



30 April 2026

WORKING DOCUMENT OF THE COMMISSION SERVICES

Subject: Dual Use in the Framework Programme for research and innovation 2028-2034

1. Introduction

As noted in the explanatory memorandum to the Horizon Europe Regulation proposal, adopted by the Commission in July 2025, the future ‘*programme may support dual use actions*’. This is a key novelty which implies that dual use activities can be funded under Horizon Europe 2028-2034, including those collaborative R&I activities that will figure in the specific dedicated part of the ECF work programmes with their dedicated budget, provided by the ‘Competitiveness’ component of Pillar II of Horizon Europe 2028- 2034.

The Commission’s proposed approach, outlined in this document, has been informed *inter alia* by discussions with stakeholders¹, the deliberations of the Heitor report and other dedicated expert reports on dual use², as well as based on questions and feedback from the European Parliament and the Council in the course of the interinstitutional negotiations. The approach takes full consideration of the need to:

- preserve the primarily civilian character of Horizon Europe 2028-2034;
- provide that pure defence applications will not be funded in Horizon Europe 2028-2034, except in the case of the EIC³; and

¹ R&I stakeholder associations including EECARO, YERUN, FORTHEM, “Manufuture” organised events on or including Horizon Europe 2018-2034 dual use related questions, with participation of DG RTD representatives. These discussions build on the consultation that followed the ‘WHITE PAPER on options for enhancing support for research and development involving technologies with dual-use potential’ (see [R&D on dual-use technologies – options for support](#)).

² The Heitor Report ([Align, act, accelerate - Publications Office of the EU](#)), published in late 2024, addressed *inter alia* addresses the issue of dual use R&I. In addition, in mid-2025, the Commission published two independent expert reports on dual use: “ESIR Policy Brief: [Making the most of EU Research and Innovation Investments: rethinking dual use](#)” and “[Unlocking the potential of dual-use research and innovation](#)”.

³ This non- paper does not address the implementation of defence related activities under the European Innovation Council (EIC).

- ensure that there is sufficient and necessary flexibility to address strategic and critical technologies supporting civilian purposes, including those with a security dimension, as well as EU defence capabilities and readiness.

2. Principles guiding the implementation of dual use R&I in Horizon Europe 2028- 2034

In the context of Horizon 2028-2034, ‘dual use’ means research and innovation activities that may lead to technologies or products that are expected to enable both civil and defence applications.

In principle, we differentiate between the treatment of dual use in ‘top-down’ and ‘bottom-up’ calls/topics. These calls/topics may be found in one or more of the four Pillars of the programme in the course of its implementation, and they will be defined in the work programmes.

For ‘**top down**’ calls/topics, a ‘**dual use by design**’ approach is proposed:

- In order to ensure that the fundamentally civilian character of the Horizon Europe 2028-2034 is preserved, the Commission is proposing an approach which will ensure that resources are dedicated in a targeted way to the areas with the highest potential impact when technologies are intentionally developed from the outset to enable both civilian and defence applications.
- Specifically, this ‘dual use by design’ approach would be implemented through dedicated topics/calls defined at work programme level that are *explicitly* aimed at technologies that are expected to enable *both* civil and defence use. As such, proposals with defence-only applications would be explicitly excluded from such calls (and covered by the specific programme for defence research under ECF). All other top down calls/topics – namely those not explicitly targeted as ‘dual use approach by design’ topics/calls – would have an exclusive focus on civil application, as specified in the work programme.
- ‘Dual use by design’ calls/topics will also be fully open to proposals with ‘civilian only’ applications, with no discrimination in evaluation and award decisions.
- Finally, no dedicated dual use procedures are envisaged, and any specific considerations on ethics, security (including expected research security) and international cooperation aspects will be embedded in the programme-wide procedures as regards implementation. See below for more information on the proposed approach.

