ANALYTICAL REPORT 06

INNOVATION PROCUREMENT IN THE EU SECURITY SECTOR: STATE OF PLAY, THE USE OF AVAILABLE TOOLS ACROSS EU MEMBER STATES, AND BEST PRACTICES

An External Expert Report prepared for ENACT

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ENACT.
European Network Against Crime and Terrorism

ABOUT ENACT

ENACT is a knowledge network focused on the fight against crime and terrorism (FCT). The network is funded under the Horizon Europe Framework Programme in Cluster 3 – Civil Security for Society. The project addresses the call topic HORIZON-CL3-2022-SSRI-01-02 'Knowledge Networks for Security Research & Innovation', aiming to collect, aggregate, process, disseminate and make the most of the existing knowledge in the FCT area.

The project aims to satisfy two major ambitions,

- Provide evidence-based support to the decision-makers in the EU research and innovation (R&I) ecosystem in the FCT domain, targeted explicitly at enabling more effective and efficient programming of EU-funded R&I for the fight against crime and terrorism.

- Act as a catalyst for the uptake of innovation by enhancing the visibility and reliability of innovative FCT security solutions.

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ACRONYMS

AID	Agence de l'Innovation de Défense
ASD	AeroSpace and Defence Industries Association of Europe
CDTI	Compra Pública de Tecnología Innovadora
CPI	Compra Pública de Innovación
CPP	Compra Pública Precomercial
DEP	Digital Europe Programme
EC	European Commission
ECF	European Competitiveness Fund
EU	European Union
ISF	Internal Security Fund
ITRE	Committee on Industry, Research and Energy
KEINO	Competence Centre for Sustainable and Innovative Public Procurement
LCSP	Law 9/2017 on Public Sector Contracts
MFF	Multi-annual Financial Framework
PCP	Pre-commercial Procurement
PNR	Programma Nazionale per la Ricerca
PPI	Public Procurement of Innovation Solutions
R&D	Research and Development
SBRI	Small Business Research Initiative
SMEs	Small and Medium Sized Enterprises

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EXECUTIVE SUMMARY

This report was prepared for the **ENACT consortium** (European Network Against Crime and Terrorism, Horizon Europe Cluster 3, coordinated by Polícia Judiciária, Portugal). Considering the revision of Directive 2009/81/EC on defence and sensitive security procurement, and the persisting difficulty in identifying the right tools and instruments to boost innovation uptake, to provide an analytical report on innovation procurement focusing on the state of play, the use of available tools across EU Member States, and best practices.

The report is organised accordingly.

Section 1 sets out the state of play of the EU legal and policy framework: the innovation-procurement instruments available under Directive 2014/24/EU; the specific regime of Directive 2009/81/EC; the Commission's June 2025 proposal amending that Directive and the comprehensive revision announced for 2026; the pipeline between EU-funded security research and deployment-stage funds; and the integration of EU and national funding, together with the legislative outlook under the proposed 2028–2034 Multiannual Financial Framework and the European Competitiveness Fund.

Section 2 provides the cross-cutting analysis: technology push and capability pull; long innovation cycles; the European Commission's 2024 benchmarking of national innovation-procurement policy frameworks across thirty countries; the specific trajectory of the security and defence sector within that benchmark; the legal question of which reforms require EU action and which are already available to Member States; and the emerging framework for European preference in defence and security procurement.

Section 3 examines the use of available tools country by country: profiles of the nine ENACT member states, best practices drawn from the wider thirty-country benchmark, and a comparative overview of national transpositions of Directive 2009/81/EC.

Section 4 analyses the relationship between national security research programmes, innovation outcomes, and EU–national funding integration.

Section 5 draws conclusions and recommendations.

KEY FINDINGS

- **The policy framework for innovation procurement remains under-developed across Europe, including in all ENACT member states**. In the European Commission's 2024 benchmarking of thirty countries (EU-27, Norway, Switzerland and the United Kingdom), the European average score is 33.05%, and no country reaches the "strong performer" category; Finland, the highest-ranked country at 70.23%, is the only one classified as a solid performer.[1] The ENACT member states range from Finland (1st) and Spain (4th) to Greece (16th) and Portugal (20th).

- **The security and defence sector records one of the most significant recent advances in national sectoral policy across the benchmark, from a comparatively low starting point**. The European average score for the "public order, safety, security and defence" sectoral sub-indicator rose from 12% in the 2020 benchmarking to 40% in 2024, an increase of 28 percentage points — the second-largest sectoral gain after the environment sector (+54 percentage points) — which the Commission's synthesis links to EU security and defence policies and the geopolitical situation.[2]

- **Across the benchmark, policy recognition of innovation procurement is considerably more advanced than the operational instruments needed to implement it**. The Commission's synthesis identifies the six most underdeveloped areas — sectoral policies, action plans, spending targets, monitoring systems, incentives, and capacity building — as unchanged since the previous benchmarking, with average performance below 35% in each.[3]

- **The principal legal gap identified for the security and defence sector concerns the acquisition stage, not the research stage**. Pre-commercial procurement of research and development services is already available to Member States in the fields of defence and security, as such services fall outside the scope of Directive 2009/81/EC under its research and development exclusion; by contrast, the procedures available for acquiring the resulting solutions within the Directive's scope are exhaustively defined at EU level and do not currently include the innovation partnership. The Commission's proposal of 17 June 2025 would introduce the innovation partnership, the open procedure and a simplified route for the direct procurement of innovative products resulting from competitive parallel R&D projects into Directive 2009/81/EC.[4]

[1] European Commission, Directorate-General for Research and Innovation / PwC EU Services EESV, Synthesis Report for the Benchmarking of National Policy Frameworks for Innovation Procurement (2024 benchmarking), Contract LC-01986029. Available at: https://research-and-innovation.ec.europa.eu/document/download/042cc514-04f9-4b2e-9827-91ff3b23883f_en, Section 3.1.1 and Table 1.

[2] European Commission, Directorate-General for Research and Innovation / PwC EU Services EESV, Synthesis Report for the Benchmarking of National Policy Frameworks for Innovation Procurement (2024 benchmarking), Contract LC-01986029. Available at: https://research-and-innovation.ec.europa.eu/document/download/042cc514-04f9-4b2e-9827-91ff3b23883f_en, Section 3.2.2 and Table 3.

[3] European Commission, Directorate-General for Research and Innovation / PwC EU Services EESV, Synthesis Report for the Benchmarking of National Policy Frameworks for Innovation Procurement (2024 benchmarking), Contract LC-01986029. Available at: https://research-and-innovation.ec.europa.eu/document/download/042cc514-04f9-4b2e-9827-91ff3b23883f_en, Section 3.2.1.

[4] European Commission, Proposal for a Directive amending Directives 2009/43/EC and 2009/81/EC as regards the simplification of intra-EU transfers of defence-related products and defence and security procurement, 17 June 2025 (Defence Readiness Omnibus). Available at: https://defence-industry-space.ec.europa.eu/system/files/2025-06/Proposal-for-a-directive_defence-simplification.pdf

- **A first EU legal framework for European preference in defence procurement now exists, while its definitional questions remain open.** Regulation (EU) 2025/2643 (the European Defence Industry Programme, EDIP), in force since 30 December 2025, conditions EU funding on a maximum of 35% of component costs originating outside the Union and associated countries and on the location of design authority within the Union; published analyses document unresolved questions concerning the calculation methodology, licensing arrangements and supply-chain dependencies.[5]

- **The existence of a national security research programme is a poor proxy for procurement capacity**. The five countries publicly identified as having such programmes (Germany, Austria, Bulgaria, Czechia and Italy) span nearly the full range of the European Innovation Scoreboard classification, and no assessment isolating the effect of programme existence was identified in the sources consulted. Review of the official programme documentation further shows that the category encompasses materially different national arrangements, and that where connections between these programmes and EU funding are documented, they operate at the research stage - contact points, coordination structures, demarcation rules - rather than at the stage of deployment or procurement of results.[6]

- **The funding architecture on which security innovation depends is currently being renegotiated**. The Commission's proposal of July 2025 for the 2028–2034 Multiannual Financial Framework would consolidate the instruments at both ends of the research-to-deployment pipeline into a European Competitiveness Fund, integrating the security research component of Horizon Europe into that fund's work programmes; the European Parliament's ITRE committee published its draft report in April 2026, and the Council agreed a partial negotiating position in June 2026. Whether the future architecture strengthens or narrows the connection between security research and deployment is among the live questions of that negotiation.[7]

- **Best practices are identifiable and specific**. The documented differentiators between stronger and weaker national frameworks are: quantified, dated spending targets (Finland; Estonia); annual key performance indicators for individual procurers (applied by only two of the thirty countries benchmarked); permanent competence centres engaging end users; dedicated innovation agencies operating under formal convention with end users and with EU co-financing (Spain's CDTI with the Ministry of the Interior; France's AID); and national security and defence strategies that name innovation procurement expressly (Netherlands, Italy, France, Finland).[8]

[5] Council of the European Union, 'European Defence Industry Programme', consilium.europa.eu/en/policies/defence-industry-programme; Regulation (EU) 2025/2643. See Section 2.9 of this report for the analyses cited.

[6] Science|Business, 'Call for dedicated fund for civil security research and deployment', sciencebusiness.net; European Commission, European Innovation Scoreboard 2024, available at: https://research-and-innovation.ec.europa.eu/statistics/performance-indicators/european-innovation-scoreboard_en. See Section 4. On the national programme documentation reviewed, see Sections 4.1–4.3.

[7] Proposal for a Regulation establishing the European Competitiveness Fund ('ECF'), COM(2025) 555, 16 July 2025. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A52025PC0555; European Parliament, Draft Report on the proposal for a regulation establishing the European Competitiveness Fund, ITRE-PR-784506, 20 April 2026. Available at: https://www.europarl.europa.eu/doceo/document/ITRE-PR-784506_EN.pdf; Council of the European Union, 'MFF 2028-2034: Council agrees its position on new and innovative fund to boost EU's competitiveness', press release, 16 June 2026. Available at: https://www.consilium.europa.eu/en/press/press-releases/2026/06/16/mff-2028-2034-council-agrees-its-position-on-new-and-innovative-fund-to-boost-eu-s-competitiveness/

[8] The evidence for each practice is set out in Section 3; see in particular Sections 3.2 (Finland), 3.3 (Spain), 3.5 (Netherlands), 3.7 (Italy), 3.8 (France) and 3.11 (Estonia and other reference points).

1 - STATE OF PLAY: THE EU LEGAL AND POLICY FRAMEWORK

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1.1 - SCOPE AND APPROACH

This report addresses innovation procurement from three angles: the **state of play** of the legal and policy framework (Section 1 and 2), the **use of available tools across EU Member States** Section 3 and 4), and **best practices** (throughout Section 3, consolidated in the recommendations of Section 5). All factual claims are attributed to primary EU documents, national legislation or official gazettes, or clearly identified published analyses. The empirical core of the comparative analysis is a single, consistent methodology - the European Commission's 2024 benchmarking of national policy frameworks for innovation procurement - so that country comparisons are made on a like-for-like basis.

1.2 - THE GENERAL FRAMEWORK AND THE DEFENCE AND SECURITY REGIME

Directive 2014/24/EU is the general EU public procurement directive[9] and provides the basis for the demand-side innovation instruments used across most civil sectors, including the innovation partnership procedure (Articles 31 and related provisions) and public procurement of innovative solutions through ordinary procedures. Defence procurement and sensitive security procurement - broadly, contracts for military equipment, sensitive equipment involving classified information, and directly related works and services - fall instead under Directive 2009/81/EC,[10] a separate instrument tailored to those markets. Its distinctive features include the elevation of the negotiated procedure with publication to an ordinary procedure available without prior justification, specific rules on security of information and security of supply, and specific rules on research and development contracts.[11] Member States retain the right, under Article 346 TFEU, to exempt contracts from the Directive where strictly necessary to protect essential security interests.[12]

[9] Directive 2014/24/EU of the European Parliament and of the Council of 26 February 2014 on public procurement and repealing Directive 2004/18/EC, OJ L 94, 28.3.2014. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:32014L0024

[10] Directive 2009/81/EC of the European Parliament and of the Council of 13 July 2009 on the coordination of procedures for the award of certain works contracts, supply contracts and service contracts by contracting authorities or entities in the fields of defence and security, OJ L 216, 20.8.2009. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:32009L0081

[11] European Commission, Directorate-General for Defence Industry and Space, 'Defence procurement'. Available at: [6] https://defence-industry-space.ec.europa.eu/eu-defence-industry/defence-procurement_en

[12] EUR-Lex, 'Public procurement in the fields of defence and security' (official summary of Directive 2009/81/EC). Available at: https://eur-lex.europa.eu/EN/legal-content/summary/public-procurement-in-the-fields-of-defence-and-security.html

1.3 - THE REVISION OF DIRECTIVE 2009/81/EC

The revision of Directive 2009/81/EC is proceeding in two stages. The first stage is already on the table: on 17 June 2025, within the "Defence Readiness Omnibus" package, the Commission published a **proposal for a Directive amending Directives 2009/43/EC and 2009/81/EC**[13] (a REFIT simplification proposal, now before the European Parliament and the Council under the ordinary legislative procedure). The second stage is a comprehensive revision of the Directive, which is planned for Q3 2026. The main changes put forward in the June 2025 proposal, as relevant to innovation procurement, are the following:

- **Introduction of the innovation partnership procedure** into Directive 2009/81/EC, based on the procedure of Directive 2014/24/EU, to support the procurement of innovative solutions. The innovation partnership combines the research and development phase and the subsequent purchase of the resulting supplies, services or works within a single procedure, subject to pre-agreed performance levels and maximum costs.[14]
- **A simplified route for the direct procurement of innovative products and services resulting from competitive parallel research and development projects**, described in the proposal's explanatory memorandum as intended to allow Member States to remain at the forefront of defence technology. The proposal also codifies in the Directive the treatment of procurement following the end of the R&D phase.[15]
- **Introduction of the open procedure and the dynamic purchasing system**, based on Directive 2014/24/EU, to broaden the range of tools available to contracting authorities.
- **Higher thresholds**: from EUR 443,000 to EUR 900,000 for supply and service contracts and from EUR 5,538,000 to EUR 7,000,000 for works contracts, intended to focus resources on critical contracts and reduce administrative burden.[16]
- **Extension of framework agreements** from a maximum of seven to ten years, and a time-limited extension of the negotiated procedure without prior publication to certain off-the-shelf products — identical defence products, or products undergoing only minor modifications, exported by at least three Member States — for contracts concluded before 1 January 2031.[17]

Expectations for these measures should nonetheless be framed by the evidence presented in Section 2 of this report: across the general procurement regime, the availability of innovation-procurement instruments has not, by itself, translated into widespread use, with uptake depending on the operational measures - action plans, targets, incentives and institutional machinery - that most Member States have yet to put in place.

