set out more	The ECF, ***with the exception of the ECF InvestEU Instrument,*** should be implemented through work programmes as set out in this Regulation. Work programmes could be adopted under an annual or multi-annual format. ~~The latter could in particular be considered for the purposes of Union support provided for budgetary guarantees and financial instruments, with a view to provide predictability to implementing partners.~~ ***A multiannual approach is particularly appropriate when aiming to increase, through contributions from work programmes, the minimum amount of Union support for the ECF delivered via the ECF InvestEU Instrument, thereby***

technical implementation details for the budget across the set of policies supported by the ECF, including specific eligibility and award criteria depending on the instrument of budget implementation, be it grant, or procurement, and the specific policy objectives pursued. In accordance with Article 136 of the Financial Regulation, eligibility restrictions should apply to high-risk suppliers, for security reasons. Where work programmes lay down award criteria these should where applicable take into account the quality and impact of proposals in light of the ECF objectives as well as the ability of proposals to support the specific activities of the policy windows. Work programmes are also the appropriate place to allocate budget in accordance with evolving policy priorities, and they should set out contributions, specific conditions and expected results.	***providing greater predictability to implementing partners.*** The designated mode of implementation reflects the identified needs for directionality, flexibility, predictability and efficiency, required to meet the objectives of the Regulation. In accordance with Regulation (EU Euratom) 2024/2059, the work programmes and the call documents will set out more technical implementation details for the budget across the set of policies supported by the ECF, including specific eligibility and award criteria depending on the instrument of budget implementation, be it grant, or procurement, and the specific policy objectives pursued. In accordance with Article 136 of the Financial Regulation, eligibility restrictions should apply to high-risk suppliers, for security reasons. Where work programmes lay down award criteria these should where applicable take into account the quality and impact of proposals in light of the ECF objectives as well as the ability of proposals to support the specific activities of the policy windows. Work programmes are also the appropriate place to allocate budget in accordance with evolving policy priorities, and they should set out contributions, specific conditions and expected results.

Justification

As far as financial instruments are concerned, long-term programming is essential to provide predictability, catalyse private investment, and support strategic projects. Annual programming is ill-suited to the nature of financial instruments, which require a stable multi-year horizon and sufficiently large budgets to justify tailored financial engineering. Therefore, additional contributions to the ECF InvestEU Instrument from thematic work programmes should be structured on a multiannual basis. While the Commission's desire for flexibility is understandable, it must be reconciled with the stability and visibility required for the effective deployment of financial instruments. Flexibility can be ensured within the ECF InvestEU Instrument through regular or continuously open calls for expressions of interest, enabling implementing partners to select the most appropriate instruments based on context and needs, and allowing the objectives of specific products to be adjusted. Overly prescriptive and short-term work programmes risk undermining this flexibility and fragmenting implementation.

5. Project Advisory Component

Legal reference Proposal for a Regulation (EU) 2025/0555 (COD) (ECF Regulation) **Article 26 – Paragraph 4**	
Current text	**Proposed Amendment**
4. The Commission may conclude advisory agreements with advisory partners and service providers in line with the needs of each policy windows. The Commission and the advisory partners, including the EIB Group, shall cooperate closely with a view to ensuring efficiency, synergies and effective geographic coverage across the Union, while taking account of existing structures and work.	4. The Commission may conclude advisory agreements ***with all the categories of pillar-assessed entities listed under Article 62(1), point (c), Regulation (EU, Euratom) 2024/2059 and*** ~~with advisory partners and service providers~~ in line with the needs of each policy windows. The Commission and the advisory partners, including the EIB Group, ***other international financial institutions and national and regional promotional banks and institutions***, shall cooperate closely with a view to ensuring efficiency, synergies and effective geographic coverage across the Union, while taking account of existing structures and work.
Justification *In line with Article 62 of the Financial Regulation, advisory agreements should remain limited to pillar-assessed financial institutions with a public service mission. National and Regional Promotional Banks and Institutions (NPBIs) and other International Financial Institutions (IFIs) play a key role in providing advisory services across EU Member States and regions, ensuring proper geographic coverage and improving the quality of local project pipelines. They should therefore be recognised as strategic partners for future Project Advisory services.* *NPBIs and IFIs are already advisory partners of the InvestEU Advisory Hub. Including them in the ECF framework is necessary to ensure continuity for all advisory partners under the current InvestEU system. Promotional institutions should continue to play a central role as advisory partners to the European Commission, given their proximity to local ecosystems and their capacity to support project development. The Commission should allocate sufficient resources to promotional institutions to strengthen their advisory function and ensure effective delivery of support across Member States.*	

