

# Orgalim analysis 2025 COMMISSION WORK PROGRAMME

Brussels, 14 February 2025

## Introduction

On Wednesday, the European Commission adopted its [work programme](#) for the coming year. This is the first work programme of the incoming Commission that took office on 1 December last year. This means that the Commission work programme is delayed compared to the typical presentation date of mid-October. It also means that the format of the current Commission work programme is likely to set a precedent for the work programmes in the coming five years that will complete the current Commission mandate.

This legislative cycle stretches from 2024-2029 and we already have a good idea of what the Commission will propose in the coming years through the [incoming Commission President Guidelines](#), the Commissioner hearings and through bilateral meetings with the Commission.

The Commission work programme 2025 focuses strongly on simplification, which is something that Orgalim welcomes and has called for. It includes a first series of Omnibus packages and proposals designed to make EU policies and laws work better and faster to strengthen the EU's competitiveness. During the first year, five omnibus proposals are announced including on corporate sustainability, administration for SMEs, simplification for investments and digital.

The initiatives in the work programme are also categorised differently from previous years with a particular focus on simplification, competitiveness and security. Previously, the headlines for policy objectives were more descriptive, but the Commission has clarified the headlines for the policy objectives to address the criticism that not enough of their proposals focused on competitiveness and simplification.

Overall, the Commission work programme includes:

- 51 new policy initiatives of which 18 are legislative initiatives and 37 initiatives that will undergo evaluations and fitness checks kickstarting a process to stress-test the stock of EU legislation to identify potential to simplify, to reduce cost
- 37 proposals for withdrawal, 4 proposals to repeal and 123 pending proposals

Some of the more noticable initiatives are the Clean Industrial Deal, the omnibus proposals, the revision of the chemicals legislation REACH, the Climate Law amendment and the post 2027 multiannual financial framework.

### 2025 Commission work programme - key figures

► **51**

New Policy Initiatives

► **11 out of 18**

Legislative initiatives are packages or initiatives with simplification objective or significant simplification dimension.

► **37**

Evaluations and Fitness Checks, kickstarting a process to stress-test the stock of EU legislation, to identify potential to simplify, to reduce costs and to consolidate rules.

► **37**

Proposals for withdrawal

► **4**

Proposals to repeal

► **123**

Pending proposals

The AI liability directive was added on Tuesday evening to the list of proposals to be withdrawn. This is something that Orgalim has called for and it is a positive development in these later stages of adopting the Commission work programme.

Orgalim welcomes the focus of the work programme on competitiveness and simplification, but there is no guarantee that simplification proposals, after they go through the legislative process, will lead to substantial simplification. The Commission even mentions this and asks for cooperation from the European Parliament and the Council of the EU. The target to decrease the administrative burden for companies by 25% and 35% for SMEs by 2029 is maintained under this Commission. The Commission has now clarified that this target equals €37.5 billion in annual recurrent costs.

Furthermore, in its new [Communication on implementation and simplification](#), published alongside the work programme, the Commission sets out its plans over the five next years to make implementation of EU rules easier in practice, and to reduce administrative burdens and simplify EU rules. For future legislation the Commission will prepare roadmaps and strategies which should assist and guide Member States in the implementation process. New SME and competitiveness checks should complement the impact assessment and have a sectoral focus.

The expected simplifications only represent a fraction of the burden created by new legislation in the last years, and with 51 new initiatives the Commission is back to business as usual. As a reference, the Commission proposed, on average, 43 new initiatives from 2020-2023 (with 2024 being an exception with only 18 new initiatives) with many pending proposals from previous years..

The key deliverables of the Commission work programme 2025 are:

- Sustainable Prosperity and Competitiveness
- Defence and Security
- Supporting people, strengthening our societies and our social model
- Sustaining our quality of life
- Protecting democracy and upholding values
- A global Europe: leveraging our power and partnerships
- Delivering together and preparing our Union for the future

We have provided below an overview of priorities by policy area by following Orgalim's Working Group structure instead of the Commission's division of the topics. This will allow our Working Groups and Task Forces to have an overview of the files that impact them directly. As always, there are overlapping issues, which we have tried to highlight in the overview.

