Keeping industrial ecosystems visible in the 2028-2034 EU budget: what SMEs gain from clusters and how to measure it

Request: **keep industrial ecosystems, and the SMEs that take part in them, visible in Annex I of the 2028–2034 performance framework through four targeted changes. Changes (2) to (4) work within the existing fields and stand on their own**:

- **(1)** a dedicated intervention field for innovation clusters (63a) in Annex I, ensuring continuity with intervention code 026 of the 2021–2027 programming period;
- **(2)** one collaboration indicator counting the enterprises that take part in collaborative actions facilitated by cluster organisations or other business intermediaries, as the framework already counts the users of Digital Innovation Hubs;
- **(3)** a title for field 63 that keeps SMEs and innovation ecosystems, with the ** footnote marker;
- **(4)** a classification rule for cascade funding, which reaches SMEs through open calls: classified once the SME sub-projects are selected (Article 8(2)).

1. Clusters mobilise Europe's industrial base

On the **European Cluster Collaboration Platform** alone, **1,258 cluster** organisations bring together **around 155,000 members**, **nearly 80% of them SMEs**, across all **14 European industrial ecosystems.** These registered organisations represent only part of Europe's wider cluster landscape.[1]

The **European Clusters Alliance**, through its 25 national associations and ambassadors, represents more than 1,000 cluster organisations, connecting 150,000 enterprises and over 11,000 universities, research centres and public institutions.[2]

For **SME innovation**, clusters organise cooperation with research institutions, technology providers and larger companies, giving smaller firms access to expertise, testing facilities and prototyping capabilities they could rarely develop individually. They translate business needs into joint R&D projects and help enterprises turn research results into new products, processes and services.

For **SME internationalisation**, clusters pool resources for entry into foreign markets, organise business partnerships and connect enterprises with international customers and suppliers. Their role extends beyond export promotion to securing a place for SMEs in European and global value chains. Through **value-chain building**, they identify complementary capabilities across companies, sectors and regions and bring partners together around shared innovation and investment projects.

Their **agility** in times of crisis was demonstrated during the COVID-19 pandemic, when cluster networks rapidly identified supply shortages, mapped available production capabilities, connected alternative suppliers and helped companies adapt production to urgent needs. This capacity to combine industrial intelligence with coordinated action remains essential to Europe's resilience and technological sovereignty.[3]

Clusters therefore provide a practical capacity to deliver SME innovation, internationalisation and stronger European value chains at scale.

2. Recognition translates into programmes and results

In the 2021–2027 framework, **intervention code 026** in Annex I to Regulation (EU) 2021/1060 explicitly identifies support for innovation clusters. It continued code 063, "Cluster support and business networks primarily benefiting SMEs", of the 2014–2020 period (Commission Implementing Regulation (EU) No 215/2014, Annex I): cohesion policy has classified cluster support under a dedicated code since 2014. Combined with programme eligibility provisions and output and result indicators, it provides managing authorities with a clear basis for designing, financing and monitoring dedicated cluster interventions.[4]

As an example, **Romania's Centru Regional Programme** illustrates how this works. Its current €11.66 million Innovative Clusters call supports cooperation, specialised services and shared innovation infrastructure, using the following indicators.[5]

Intervention field	Output indicators	Result indicators
026 - Support for innovation clusters, including cooperation between businesses, research organisations and public authorities, and business networks primarily benefiting SMEs	RCO01 — Enterprises supported RCO02 — Enterprises supported by grants RCO04 — Enterprises receiving non-financial support RCO08 — Nominal value of research and innovation equipment RCO101 — Enterprises investing in skills for smart specialisation, industrial transition and entrepreneurship	RCR02 — Private investment matching public support RCR98 — SME staff completing training for smart specialisation, industrial transition and entrepreneurship

[1] European Cluster Collaboration Platform, Clusters and Europe's Competitiveness, ECCP Summary Report 2025, revised January 2026, executive summary. clustercollaboration.eu/sites/default/files/document-store/ECCP_SummaryReport_2025_0.pdf

[2] European Clusters Alliance, About us, figures published on the ECA website, accessed 6 November 2026. clustersalliance.eu/about/

[3] ECA, Clusters Shaping Industrial Strategies: Good Practices, foreword and cases; ECA–EURADA–Vanguard Initiative, Joint statement on the European Competitiveness Fund, November 2026. clustersalliance.eu; CLUSTERO, Situația clusterelor din România, January 2024, p. 1.