6. Simplification of reporting requirements

Legal reference Proposal for a Regulation (EU) 2025/0555 (COD) (ECF Regulation) **Recital 83**	
Current text	**Proposed Amendment**
(83) The ECF is to be implemented in accordance with Regulation (EU) [XXX] of the European Parliament and of the Council [Performance Regulation] which establishes the rules for the expenditure tracking and the performance framework for the Union budget, including rules for ensuring a uniform application of the principles of 'do no significant harm' and gender equality referred to in Article 33(2), points (d) and (f), of Regulation (EU, Euratom) 2024/2509 respectively, rules for monitoring and reporting on the performance of Union programmes and activities, rules for establishing a Union support portal, rules for the evaluation of the programmes, as well as other horizontal provisions applicable to all Union programmes such as those on information, communication and visibility.	(83) The ECF is to be implemented in accordance with Regulation (EU) [XXX] of the European Parliament and of the Council [Performance Regulation] which establishes the rules for the expenditure tracking and the performance framework for the Union budget, including rules for ensuring a uniform application of the principles of 'do no significant harm' and gender equality referred to in Article 33(2), points (d) and (f), of Regulation (EU, Euratom) 2024/2509 respectively, rules for monitoring and reporting on the performance of Union programmes and activities, rules for establishing a Union support portal, rules for the evaluation of the programmes, as well as other horizontal provisions applicable to all Union programmes such as those on information, communication and visibility. ***A simplified application of the performance framework will be used for the budgetary guarantee and financial instruments under the ECF InvestEU Instrument, whereby the application of such rules should be proportionate, feasible and appropriate for such instruments.***
Justification *This amendment proposes the application of a simplified performance framework where the EU budget is implemented through budgetary guarantees and financial instruments under the ECF InvestEU Instrument. Such an approach would substantially reduce administrative burdens for implementing partners and final beneficiaries by allowing them to rely on the governance, monitoring and reporting systems already established under the existing InvestEU Programme. Only limited and clearly targeted adjustments to the current reporting framework would be required, thereby avoiding unnecessary duplication, ensuring continuity and legal certainty, and fully respecting the principle of proportionality in the use of EU funds.*	

Legal reference Proposal for a Regulation (EU) 2025/0555 (COD) (ECF Regulation) Article 21 – Paragraphs 8 and 9 [NEW]	
Current text	**Proposed Amendment**
[…]	***8. Support from a budgetary guarantee or a financial instrument under this Regulation and support provided through financial instruments or budgetary guarantees established by programmes in other programming periods may be combined to support financial products or portfolios implemented or to be implemented under this Regulation.*** ***9. By derogation of Article 212(3) of the Financial Regulation, resources paid back, before the end of the eligibility period, to financial instruments from investments in final recipients or from the release of resources set aside for guarantee contracts, including capital repayments and any type of generated income that is attributable to the support from the Funds, may be re-used in the same or other financial instruments or budgetary guarantees for further investments in final recipients, to cover the losses in the nominal amount of the Funds contribution to the financial instrument resulting from negative interest, or for any management costs and fees associated to such further investments, taking into account the principle of sound financial management.***
Justification *This amendment has the objective to confirm that the flexibilities and enhanced possibilities of combinations of EU support introduced by the Omnibus II Regulation also apply to the ECF Regulation. The changes allow EU budgetary guarantees to be combined with reflows and surpluses from previous programmes, such as InvestEU, making them reusable for the 2028–2034 programming period.*	