We will discuss this new work programme from the Commission when necessary in the upcoming meetings of Orgalim Working Groups and Task Forces.

You can find all relevant links to the Commission work programme and its annexes at the end of this document.

## Summary of priorities per policy area

### Industrial strategy

#### New initiatives

- Competitiveness Compass (non-legislative, Q1 2025)
- Clean Industrial Deal (non-legislative, Q1 2025)
- Industrial Decarbonisation Accelerator Act (legislative, including impact assessment, Q4 2025)
- Third omnibus package on investment simplification (legislative, Q2 2025)
- Communication on a Savings and Investments Union (non-legislative, Q2 2025)
- Multiannual Financial Framework ( 2025)
- EU Start-up and Scale-up Strategy (non-legislative, Q2 2025)

#### Priority pending proposals

- None

## Evaluation and fitness check

- Evaluation of state aid rules for banks in difficulties (Q4 2025)
- Evaluation of the Public Procurement Directives (Q3 2025)

## Orgalim initial analysis

The work programme confirms the Commission's plans to present the Clean Industrial Deal (CID) in Q1 2025, as announced in the Competitiveness Compass, the first major initiative by the new Commission published on 29 January 2025. The expected publication date of the CID is 26 February, although it could be delayed. The CID will be presented in the form of a Communication, which will be followed by actual legislative measures in the coming months/years. According to the work programme, the CID will "improve access to affordable energy, lead markets and circular materials, products and services, as well as strengthen economic security".

The first major legislative initiative to be presented this year as part of the CID will be the Industrial Decarbonisation Accelerator Act, expected in Q4 2025. The work programme makes clear that the focus of the Act will be to "support energy intensive industries", for example by streamlining permitting processes for industrial plants to make investment in clean technologies easier in Europe.

The work programme does not, however, include two important initiatives that, according to the Competitiveness Compass, should be presented in 2025 as part of the CID. First, the revision of the EU State Aid Framework (expected in Q2 2025), to encourage investment for decarbonisation with targeted, simplified state aid, thereby avoiding market distortions. Second, the Steel and Metals Action plan, which will address investment needs, access to primary and secondary materials, use of trade defence instruments, and define a long-term solution to replace current safeguarding measures.

The work programme mentions several omnibus proposals with the aim of simplifying various pieces of legislation and reducing reporting obligations, which is a positive development. The first omnibus proposal on sustainability is analysed in the section on corporate sustainability (see page 10). The second omnibus proposal on small-mid caps has not been in our focus so far. In Q2 2025, the Commission will propose a third omnibus simplification package on investments stemming from the InvestEU Programme and the European Fund for Strategic Investments. In Q4 2025, the Commission will propose another omnibus simplification package on digital (see details on page 5).

In an effort to scale up investments, the Commission will present a set of measures to facilitate the implementation and simplify reporting required for these two EU financing instruments. Orgalim will monitor the new measures, in particular because we view the InvestEU programme as a model for shaping future, similar financial instruments.

Within the new mandate, the Commission will propose a Communication on a Savings and Investment Union to serve as a blueprint for an internal market for capital. This initiative will focus on mobilising individual, private savings within the EU to channel them into the twin and social transitions. Until now, the Commission has focused on new initiatives and measures to create a single capital market, to boost financing opportunities both for businesses and investors, namely traditional private investors such as banks. In Q2, we expect that the Commission will present a Multiannual Financial Framework, for the financing period of 2028-2034. The Commission aims to make the new EU budget better aligned with EU priorities, simpler and more impactful. In this context, the Commission will propose a new European Competitiveness Fund. It is a positive development that the Fund, as announced in the Competitiveness Council, will focus on manufacturing and not only on strategic technologies.

The announced EU start-up and scale-up strategy is expected to include a proposal establishing a 28th legal regime to support innovative companies to operate in the single market. This should reduce the cost of failure and simplify aspects related to corporate law, insolvency, labour and tax law.