[13] European Commission, Proposal for a Directive amending Directives 2009/43/EC and 2009/81/EC, as regards the simplification of intra-EU transfers of defence-related products and the simplification of security and defence procurement, 17 June 2025. Available at: https://defence-industry-space.ec.europa.eu/system/files/2025-06/Proposal-for-a-directive_defence-simplification.pdf. Legislative status: European Parliament, Legislative Train Schedule, https://www.europarl.europa.eu/legislative-train/theme-a-new-era-for-european-defence-and-security/file-simplifying-intra-eu-transfers-and-security-and-defence-procurement.

[14] AKD, 'European Commission proposes Directive amending defence procurement and transfer Directives', June 2025. Available at: https://www.akd.eu/insights/european-commission-proposes-directive-amending-defence-procurement-and-transfer-directives.

[15] Proposal of 17 June 2025, cited above, explanatory memorandum.

[16] Gleiss Lutz, 'Defence Readiness Omnibus – the next step towards European defence capability', July 2025. Available at: https://www.gleisslutz.com/en/know-how/defence-readiness-omnibus-next-step-towards-european-defense-capability

[17] Monard Law, 'Accelerated investments in Defence – Significant measures proposed by the European Commission', July 2025. Available at: https://monardlaw.be/en/stories/informed/versneld-investeren-in-defensie/

1.4 - INNOVATION PROCUREMENT INSTRUMENTS: PCP, PPI AND THE INNOVATION PARTNERSHIP

Pre-commercial procurement (PCP) enables public buyers to procure research and development services from several competing suppliers in parallel, comparing alternative approaches through phased development, before any large-scale purchase. It is legally structured under the research and development services exclusion from the procurement directives, subject to conditions relating to the sharing of risks and benefits.[18] Public procurement of innovative solutions (PPI) is used where solutions are already close to the market, and the public buyer acts as an early adopter. The innovation partnership, introduced by Directive 2014/24/EU, is structurally distinct from the PCP-then-purchase sequence in that it commits development and eventual acquisition to a single continuous procedure from the outset. Section 2.8 analyses how these instruments map onto the defence and security regime.

1.5 - THE PIPELINE BETWEEN EU-FUNDED SECURITY RESEARCH AND DEPLOYMENT FUNDS

A structural weakness identified by both industry and the Commission concerns the connection between EU-funded civil security research — principally Horizon Europe Cluster 3, “Civil Security for Society” — and the EU funds intended to support deployment, chiefly the Internal Security Fund (ISF) and the Border Management and Visa Instrument.[19] The industry association ASD has proposed consolidating these instruments into a single European security fund in order to link the planning, research, development, procurement and deployment stages coherently, describing the ISF as one of numerous separate funds providing follow-on funding for the deployment of security solutions.[20]

The Commission's own programming documents treat the connection as work in progress: the Horizon Europe Work Programme 2026–2027 for Cluster 3 identifies facilitating the uptake of Cluster 3 research results by Member States and Associated Countries in their national programmes as a continuing task, together with programming EU actions with funding dedicated to the take-up of research results.[21] A parallel diagnosis appears on the defence side: the Commission's EU Defence Industry Transformation Roadmap of November 2025 records a notable disconnect between defence R&D efforts, including collaborative projects supported by the European Defence Fund, and procurement processes, and identifies improving that link as a significant opportunity to accelerate the uptake of promising technologies.[22] The civil-security and defence framings describe, in substance, the same structural issue.

[18] European Commission, 'Pre-Commercial Procurement'. Available at: https://research-and-innovation.ec.europa.eu/strategy/support-policy-making/shaping-eu-research-and-innovation-policy/new-european-innovation-agenda/innovation-procurement/pre-commercial-procurement_en.

[19] European Commission, Directorate-General for Migration and Home Affairs, 'Innovation and security research'. Available at: https://home-affairs.ec.europa.eu/policies/internal-security/innovation-and-security-research_en .

[20] Science|Business, 'Call for dedicated fund for civil security research and deployment'. Available at: https://sciencebusiness.net/news/dual-use/call-dedicated-fund-civil-security-research-and-deployment .

[21] European Commission, Horizon Europe Work Programme 2026–2027, '6. Civil Security for Society'. Available at: https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/horizon/wp-call/2026-2027/wp-6-civil-security-for-society_horizon-2026-2027_en.pdf .

[22] European Commission, COM(2025) 845 final, EU Defence Industry Transformation Roadmap: Unleashing Disruptive Innovation for Defence Readiness, 19 November 2025, Section 3.3. Available at: https://defence-industry-space.ec.europa.eu/document/download/513de692-d08c-40cc-80c3-cb6611ace178_en .

The instruments at both ends of this pipeline are themselves under renegotiation for the 2028–2034 period; the proposed successor architecture and the positions taken on it by the EU institutions and by industry are set out in Section 1.8.

1.6 - THE DIGITAL EUROPE PROGRAMME AS A POSSIBLE STRUCTURAL MODEL

One possible model for a structured research-to-deployment pipeline is the Digital Europe Programme (DEP). Its stated purpose supports that framing: the programme is designed to bridge the gap between digital technology research and market deployment,[23] operating in complementarity with Horizon Europe (research) and the Connecting Europe Facility (infrastructure).[24] The structural mechanism of greatest relevance to a possible security-sector application is the documented practice of using the results of grant-funded projects as evidence of capability when bidding for deployment-stage tenders, creating a continuous route from research results into procurement.[25]

It should also be noted that the digital funding landscape from which this model is drawn is itself being restructured: under the proposed 2028–2034 framework, the Digital Europe Programme is among the programmes consolidated into the ECF's Digital Leadership policy window (Section 1.8). The industry association ASD, assessing the ITRE draft report on the ECF, has expressed concern that the draft removes the explicit reference to market uptake from the Commission's text for that window and contains limited provisions for demand-side mechanisms or deployment pathways.[26] The pipeline logic this section draws from the Digital Europe Programme is, in other words, itself part of what is being negotiated.

1.7 - EU-NATIONAL FUNDING INTEGRATION

A further structural concern is limited national integration: connections exist between Horizon Europe and the EU Home Affairs Funds, while engagement with national programmes remains insufficient. The available evidence indicates that this is a documented, EU-wide pattern rather than a security-specific one. The European Court of Auditors' Special Report 23/2022 examined synergies between Horizon 2020 and the European Structural and Investment Funds and concluded that they were not yet used to full potential: measures creating upstream synergies (such as support for research centres) were generally implemented, whereas measures creating downstream synergies — funding the exploitation of research results — were hardly implemented. The auditors attributed this to differences in fund rules, limited cooperation between the Commission and Member States and within Member States, and the absence, until March 2022, of a database linking projects funded under both frameworks.[27]

[23] European Commission, 'Digital Europe Programme'. Available at: https://commission.europa.eu/funding-and-tenders/find-funding/eu-funding-programmes/digital-europe-programme_en.
[24] European Commission, 'The Digital Europe Programme', Shaping Europe's Digital Future. Available at: https://digital-strategy.ec.europa.eu/en/activities/digital-programme.
[25] KPMG, 'How EU funding drives digital sovereignty', November 2025. Available at: https://kpmg.com/xx/en/our-insights/esg/how-eu-funding-drives-digital-sovereignty.html.
[26] ASD, ASD considerations — ITRE Draft Report on the European Competitiveness Fund: Digital Leadership, Note, Brussels, 10 June 2026, points 4(a)–(d).
[27] European Court of Auditors, Special Report 23/2022: Synergies between Horizon 2020 and European Structural and Investment Funds – Not yet used to full potential, 21 November 2022. Available at: https://www.eca.europa.eu/en/publications/SR22_23 .

Country-level evidence developed in Parts Three and Four is consistent with this finding: a Commission-commissioned comparative study records that in Bulgaria, Portugal, Romania and Slovakia, innovation procurement is recognised only in policy supported by the European Structural and Investment Funds, without a separate national horizontal strategy covering areas outside that funding.[28] Downstream research-to-deployment integration at national level is therefore the weakest documented link in the chain, at both EU and Member State level.

1.8 - LEGISLATIVE OUTLOOK: THE 2028–2034 MULTIANNUAL FINANCIAL FRAMEWORK AND THE EUROPEAN COMPETITIVENESS FUND

The framework described in Sections 1.5 to 1.7 is in legislative transition. On 16 July 2025, the Commission presented its proposal for the 2028–2034 Multiannual Financial Framework, amounting to almost EUR 2 trillion (1.26% of EU gross national income on average over the period).[29] Within it, the proposal for a Regulation establishing the European Competitiveness Fund (ECF) [COM(2025) 555] would consolidate fourteen programmes of the current framework under a single rulebook, structured along four policy windows — including a window covering resilience, security, defence industry and space — with the stated objective of ensuring a seamless investment journey from research to deployment and manufacturing; the proposed ECF financial envelope is EUR 234.3 billion, alongside EUR 175 billion for Horizon Europe, which would remain a self-standing programme connected to the ECF.[30] Of direct relevance to this report, the proposal integrates the security research component of Horizon Europe into the ECF's work programmes, while the successors of the current deployment-stage funds — Union support for Internal Security, and Union support for the Schengen area, European integrated border management and the common policy on visas - are proposed under a different budget heading.[31]

[28] PwC / European Commission, Directorate-General for Communications Networks, Content and Technology, The Strategic Use of Public Procurement for Innovation in the Digital Economy – comparative analysis of country performance (2021). Available at: https://upravnopravo.blog/wp-content/uploads/2025/06/2cf1f-comparativeanalysisofcountryperformancespdf-2.pdf.

[29] European Commission, 'EU budget 2028-2034', https://commission.europa.eu/strategy-and-policy/eu-budget/long-term-eu-budget/eu-budget-2028-2034_en (proposal presented 16 July 2025).

[30] Proposal for a Regulation establishing the European Competitiveness Fund ('ECF'), including the specific programme for defence research and innovation activities, COM(2025) 555, 16 July 2025, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A52025PC0555; European Parliament, Legislative Train Schedule, 'European Competitiveness Fund', https://www.europarl.europa.eu/legislative-train/spotlight-MFF%202028-2034/file-european-competitiveness-fund; I. Hallak, 'European Competitiveness Fund', EPRS Briefing, European Parliament, 27 November 2025.

[31] ASD, Addressing security in the next Multiannual Financial Framework, Position Paper, Brussels, 2 February 2026 (recording the heading structure of the July 2025 proposal); on the Horizon Europe integration, COM(2025) 555, cited above.