TIER 2 Amendments

7. Governance of the ECF and of the ECF InvestEU Instrument

Legal reference Proposal for a Regulation (EU) 2025/0555 (COD) (ECF Regulation) **Article 14 – Paragraph 2**	
Current text	**Proposed Amendment**
2. The members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, following an open call for nominations or for expressions of interest, or both, whichever the Commission finds more appropriate, and taking into account the need for balance in sector, organisation type, including private investors, and size, expertise, gender, age and geographical distribution. The term of members the Board shall be limited to four years, renewable once. Members of the Board should act with integrity and probity.	*2.* ***The EIB Group shall have [two] permanent representatives.*** *The* ***other*** *members of the ECF Strategic Stakeholders Board shall be appointed by the Commission, following an open call for nominations or for expressions of interest, or both, whichever the Commission finds more appropriate, and taking into account the need for balance in sector, organisation type, including* ***other ECF InvestEU Instrument implementing partners and*** *private investors, and size, expertise, gender, age and geographical distribution. The term of members the Board shall be limited to four years, renewable once. Members of the Board should act with integrity and probity.*
Justification *In order to ensure full coherence and effective coordination between the overall ECF architecture and the implementation of the ECF InvestEU Instrument, the composition of the ECF Strategic Stakeholders Board should explicitly include Implementing Partners. Their participation would strengthen the Board's strategic guidance by bringing in operational experience and technical expertise directly linked to the delivery of EU investment objectives.* *Implementing Partners are key actors in addressing market failures and suboptimal investment situations, notably through the provision of long-term, patient capital and by operating in complementarity with private investors where market forces alone are insufficient. Their systematic involvement in the Board would therefore enhance the alignment of investment priorities, improve the consistency of interventions across the ECF, and contribute to the Union's long-term competitiveness objectives.*	

Legal reference Proposal for a Regulation (EU) 2025/0555 (COD) (ECF Regulation) **Article 14 – Paragraph 7**	
Current text	**Proposed Amendment**
7. The Investment Committee shall examine the proposals for financing and investment operations submitted by implementing partners for coverage under the Union guarantee and verify the compliance with the applicable rules of the proposals for financing under the ECF InvestEU Instrument.	7. The Investment Committee shall examine the proposals for financing and investment operations***, including framework operations,*** submitted by implementing partners for coverage under the Union guarantee and verify compliance with the applicable rules of the proposals for financing under the

	ECF InvestEU Instrument. ***The Investment Committee shall act with a view to minimise costs for implementing partners, financial intermediaries and final beneficiaries, in line with the Union's objective of reducing administrative burden.***
Justification *While ensuring compliance with all relevant rules, the Investment Committee should be allowed to approve framework operations and should avoid imposing excessive administrative burdens on implementing partners, financial intermediaries, and final beneficiaries. This approach is consistent with the Commission's commitment to a regulatory framework that achieves policy objectives at minimum cost, as outlined in the Communication "Long-term competitiveness of the EU: looking beyond 2030". Reducing unnecessary complexity will improve efficiency, accelerate project delivery, and support the Union's goal of fostering competitiveness.*	

Legal reference Proposal for a Regulation (EU) 2025/0555 (COD) (ECF Regulation) **Article 14 – Paragraph 10**	
Current text	**Proposed Amendment**
10.The Commission and Implementing partners shall establish regular Policy Review Dialogues to discuss progress with the implementation of the financial products and engage on relevant policy developments.	10.The Commission and Implementing partners shall establish regular Policy Review Dialogues to discuss progress with the implementation of the financial ***and advisory*** products and engage on relevant policy developments.
Justification *This amendment is to ensure that Policy Review Dialogues are conducted also for advisory products as is also the case under the current InvestEU Programme.*	