## Digital Transformation

### New initiatives

- AI Continent Action Plan (Q1, 2025) which covers:
  - AI Factories boosting competitive AI ecosystems in Europe (Q1, 2025)
  - Apply AI Strategy (Q3, 2025)
  - EU Quantum Strategy (non-legislative, Q2 2025)
  - Digital Networks Act (legislative, Q4 2025)
- Digital package (simplification) (legislative, Q4 2025) which covers:
  - The review of the Cybersecurity Act and simplification of cybersecurity legislation
  - Data Union Strategy
  - European Business Wallet (legislative, Q4 2025)

### Priority pending proposals

- None

### Evaluation and fitness check

- Fitness check on the legislative acquis in the digital policy area (Q4 2025)
- \*Evaluation of the Data Governance Act (Q3 2025)
- \*Evaluation of the Free Flow of Data Regulation (Q3 2025)
- \*Evaluation of the Open Data Directive (Q3 2025)

### Orgalim initial analysis

The Commission work programme announces an AI Continent Action Plan which will include AI initiatives previously presented in the Competitiveness Compass and incoming Commission President Guidelines. The action plan will cover the AI Factories initiative, highlighted as one of the key actions for strengthening European competitiveness. The AI Factories initiative aims to leverage the existing network of EuroHPC supercomputers and harness the computing power to ultimately help industry access training environments and improve their AI models through training.

The AI Continent Action Plan also covers the Apply AI Strategy which will focus on boosting new industrial uses of AI in various sectors including manufacturing and robotics. The strategy is expected to be impactful for the industry and drive the adoption of AI which has been lagging behind according to the 2024 Digital Decade report. Orgalim has consistently contributed to the dialogue on AI and its uptake in industry. Our Manifesto on a European Agenda on Industrial AI (2020) highlights how industrial AI can drive progress and competitiveness. It also calls for a clear and proportionate legislative framework.

The Competitiveness Compass identified Quantum as one of the frontier technologies the EU should focus on in coming years. The new Quantum strategy should outline the EU's intentions in this field. Following the Draghi report, the strategy is expected to build on the Chips Act to address the fragmentation of national initiatives and support investments.

The Digital Networks Act is expected to be a legislative intervention aimed at the creation of a single market for connectivity and at creating the market conditions for increased investments in digital infrastructure. Whether manufacturers of digital networks equipment will be in scope of the initiative remains to be seen.

The Commission announced a simplification package of digital policy, to be launched by Q4 2025. This goes hand in hand with the announced "fitness check of digital policy". This is a welcome step, which Orgalim has been calling for, with a view to simplifying digital rules. According to the Communication on simplification, such a package will include at least the Data Union strategy, a review of the cybersecurity act and of cybersecurity reporting obligations.

- The Cybersecurity Act, establishing the EU cybersecurity certification framework and strengthening ENISA's mandate, underwent an evaluation in February/March 2024. As a result, a decision for review was taken and the process is set to start in Q4 of 2025. Orgalim contributed to the Commission's consultation on the evaluation of the Cybersecurity Act and emphasised the need



for the cybersecurity certifications schemes to remain voluntary. The initiative also mentions the simplification of cybersecurity legislation which is known for overlapping reporting obligations (specifically under the CRA and NIS2 Directive). Orgalim's call to simplify the reporting obligations is reiterated in the key recommendations and the regulatory burden report.

- The Data Union Strategy, announced in the Competitiveness Compass, is expected to facilitate private and public data sharing and streamline the data regulatory regime (possible upcoming "European Data Code"). Clarifications on international data flows and a strategy facilitating the use of data for compliance may be included, according to our early information. However, DG CNECT is still brainstorming. A public consultation is expected in Q2 2025.

The European Business Wallet initiative has been on DG CNECT's agenda since last year and is expected to build on the experience of the recent digital identity wallet (for individuals) this time focusing on businesses. From the information available so far, the business wallet should simplify B2B, B2C and B2G data exchanges and provide opportunities for trust service providers. This is also expected to be linked to the Data Union strategy. The Communication on simplification further clarifies that the Business Wallet is expected to enable businesses to manage national, cross-border and EU regulatory requirements, notifications, and compliance processes in one place and in a user-friendly way.