The legislative process is advanced but not concluded, and the positions taken so far bear directly on the pipeline question analysed in Section 1.5:

- The **European Parliament's** ITRE committee (rapporteurs Christian Ehler and Dan Nica) published its draft report on 20 April 2026 and presented it in committee on 6 May 2026, with the committee vote expected in September 2026.[32] Among the elements relevant to this report, the draft introduces "Horizon Europe Pathway Actions" as the instrument linking the ECF to the future framework programme, intended to address the market failures that limit the translation of research results into competitiveness.[33] The industry association ASD, assessing the draft, has taken the position that this narrows the connection between the ECF and security research by comparison with the Commission's proposal, and notes that the draft does not include provisions ensuring complementarity between the ECF security section and the non-ECF instruments that would support deployment, uptake, procurement or operational use of security solutions after the R&D phase - the pipeline connection analysed in Section 1.5.[34]
- The **Council** agreed a partial negotiating position on the ECF on 16 June 2026, strengthening the role of Member States in the governance of the fund - including through the examination procedure for implementing acts and a reinforced role for Member States in the ECF General Committee - and aligning the ECF rules with the current European Defence Fund to ensure consistency with the existing defence industrial framework.[35]
- The **European Court of Auditors** issued Opinion 01/2026 on the ECF proposal in January 2026, and opinions were also adopted by the European Economic and Social Committee (December 2025) and the European Committee of the Regions (March 2026), the latter noting that the merging of fourteen programmes into one instrument may pose a challenge for preserving the effective tools of the predecessor programmes.[36]

For the purposes of this report, two implications follow. First, the pipeline weakness documented in Section 1.5 is being renegotiated in real time: whether the future architecture strengthens or narrows the research-to-deployment connection for security is one of the live questions of the ECF negotiation. Second, all statements about the 2028–2034 framework in this report describe proposals and negotiating positions, not adopted law; the MFF Regulation requires unanimity in the Council and the consent of the European Parliament, with adoption of the legislative acts expected in 2027 for entry into force in January 2028.[37]

[32] European Parliament, Legislative Train Schedule, cited above; European Parliament, Draft Report on the proposal for a regulation establishing the European Competitiveness Fund, ITRE-PR-784506, 20 April 2026, https://www.europarl.europa.eu/doceo/document/ITRE-PR-784506_EN.pdf; ITRE Committee highlights meeting of 6 May 2026.
[33] Swisscore, 'Shaping the next MFF: new updates for the ECF', 29 April 2026, https://www.swisscore.org/shaping-the-next-mff-new-updates-for-the-ecf/.
[34] ASD, *Industry considerations on the draft ITRE report on the proposed European Competitiveness Fund: Defence and Security*, Note, Brussels, 9 June 2026, points 1(e) and 3(b). The same association has further proposed the introduction of European Security Projects of Common Interest as a dedicated instrument bringing together development, industrialisation, procurement and deployment actions for large-scale transnational security projects, particularly critical infrastructure protection — a proposal taken up in neither the Commission proposal nor the ITRE draft report (ASD Position Paper of 2 February 2026, conclusion; Note of 9 June 2026, point 4(b)).
[35] Council of the European Union, 'MFF 2028-2034: Council agrees its position on new and innovative fund to boost EU's competitiveness', press release, 16 June 2026, https://www.consilium.europa.eu/en/press/press-releases/2026/06/16/mff-2028-2034-council-agrees-its-position-on-new-and-innovative-fund-to-boost-eu-s-competitiveness/.
[36] European Court of Auditors, Opinion 01/2026 concerning the proposal for a Regulation establishing the ECF, January 2026; EESC, 'Competitiveness fund', Opinion, December 2025; European Committee of the Regions, Opinion ECON-VIII/008, 4–5 March 2026 (all as listed on the European Parliament Legislative Train page, cited above).
[37] Council press release of 16 June 2026, cited above.

2 - CROSS-CUTTING ANALYSIS

2.1 - TECHNOLOGY PUSH AND CAPABILITY PULL

The distinction between technology push (innovation driven from the supply side, seeking a market) and capability or demand pull (innovation driven by an articulated user need) is long established in innovation studies, tracing to the debate between Schmookler, who stressed the role of market demand in stimulating innovation, and Rosenberg, who emphasised supply-side conditions.[38] Public procurement is, within this framework, a demand-side instrument. At EU level, the corresponding policy logic is stated in the Commission's Defence Industry Transformation Roadmap, which places responsibility on Member States for defining and communicating demand signals to industry, and holds that transformation depends not only on supply-side measures but equally on a transformation of demand that steers industry toward innovation and readiness.[39] The implication for the present analysis is that a security-innovation strategy built on research funding alone is, on the Commission's own diagnosis, structurally incomplete without a matching procurement-side commitment from Member States — the gap documented empirically throughout this Section.

2.2 - LONG INNOVATION CYCLES: PUBLIC SAFETY COMMUNICATIONS

Large-scale security innovations can take ten years or more from research to market. Public safety communications provides a verifiable illustration. The transition from narrowband TETRA and Tetrapol systems to mission-critical broadband has been in development since the first half of the 2010s and remains in progress across Europe: current market analysis records that the United Kingdom, France, Finland and Sweden plan to migrate all public protection and disaster relief users to nationwide mission-critical 3GPP networks between 2028 and 2031, while Romania's TETRA network is expected to operate in parallel with its broadband successor until 2035.[40] Measured from early standardisation work to completed national deployment, several national transitions will approach two decades. Three of the four countries named above are ENACT member states.

[38] Oxford Academic, Science and Public Policy, 45(4), 'Demand, challenges, and innovation. Making sense of new trends in innovation policy' (2018). Available at: https://academic.oup.com/spp/article/45/4/435/4915393.

[39] COM(2025) 845 final (full reference in Section 1.5), Section 1.

[40] SNS Telecom & IT, 'Public Safety Broadband Market to Exceed $6.3 Billion', January 2026. Available at: https://www.thefastmode.com/technology-and-solution-trends/46855-public-safety-broadband-market-growth-to-6-3b-by-2028.

2.3 - THE 2024 EU BENCHMARKING OF NATIONAL POLICY FRAMEWORKS

The empirical core of this report is the **2024 benchmarking of national policy frameworks for innovation procurement**, conducted by PwC EU Services for the European Commission's Directorate-General for Research and Innovation (Contract LC-01986029), covering the EU-27, Norway, Switzerland and the United Kingdom — thirty countries in total. It is the third iteration of the exercise and the first permitting a consistent trend comparison across two full rounds.[41] Each country is scored on ten indicators, compounded into a single total: (1) official definitions; (2) horizontal policies; (3) ICT policies; (4) sectoral policies, including a dedicated "public order, safety, security and defence" sub-indicator; (5) action plan; (6) spending target; (7) monitoring system; (8) incentives; (9) capacity building and assistance; and (10) innovation-friendly procurement market.

2.4 - THE THIRTY-COUNTRY RANKING

Figure 1 presents the full 2024 ranking. The European average is 33.05%. The Commission's synthesis notes that the category of strong performers is empty, as no country has yet activated more than 75% of the policy measures that support innovation procurement, and that Finland is the only country classified as a solid performer.[42]

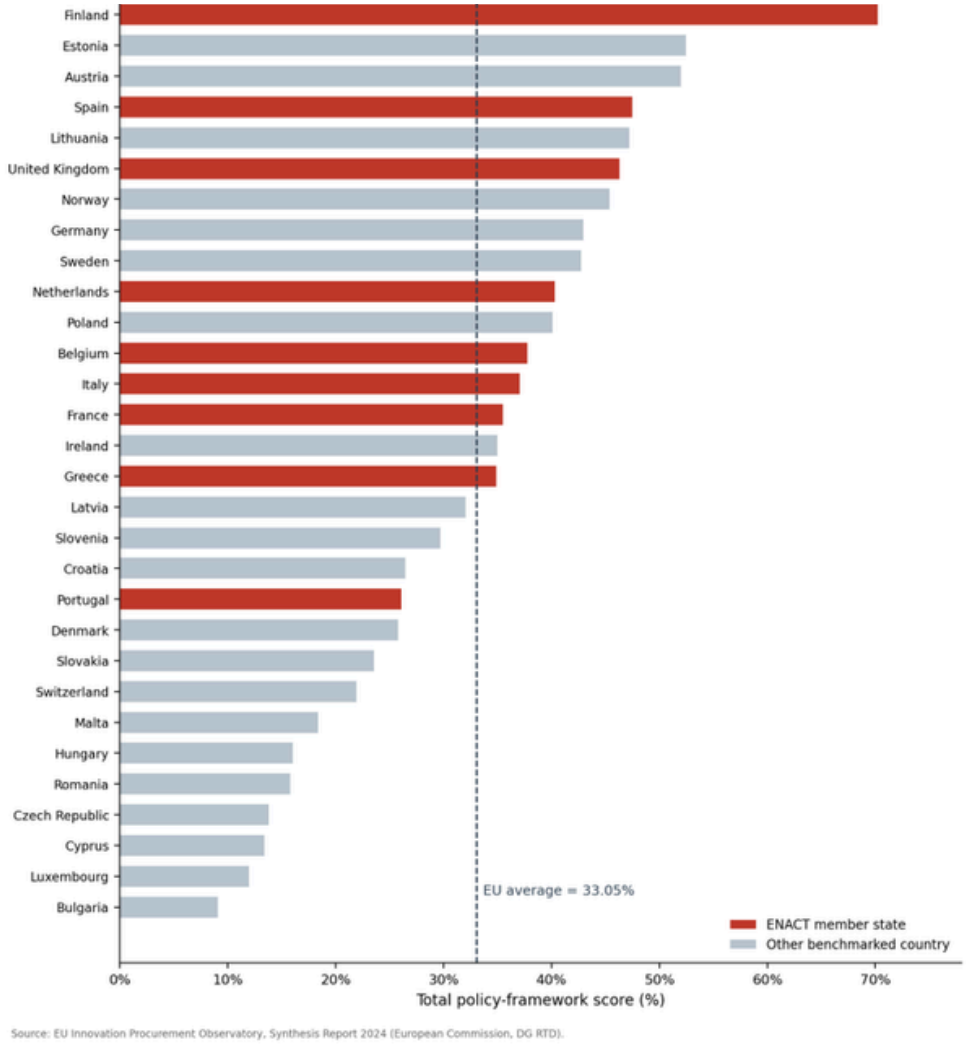


Figure 1: Innovation Procurement Policy Framework Benchmarking 2024 - ranking of the thirty countries assessed, ENACT member states highlighted. Source: Synthesis Report 2024, Table 1.

2.5 - TREND 2020-2024

The European average rose from 26.58% in the 2020 benchmarking to 33.05% in 2024. Several countries advanced substantially - Lithuania from 27.59% to 47.24%, Poland from 17.36% to 40.12%, Portugal from 8.77% to 26.08% - while seventeen of the thirty countries nonetheless moved down the ranking because other countries improved their frameworks faster; among ENACT member states, this applies to the Netherlands (3rd to 10th), Belgium (4th to 12th), Italy (12th to 13th), France (11th to 14th) and Greece (15th to 16th).[43] The Commission's synthesis identifies the most under-developed areas as Indicators 4 to 9 - sectoral policies, action plans, spending targets, monitoring systems, incentives and capacity building - each with average performance below 35%, and observes that these six areas are unchanged from the previous benchmarking.[44] In short, declaratory recognition continues to advance while the operational instruments that convert recognition into procurement practice remain the weakest part of the European picture.

2.6 - THE SECURITY AND DEFENCE SECTOR'S TRAJECTORY

Figure 2 isolates Indicator 4 (sectoral policies) by sector across the two benchmarking rounds. As stated in the Executive Summary, this report corrects an earlier transcription error: the public order, safety, security and defence sub-indicator rose from 12% in 2020 to 40% in 2024 — an increase of 28 percentage points, the second-largest sectoral gain after the environment sector (+54 percentage points), ahead of energy (+41 percentage points), and above the cross-sectoral Indicator 4 average of 30%. The Commission's synthesis attributes the progress in national strategies for the security and defence sector to EU security and defence policies and the geopolitical situation, in parallel with the progress in the energy and environment sectors linked to the European Green Deal.[45]

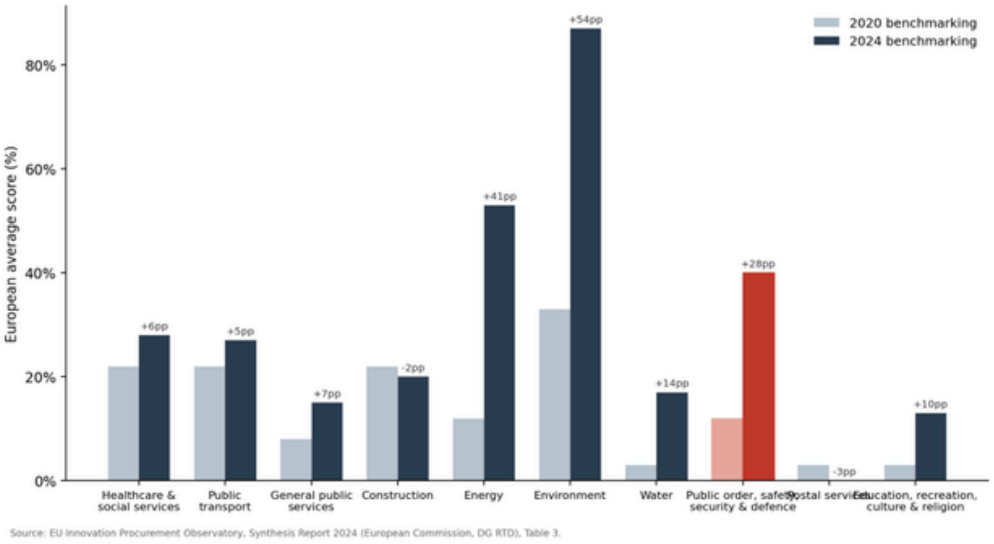


Figure 2: Indicator 4 (Sectoral Policies): European average score by sector, 2020 and 2024 benchmarking rounds; security and defence sector highlighted. Source: Synthesis Report 2024, Table 3.

