

Fraunhofer-Gesellschaft zu Förderung der angewandten Forschung e. V.

Position paper on the European Innovation Act (EIA)

Europe produces world-class science but still struggles to translate discoveries into competitive products and services. The European Innovation Act (EIA) is a unique opportunity to tackle the structural obstacles that slow down the journey from laboratory to market. Drawing on the experience as a leading Research and Technology Organization (RTO), Fraunhofer proposes five concrete actions that, if embedded in the EIA, will strengthen Europe's innovation performance. To this end, Fraunhofer strongly supports the recommendations put forward by EARTO¹.

Reducing bureaucracy in procurement providing greater speed and agility

The European Union must catch up in the global competition for innovation and economic strength. To achieve this, it is urgently necessary to strengthen the flexibility and innovation capacity of public contracting authorities with research organizations and companies in this area. Therefore, the amendment to the Public Procurement Directive must reduce bureaucracy, speed up procedures, and increase flexibility in procurement. The goods and services procured by RTOs are highly specific and do not correspond to the majority of standard procurements made by other public contracting authorities.

Therefore, the amendment to the Directive on public procurement needs to extend the existing exemptions for R&D services to include research organizations and their procurement practices. In practice, this would remove services required for the purpose of fulfilling R&D tasks from the scope of public procurement law. Countries outside the European Union, such as Japan, China, and the US and the research performing organizations, are much more advanced in this area and much faster in comparison to European RPOs, due to less stringent regulations.

Embedding RTOs as sources of knowledge for start-ups

RTOs are at the very heart of the innovation pipeline: they generate intellectual property and transfer it into industry through multiple pathways, making RTOs an indispensable pillar of Europe's deep-tech ecosystem. While start-ups and spin-offs derived from RTOs are a vital element of this pipeline, they still struggle with the familiar hurdle of securing sufficient financing for high-risk, high-impact technologies.

To close this gap, we propose establishing a dedicated deep-tech venture fund under InvestEU, linked to the European Competitiveness Fund (ECF), to supply catalytic capital. In parallel, RTOs must be integrated into the EU Start-up Hub Network to strengthen collaboration and visibility for the different support mechanisms for start-ups. Declaring early-stage start-up support a non-profit activity would remove administrative barriers and unleash entrepreneurial talent within RTOs, while a more flexible application of EU competition law could further unlock private investment in RTO-based ventures.

¹ [»No EU Tech, No EU Competitiveness«](#)

Making greater use of innovation procurement (PCPs und PPIs)

We urge the EU to strengthen both pre-commercial procurement (PCP) and public procurement of innovative solutions (PPI) as powerful demand-side levers for deep-tech uptake. In this context, we welcome the Commission's initiative to establish burden-sharing regimes that help smaller public bodies pool resources, reduce administrative costs, and engage more confidently in innovative procurement.

Supporting state-of-the-art research and technology infrastructures

RTOs maintain state-of-the-art research and technology infrastructures that provide industry partners with neutral, high-tech environments for developing and testing key emerging technologies, services and know-how. However, the capital and operational expenditures required to keep these facilities on the cutting edge are substantial, while current support mechanisms are fragmented and short-term.

Europe therefore needs a coherent, long-term investment framework that pools and streamlines funding for RTO infrastructures, ensuring they remain accessible, world-class platforms for industrial innovation. To this end we welcome the strategy on research and technology infrastructures by the Commission.

Norms and Standards

Standards are the self-organizing backbone of industry and trade. Fraunhofer, as a globally active RTO, contributes to over 1,400 standardization committees worldwide, underscoring the critical role of standards for a faster technology adoption. However, Europe lags behind in aligning its standardization landscape with the dynamic needs of new transitions. To address this, the EIA must address a harmonized, industry-driven European standardization landscape by:

- Linking research and standardization closer together: Establishing clear pathways for researchers to contribute to standardization efforts, recognizing their expertise as a strategic asset. This includes integrating standardization KPIs into grant allocation criteria, standardization training and ensuring that research outcomes align with scalable, industry-ready solutions required by the various industries.
- Accelerating researchers' careers via standardization expertise: Creating incentives for researchers to engage in standardization, such as career advancement opportunities or recognition in grant evaluations. This would address the current mismatch between the time-intensive nature of standardization and the performance metrics driving academic and research careers.
- Leveraging standards for knowledge valorisation: Developing standards that explicitly support the commercialization of research. This includes aligning standardization efforts with the European Commission's strategy on research and technology Infrastructures, ensuring state-of-the-art facilities remain globally competitive and interoperable.

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