[4] Regulation (EU) 2021/1060, Annex I, Table 1, intervention field 026. eur-lex.europa.eu/eli/reg/2021/1060/oj/eng

[5] ADR Centru, Intervention 1.2.2 Innovative Clusters, Applicant Guide, Corrigendum 1, indicator sections; call budget €11,664,904. regiocentru.ro/actiuni/clustere-inovative-1-2-2/

The same code is used across European economies and administrative levels[6] :

Programme	EU funding under code 026
Poland — FENG.02.17 Development of the cluster offer for enterprises	€66.48 million
France — Nouvelle-Aquitaine Regional Programme	€13.08 million
France — Île-de-France et bassin de la Seine Regional Programme (RSO1.1 and RSO1.3)	€19.00 million
All 2021–2027 programmes using code 026: 118 programmes in 23 Member States and Interreg	**€1,120.6 million**

In **Cluj-Napoca, Romania**, the Transylvanian Furniture Cluster developed the Centre of Excellence for Furniture: **eight R&D laboratories and a Future Factory hall** provide shared testing, prototyping and advanced manufacturing capabilities. Supported through the 2014–2020 Competitiveness Operational Programme, it illustrates the tangible assets that sustained cluster support can create.[7]

Poland, technology adoption in enterprises. **Silesia Automotive & Advanced Manufacturing** uses a mobile demonstration centre and delivers services addressing automation, productivity and industrial resilience. Its FENG.02.17 project connects dedicated cluster funding with practical support for enterprises adopting new technologies.[8]

Nouvelle-Aquitaine, innovation reaching international markets. Aquassay's e-Water Efficiency R&D programme, endorsed by the **ALPHA-RLH cluster** and supported by the region and ERDF, developed a digital solution for industrial water efficiency. By June 2020, the company reported deployment in over 100 factories across seven countries and three continents, alongside a global deployment contract with Nestlé Waters.[9]

Launched in late 2021 by AVENIA, the French competitiveness cluster dedicated to subsurface industries, **earth2 has grown into a European initiative bringing together nearly 50 organisations around natural hydrogen and underground hydrogen storage**. The initiative connects companies of all sizes, research organisations, universities, investors and other stakeholders across Europe. Its purpose is not simply to support individual businesses, but to structure an emerging industrial sector, build a shared vision and foster collaboration in innovation.

2.1 Evidence from Romania and Poland

Romania's national cluster analysis, published in January 2024, reports substantial expansion compared with 2013. R&D expenditure increased by 131%, reaching RON 607 million.[10]

Indicator	Reported growth
R&D expenditure	+131%
Enterprises participating in clusters	+235%
Employment	+245%
Turnover	+182%
Exports	+156%

The increase in R&D expenditure is particularly significant in a country where public support for innovation has remained limited. The European Innovation Scoreboard 2025 ranks Romania last in the EU for public-sector R&D expenditure and 23rd for

[6] Poland, Detailed Description of FENG Priorities, SZOP.FENG.012, effective 20 May 2026, p. 51: FENG.02.17, code 026, EU allocation €66,477,310. gov.pl/attachment/74329cd0-01f5-4a40-a0d5-55d86d05f87b. Nouvelle-Aquitaine, Regional ERDF/ESF+ Programme, modified 26 November 2025, pp. 27 and 37: code 026 allocations €10,083,721 and €3,000,000. europe-en-nouvelle-aquitaine.eu. Île-de-France et bassin de la Seine (ERDF-ESF+ programme) and the total for all programmes: European Commission, Cohesion Open Data, 2021–2027 categorisation data by intervention field, EU amount under code 026, consulted in November 2026. cohesiondata.ec.europa.eu

[7] Transylvanian Furniture Cluster, Centre of Excellence for Furniture project and inauguration article (20 December 2023); ECA Good Practices, case 3.2.16. mobiliertransilvan.ro/proiecte/centrul-de-excelenta-pentru-mobila/ .