8. SME Support

Legal reference Proposal for a Regulation (EU) 2025/0555 (COD) (ECF Regulation) **Recital 19**	
Current text	**Proposed amendment**
(19) ‘Small and medium-sized enterprise’ or ‘SME’ means a micro, small or medium sized enterprise within the meaning of the Annex to Commission Recommendation 2003/361/EC;	(19) ‘Small and medium-sized enterprise’ or ‘SME’ means ~~a micro, small or medium sized enterprise within the meaning of the Annex to Commission Recommendation 2003/361/EC~~; ***(a) an enterprise that, unless otherwise specified in the work programme or call for proposals, according to its last annual or consolidated accounts, employs less than 250 employees, and which, where necessary for implementation purposes, is assessed in accordance with the principles laid down in the relevant provisions of Annex I to Commission Recommendation 2003/361/EC; or*** ***(b) in the case of financial products for which the applicable State aid rules require the use of the SME definition in Annex I to Commission Recommendation 2003/361/EC, a micro, small or medium-sized enterprise within the meaning of that Annex;***
Justification *This amendment offers a simplified application of the SME definition set out in Commission Recommendation 2003/361/EC. In the spirit of the changes introduced by the Omnibus II Regulation, a streamlined definition that only looks at headcount over the previous year would apply to all types of support under the ECF Regulation – with the exception of financial products for which the applicable State aid rules require the use of the SME definition set out in Annex I to Commission Recommendation 2003/361/EC. This adjustment would significantly remove complexities for financial intermediaries and final recipients – in particular microenterprises – which find burdensome the application of all the criteria and provisions laid down in Annex I to Commission Recommendation 2003/361/EC.*	

Legal reference Proposal for a Regulation (EU) 2025/0555 (COD) (ECF Regulation) **Recital 18**	
Current text	**Proposed amendment**
(18) ‘Small mid-cap company’ means an entity as defined in the Commission recommendation 2025/3500 final;	(18) ‘Small mid-cap ~~company~~ ***enterprise***’ means ~~an entity as defined in the Commission recommendation 2025/3500 final~~;

	(a) an enterprise that, unless otherwise specified in the work programme or call for proposals, is not an SME and that, according to its last annual or consolidated accounts, employs less than 750 employees, and which, where necessary for implementation purposes, is assessed in accordance with the principles laid down in the relevant provisions of Annex I to Commission Recommendation 2025/3500; or ***(b) in the case of financial products for which the applicable State aid rules require the use of a specific definition, an enterprise meeting the definition set out in those State aid rules.***

Justification

This amendment offers a simplified application of the SMC definition set out in Commission Recommendation 2025/3500. A streamlined definition that only looks at headcount over the previous year would apply to all types of support under the ECF Regulation – with the exception of financial products for which the applicable State aid rules require the use of the SMC definition set out in Annex I to Commission Recommendation 2025/3500. This adjustment would ensure consistency with the simplified application of the SME definition proposed in the previous amendment, and equivalently, remove complexities for financial intermediaries and final recipients – even after outgrowing SME status.

Legal reference
Proposal for a Regulation (EU) 2025/0555 (COD) (ECF Regulation)
Article 3 – Paragraph 2

Current text	Proposed amendment
2. Under the general objectives set out in paragraph 1, the ECF shall in particular pursue the following specific objectives: […] (d) For support to 'Resilience and Security, Defence Industry and Space' policy, respectively the specific objectives of: (1) For support to resilience of supply chains, the specific objectives of reinforcing Europe's resilience by strengthening the Union capacity in exploration, extraction, processing and recycling of raw materials and diversifying supply sources and markets, and improving the timely availability of such products, including through the reduction of their delivery lead time, reservation of manufacturing slots or stockpiling of products, intermediate products or raw materials.	2. Under the general objectives set out in paragraph 1, the ECF shall in particular pursue the following specific objectives: […] (d) For support to 'Resilience and Security, Defence Industry and Space' policy, respectively the specific objectives of: ***(1a) For support to the resilience and competitiveness of microenterprises, SMEs and small mid-cap enterprises, the specific objective shall be to strengthen their financial resilience by increasing the access to and the availability of finance, ensuring timely and tailored financial solutions.*** (1) For support to resilience of supply chains, the specific objectives of reinforcing Europe's resilience by strengthening the Union capacity in

	exploration, extraction, processing and recycling of raw materials and diversifying supply sources and markets, and improving the timely availability of such products, including through the reduction of their delivery lead time, reservation of manufacturing slots or stockpiling of products, intermediate products or raw materials.