[41] European Commission, Directorate-General for Research and Innovation / PwC EU Services EESV, Synthesis Report for the Benchmarking of National Policy Frameworks for Innovation Procurement (2024 benchmarking), Contract LC-01986029. Available at: https://research-and-innovation.ec.europa.eu/document/download/042cc514-04f9-4b2e-9827-91ff3b23883f_en. Methodology: https://research-and-innovation.ec.europa.eu/document/download/59645f7f-ab9d-49bb-8da2-7b07060f01a1_en. Individual country reports: https://ec.europa.eu/assets/rtd/innovation-procurement/country-report-2024-policy-benchm-[country].pdf.

[42] Synthesis Report 2024 (full reference in Section 2.3), Section 3.1.1.

[43] Synthesis Report 2024 (full reference in Section 2.3), Section 3.1.2.

[44] Synthesis Report 2024 (full reference in Section 2.3), Section 3.2.1.

[45] Synthesis Report 2024 (full reference in Section 2.3), Section 3.2.2 and Table 3.

Notwithstanding this advance, the security and defence sectoral score of 40% remains below the environment (87%) and energy (53%) sectors. A reasonable characterisation is that security and defence innovation procurement occupies a position broadly comparable to that of environmental innovation procurement several benchmarking cycles ago: a rapidly rising policy priority whose institutional development is at an earlier stage than that of the longer-established demand-side policy areas.

2.7 - PATTERNS ACROSS THE DATASET

- **Policy recognition is consistently more advanced than operational machinery**. This is the most consistent finding across the country profiles in Section 3, and the Commission's own synthesis identifies the operational indicators as the persistent weak points (Section 2.5).
- **Country size and general economic weight do not predict innovation-procurement performance**. France, Germany and Italy are classified among the modest performers, below Estonia, Lithuania and Austria.[46]
- **EU-level policy attention is the strongest observed correlate of national progress**. The Commission's synthesis states that the progress countries have made is clearly linked to the level of EU policy push, and that countries do not sufficiently improve their frameworks without it.[47]
- **Legal frameworks can regress as well as progress**. Italy's official-definitions score declined from 65% to 40% between rounds following the 2023 reform of its procurement code, which did not retain the definitions contained in the previous 2016 code (Section 3.7).
- **Where innovation-procurement activity depends on EU structural funding without an independent national strategy, integration remains structurally thin**. This applies, among the countries examined, to Portugal and Bulgaria (Sections 3.10, 3.11 and Section 4).

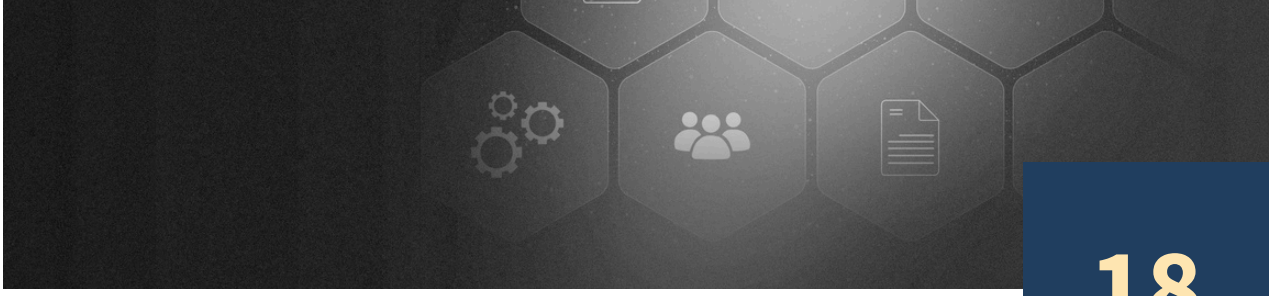
2.8 - FAST TRACK FROM RESEARCH TO ACQUISITION: WHAT REQUIRES EU ACTION AND WHAT MEMBER STATES CAN ALREADY DO

This section examines the absence of a structured framework for the rapid adaptation and adoption of innovative solutions to address short-term capability gaps - a fast track from research to acquisition. The legal analysis supports a precise formulation of where that gap lies. It is useful to distinguish three layers.

2.8.1 - THE RESEARCH PHASE: AVAILABLE TO MEMBER STATES TODAY

Pre-commercial procurement of R&D services is available in the fields of defence and security without any EU reform, because such services fall outside the scope of Directive 2009/81/EC under its research and development exclusion (Article 13). The Commission's Guidance Note on research and development under the Directive states that, in the defence and security context, the exclusion is principally aimed at service contracts for co-financed research and development activities in which the contracting authority and the contractor share costs and/or benefits - the defining structure of pre-commercial procurement.[48]

[46] Synthesis Report 2024 (full reference in Section 2.3), Section 3.1.1.
[47] Synthesis Report 2024 (full reference in Section 2.3), key findings.
[48] European Commission, Guidance Note – Research and Development (Directive 2009/81/EC), Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs. Available at: https://ec.europa.eu/docsroom/documents/15410/attachments/1/translations/en/renditions/pdf



Recital 55 of the Directive supplies the policy rationale and its limit: the importance of R&D in this field justifies maximum flexibility in the award of contracts for research supplies and services, provided such contracts cover activities only up to the stage where the maturity of new technologies can be reasonably assessed and de-risked, and are not used beyond that stage as a means of avoiding the Directive.[49] Spain's practice, documented in Section 3.3, demonstrates the model in operation in the security sector.

2.8.2 - THE ACQUISITION PHASE: DEFINED EXHAUSTIVELY AT EU LEVEL

For contracts within the scope of Directive 2009/81/EC, the menu of award procedures is defined by the Directive itself: the restricted procedure and the negotiated procedure with publication as ordinary procedures, the competitive dialogue for particularly complex contracts, and the negotiated procedure without publication in the cases listed in Article 28. The open procedure, the dynamic purchasing system and the innovation partnership are not part of that menu, and a Member State cannot add them unilaterally for in-scope contracts. This is the precise sense in which the fast-track gap depends on EU legislation: the acquisition-stage toolbox within the Directive's scope can be changed only at EU level.

2.8.3 - THE BRIDGE: PARTIALLY PRESENT, COMPLETED BY THE JUNE 2025 PROPOSAL

The Directive already contains elements of a bridge between the two phases - Recital 55 contemplates that the contracting authority should not have to organise a separate tender for later phases where the original contract covered those activities, and Article 28 permits the negotiated procedure without publication in defined R&D-related cases. The June 2025 proposal completes the structure by introducing the innovation partnership and a simplified route for the direct procurement of innovative products resulting from competitive parallel R&D projects (Section 1.3). If adopted, the combination would give the defence and security regime, for the first time, a codified end-to-end pathway from competitive R&D to acquisition. As the evidence in Part Two indicates, legislative availability alone is unlikely to be sufficient; the operational measures identified in Section 3 - dedicated agencies, formal end-user conventions, co-financing arrangements - are the complement on which uptake has depended in practice.

The same acquisition-stage boundary is visible in the proposed 2028–2034 framework: in the industry association ASD's assessment, the proposed ECF supports activities up to TRL 9, covering the final stages of R&D and possibly industrialisation, but not procurement itself, and ASD has accordingly recommended that the ECF support procurement activities jointly undertaken by contracting authorities from several Member States.[50] On that reading, the transition from EU-funded development to acquisition would continue to depend on the procurement instruments analysed in this section, whatever the outcome of the funding-side negotiations.

[49] Directive 2009/81/EC, Recital 55.

[50] ASD Position Paper of 2 February 2026, cited in Section 1.8, section 'Link between ECF activities and procurement'. The proposal itself describes an 'ECF Toolbox' comprising grants, procurement and industrial policy coordination tools (COM(2025) 555, Chapter II); the scope of 'procurement' as a funding modality under the ECF, as distinct from procurement of resulting solutions by national authorities, is a matter for the ongoing legislative process.

2.9 - EUROPEAN PREFERENCE AND THIRD-COUNTRY PARTICIPATION

A further question concerns European competitiveness and sovereignty: whether procurement rules could promote solutions aligned with EU standards and interests, including with respect to third-country participation. The state of play is that a first EU legal framework operationalising a form of European preference in defence procurement now exists, while its central definitional questions are documented as unresolved.

The legal starting point is that Directive 2009/81/EC does not itself impose a European preference: its recitals record that, in the specific context of defence and security markets, Member States retain the power to decide whether their contracting authorities may allow economic operators from third countries to participate.[51] The developments described below have therefore taken place through EU funding instruments rather than through procurement law.

The framework. Regulation (EU) 2025/2643 establishing the European Defence Industry Programme (EDIP), adopted by the Council on 8 December 2025 and in force since 30 December 2025, provides EUR 1.5 billion for 2025–2027 and conditions eligibility for EU funding on, inter alia: establishment and executive management of beneficiaries in the EU or associated countries; a requirement that at least 65% of the cost of the components of the end product originate in the EU or associated countries (equivalently, a 35% cap on components originating elsewhere, Article 10(3)); a requirement that the design authority — the entity with the legal and technical capacity to decide on the design of the product — generally be located in the EU; and the exclusion of components originating in non-associated third countries that contravene the security and defence interests of the Union.[52]

The open questions. Published analyses document at least four unresolved issues, which together support presenting this topic as one on which no settled answer currently exists:

- **Calculation methodology**. Policy analysis of the predecessor instrument records that the 65% threshold refers to the value of components within the finished product, while no specific methodology for calculating that value has been established, and that the complexity of modern systems — components sourced globally, in some cases moving between countries during production — makes the calculation difficult.[53]

[51] Directive 2009/81/EC, Recital 18.

[52] Council of the European Union, 'European Defence Industry Programme' and 'Common defence procurement'. Available at: https://www.consilium.europa.eu/en/policies/defence-industry-programme/ and https://www.consilium.europa.eu/en/policies/defence-procurement/. Regulation (EU) 2025/2643, OJ, 29 December 2025. Legal analyses: Gleiss Lutz, 'EDIP takes force', February 2026, https://www.gleisslutz.com/en/know-how/edip-takes-force-new-rules-arms-industry-and-its-supply-chain; CMS, 'The 35% rule and design authority', 2026, https://cms-lbr.com/en/ang/publication/CMS-Global-Radar-2026-third-edition/The-35-rule-and-design-authority-how-EDIP-s-third-country-restrictions-reshape-defence-supply-chains.

[53] IRIS / ARES Group, 'The involvement of third-country entities in EU defence industrial programmes – the design authority concept', Policy Paper, June 2025. Available at: https://www.iris-france.org/wp-content/uploads/2025/06/ARES_2025_06_114_Design_Authority_PolicyPaper.pdf

- **The definition of "European".** The same analysis notes that the component-cost rule alone would not prevent funding for a product manufactured on EU soil under a licence granted by a third-country entity, nor exclude activities carried out by foreign subsidiaries established in the Union — illustrating that a numeric threshold does not by itself settle what qualifies as European.
- **Member State positions differ**. Published analysis of the parallel debate on EU-preference conditions in procurement legislation records that some Member States, such as France, have supported a strict European preference, while others, such as Germany and the Netherlands, favour a more flexible approach; the component-cost balance in EDIP was among the points that delayed the Regulation's adoption, with Italy advocating the 65/35 balance to preserve supply chains involving the United Kingdom, Norway, Canada and the United States.[54]
- **Supply-chain dependencies**. Analysis of the adopted balance records that, given existing dependencies on non-EU supplies, a stricter closure of extra-EU supply chains was assessed as entailing substantial increases in costs and timelines; building new European supply chains for the affected component families is a long-term undertaking rather than an available near-term alternative.[55]

The question is also live in the negotiations on the 2028–2034 framework. The proposed ECF Regulation contains horizontal provisions relevant to European preference (Article 10 of the proposal); the industry association ASD has recommended making those provisions mandatory for particularly sensitive security application areas, notably the protection of critical infrastructure against hybrid threats, and has proposed that an explicit European preference be introduced in the deployment-support programmes, either as a condition of access to EU support or as an incentive mechanism such as higher funding rates for the procurement of European products.[56] In ASD's assessment, the ITRE draft report of April 2026 maintains EU preference for security in general terms through the ECF's horizontal provisions without introducing a mandatory preference clause for sensitive application areas.[57] Separately, the Council's partial position of June 2026 aligns the ECF rules with the current European Defence Fund, whose eligibility conditions embody the establishment and control requirements discussed above.[58] These are negotiating positions within an ongoing legislative procedure and are recorded here as part of the state of play, not as settled outcomes.

Whether analogous preference conditions should be introduced into Directive 2009/81/EC itself in the 2026 comprehensive revision remains, at the time of writing, an open policy question, on which this report records the existing framework and the documented difficulties without proposing an answer.