## Green Transition

### Energy & Climate

#### New initiatives

- Action plan on affordable energy (non-legislative, Q1 2025)
- Roadmap towards ending Russian energy imports (non-legislative, Q1 2025)
- European Climate Law amendment (legislative, Q2 2025)

#### Priority pending proposals

- Proposal for a Council Directive restructuring the Union framework for the taxation of energy products and electricity (recast) (Energy Taxation Directive)

#### Evaluation and fitness check

- Fitness check on energy security architecture, Q2 2025

#### Orgalim initial analysis

Under the Clean Industrial Deal, the Commission will outline a number of strategies supporting the twin goals of industry competitiveness and decarbonisation. Initiatives will focus on energy prices and capacity, infrastructure and financing, as well as maintaining a clear target objective towards climate neutrality in 2050.

The Commission will address the issue of high energy costs with the release of the Action Plan on Affordable Energy Prices expected to be published on 26 February. This initiative aims at decreasing energy prices in the EU, which are two to three times higher than in the US and China. This price difference is significantly affecting the EU's global competitiveness and is an obstacle to helping the industry to decarbonise its processes. The Commission also indicates that it will work on further measures for the energy system integration and digitalisation, with a focus on electricity grids. This should pave the way for the Electrification Action Plan, to be presented in 2026.

In order to support the energy transition, the Commission is planning to develop a new State Aid Framework for deploying renewable energy, decarbonising the industry and also ensuring sufficient clean tech manufacturing capacities.

The Commission is increasing support for nuclear energy as an important component of the Union's energy security. A plan for a nuclear illustrative programme is envisaged in 2025, with an indication of nuclear energy production targets and a strategic plan for accelerating small modular reactors.

As part of reducing Europe's energy dependencies from Russia, the Commission will publish a Roadmap

towards ending Russian energy imports – with the objective of phasing out entirely all Russian energy imports.

And finally, the timing for amending the EU Climate Law to include an EU 2040 emission reduction target is now clarified with a proposal expected in Q1 2025, alongside the Clean Industrial Deal. The Commission confirmed its plan to propose a 90% emission reduction objective for 2040 and to prepare its global climate and energy vision for the COP 30 meeting in November 2025 in Brazil.

The Commission will continue to assess the EU's energy security architecture to evaluate the existing rules on the security, resilience and autonomy of the EU's energy system as well as the emergency measures that were adopted in the context of RePowerEU. An initial call for evidence was launched in Q3-Q4 2024.

## Environment

### New initiatives

- Targeted Revision of the REACH regulation (legislative, Q4 2025)
- European Water Resilience Strategy (non-legislative, Q2 2025)

### Priority pending proposals

- Proposal for a Directive on substantiation and communication of explicit environmental claims (Green Claims Directive)
- Proposal for a Directive amending the Waste Framework Directive
- Proposal for a Regulation on the re-attribution of scientific and technical tasks and improving cooperation among Union agencies in the area of chemicals
- Proposal for a Directive on the re-attribution of scientific and technical tasks to the European Chemicals Agency
- Proposal for a Directive establishing a common data platform on chemicals, laying down rules to ensure that the data contained in it is findable, accessible, interoperable, and reusable and establishing a monitoring and outlook framework for chemicals

### Evaluation and fitness check

- Evaluation of the National Emission Reduction Commitments Directive (Q4 2025)
- Evaluation of Radioactive Waste Directive (Q4 2025)

### Orgalim initial analysis

Regarding **sustainable products**, the new Ecodesign Regulation establishing a framework for setting ecodesign requirements for sustainable products (ESPR) is not mentioned in the Commission work programme. However, the Commission will actively start the implementation of the ESPR. The first meeting of the new Ecodesign Forum will be held next week on 19-20 February. On 19 April, the first ESPR and Energy Labelling Working Plan is expected to be published and will list the first end-products, intermediate products and horizontal measures to be regulated under upcoming ESPR measures. On 19 July, ESPR acts on unsold goods destruction ban and exemptions are expected to be published, followed at the end of 2025 by ESPR acts on the Digital Product Passport (DPP) registry, service providers, data carriers and digital credentials. Orgalim has been selected by the Commission as a member of the new Ecodesign Forum and will remain very active on ESPR

The substantiation and communication of the explicit environmental “**Green Claims**” Directive is expected to be finalised in June 2025, with the trilogue negotiations having recently started under the Polish Presidency. Orgalim will continue to be active on Green Claims.