8 Silesia Automotive & Advanced Manufacturing, project FENG.02.17-IP.02-0002/23 and activities on mobile welding cells, virtual planning and Resilience 2030. silesia-automotive.pl/aktualnosci-4369; silesia-automotive.pl/my/?_id=75&lang_id=4&p=21

9 Aquassay, press release, 9 June 2020, e-Water Efficiency 2018 programme completion. aquassay.com/communique-de-presse-aquassay-finalise-son-programme-de-rd-e-water-efficiency-2018/

[10] CLUSTERO, Situația clusterelor din România, January 2024, pp. 5–6 and 21, comparison with 2013. Aggregate growth reflects the evolving cluster community, not a fixed cohort or an estimate of causal impact. clustero.eu/wp-content/uploads/2024/01/situatia-clusterelor-din-romania.pdf

direct and indirect government support for business R&D. **This strengthens the case for preserving clusters as a means of mobilising enterprises around innovation and international markets**.[11]

Poland provides complementary evidence. PARP's 2024 benchmarking study of 42 clusters reports average sales growth of 14.2% in 2022–2023, compared with 4.8% nationally. Between the 2022 and 2024 benchmarking editions, the number of exporting enterprises increased from 1,471 to 1,731, while the average export share of sales rose from 29.2% to 36.8%.[12]

Further examples of how clusters support SME innovation, internationalisation and value-chain development are documented in the European Clusters Alliance good practices brochure, Clusters shaping industrial strategies.[13]

3. The proposed framework threatens continuity

Neither the Commission's proposal for a budget expenditure tracking and performance framework (COM(2025) 545, procedure 2025/0545(COD)) nor the Council's partial mandate of 26 June 2026 (ST 11033/26) contains a dedicated intervention field for innovation clusters or any output or result indicator explicitly identifying supported cluster organisations or the enterprises benefiting from their activities. The word "cluster" appears nowhere in either text, and code 026 has no dedicated successor. Field 63 - "Support to innovation and advanced support services for SMEs - Processes, Ecosystems, and Strategic Development" in the Commission text, retitled "Support for competitiveness and innovation in enterprises" by the Council, which drops the references to SMEs, support services and ecosystems and counts large enterprises in the output indicator - leaves the shared infrastructure, specialised services and organised cooperation through which clusters support SMEs unrecognised.[14]

Annex I does not decide eligibility, which stays with the sector-specific rules (Article 8(2)); it decides what can be programmed, reported and compared, and that has direct operational consequences. Managing authorities must translate European priorities into programmes, budget allocations, calls and measurable targets. Removing the dedicated field weakens the established link between recognition of clusters, allocation of resources and accountability for results. Cluster support would have to compete within generic enterprise measures, with no explicit provision securing its inclusion.

The foreseeable consequence is the decline of dedicated cluster calls and the erosion of the professional capacity and shared infrastructure built through successive programming periods. SMEs would lose access to joint innovation projects, testing facilities and international partnerships. **The damage would be particularly severe in less developed innovation ecosystems, where enterprises have fewer alternatives.**

This direction is inconsistent with the proposed revision of the General Block Exemption Regulation. Article 39(8) would keep the ten-year limit on operating aid for innovation clusters and allow an extension of up to ten further years. Extending the permitted duration of cluster aid while removing its explicit place in the performance framework sends contradictory policy signals.[15]

Europe cannot expect clusters to mobilise SMEs, organise industrial cooperation and respond to supply-chain disruptions while allowing the classification that keeps that support visible and programmable to disappear.

4. Targeted changes to preserve continuity

Change 1: a dedicated intervention field 63a

"Support for innovation clusters and collaborative industrial ecosystems, including shared innovation infrastructure, cluster management and animation, specialised enterprise services and cooperation between enterprises, research organisations and public authorities."