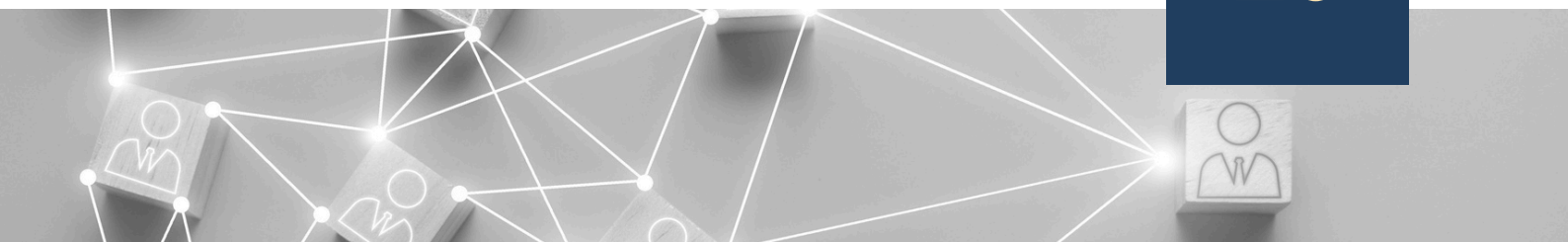
[54] Gide Loyrette Nouel, '(Somewhat) advancing EU preference in the IAA's public procurement rules', 2026. Available at: https://www.gide.com/en/news-insights/somewhat-advancing-eu-preference-in-the-iaas-public-procurement-rules/; Istituto Affari Internazionali, 'The European Defence Industry Programme: The Last Piece of the EU Defence Puzzle?', February 2026. Available at: https://www.iai.it/en/publications/c41/european-defence-industry-programme-last-piece-eu-defence-puzzle .

[55] Istituto Affari Internazionali, cited above; Defence Finance Monitor, 'EDIP Eligibility and the New Geometry of European Defence Supply Chains', May 2026. Available at: https://www.defencefinancemonitor.com/p/edip-eligibility-and-the-new-geometry.

[56] ASD Position Paper of 2 February 2026, cited in Section 1.8, sections 'European preference' and 'Link between ECF activities and procurement'.

[57] ASD Note of 9 June 2026, cited in Section 1.8, point 7(d). The same association has also taken the position that the United Kingdom — an ENACT member state — should be associated to security industrial activities under the ECF under appropriate conditions, noting the absence of complementary rules on third-country association in the ITRE draft report (ASD Position Paper of 2 February 2026, section 'Association of third countries'; Note of 9 June 2026, point 7(e)).

[58] Council press release of 16 June 2026, cited in Section 1.8.



3 - THE USE OF AVAILABLE TOOLS ACROSS MEMBER STATES

This Section profiles the nine ENACT member states - Finland, Spain, the United Kingdom, the Netherlands, Belgium, Italy, France, Greece and Portugal - against the ten-indicator methodology described in Section 2.3, with particular attention to security and defence-sector evidence (Sections 3.2–3.10); consolidates best practices and reference points from the wider thirty-country benchmark (Section 3.11); and provides a comparative overview of national transpositions of Directive 2009/81/EC (Section 3.12). Depth of coverage varies by country according to what could be verified in the sources consulted: full ten-indicator detail was obtained for Finland, Italy, France, Belgium and Portugal, while total scores, the first two indicators, and specific security-sector evidence were obtained for Spain, the United Kingdom, the Netherlands and Greece. Remaining gaps are stated in the relevant sections and consolidated in Annex A.

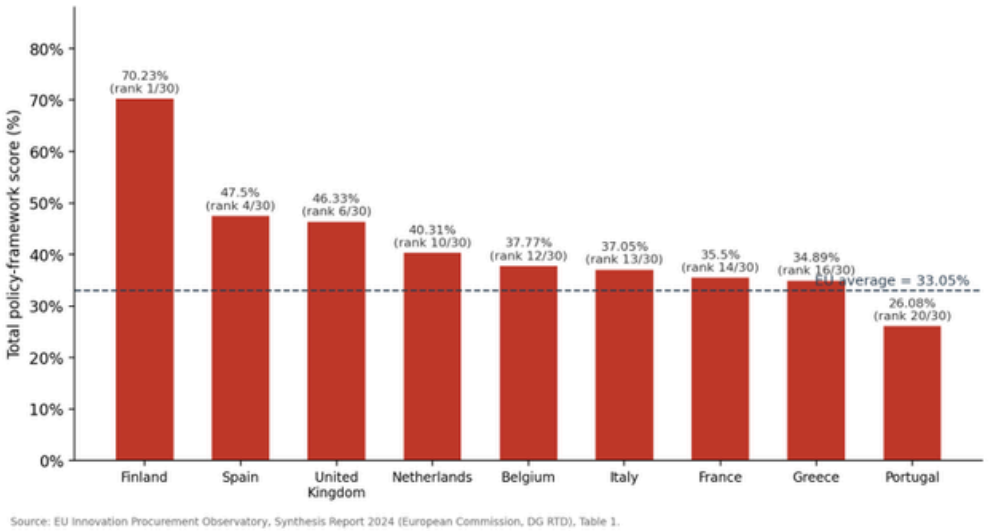


Figure 3: ENACT member states: total innovation procurement policy framework score and rank among the thirty countries assessed, 2024 benchmarking. Source: Synthesis Report 2024, Table 1.

3.1 - COMPARATIVE SNAPSHOT

Indicators 1 (official definitions) and 2 (horizontal policies) are the two indicators for which sub-indicator data was obtained for all nine ENACT member states directly from the Commission's synthesis tables, permitting a like-for-like comparison:[59]

[59] Synthesis Report 2024 (full reference in Section 2.3), Tables 1, 5 and 9.

Table 1: Comparative snapshot

COUNTRY	RANK /30	TOTAL SCORE	IND. 1: DEFINITIONS	IND. 2: HORIZONTAL POLICIES
Finland	1	70.23%	60%	86%
Spain	4	47.50%	60%	71%
United Kingdom	6	46.33%	53%	71%
Netherlands	10	40.31%	56%	57%
Belgium	12	37.77%	55%	50%
Italy	13	37.05%	40%	50%
France	14	35.50%	48%	29%
Greece	16	34.89%	71%	71%
Portugal	20	26.08%	58%	36%
EUROPEAN AVERAGE (30 COUNTRIES)	**—**	**33.05%**	**53%**	**50%**

3.2 - FINLAND - RANK 1/30, SCORE 70.23%

Finland is the highest-ranked country in the benchmark and the only one classified as a solid performer. The Commission's synthesis describes it as the only country implementing an action plan that mobilises concrete measures to mainstream innovation procurement across the whole country, including a clear spending target, key performance indicators for all public buyers, and a permanent national competence centre with regional satellite offices.[60] The framework rests on a 2019 government target that 10% of all public procurement be innovation procurement, a 2020 national action plan, and the Competence Centre for Sustainable and Innovative Public Procurement (KEINO), operational since 2018. Finland also measures actual uptake: a 2022 KEINO survey found innovation procurement at 11% of observed procurements, above the national target.[61]

On the security and defence side, the Finnish Ministry of Defence's 2023 Materiel Policy Strategy provides that the Defence Forces' procedures and processes should be developed to facilitate research and technology procurement, including by means of new innovative procurement and financing models and innovation or technology partnerships.[62] Finland transposed Directive 2009/81/EC through a dedicated statute, the Act on Public Procurement in the Fields of Defence and Security (the PUTU Act – Law 1531/2011), which is one of only two national laws in the benchmark containing a complete definition of R&D procurement applicable to this sector.[63]

3.3 - SPAIN - RANK 4/30, SCORE 47.50%

Spain is the highest-ranked ENACT member state after Finland and provides the benchmark's most fully documented example of innovation procurement applied to the security sector. Understanding the Spanish model requires distinguishing its legal architecture, its institutional machinery, and its security-sector application.

[60] Synthesis Report 2024 (Section 2.3), Section 3.1.1.

61 European Commission, EU Innovation Procurement Observatory, Country Report — Finland (2024). Available at: https://ec.europa.eu/assets/rtd/innovation-procurement/country-report-2024-policy-benchm-finland.pdf, Indicators 5, 6 and 7.

[62] European Commission, EU Innovation Procurement Observatory, Country Report — Finland (2024). Available at: https://ec.europa.eu/assets/rtd/innovation-procurement/country-report-2024-policy-benchm-finland.pdf, Indicator 4.

[63] European Commission, EU Innovation Procurement Observatory, Country Report — Finland (2024). Available at: https://ec.europa.eu/assets/rtd/innovation-procurement/country-report-2024-policy-benchm-finland.pdf, Indicator 1.

LEGAL ARCHITECTURE

Spanish law distinguishes three modalities of innovation procurement (Compra Pública de Innovación, CPI): Compra Pública Precomercial (CPP) - pre-commercial procurement of R&D services, typically taking technologies from Technology Readiness Levels 4-5 to level 7, in which the resulting prototype is used exclusively for technological validation and may not be commercially exploited; Compra Pública de Tecnología Innovadora (CPTI) - the purchase of innovative solutions already at high readiness levels (TRL 7–8 upward), in which the administration acts as first reference client; and the Asociación para la Innovación - the innovation partnership of Directive 2014/24/EU, transposed in Articles 177-182 of Law 9/2017 on Public Sector Contracts (LCSP).[64] The model where end-users test and validate prototypes, with the option to purchase validated solutions through subsequent procurement, corresponds to the CPP-then-CPTI sequence, not to the innovation partnership: in the Spanish sequence, development and purchase are separate procurements with no purchase commitment at the R&D stage, whereas the innovation partnership binds both into a single procedure. On the readiness levels, the primary sources situate the CPP development phase at TRL 4 to 7, with CPTI covering the higher levels.[65]

RELATIONSHIP WITH DIRECTIVE 2009/81/EC

Spain transposed Directive 2009/81/EC not through the LCSP but through a dedicated statute, **Law 24/2011 of 1 August on public sector contracts in the fields of defence and security**, whose preamble states that it incorporates the Directive into Spanish law; the general procurement law applies on a supplementary basis to matters the special law does not expressly regulate.[66] The applicability of the CPI modalities therefore divides along the lines analysed in Section 2.8: the CPP phase operates in both the civil and the defence/security fields, because pre-commercial R&D services fall outside the scope of both directives; the innovation partnership of the LCSP is available for acquisitions under the general regime but not for contracts within the scope of Law 24/2011, whose procedural menu follows Directive 2009/81/EC; and the purchase of validated solutions must follow whichever regime the acquisition falls under.

SECURITY-SECTOR APPLICATION

The security-sector application of the CPP model is documented in primary sources. Two conventions between CDTI (the national innovation agency) and the Ministry of the Interior, published in the Spanish Official Gazette in July 2020, established pre-commercial R&D procurement for Guardia Civil operational needs - security in rural areas and the detection of illicit maritime drug trafficking - co-financed by the European Regional Development Fund.[67] In 2023, the resulting rural-security prototype, developed under a contract of EUR 8,518,400, was delivered to the Guardia Civil.[68]

[64] CEDEX (Centro de Estudios y Experimentación de Obras Públicas), 'Tipología y características de la CPI'. Available at: https://www.cedex.es/tipologia-caracteristicas-cpi; CDTI, 'El CDTI Innovación lidera desde 2019 la Compra Pública Precomercial innovadora en España'. Available at:https://www.cdti.es/noticias/compra-publica-innovacion-CPP-CPI-CDTI.

[65] Resolutions of 16 July 2020 of the Spanish Subsecretaría del Interior publishing the CDTI–Ministry of the Interior conventions (BOE-A-2020-8276 and BOE-A-2020-8275), which stipulate that the pre-commercial contracting must fall within industrial research and/or experimental development, specifically phases TRL 4 to TRL 7. Available at: https://www.boe.es/diario_boe/txt.php?id=BOE-A-2020-8276 and https://www.boe.es/diario_boe/txt.php?id=BOE-A-2020-8275.

[66] Ley 24/2011, de 1 de agosto, de contratos del sector público en los ámbitos de la defensa y de la seguridad, BOE-A-2011-13239. Available at: https://www.obcp.es/opiniones/la-contratacion-publica-en-los-ambitos-de-la-defensa-y-la-seguridad.

[67] BOE-A-2020-8276 and BOE-A-2020-8275, cited above.

[68] Ministerio del Interior, 'La Guardia Civil recibe de manos del CDTI una revolucionaria solución tecnológica para la seguridad en el medio rural', 2023. Available at: https://www.interior.gob.es/opencms/es/detalle/articulo/La-Guardia-Civil-recibe-de-manos-del-Centro-para-el-Desarrollo-Tecnologico-Industrial-CDTI-una-revolucionaria-solucion-tecnologica-para-la-seguridad-en-el-medio-rural/.