Justification
This amendment proposes to add access to finance for microenterprises, SMEs and small mid-cap enterprises as a specific objective under the ECF Regulation, recognising the strategic nature of financing SMEs – beyond those active in strategic sectors and technologies. SMEs represent over 99 % of enterprises in the Union and their economic value is significant and crucial. However, they face important difficulties when accessing finance because of their perceived high risk and lack of sufficient collateral. Supporting microenterprises, SMEs and small mid-caps by making it easier for them to gain access to finance and by providing more diversified sources of funding is necessary to increase their ability to finance their creation, growth, innovation and sustainable development, ensure their competitiveness and withstand economic shocks to make the economy and the financial system more resilient during economic downturns and to maintain their overall ability to create jobs and social well-being.

Legal reference Proposal for a Regulation (EU) 2025/0555 (COD) (ECF Regulation) **Article 42 – Paragraphs 1 and 2**	
Current text	**Proposed amendment**
1. Support to Resilience policy shall reinforce the strategic autonomy, economic security and the resilience of the Union industry by strengthening the different stages of the raw materials value chain, including through diversification of the supply of critical raw materials from third countries. 2. Support for resilience policy shall be implemented in particular through the following activities: (a) support for the strengthening of the EU capacity in exploration, extraction, processing and recycling of raw materials;	1. Support to Resilience policy shall reinforce the strategic autonomy, economic security and the resilience of the Union industry by strengthening the different stages of the raw materials value chain, including through diversification of the supply of critical raw materials from third countries. ***More broadly, Resilience policy shall support the financial resilience and competitiveness of microenterprises, SMEs and small mid-cap enterprises.*** 2. Support for resilience policy shall be implemented in particular through the following activities: ***(aa) financial support to increase the access to and the availability of finance for microenterprises, SMEs and small mid-cap enterprises, ensuring timely and tailored financial solutions;*** (a) support for the strengthening of the EU capacity in exploration, extraction, processing and recycling of raw materials;

Justification
This amendment ensures coherence and legal consistency with the previous amendment, confirming that the financial resilience and competitiveness of microenterprises, SMEs and small mid-cap enterprises is introduced as a specific policy objective under Resilience policy.

9. Cost coverage

<table>
<tr><th colspan="2">Legal reference
Proposal for Regulation (EU) 2025/0555 (COD) (ECF Regulation)
Article 4 – Paragraphs 5 and 6 [NEW]</th></tr>
<tr><th>Current text</th><th>Proposed Amendment</th></tr>
<tr><td>4. The financial envelope referred to in paragraph 1 of this Article and the additional resources referred to in Article 5 may also be used for technical and administrative assistance for the implementation of the ECF, such as preparatory, monitoring, control, audit and evaluation activities, corporate information technology systems and platforms, information and communication activities, including corporate communication on the political priorities of the Union, and all other technical and administrative assistance or staff-related expenses incurred by the Commission for the management of the ECF.</td><td>5. The financial envelope referred to in paragraph 1 of this Article and the additional resources referred to in Article 5 may also be used for technical and administrative assistance for the implementation of the ECF, such as preparatory, monitoring, control, audit and evaluation activities, corporate information technology systems and platforms, information and communication activities, including corporate communication on the political priorities of the Union, and all other technical and administrative assistance or staff-related expenses incurred by the Commission and implementing partners for the management of the ECF.