Chemicals have gained momentum in the Commission's 2025 work programme, particularly with the revision of the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) Regulation now scheduled for Q4 2025. The new Commission will aim to simplify and streamline REACH procedures with this targeted revision as well as introducing the Essential Use Concept into the REACH Framework. See Orgalim key messages for the upcoming revision of REACH and the Essential Use Concept. PFAS is not mentioned in the Commission work programme as it is a restriction under REACH. However, it will remain a top priority for Orgalim. The revision of the RoHS Directive is not mentioned in the Commission

work programme 2025 either and might be postponed at least until the completion of the REACH revision in order to ensure consistency between RoHS and REACH. “The ‘One Substance, One Assessment’ package, which includes three proposals on chemicals (listed in the pending proposals section), will also progress through the legislative process in 2025.” There is no mention of the Chemicals Industry Package nor the ECHA Founding Regulation, which we expected for 2025.

Regarding **waste** issues, the Commission’s work programme only mentions the targeted amendment to the Waste Framework Directive for textiles and food waste. The main deliverable for waste, the Circular Economy Act, expected to be published end of 2026, aims to create market demand for secondary materials and to establish a single market for waste, including harmonised approaches to Extended Producer Responsibility (EPR). It is expected to include the awaited revision of the WEEE Directive as well as a full revision of the Waste Framework Directive. Orgalim is proactively preparing recommendations to impact the upcoming new Circular Economy Act.

It is also to be noted that the Commission will put forward a **water** resilience strategy in Q2 2025, a topic with increased relevance for the new Commission and one that Orgalim is monitoring.

## Corporate Sustainability

### New initiatives

- First Omnibus Simplification Package on sustainability (Q1 2025)

### Priority pending proposals

- None

### Evaluation and fitness check

- None

### Orgalim initial analysis

The Commission in its previous mandate introduced a series of new regulatory initiatives critical to corporate reporting and behaviour, such as the EU Taxonomy, Corporate Sustainability Reporting Directive (CSRD) and Corporate Sustainability Due Diligence Directive (CSDDD). The focus of this mandate will be to maintain the content of existing laws, while ensuring that reporting is reduced and overlapping requirements are eliminated. In this context, and as expected, the Commission plans to present a first Omnibus simplification package for sustainability reporting in Q1 2025. According to the Competitiveness Compass, the package will cover sustainable finance reporting, sustainability due diligence and taxonomy. It will align reporting with investor needs, address trickle down effects on smaller companies and encourage investment in companies in transition, among other things. The timeline for this initiative seems ambitious, in particular given that a first draft proposal is only now being developed at the Service level. As the details remain unknown, we will closely monitor the developments. Regarding the EU taxonomy and CSRD, Orgalim would welcome a proposal that would postpone reporting for the next group of companies in scope (over 250 employees) and, in the meantime, simplify reporting for all companies. We will finalise Orgalim’s key recommendations on the EU taxonomy, CSRD and CSDDD once the omnibus proposal is published.

Apart from the omnibus proposal for simplification on sustainability reporting, the work programme did not specifically mention the review of the EU Taxonomy’s delegated act on climate change, expected this year. Separately, in the omnibus, we expect to see more clarifications regarding the next steps on the sector-specific standards and SME related standards. The Commission was expected to launch a public consultation on the recently adopted CSDDD, but no details were provided on the status of this consultation.

## Internal Market

### New initiatives

- Single Market Strategy (non-legislative Q2 2025)

- Third omnibus package including on small midcaps and removal of paper requirements (legislative, Q2 2025)

### Priority pending proposals

- None

### Evaluation and fitness check

- Evaluation of the Pressure Equipment Directive and the Simple Pressure Vessels Directive (Q4 2025)

### Orgalim initial analysis

This year's work programme has a much clearer focus on the single market compared to previous years, and includes new, horizontal initiatives whose impact will be far-reaching as well some more granular initiatives related to product-specific legislation.