INCIBE, the national cybersecurity institute, runs dedicated pre-commercial procurement calls for cybersecurity R&D services under the Recovery and Resilience Plan,[69] and CDTI identifies security and defence as one of the areas of strongest growing momentum in Spanish pre-commercial procurement.[70] At the strategic level, the Digital Spain 2026 plan channels EUR 224 million of the EUR 235 million CIBERINNOVA cybersecurity-innovation budget through innovative public procurement.[71]

3.4 - UNITED KINGDOM - RANK 6/30, SCORE 46.33%

The United Kingdom rose from 9th (35.4%) in the previous benchmarking to 6th (46.33%). The Crown Commercial Service acts as the central purchasing body, and Innovate UK has implemented the Small Business Research Initiative (SBRI), the national pre-commercial procurement programme, since 2018, alongside the Connected Places Catapult.[72] The United Kingdom is one of two countries in the benchmark - with Finland - applying the incentive mechanism the Commission's synthesis identifies as the most effective observed: the annual setting of key performance indicators for all procurers to improve the quality and cost of public services through innovation procurement.[73] The United Kingdom transposed Directive 2009/81/EC through the Defence and Security Public Contracts Regulations 2011, implemented by the Ministry of Defence and applicable to procurements from 21 August 2011.[74] Commission evaluation data also documents the scale of UK use of the Directive: contracts awarded by UK authorities accounted for over half of the value of all contracts awarded under the Directive in 2011–2015 (nearly EUR 17 billion of EUR 30.85 billion).[75]

3.5 NETHERLANDS - RANK 10/30, SCORE 40.31%

The Netherlands provides the most fully documented example among the ENACT member states of security and defence sectoral policy formally anchored to innovation procurement. The Commission's country report records that innovation procurement is recognised as a strategic priority in six sectoral policies, including public order, safety, security and defence policy; that the Ministry of Justice and Security adopted a step-by-step plan for innovation procurement in 2018, renewed in June 2021; and that the Ministry of Defence has adopted a strategy for both pre-commercial procurement and the public procurement of innovative solutions, publishing its strategic knowledge and innovation agenda for 2021–2025 in 2020.[76]

[69] INCIBE, 'Compra Pública de Innovación'. Available at: https://www.incibe.es/industria-cpi.
[70] CDTI, cited above.
[71] Digital Spain 2026 / CIBERINNOVA, quoted in Synthesis Report 2024, Table 17.
[72] European Commission, EU Innovation Procurement Observatory, Country Report — UK (2024). Available at: https://ec.europa.eu/assets/rtd/innovation-procurement/country-report-2024-policy-benchm-uk.pdf.
[73] Synthesis Report 2024 (Section 2.3), Section 3.2.2.
[74] GOV.UK, 'Implementation of Directive 2009/81/EC'. Available at: https://www.gov.uk/government/publications/implementation-of-directive-2009-81-ec.
[75] European Commission, COM(2016) 762 final, Report on the implementation of Directive 2009/81/EC on public procurement in the fields of defence and security, 30 November 2016. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52016DC0762.
[76] European Commission, EU Innovation Procurement Observatory, Country Report — Netherlands (2024). Available at: https://ec.europa.eu/assets/rtd/innovation-procurement/country-report-2024-policy-benchm-netherlands.pdf, Indicator 4.
[77] PIANOo, 'Innovatiegericht inkopen'. Available at: https://www.pianoo.nl/nl/themas/innovatie and https://www.pianoo.nl/themas/innovatiegericht-inkopen/innovatiegericht-inkopen-toegelicht/kansrijke-actuele-themas-innovatiegericht-inkopen-diensten.
[78] EUR-Lex, National transposition measures for Directive 2009/81/EC. Available at: https://eur-lex.europa.eu/legal-content/en/NIM/?uri=CELEX:32009L0081.

Two ministries each maintaining a dedicated innovation-procurement strategy is not replicated with the same documented specificity elsewhere among the ENACT member states. The national competence centre PIANOo convenes an innovation-procurement working group whose membership includes the national police and the Ministry of Justice and Security, and the Dutch SBIR mechanism has been applied to security technologies, including simulation and physical-protection applications, through the Hague Security Delta cluster.[77] The Netherlands transposed Directive 2009/81/EC through a dedicated statute, the Aanbestedingswet op defensie- en veiligheidsgebied (Act of 28 January 2013).[78]

3.6 BELGIUM - RANK 12/30, SCORE 37.77%

Belgium illustrates, in documented form, the general pattern identified in Section 2.7: strategic investment intent in the security and defence field that is not yet connected to procurement policy. The Commission's country report records that the 2022 National Defence Plan commits to gradually increasing investment in innovation, including at least 2% of the defence effort on R&D, and that the National Safety Plan commits to modernising police, security and safety services with innovative technologies - while neither document links these commitments to innovation procurement, resulting in a score of 0% on the public order, safety, security and defence sub-indicator.[79] For the purposes of this report, Belgium is thus a useful reference case of the specific missing link - between investment planning and procurement mechanism - that several of the recommendations in Section 5 are designed to address.

Belgium's framework has notable strengths elsewhere: it achieves the maximum score in the benchmark on the default intellectual property regime, based on a clear default rule leaving IPR ownership with contractors while granting usage licences to the procuring authority, and the Flemish Programme for Innovation Procurement (PIO), operating since 2009, is among the longer-established sub-national competence-centre models in Europe.[80] Belgium transposed Directive 2009/81/EC through the Law of 13 August 2011 on public contracts in the fields of defence and security.[81]

3.7 ITALY - RANK 13/30, SCORE 37.05%

Italy's defence sectoral policy receives the maximum score in the benchmark: the Ministry of Defence's 2022–2024 Annual Programmatic Document highlights the need for faster adoption of highly innovative technological equipment and refers to the National Plan for Military Research, which plans R&D acquisitions aimed at laying the foundations for the acquisition of future innovative solutions of strategic interest.[82] Italy transposed Directive 2009/81/EC through Legislative Decree No. 208 of 15 November 2011; the general Public Contracts Code (Legislative Decree 36/2023) applies only residually to defence and security contracts.

[79] European Commission, EU Innovation Procurement Observatory, Country Report — Belgium (2024). Available at: https://ec.europa.eu/assets/rtd/innovation-procurement/country-report-2024-policy-benchm-belgium.pdf, Indicator 4.

[80] European Commission, EU Innovation Procurement Observatory, Country Report — Belgium (2024). Available at: https://ec.europa.eu/assets/rtd/innovation-procurement/country-report-2024-policy-benchm-belgium.pdf, Indicators 10 and 5.

[81] EUR-Lex, National transposition measures for Directive 2009/81/EC, cited above (Loi du 13 août 2011 relative aux marchés publics et à certains marchés de travaux, de fournitures et de services dans les domaines de la défense et de la sécurité, Moniteur belge).

[82] European Commission, EU Innovation Procurement Observatory, Country Report — Italy (2024). Available at: https://ec.europa.eu/assets/rtd/innovation-procurement/country-report-2024-policy-benchm-italy.pdf, Indicator 4.

Italy also provides the benchmark's principal documented example of regression in definitional clarity: its official-definitions score declined from 65% to 40% between rounds - the largest decrease recorded for any country on this indicator - because the 2023 reform of the procurement code did not retain the definitions of innovation and of pre-commercial procurement contained in the previous 2016 code.[83] This is of direct relevance to any recommendation urging Member States to legislate clearer definitions: such gains require active maintenance through subsequent legislative reforms. Strengths documented in the same report include full recognition of innovation procurement in ICT policy and sub-national leadership: the report notes that northern regions show the way forward with strategic planning, spending targets, financial incentives and capacity building, citing in particular Lombardy's regional target that at least 3% of regional procurement expenditure be devoted to innovation procurement, including pre-commercial procurement.[84]

3.8 FRANCE - RANK 14/30, SCORE 35.50%

France has the most fully documented dedicated defence-innovation structure among the ENACT member states — the Agence de l'Innovation de Défense (AID), created in September 2018 under the Direction Générale de l'Armement — and its defence sectoral policy receives the maximum benchmark score: the AID publishes an annual reference document to steer innovation, whose 2022 edition includes a section identifying innovation procurement as an important lever for the efficiency and effectiveness of the armed forces, and the Ministry of the Armed Forces has adopted a departmental plan dedicated to innovation procurement for 2021–2024.[85] The AID's single-desk initiative ("Guichet Unique") provides a simplified entry point connecting start-ups and other innovation holders to defence needs; according to the agency's official 2025 activity report,[86] the Guichet Unique team held more than 1,000 meetings with innovation holders across France during 2025. The same report records that the agency committed nearly EUR 1.173 billion to defence innovation projects in 2025, selecting 187 new research projects, 158 innovation-acceleration projects and 20 participative innovation projects, with 18 projects scaled up to the forces during the year.

France's overall position reflects the sectoral character of this strength: its horizontal-policy indicator (29%) is below the European average of 50%, and the country report records neither a national action plan nor financial incentives for public buyers. France's spending target is likewise specific in scope: a commitment under the 2023 "Je choisis la French Tech" programme to double central-government orders from innovative SMEs from 2.4% to 4% by 2027, applicable to State procurement rather than to public procurement as a whole.[87]

[83] European Commission, EU Innovation Procurement Observatory, Country Report — Italy (2024). Available at: https://ec.europa.eu/assets/rtd/innovation-procurement/country-report-2024-policy-benchm-italy.pdf, Indicator 1.
[84] European Commission, EU Innovation Procurement Observatory, Country Report — Italy (2024). Available at: https://ec.europa.eu/assets/rtd/innovation-procurement/country-report-2024-policy-benchm-italy.pdf, strengths and weaknesses summary and Indicator 6.
[85] European Commission, EU Innovation Procurement Observatory, Country Report — France (2024). Available at: https://ec.europa.eu/assets/rtd/innovation-procurement/country-report-2024-policy-benchm-france.pdf, Indicator 4.
[86] Agence de l'innovation de défense / Ministère des Armées et des Anciens combattants, Bilan d'activités 2025, published 29 May 2026. Available at: https://www.defense.gouv.fr/aid/actualites/lagence-linnovation-defense-presente-son-bilan-dactivites-2025.
[87] European Commission, EU Innovation Procurement Observatory, Country Report — France (2024). Available at: https://ec.europa.eu/assets/rtd/innovation-procurement/country-report-2024-policy-benchm-france.pdf, Indicators 2, 5, 6 and 8.

3.9 GREECE - RANK 16/30, SCORE 34.89%

Greece combines the strongest definitional framework among the ENACT member states - 71% on the official-definitions indicator, among the highest in the benchmark - with an active role in European advocacy: on 29 September 2021, at the European Competitiveness Council, Greece, with the support of Italy, Germany, Austria, Luxembourg and Cyprus, invited other Member States to co-sign a ministerial declaration on mainstreaming innovation procurement.[88] The Commission's parallel investment benchmarking records that Greek expenditure remains below the European averages: 0.23% of public procurement devoted to R&D procurement (19th; European average 0.6%) and 5.06% devoted to the procurement of innovative solutions (24th; European average 9.9%).[89] Greece is also among the countries recorded by the Commission's Defence Industry Transformation Roadmap as having established a dedicated innovation unit within its Ministry of Defence, with ring-fenced budgets oriented toward artificial intelligence, quantum computing and autonomous systems.[90]

3.10 PORTUGAL - RANK 20/30, SCORE 26.08%

Portugal records the lowest benchmark position among the ENACT member states while showing one of the largest improvements of any country between rounds, from 8.77% (29th) to 26.08% (20th). The Commission's country report notes that performance remains below the European average on eight of the ten indicators.[91] The comparative study cited in Section 1.7 places Portugal among the countries in which innovation procurement is recognised only in policy supported by the European Structural and Investment Funds, without a separate national horizontal strategy; the implications for EU–national funding integration are analysed in Section 4.[92]

Portugal's national infrastructure includes: Decree-Law No. 104/2011, transposing Directive 2009/81/EC - the national legal instrument that will require amendment to reflect whatever changes result from the EU-level revision discussed in Sections 1.3 and 2.8; the national competence centre PROCURE+i; and the regulatory authority IMPIC. General public procurement is governed by the Public Contracts Code (Decree-Law No. 18/2008, most recently amended by Decree-Law No. 112/2025 and now under revision).[93] No dedicated national security or defence innovation-procurement strategy comparable to those documented for the Netherlands, France or Italy was identified for Portugal in the sources consulted.

3.11 - BEST PRACTICES AND REFERENCE POINTS FROM THE WIDER BENCHMARK

In line with this report's focus on best practices, this section consolidates reference points from countries outside the ENACT consortium whose practices are documented in the benchmark as leading examples - or whose experience is otherwise instructive for the analysis in Section 4.

[88] European Commission, 'EU policy initiatives on Innovation Procurement'. Available at: https://research-and-innovation.ec.europa.eu/strategy/support-policy-making/shaping-eu-research-and-innovation-policy/new-european-innovation-agenda/innovation-procurement_en.

[89] European Commission, EU Innovation Procurement Observatory, Country Investment Report — Greece (2024). Available at: https://ec.europa.eu/assets/rtd/innovation-procurement/ec_rtd_country-report-investment-el.pdf.

[90] COM(2025) 845 final (Section 1.5), Section 3.3.

[91] European Commission, EU Innovation Procurement Observatory, Country Report — Portugal (2024). Available at: https://ec.europa.eu/assets/rtd/innovation-procurement/country-report-2024-policy-benchm-portugal.pdf .

[92] PwC / European Commission (2021), full reference in Section 1.7.

[93] European Commission, EU Innovation Procurement Observatory, Country Report — Portugal (2024). Available at: https://ec.europa.eu/assets/rtd/innovation-procurement/country-report-2024-policy-benchm-portugal.pdf, governance and legal framework section.