Output indicators	Result indicators
Number of enterprises supported – by micro, small & medium, large	Number of product or business process innovations introduced
	Number of enterprises with higher turnover

[11] European Commission, European Innovation Scoreboard 2025, Country profile Romania, Finance and support indicators. Rankings describe the national context; they are not a matched-period comparison with the CLUSTERO growth figures. ec.europa.eu/assets/rtd/eis/2025/ec_rtd_eis-country-profile-ro.pdf

[12] PARP, Benchmarking of Clusters in Poland — 2024 Edition, pp. 65–66 and 109. Comparisons concern successive survey editions, not an impact evaluation of FENG.02.17. parp.gov.pl/storage/publications/pdf/2025.11.16.-Raport-ogolny---EN.pdf

[13] European Clusters Alliance, Clusters shaping industrial strategies — good practices. https://clustersalliance.eu/-cms/wp-content/uploads/2025/12/European-Clusters-Alliance-Clusters-shaping-industrial-strategies-good-practices.pdf

[14] European Commission, COM(2025) 545, 16 July 2025, Annex I, fields 63 and 67; Council of the European Union, ST 11033/26, 26 June 2026, partial mandate for negotiations with the European Parliament, Annex I, fields 63 and 98, pp. 60–61 and 68–69. The absence of a dedicated field is not an express legal prohibition; eligibility remains governed by the applicable programme rules.

[15] European Commission, draft GBER submitted to public consultation, 25 February–23 April 2026, Article 39(8), p. 79. Proposal, not an adopted provision. competition-policy.ec.europa.eu/public-consultations/2026-gber_en

The output and result indicators are already present in the draft. The dedicated field would preserve the programming function of code 026, covering shared facilities and the professional services needed to organise cooperation. The field would carry 0% in every coefficient column, like field 63, and would sit immediately after it, following the Council's convention for inserted fields (63a).

Change 2: one collaboration indicator in fields 63 and 65

Output: "Number of enterprises taking part in collaborative actions facilitated by cluster organisations or other business intermediaries – by business size, type of intermediary and territorial scope (regional, interregional, cross-border)." A collaborative action is a documented joint action between independent entities with a shared objective, assigned tasks and evidence of implementation; membership or attendance alone do not qualify. Each enterprise is counted once per operation, using the identifiers already required for "enterprises supported".

Result: "Number of enterprises using services or shared infrastructure provided by supported cluster organisations or other business intermediaries — by business size, sector and type of intermediary."

This follows field 98, which explicitly counts supported European or National Digital Hubs and their users. In the Commission text the same indicator sits in field 67, where the ITRE opinion (amendment 44) keeps it.

Change 3: a title for field 63 that keeps SMEs and innovation ecosystems

The Commission title, which ITRE amendment 43 retains, or, in the Council text, "Support for competitiveness and innovation in enterprises, in particular SMEs, including through advanced support services and innovation ecosystems", with the ** footnote marker extended to fields 63 and 65.

Change 4: a classification rule for cascade funding (Article 8(2))

Support that an intermediary passes on to SMEs through open calls is classified provisionally at award and updated through existing reporting once the SME sub-projects are selected, each amount being counted once. At award, the enterprises and activities it will reach are not yet known. Changes 2 to 4 work within the existing fields and stand on their own, whether or not field 63a is adopted.

5. Conclusions

Europe's competitiveness is built where enterprises meet research, where a small company finds its first international partner, and where complementary capabilities become a new European value chain. Clusters give these connections a place to grow and the capacity to deliver. Over successive programming periods, Europe has invested in this fabric of cooperation. Removing its place in the next performance framework risks unravelling what public institutions, enterprises and regions have built together.

We call on the European Parliament, the Council and the Commission to **preserve the recognition of innovation clusters in the 2028–2034 performance framework by introducing a dedicated intervention field 63a in Annex I**, ensuring continuity with the support provided under code 026 in the current programming period. This should be accompanied by indicators capturing the participation of enterprises in collaborative activities and the benefits they receive, explicit recognition of SMEs and innovation ecosystems in the title of field 63, and a classification rule for cascade funding. These three changes also stand on their own, within the existing fields.

The objective is not to introduce a new policy priority, but to preserve an established and effective instrument for delivering existing European priorities. Innovation, competitiveness, industrial resilience and stronger European value chains depend on cooperation between enterprises, research organisations and public authorities. The next EU budget must continue to recognise, support and measure that cooperation.