6. With respect to the budgetary guarantee and other financial instruments under the ECF InvestEU Instrument, technical and administrative assistance referred to in point 5 of this Article shall include adequate remuneration related to the implementation of financing and investment operations under the EU guarantee due to implementing partners by the Commission in accordance with point (g) of Article 212(2) of the Financial Regulation.</td></tr>
<tr><td colspan="2">Justification

The implementation of the ECF InvestEU Instrument will require substantial upfront and ongoing investments, including significant ICT upgrades, enhanced reporting systems, and dedicated staffing and training. These efforts extend well beyond the costs normally associated with executing investment and financing operations. They also encompass ensuring full compliance with EU regulatory requirements, maintaining extensive coordination with EU institutions and partners, and contributing regularly to the programme's governance bodies. In addition, Implementing Partners operating across multiple EU Member States face increased operational complexity due to EU-wide coordination responsibilities. Experience under the current InvestEU programme demonstrates that establishing and managing guarantee instruments generates considerable administrative and operational costs. It is therefore appropriate that Implementing Partners be allowed to recover part of these costs through administrative fees.</td></tr>
</table>

10. Predictability

Legal reference Proposal for a Regulation (EU) 2025/0555 (COD) (ECF Regulation) **Article 21 – Paragraph 2a [NEW]**	
Current text	**Proposed Amendment**
[…]	***2a. In accordance with Article 222(1) of Regulation (EU, Euratom) 2024/2509, where Union support is provided in the form of a budgetary guarantee, it shall be granted as an irrevocable, unconditional and on demand guarantee to the implementing partners and implemented in indirect management in accordance with Title X of that Regulation.***
Justification *This amendment ensures that Union support provided in the form of a budgetary guarantee under the European Competitiveness Fund (ECF) Regulation is granted as an irrevocable, unconditional and on-demand guarantee to implementing partners, in line with Article 222(1) of the Financial Regulation (EU, Euratom) 2024/2509 and implemented in indirect management pursuant to Title X of that Regulation.* *This clarification is necessary to ensure consistency with the Financial Regulation and the current InvestEU Regulation, both of which apply the same formulation. The irrevocable, unconditional and on-demand nature of the guarantee provides legal certainty and predictability, reinforces market confidence, and ensures the credibility and effectiveness of the Union guarantee framework.*	

11. Simplification of Reporting Requirements

Legal reference Proposal for a Regulation (EU) 2025/0555 (COD) (ECF Regulation) **Recital 69**	
Current text	**Proposed Amendment**
(69) To avoid undue administrative burden and ensure a swift deployment and support to the market in continuity across programming periods, the implementation of the ECF InvestEU Instrument will build on the existing community of the InvestEU Programme pillar assessed implementing partners, contractual arrangements and relevant financial products. Moreover, to ensure sound financial management, a faster roll-out and simplification to entrusted entities, the implementation of the ECF InvestEU Instrument should build on existing agreements, templates for legal and contractual arrangements, as well as established monitoring and reporting tools. This improves the impact of Union support and allows for more focus on efficiently supporting final recipients. The Commission may rely on and reuse in full or in part the agreements with implementing partners concluded under Regulation (EU) 2021/253, and on assessments made by itself or other entities in the context of agreements under that Regulation.	(69) To avoid undue administrative burden and ensure a swift deployment and support to the market in continuity across programming periods, the implementation of the ECF InvestEU Instrument will build on the existing community of the InvestEU Programme pillar assessed implementing partners, contractual arrangements and relevant financial products. Moreover, to ensure sound financial management, a faster roll-out and simplification to entrusted entities, the implementation of the ECF InvestEU Instrument should build on existing agreements, templates for legal and contractual arrangements, as well as established monitoring and reporting tools***, together with enhanced reliance on the Implementing Partners's rules, policies and procedures***. This improves the impact of Union support and allows for more focus on efficiently supporting final recipients. ***Without prejudice to the timely selection of new implementing partners, t***he Commission may rely on and reuse in full or in part the agreements with implementing partners concluded under Regulation (EU) 2021/253, and on assessments made by itself or other entities in the context of agreements under that Regulation.
Justification *This amendment is fully consistent with the obligations set out in Article 160(2) of the Financial Regulation, which explicitly requires the Commission to "rely" on the rules, systems and procedures of Implementing Partners when the EU budget is implemented under indirect management. Making effective use of pillar-assessed entities not only ensures compliance with the Financial Regulation, but also significantly reduces administrative burdens for Implementing Partners and final recipients, thereby facilitating the swift, efficient and effective deployment of EU resources. Relying on existing arrangements should not result in the delay of running selection procedures for new implementing partners*	