ESTONIA - RANK 2/30, SCORE 52.43%: STEPPED, LONG-HORIZON SPENDING TARGETS

Estonia's Strategic Principles of Public Procurements set targets for innovation procurement of 2% of the volume and 5% of the expenditure of all public procurement by 2025, rising to 5% of volume and 10% of expenditure by 2035 — one of the few examples in the benchmark of a dated, escalating national target rather than a single static figure, and a directly transferable model for target-setting recommendations.[94]

AUSTRIA - RANK 3/30, SCORE 52.02%: BRIDGING RESEARCH AND PROCUREMENT IN CYBERSECURITY STRATEGY

Austria performs above the European average across nearly all indicators, supported by its national competence centre (the PPPI Service Centre within the Federal Procurement Agency). Of particular relevance to Section 1.5, Austria's 2021 Cybersecurity Strategy commits to establishing a framework to close the gap between application-focused research projects and the public procurement process, covering the pathway from fundamental research to the introduction of specific products to the market - a national-level articulation of precisely the research-to-deployment bridge discussed in this report.[95]

GERMANY - RANK 8/30, SCORE 42.97%: SECTORAL STRENGTH ALONGSIDE OPERATIONAL GAPS

Germany's profile illustrates the recognition-versus-machinery pattern in a large Member State: its ICT-policy indicator reaches 100%, supported by the Cybersecurity Strategy's mandate to the Agency for Innovation in Cybersecurity (Cyberagentur) to implement pre-commercial procurement projects, while the country report records no dedicated action plan and no spending target (both indicators at 0%).[96] Germany transposed Directive 2009/81/EC by amending its general competition and procurement framework (the GWB) rather than through a standalone statute; published analysis records that transposition proceeded with delay, prompting Commission enforcement action.[97]

BULGARIA - RANK 30/30, SCORE 9.09%: PROGRAMME EXISTENCE WITHOUT PROCUREMENT UPTAKE

Bulgaria is among the five countries publicly identified as having a national security research programme (Section 4), while occupying the final position in the innovation-procurement benchmark. The European Innovation Scoreboard country profile records that 2% of total procurement in 2024 was innovation-related, compared with an EU average of 9.2%,[98] and the comparative study cited in Section 1.7 places Bulgaria among the countries whose innovation-procurement activity is recognised only in policy supported by EU structural funds. Bulgaria's experience is central to the analysis in Section 4 of the relationship between programme existence and outcomes.

[94] Synthesis Report 2024 (Section 2.3), Section 4.2.2.
[95] Austrian Cybersecurity Strategy 2021, quoted in Synthesis Report 2024, Table 17; European Commission, EU Innovation Procurement Observatory, Country Report - Austria (2024). Available at: https://ec.europa.eu/assets/rtd/innovation-procurement/country-report-2024-policy-benchm-austria.pdf.
[96] European Commission, EU Innovation Procurement Observatory, Country Report — Germany (2024), Indicators 3, 5 and 6. Available at: https://ec.europa.eu/assets/rtd/innovation-procurement/country-report-2024-policy-benchm-germany.pdf.
[97] D. Tokaji, 'Directive 2009/81/EC on EU Defence and Security Procurement — implementation in Hungarian and German law', Maastricht University. Available at: https://www.maastrichtuniversity.nl/file/tokajipdf.
[98] European Commission, European Innovation Scoreboard 2025, Country Profile — Bulgaria. Available at: https://ec.europa.eu/assets/rtd/eis/2025/ec_rtd_eis-country-profile-bg.pdf.

LITHUANIA - RANK 5/30, SCORE 47.24%: DEFINITIONAL CLARITY

Lithuania records the strongest official-definitions indicator in the benchmark (76%) and the largest overall improvement between rounds among the top performers (from 27.59% to 47.24%) and is cited in the German country report as the top performer against which definitional frameworks are measured.[99]

3.12 - TRANSPOSITION OF DIRECTIVE 2009/81/EC: COMPARATIVE OVERVIEW

Because the fast-track analysis in Section 2.8 turns on the relationship between national law and the Directive's procedural menu, the table below consolidates the verified national transposing instruments for the ENACT member states and the comparator countries discussed above. Two structural models appear: dedicated defence-and-security procurement statutes operating alongside the general procurement law (the majority model), and integration into the general procurement framework (documented for Germany). Transposition history is itself relevant to the state of play: the Commission's transposition report records that only three Member States had notified complete transposition by the August 2011 deadline, that infringement letters were sent to twenty-three Member States in September 2011, and that in September 2012 the Commission asked the Court of Justice to impose penalty payments on Poland, the Netherlands, Luxembourg and Slovenia.[100]

Table 2: Comparative snapshot

COUNTRY	TRANSPOSING INSTRUMENT	MODEL
Spain	Ley 24/2011, de 1 de agosto (LCDS)	Dedicated instrument; general law supplementary
Portugal	Decree-Law No. 104/2011	Dedicated instrument
Finland	Act 1531/2011 on Public Procurement in the Fields of Defence and Security	Dedicated instrument
Italy	Legislative Decree No. 208/2011	Dedicated instrument
United Kingdom	Defence and Security Public Contracts Regulations 2011 (DSPCR)	Dedicated instrument
Netherlands	Aanbestedingswet op defensie- en veiligheidsgebied (Act of 28 Jan. 2013)	Dedicated instrument
Belgium	Loi du 13 août 2011 (défense et sécurité)	Dedicated instrument
Germany	Amendment of the general framework (GWB and implementing rules)	Integrated into general framework
Sweden	Act on Defence and Sensitive Security Procurement (2011:1029, LUFS)	Dedicated instrument
France	Loi 2011-702 et Décret 2011-1104 (today all under Code de la commande publique)	Integrated into general framework
Greece	Law No. 3978/2011	Dedicated instrument

[99] Synthesis Report 2024 (Section 2.3), Tables 1 and 5; Country Report — Germany (2024), Indicator 1.

[100] European Commission, COM(2012) 565 final, Report on transposition of Directive 2009/81/EC on Defence and Security Procurement, 2 October 2012; Fondation pour la Recherche Stratégique, 'The Directive 2009/81/EC on Defence and Security Procurement under Scrutiny', Recherches & Documents, 2015. Available at: https://www.frstrategie.org/web/documents/publications/recherches-et-documents/2015/201503.pdf

4 - NATIONAL SECURITY RESEARCH PROGRAMMES AND EU-NATIONAL FUNDING INTEGRATION

This Section examines the relationship between national security research programmes, innovation outcomes, and the integration of EU and national funding. The evidence reviewed does not support a settled causal account in either direction - a finding which is itself of analytical value: it indicates that the existence of a national programme is a poor proxy for the operational capacity that Sections 2 and 3 identify as the true differentiator.

4.1 - THE COUNTRIES WITH A NATIONAL SECURITY RESEARCH PROGRAMME

An expert assessment of Horizon Europe Clusters 1–3, reported with comment from the responsible Head of Unit at the Commission's Directorate-General for Migration and Home Affairs, records that national security research programmes exist only in Germany, Austria, Bulgaria, Czechia and Italy, and that most Member States are accordingly reliant on Horizon Europe for civil security research and innovation.[101] Of the five, Italy is the only ENACT member state; Germany, Austria and Bulgaria are discussed in Section 3.11, and Czechia was not separately profiled.

4.2 - OUTCOMES: NO CORRELATION ESTABLISHED

Taking the European Innovation Scoreboard's classification[102] as the closest available general outcome measure, the five countries span nearly the full range of the classification: Germany and Austria are classified as Strong Innovators; Italy and Czechia as Moderate Innovators; and Bulgaria in the Emerging Innovators group.[103]

[101] Science|Business, 'Call for dedicated fund for civil security research and deployment', quoting Nicolas Bessot, Head of Unit for Innovation and Security Research, DG HOME. Available at: https://sciencebusiness.net/news/dual-use/call-dedicated-fund-civil-security-research-and-deployment.

[102] The European Innovation Scoreboard classification (Innovation Leaders, Strong, Moderate and Emerging Innovators) measures overall national innovation performance and is distinct from the innovation-procurement policy benchmarking used in Parts Two and Three of this report (strong, solid, moderate, modest and low performers), which measures the maturity of national policy frameworks for innovation procurement specifically. The two instruments answer different questions, and their classifications are not comparable.

[103] European Commission, European Innovation Scoreboard 2024, main report, performance groups. Available at: https://research-and-innovation.ec.europa.eu/statistics/performance-indicators/european-innovation-scoreboard_en.

Portugal, which does not have a national security research programme, is classified in the same Moderate Innovators group as Italy and Czechia, which do.[104] On the innovation-procurement benchmark specifically, the pattern is likewise mixed: the five countries occupy ranks 3 (Austria), 8 (Germany), 13 (Italy) and 30 (Bulgaria) of the thirty countries assessed, with Czechia at rank 27.[105]

The conclusion this report draws, stated within the limits of the evidence: **no source reviewed establishes a correlation between the existence of a national security research programme and stronger innovation or procurement outcomes, and the available classification data is not consistent with such a correlation**. The factors that do distinguish stronger from weaker performers throughout this report are the operational ones identified in Section 2: dedicated action plans, quantified spending targets, incentives for procurers, and institutional machinery connecting funding agencies with end users.

4.3 - EU-NATIONAL FUNDING INTEGRATION: THE DOCUMENTED PATTERNS

The evidence reviewed documents two distinct baseline patterns of EU–national funding relationship in the civil security field. The first is **reliance without a national counterpart**: as recorded in Section 4.1, a majority of Member States have no national security research programme and are accordingly reliant on Horizon Europe for civil security research - in these countries, the question of integrating two funding streams does not fully arise, because one of them is largely absent. The second is **channelling without an independent strategy**: in the countries identified in Section 1.7[106] (Bulgaria, Portugal, Romania and Slovakia), innovation-procurement activity is recognised only within policy supported by the European Structural and Investment Funds, without a separate national strategy covering other areas. Bulgaria illustrates that these patterns are independent of programme existence: it has a named national security research programme while falling within the second category.

[101] Science|Business, 'Call for dedicated fund for civil security research and deployment', quoting Nicolas Bessot, Head of Unit for Innovation and Security Research, DG HOME. Available at: https://sciencebusiness.net/news/dual-use/call-dedicated-fund-civil-security-research-and-deployment.

[102] The European Innovation Scoreboard classification (Innovation Leaders, Strong, Moderate and Emerging Innovators) measures overall national innovation performance and is distinct from the innovation-procurement policy benchmarking used in Sections 2 and 3 of this report (strong, solid, moderate, modest and low performers), which measures the maturity of national policy frameworks for innovation procurement specifically. The two instruments answer different questions, and their classifications are not comparable.

[103] European Commission, European Innovation Scoreboard 2024, main report, performance groups. Available at: https://research-and-innovation.ec.europa.eu/statistics/performance-indicators/european-innovation-scoreboard_en

[104] European Commission, European Innovation Scoreboard 2025, Country Profile — Portugal. Available at: https://ec.europa.eu/assets/rtd/eis/2025/ec_rtd_eis-country-profile-pt.pdf

[105] Synthesis Report 2024 (Section 2.3), Table 1.

[106] PwC/European Commission (2021), full reference in Section 1.7.

For three of the four remaining countries with national security research programmes – Germany, Austria and Czechia - , official programme documentation records structured connections to the EU level, of a consistent kind. In **Germany**, the federal framework programme "Forschung für die zivile Sicherheit", first launched in 2007 and currently in its 2024–2029 edition as a whole-of-government framework programme, is presented by the federal authorities as the national level of a landscape whose European level comprises Horizon Europe and the Internal Security Fund; the implementing agency of the national programme also operates the National Contact Points for security research in Horizon Europe and for the European Defence Fund.[107]

In **Austria**, the national security research programme KIRAS (operational since 2006, under the programme responsibility of the Federal Ministry of Finance and managed by the FFG) includes among its stated tasks the preparation of Austrian participants for successful participation in Horizon Europe Cluster 3, and its funding rules contain a formal demarcation clause reserving national funding for projects with a clear Austrian focus while directing projects of a predominantly European character to the EU programme.[108] In Czechia, the Ministry of the Interior operates a portfolio of dedicated security research programmes under an interagency policy framework, describes the facilitation of international cooperation chiefly within Horizon Europe as a key pillar of its security research department's mission, and hosts the national delegate to the Horizon Europe programme committee for Cluster 3.[109]

Italy presents a structurally different arrangement. Its national research planning instrument is the Programma Nazionale per la Ricerca (PNR) 2021–2027, adopted in December 2020 under Legislative Decree 204/1998 and coordinated by the Ministry of University and Research; the PNR is expressly organised into major research areas mirroring the six clusters of Horizon Europe, precisely in order to secure coordination between national, European and international research planning, with security appearing as a domain within that architecture.[110] The EU connection is therefore structural - the national programme's thematic architecture is aligned to the EU framework programme by design - but Italy's arrangement is not a ring-fenced security research funding programme with its own budget, calls and designated security-sector programme owner, as in the German, Austrian and Czech cases. This divergence is itself of analytical relevance: it indicates that the category of "national security research programme", as used in the source underlying Section 4.1, encompasses materially different national arrangements, and supports the caution expressed in Section 4.2 against treating the existence of such a programme as a well-defined variable.