The Single Market Strategy is expected to have three pillars: the single market for goods, the single market for services, and the governance of the single market, with the first of these being of particular interest to our industries. Amongst other things, it is likely that this first pillar will seek to strengthen the market surveillance system, explore the opportunities presented by the Digital Product Passport, and improve the situation as regards the timely delivery of European standards. Orgalim supports initiatives to promote and facilitate the cross border circulation of goods. However, it remains to be seen how this strategy will interact with the New Legislative Framework. In anticipation of the Single Market Strategy, Orgalim has already reacted to a call for evidence launched by the Commission, submitting our key recommendations for the single market, our action plan for more effective market surveillance, and our report on the EU regulatory burden on technology industries – examples and recommendations.

The Commission also indicates that one of its simplification initiatives, the third Omnibus package, announced for the second quarter of 2025, will accelerate the transition to a digital regulatory environment, notably by tackling the removal of paper requirements in product legislation. Orgalim has been active on the amendment of guidelines (Machinery and ATEX Directives) to facilitate the provision of digital instructions, and will monitor this initiative going forward. The European Business Wallet is another initiative that seeks to harness the benefits of digitalisation for business purposes. However, as of now, there is limited information available about this initiative.

Regarding the fitness check, the work programme mentions the evaluation of the Pressure Equipment Directive and the Simple Pressure Vessels Directive. Orgalim is already participating in the evaluation process of these two pieces of legislation and results are expected by the end of the year.

Some expected initiatives do not appear in this year's work programme, including the revision of the New Legislative Framework (NLF), the evaluation of the Market Surveillance Regulation and the review of the Outdoor Noise Directive. It is unclear at this stage whether these initiatives have been delayed or whether they could be rolled into other initiatives such as, for example, the Single Market Strategy. Orgalim outreach with the Commission indicates that the revision of the NLF will indeed take place this year, despite not appearing in the Commission's work programme. This topic should therefore remain a policy priority for Orgalim. Although initial discussions are ongoing and the Commission already tackled reporting obligations last year, a decision on the possible revision of the Outdoor Noise Directive is expected in spring 2025.

The revision of the Standardisation Regulation 1025/2012 is not announced in the Commission's work programme but is an initiative planned to enter the consultation phase in the second quarter of 2025. Following the evaluation of the regulation which started in May 2024, the Commission shared their preliminary findings that the regulation is no longer fit for the European Standardisation System and its stakeholders. The upcoming revision will address the shortcomings identified in the evaluation and will aim to speed up the development of systemic standards. Orgalim consistently contributed to the evaluation of the regulation and advised the Commission against the revision, calling instead for emphasis on the implementation of the requirements and creating a more agile process among stakeholders.



## Trade

### New initiatives

- None

### Priority pending proposals

- Proposal for a Regulation on the screening of foreign investments in the Union (FDI Screening Regulation)
- Proposal for a Regulation establishing the Union Customs Code and the European Union Customs Authority (EU Customs Reform)
- Proposal for a Regulation on applying a generalised scheme of tariff preferences (GSP Regulation)

### Evaluation and fitness check

- Evaluation of EU Rules of Origin (Q4 2025)

### Orgalim initial analysis

Compared to previous years, the 2025 work programme does not include any mention of the Commission's ongoing work on the negotiation and implementation of Free Trade Agreements (FTAs), despite the fact that the Commission is negotiating FTAs with several partners including India, Indonesia and the Philippines and has recently announced the reopening of trade negotiations with Malaysia. The Commission has also announced that it will present the recently concluded EU-Mexico FTA and the EU-Mercosur FTA to the European Parliament and Council for ratification, probably in the first half of this year.

While there is no explicit mention of this in the work programme, the Commission will put forward measures for simplifying CBAM and reducing the related administrative burden for companies as part of the "First Omnibus package on sustainability" expected on 26 February. This is confirmed by the [Commission Communication on Implementation and Simplification](#) that was published together with the work programme. The Commission is also expected to carry out a comprehensive review of CBAM in the form of a Report to the European Parliament and Council by the end of this year, which will include an assessment of the feasibility of extending the scope of CBAM, including to downstream products.

As regards the Commission's ongoing work on economic security, the work programme does not mention the evaluation of the EU dual-use export controls regulation. The launch of the evaluation was foreseen for Q1 2025, according to the [EU White Paper on Export Controls](#), which was published in January 2024.