Legal reference Proposal for a Regulation (EU) 2025/0555 (COD) (ECF Regulation) **Article 6 – Paragraph 2**	
Current text	**Proposed Amendment**

2.Award procedures under the ECF may be jointly conducted under direct or indirect management with Member States, Union institutions, their departments, bodies and agencies, third countries international organisations, international financial institutions, or other third parties, provided the protection of the financial interests of the Union as well as of the security and defence interests of the Union and its Member States is ensured. Such procedures shall be subject to a single set of rules and lead to the conclusion of single legal commitments. For that purpose, the partners may make resources available to the ECF in accordance with Article 5 of this Regulation, or the partners may be entrusted with the implementation of the award procedure, where applicable in accordance with Article 62(1), point (c), of Regulation (EU, Euratom) 2024/2509. In joint award procedures representatives of the partners to the joint award procedure may also be members of the evaluation committee referred to in Article 153(3) of Regulation (EU, Euratom) 2024/2509.	2.Award procedures under the ECF may be jointly conducted under direct or indirect management with Member States, Union institutions, their departments, bodies and agencies, ***the EIB Group and national and regional promotional institutions,*** third countries international organisations, international financial institutions, or other third parties, provided the protection of the financial interests of the Union as well as of the security and defence interests of the Union and its Member States is ensured. Such procedures shall be subject to a single set of rules and lead to the conclusion of single legal commitments. For that purpose, the partners may make resources available to the ECF in accordance with Article 5 of this Regulation, or the partners may be entrusted with the implementation of the award procedure, where applicable in accordance with Article 62(1), point (c), of Regulation (EU, Euratom) 2024/2509. In joint award procedures representatives of the partners to the joint award procedure may also be members of the evaluation committee referred to in Article 153(3) of Regulation (EU, Euratom) 2024/2509.
Justification *This amendment aims to provide legal clarity by explicitly referring to the EIB Group and national and regional promotional institutions as potential partners in joint award procedures under the ECF. Their explicit inclusion reduces interpretative uncertainty, facilitates the effective pooling of resources, and supports the efficient and timely deployment of ECF funding, in full compliance with the Financial Regulation and the principle of sound financial management.*	

Legal reference Proposal for a Regulation (EU) 2025/0555 (COD) (ECF Regulation) **Article 3 – Paragraph 2**	
Current text	**Proposed Amendment**
2.Under the general objectives set out in paragraph 1, the ECF shall in particular pursue the following specific objectives:	2.~~Under~~ ***Beyond*** the general objectives set out in paragraph 1, the ECF shall ***also*** ~~in particular~~ pursue the following specific objectives:
Justification *This amendment aims to ensure the eligibility, under the ECF, of initiatives that pursue general objectives only, in particular those addressing cross-cutting priorities that contribute to strengthening EU competitiveness. This includes, notably, investments in areas such as social infrastructure and support to SMEs, which are currently reflected exclusively under the general objectives of the ECF Programme.*	

The amendment is also essential to ensure continuity with the current InvestEU Programme, under which social infrastructure benefitted from a dedicated policy window. In the absence of such a dedicated window in the Commission proposal for the ECF, it is crucial to clarify eligibility under the general objectives in order to avoid unintended gaps in support and ensure the continued financing of projects delivering significant social and economic value across the Union.