[107] Bundesministerium des Innern und für Heimat, 'Forschung für die zivile Sicherheit'. Available at: https://www.bmi.bund.de/DE/themen/sicherheit/forschung-fuer-ihre-sicherheit/forschung-fuer-ihre-sicherheit-node.html; BMFTR, 'Forschung für die zivile Sicherheit — Rahmenprogramm der Bundesregierung 2024–2029'. Available at: https://www.sifo.de/sifo/de/programm/forschung-fuer-die-zivile-sicherheit.html; on the National Contact Points, VDI Technologiezentrum, 'Zivile Sicherheit und Verteidigung'. Available at: https://www.vditz.de/in10jahren/zivile-sicherheit-verteidigung .

[108] Bundesministerium für Finanzen, 'Sicherheitsforschung KIRAS'. Available at: https://www.bmf.gv.at/themen/Sicherheit-Technologie/sicherheitsforschung-KIRAS.html; Sonderrichtlinie KIRAS 2023–2026 (funding rules), FFG. Available at: https://fdoc.ffg.at/s/vdb/public/node/content/Qic1zdXmTym1FiYj-fQKgg/1.0?a=true; KIRAS programme portal, https://www.kiras.at.

[109] Ministry of the Interior of the Czech Republic, 'Security Research in the Czech Republic'. Available at: https://mv.gov.cz/vyzkum/clanek/security-research-in-the-czech-republic.aspx (including the programme portfolio and the Interagency Security Research Support System Policy of the Czech Republic 2017–2023 with a view to 2030).

[110] Ministero dell'Università e della Ricerca, 'Programma nazionale per la ricerca'. Available at: https://www.mur.gov.it/it/aree-tematiche/ricerca/programmazione/programma-nazionale-la-ricerca; Programma Nazionale per la Ricerca 2021–2027 (adopted December 2020, pursuant to Legislative Decree 204/1998). On the Italian National Contact Point for Horizon Europe Cluster 3, see APRE, https://horizoneurope.apre.it/struttura-e-programmi/global-challenges-european-industrial-competitiveness/cluster-3/.

Two observations follow. First, in the four countries for which programme documentation was reviewed, the documented connections operate at the research stage - coordination structures, national contact points, demarcation rules, participant preparation, and, in Italy's case, thematic alignment of national research planning to the EU framework programme. No equivalent official documentation of mechanisms linking these national arrangements to the deployment or procurement of research results was identified in the sources consulted. This is consistent with the horizontal finding of the European Court of Auditors, discussed in Section 1.7, that upstream synergies between EU and national frameworks were generally implemented while downstream synergies were hardly implemented, and with the Commission's identification of the uptake of Cluster 3 results in national programmes as unfinished business for the current programming period (Section 1.5). Second, the Austrian demarcation clause merits attention as a transferable practice: it is the clearest documented example, among the countries reviewed, of an explicit, rule-level division of labour between a national security research programme and Horizon Europe.

4.4 - THE POSITION OF THE ENACT MEMBER STATES

Among the nine ENACT member states, only Italy appears among the five countries identified as having a national security research programme; the remaining eight fall within the first pattern described in Section 4.3, relying principally on Horizon Europe for civil security research. Portugal is, additionally, the only ENACT member state documented within the second pattern: its innovation-procurement activity is recognised only within ESIF-supported policy, without an independent national strategy (Section 3.10), so that the connection between EU and national funding operates predominantly through EU structural funds. Portugal's existing transposition of Directive 2009/81/EC (Decree-Law No. 104/2011) provides the national legal instrument through which the outcomes of the EU-level revision analysed in Sections 1.3 and 2.8 will enter Portuguese law; equivalent transposition instruments for the other member states are set out in Section 3.12.

5 - CONCLUSIONS AND RECOMMENDATIONS

5.1 - CONCLUSIONS

The instruments for innovation procurement in the security sector largely exist. What is missing, in most Member States and at EU level alike, is the machinery that converts them into practice - and, within the defence and security regime specifically, a legal route from validated prototype to acquisition.

- **State of play**. Innovation-procurement policy frameworks remain under-developed across Europe: the European average is 33.05%, no country reaches the strong-performer category and the ENACT member states span the range from the benchmark's leading country (Finland) to positions below the European average (Greece, Portugal). Political and strategic recognition of innovation procurement is now widespread; the operational instruments — action plans, spending targets, monitoring, incentives, capacity building — remain the weakest and least-improved part of the European framework.
- **The security and defence sector is advancing quickly from an early stage**. The figures (12% to 40%, +28 percentage points, 2020–2024) show one of the largest sectoral gains in the benchmark, which the Commission links to EU security and defence policy attention; the sector's institutional development nonetheless remains behind the longer-established demand-side policy areas such as environment and energy.
- **The reform needed is precisely located, and only partly a matter for the EU legislator**. The pre-commercial phase is already available to Member States in the defence and security field, since research and development services fall outside the scope of Directive 2009/81/EC under its Article 13 exclusion; Spain's practice in the security sector demonstrates the model in operation. What is closed to national action is the acquisition stage, whose procedures the Directive defines exhaustively, and which does not currently include the innovation partnership. Member States therefore need not await EU reform to establish pre-commercial procurement practice in the security field; the fast-track route from validated prototype to acquisition, by contrast, can be opened only at EU level — which the Commission's proposal of June 2025 seeks to do. The evidence presented in Part Two indicates that legislative availability will need to be accompanied by operational measures.

- **Best practices are identifiable and specific.** The documented differentiators are: quantified, dated spending targets (Finland; Estonia's stepped 2025/2035 targets); annual KPIs for procurers (Finland and the United Kingdom, the only two countries in the benchmark applying them); permanent competence centres with end-user engagement (KEINO; PIANOo's working group including the national police); dedicated innovation agencies with formal end-user conventions and co-financing (Spain's CDTI with the Ministry of the Interior; France's AID single desk); and sectoral strategies that name innovation procurement expressly (Netherlands - two ministries; Italy - defence programmatic documents; Finland - materiel policy strategy).
- **Legal gains require maintenance**. Italy's loss of statutory definitions in the 2023 reform demonstrates that definitional and procedural clarity, once achieved, can be removed by subsequent general reforms unless actively preserved.
- **National security research programmes and procurement performance are distinct variables**. The evidence reviewed shows no correlation between programme existence and stronger outcomes, and the Bulgarian and Portuguese cases show that EU–national funding integration is likewise independent of programme existence. The category is itself unstable: the arrangements so described range from ring-fenced security research funding programmes with designated security-sector owners (Germany, Austria, Czechia) to a general national research programme thematically aligned to Horizon Europe (Italy). Moreover, where connections between national programmes and EU funding are documented, they operate at the research stage - contact points, coordination structures, demarcation rules - and not at the stage of deployment or procurement of results.
- **The funding architecture on which security innovation depends is being renegotiated**. The proposed European Competitiveness Fund would consolidate the instruments at both ends of the pipeline analysed in this report. Whether the future architecture strengthens or narrows the connection between security research and deployment will materially determine whether the weaknesses documented here are corrected, or carried forward into the 2028–2034 period.
- **European preference now has a first legal framework whose central questions remain open**. EDIP's 35% component-cost cap and design-authority requirement operationalise a form of European preference for EU-funded procurement, while the calculation methodology, the treatment of licensing and foreign subsidiaries, divergent Member State positions and existing supply-chain dependencies are documented as unresolved. Whether analogous conditions belong in Directive 2009/81/EC itself is an open question for the 2026 revision.

5.2 - RECOMMENDATIONS

The following recommendations draw on the European Commission's own recommendations in the 2024 benchmarking synthesis and on the country evidence of Section 3, in the context of the revision of Directive 2009/81/EC. Where a recommendation reflects this report's own analytical proposal rather than a documented position, this is stated.

5.2.1 - ON THE REVISION OF DIRECTIVE 2009/81/EC

- **The innovation partnership and the simplified route for the direct procurement of innovative products** resulting from competitive parallel research and development projects should be introduced into Directive 2009/81/EC, as proposed in June 2025. These are the measures directly responsive to the acquisition-stage gap identified in Section 2.8, and the only means by which that gap can be closed.
- **The 2026 comprehensive revision should address definitional clarity**. Only two national laws among the thirty countries benchmarked contain a complete definition of research and development procurement applicable to the defence and security sector, and the Directive contains no definition of innovation procurement as such. Definitional clarity is among the indicators on which national frameworks perform most unevenly, and - as Italy's experience shows - gains in it are reversible absent an EU-level anchor.
- **Implementation guidance should accompany the new procedures from the point of entry into force**. The central finding of this report is that instruments do not produce uptake without operational machinery; the models documented in Part Three — agency–end-user conventions (Spain), single-desk entry points (France), formal ministerial innovation-procurement strategies (Netherlands) — provide tested reference designs.
- Whether the **security field warrants treatment distinct from defence** within the revised Directive merits consideration. The evidence in this report concerns civil security actors - police services, border authorities, critical infrastructure operators - whose procurement needs, market structures, buyer profiles and economies of scale differ materially from those of armed forces, while both fall within a single instrument. Whether the revision should differentiate between them is a question the evidence raises and on which this report takes no position.

5.2.2 - ON THE RESEARCH-TO-DEPLOYMENT PIPELINE AND THE FUTURE FUNDING ARCHITECTURE

- **The task of facilitating the uptake of Cluster 3 research results in national programmes** should be given concrete, dated milestones, being currently framed as a continuing objective without a defined timeline (Section 1.5).
- **The research-to-deployment connection** should be expressly provided for in the design of the European Competitiveness Fund and its relationship to the successor deployment instruments. The finding of the European Court of Auditors that downstream synergies between EU research funding and deployment-stage instruments were hardly implemented (Section 1.7) is a documented risk of carrying the existing weakness forward into the 2028–2034 framework rather than correcting it.

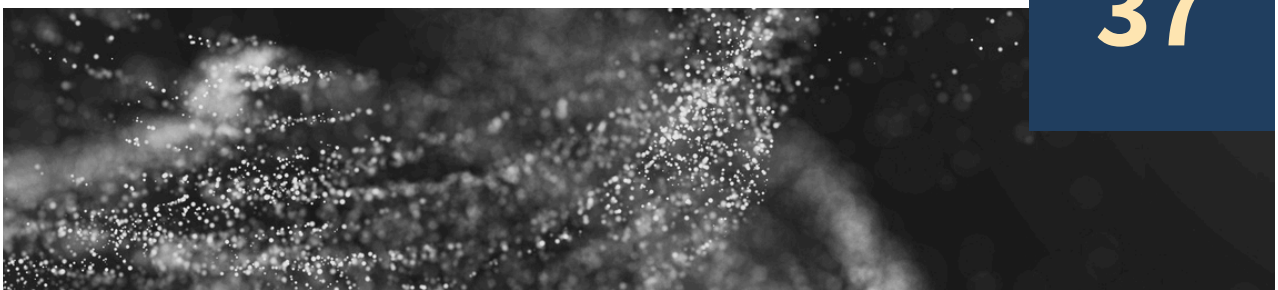
- **A structured mechanism connecting research results to deployment-stage procurement** should be examined, modelled on the documented practice under the Digital Europe Programme of using grant-funded project results as evidence of capability in subsequent tenders, for the pathway from Horizon Europe Cluster 3 to the Internal Security Fund and the Border Management and Visa Instrument (Section 1.6).
- **An EU-level target for innovation procurement in the security field should be considered**, on the model of the EU green public procurement policy's target-and-action-plan structure, which the Commission's own synthesis identifies as the precedent behind the environment sector's leading performance among all sectors benchmarked (Section 2.6).

5.2.3 - ON NATIONAL FRAMEWORKS AND OPERATIONAL CAPABILITY

- **Pre-commercial procurement practice in the security field can be established without awaiting EU reform**. It is available today under the research and development exclusion of Directive 2009/81/EC (Section 2.8.1). The Spanish model - a national innovation agency operating under formal convention with interior-ministry end users, with European co-financing and a defined pathway from prototype validation to subsequent purchase (Section 3.3) - is the most fully documented transferable design identified in this report between ENACT countries.
- **National frameworks should adopt quantified, dated targets for innovation procurement** (Finland; Estonia's stepped 2025 and 2035 targets), and **annual key performance indicators** for individual procurers - the mechanism applied by only two of the thirty countries benchmarked.
- **National security and defence strategies** should name innovation procurement expressly and assign responsibility for it, on the models documented for the Netherlands, Italy, France and Finland. The Belgian case documents the cost of omitting that link: substantial investment commitments in security and defence innovation, with no procurement mechanism identified to give effect to them (Section 3.6).
- **National innovation-procurement competence centres** should establish a named security and defence specialisation. None of those reviewed for this report currently maintains one.
- **Where a national security research programme exists, an explicit demarcation rule with Horizon Europe should be adopted**, on the model of the Austrian KIRAS funding rules; and in all cases, coordination should be established at the research-to-procurement interface, and not - as the documented practice presently shows - at the research stage alone (Section 4.3).

5.2.4 - AN OPEN QUESTION

Whether conditions analogous to those introduced by the EDIP Regulation - a component-cost threshold and a design-authority requirement - should be introduced into Directive 2009/81/EC in the 2026 comprehensive revision is a question on which this report takes no position. It is recorded here because the evidence in Section 2.9 indicates that it is likely to be among the most consequential choices in the revision, and because the difficulties documented there - the absence of an established calculation methodology, the treatment of licensing arrangements and foreign subsidiaries, divergent Member State positions, and existing supply-chain dependencies - are unresolved at the time of writing.



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