## Legal

### New initiatives

- EU Start-up and Scale-up Strategy (non-legislative, Q2 2025)
- 2030 consumer agenda, including an action plan for consumers in the single market (non-legislative, Q4 2025)

### Withdrawals

- Proposal for a directive on adapting non-contractual civil liability rules to artificial intelligence (AI Liability Directive – AILD)
- Proposal for a Standard Essential Patents regulation (SEP)

### Priority pending proposals

- None

### Orgalim initial analysis

The College of Commissioners decided to withdraw the proposal for an AI Liability Directive. This is a very welcome step and a policy win for Orgalim, which has been proactively advocating for its withdrawal.

Although the withdrawal will happen with a separate formal step, the work programme commits the Commission to do it. The justification for the decision is that there is no foreseeable agreement on the file (the Council has been indeed reticent on further working on the matter). However, the Commission will assess whether another proposal should be tabled or another type of approach should be chosen.

The announced EU start-up and scale-up strategy is expected to include a proposal establishing a 28th legal regime to support innovative companies to operate in the Single Market. This should reduce the cost of failure and simplify aspects related to corporate law, insolvency, labour and tax law. An earlier version of the draft work programme mentioned that such strategy should improve relations between universities and businesses and create better prospects for patents to be commercialised. Although this point disappeared in the final version of the communication, it is worth monitoring whether this idea will end up in the strategy.

The Commission decided to withdraw also the proposal on the Standard Essential Patents regulation. The justification is similar to the case of the AILD: no agreement is foreseeable but the Commission will still assess whether another proposal should be tabled or another type of approach should be chosen.

Orgalim is also monitoring developments related to the remaining item of the “patent licensing package”, including the proposal for a regulation on compulsory licensing of patents and the proposal for a regulation on standard essential patents. The Commission work programme 2025 does not affect the ongoing negotiations on these files.

## Research & Development and Innovation

### New initiatives

- Post-2027 Multiannual Financial Framework proposals (legislative, Q3 2025)

### Priority pending proposals

- Proposal for a Council Decision on the conclusion of the Agreement between the European Union and Canada covering the participation of Canada in any Union programme and the association of Canada to Horizon Europe Evaluation and fitness checks

### Evaluation and fitness check

- Interim evaluation of the Horizon Europe framework programme for Research and Innovation (Q2 2025)
- Evaluation on the Innovation Fund (Q4 2025)

### Orgalim initial analysis

The Commission seems to have firmly placed its Research & Innovation (R&I) policy under the Competitiveness heading. Horizon Europe’s successor, the 10th EU Research and Innovation Framework Programme (FP10) does not feature per se in the Commission work programme, indicating that R&I may well be approached through the Multiannual Financial Framework (MFF) route. As presented in the Competitiveness Compass’ “Closing the Innovation Gap” theme, the MFF for the period 2028-2034 is expected to include a Competitiveness Fund that will include R&I budget – but it is not clear if all the three pillars will effectively be part of the fund. The Commission envisages the Competitiveness Fund as an investment capacity for accompanying European projects along their entire investment journey, from R&I through scale-up, industrial deployment, to manufacturing via a single-entry point.

The work programme Communication mentions preparatory work for the Innovation Act, to be released in early 2026. The preparation will focus, among other things, on supporting start-ups’ and scale-ups’ innovation capabilities in the EU Start-up and Scale-up Strategy (see details under “Legal”).

The Commission is planning a fitness check of the Innovation Fund, a funding programme for the deployment of innovative net-zero and low-carbon technologies, financed by the EU Emissions Trading System (EU ETS) auctions income.

## Relevant Links

- [Press Release](#) from the Commission
- [Webpage](#) about the 2025 Commission work programme and its annexes
- [2025 Commission work programme](#)
- 2025 Commission work programme – [annexes](#)
- 2025 Commission work programme 2025 explained - [factsheet](#)
- Commission [Communication](#) on implementation and simplification

Orgalim represents Europe's technology industries, comprised of 770,000 innovative companies spanning the mechanical engineering, electrical engineering, electronics, ICT and metal technology branches. Together they represent the EU's largest manufacturing sector, generating annual turnover of €2,835 billion, manufacturing one-third of all European exports and providing 11.7 million direct jobs. Orgalim is registered under the European Union Transparency Register – ID number: 20210641335-88.

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