12. Budget Continuity

Legal reference Proposal for a Regulation (EU) 2025/0555 (COD) (ECF Regulation) **Article 5 – Paragraph 2**	
Current text	**Proposed Amendment**
2.Resources allocated to Member States under shared management may, at their request, in accordance Article X of Regulation (EU) [XXX][*NRPF regulation*], be made available to the ECF. The Commission shall implement those resources directly or indirectly in accordance with Article 62(1), point (a) or (c) of Regulation, (EU, Euratom) 2024/2509. They shall be additional to the amount referred to in Article 4. Those resources shall be used for the benefit of the Member State concerned. Where the Commission has not entered into a legal commitment under direct or indirect management for additional amounts thus made available to the ECF, the corresponding uncommitted amounts may, at the request of the Member State concerned, be transferred back to one or more respective chapters of the Plan or their successors.	2. Resources allocated to Member States under shared management may, at their request, in accordance Article X of Regulation (EU) [XXX][*NRPF regulation*], be made available to the ECF. The Commission shall implement those resources directly or indirectly in accordance with Article 62(1), point (a) or (c) of Regulation, (EU, Euratom) 2024/2509. They shall be additional to the amount referred to in Article 4. Those resources shall be used for the benefit of the Member State concerned. ***Where implemented through the ECF InvestEU Instrument those resources shall be implemented under the rules of the ECF InvestEU Instrument.*** Where the Commission has not entered into a legal commitment under direct or indirect management for additional amounts thus made available to the ECF, the corresponding uncommitted amounts may, at the request of the Member State concerned, be transferred back to one or more respective chapters of the Plan or their successors.
Justification *To simplify deployment, when resources from Heading 1 are implemented through the toolbox available under the ECF InvestEU Instrument, ECF rules should prevail over Heading 1 rules in line with the "Single Rulebook" approach.*	

Additional considerations on Recital 72

NPBIs consider that the scope of Recital 72 remains unclear, in particular as regards the reference to the development of additional guidance by the Commission. Given that Investment Guidelines are already in place, NPBIs call on the co-legislators to clarify the intended meaning of this recital, in order to avoid the proliferation of further guidance and documentation for implementing partners and financial beneficiaries. From a simplification perspective, reliance on the existing Investment Guidelines would be the most efficient approach.

About AECM: The European Association of Guarantee Institutions (AECM) represents 50 members operating in 32 countries in Europe, and 6 international partners (including the European Investment Fund). 32 members are public promotional institutions/banks, 8 are public-private mixed, and 10 are private/mutual guarantee institutions. They provide guarantees to SMEs that have an economically sound project but do not dispose of sufficient bankable collateral. This so-called SME financing gap is recognised as market failure. By guaranteeing loans for these enterprises, guarantee institutions help to address this market failure and facilitate SMEs' access to finance in a budget-efficient way. At the end of 2024, AECM members had EUR 218 billion of guarantees in portfolio, supporting more 6 million SMEs across Europe.

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About EAPB: The European Association of Public Banks (EAPB) gathers member organisations (financial institutions, funding agencies, promotional and public banks, associations of public banks and banks with similar interests) from 17 European Member States and countries, representing directly and indirectly the interests of over 90 financial institutions towards the EU and other European stakeholders. With a combined balance sheet total of about EUR 3.4 trillion and a market share of around 15%, EAPB members constitute an essential part of the European financial sector.

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About ELTI: The European Association of Long-Term Investors (ELTI) represents a European-wide network of National Promotional Banks and Institutions (NPBIs) who offer financial solutions tailored to the specific needs of their respective country and economy. The association gathers 33 European long-term investors from 23 Member States across the European Union as well as candidate countries. With a combined balance sheet of € 2.9 trillion, ELTI's goal is to promote long-term investment in close alignment with the objectives and initiatives developed by the European Union in order to foster sustainable, smart and inclusive growth and job creation.

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About NEFI: The Network of European Financial Institutions for Small and Medium Sized Enterprises (NEFI) represent 19 financial institutions from 18 European Union member states as well as the UK. NEFI pursues the objective of following the financial, political and legal developments in the fields of European economic and financial policies and all measures adopted by the EU institutions which are relevant for promotional financial institutions focusing on the facilitation of SMEs' access to finance. NEFI members act complementary to and in cooperation with the national banking system through co-financing, risk-sharing, expertise and advisory services in order to address shortcomings in the SME financial markets. In 2024, NEFI members actively supported and financed more than 220.000 SMEs all over Europe with more than EUR 64,6 billion of financing, mainly in the form of loans and guarantees.

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