For ‘**bottom-up**’ calls/topics:

- Applicants will need to provide a detailed explanation in their application on the dual use potential of their technology and the market demand they seek to address in both civil and defence markets to demonstrate they have a credible business case (e.g. indicative use cases, types of customers or end-users involved, scaling roadmap). However, no preference will be given in the award decision to applicants proposing a dual-use technology innovation.
- Finally, the implementation of bottom-up calls involving dual use should not require specific procedures, but be integrated under programme-wide procedures, to cover aspects related to eligibility, ethics, security of information (including expected research security).

3. Prioritisation of ‘Dual Use by Design’ Topics

The aim is to fund a narrow range of dual use areas and priorities of specific relevance. It is not the intention to cover all technologies that may have a ‘dual use potential’. This will require the application of criteria for the prioritisation of dual use thematic areas, such as:

- Does the technology have both a civilian and a defence application?
- Is it a novel technology and recognised as such in the EU legislation, for example as a critical technology?
- Is it specifically relevant to European defence needs?
- Is the EU exposed or overdependent in the area in question?

In terms of scope, it is important to stress that ‘dual use approach by design’ calls will not cover entire technology, or even sub-technology, areas. The aim is to target specific areas, whereby certain technology areas (e.g. space, aviation, cybersecurity, AI, quantum, advanced materials) are more likely than others to address civilian as well as defence needs.

The identification and prioritisation of these areas should be embedded across the priority setting and work programme drafting process (as described in non-paper n. 9 ‘ECF governance, including the tight links with Horizon Europe 2028-2034’). This assessment will be supported by strong internal and external expertise, including the European Observatory for Emerging Technologies (ETO) and external experts, the Observatory of Critical Technologies (OCT), the Strategic Stakeholders Board (SSB) (external R&I and industry experts providing advice on areas of market failures and suboptimal investment situations) and the Thematic Platforms (wider configuration of stakeholders, for each ECF policy window). This expertise will directly inform the programming of Pillar II ‘Competitiveness’ and also be kept into consideration into the EIC programming.

4. Evaluation of Dual Use Proposals

In line with Article 25 of the Horizon Europe Regulation proposal on ‘Award Criteria and Selection’, there will be no specific award criteria for dual use calls. To ensure simplification goals are met, no classified documents will be admissible at application stage, and this will be outlined and explained in the respective work programme, proposal submission forms, guidance documents and on IT templates. We envisage to this end revisions to a limited number of guidance documents and forms/templates, as well as the need to involve specific expertise in the evaluation procedure and the monitoring process.

Finally, and as outlined in greater detail below, ethics and security (of information) checks will apply in principle across the board.

5. Security (of information)/Ethics and International Participation Dimensions

In line with the Commission’s simplification goals, the implementation of ‘dual use by design’ should not require specific procedures, but be integrated under programme-wide procedures, to cover aspects related to ethics, security (including expected research security) to ensure that risks can be detected and mitigated.

The **types of risks** related to dual use are of a similar nature to other projects (for example, risk of misuse against the EU interest, risk of disclosing sensitive or classified information, risks of weaponisation of vulnerabilities and critical dependencies)..

That being said, the **level of risk** posed for targeted dual use calls is likely to be higher than for other calls – even compared with ‘standard’ critical technology-related ones, and hence, dual use calls may require a higher level of security/ ethics review and scrutiny.

With regards to the specific safeguards in place:

- **Security (of information) & Ethics:** Checks are performed to manage risks that may emanate from both within the EU and from outside. The aim is to use programme-wide procedures, making small additions where necessary for dual use calls (e.g. for dual use calls, the work programme could indicate that full security checks will be performed).
- **International Participation:** It is expected that for ‘dual use by design’ areas the risks related to international participation will most often be higher than for other (civil only) calls. International participation will have to reflect this, with implications for associated countries beyond the EEA. For example, associated countries and other third countries may be excluded from participating in calls/topics for ‘dual use by design’ actions, based on Articles 10(2) and 10(3) of the European Competitiveness Fund, which also apply to Horizon Europe by virtue of the cross-reference set out in Article 20 of the Horizon Europe 2028- 2034 proposal. Finally, for bottom-up calls involving dual use, risk-based due diligence for entities in associated countries will be also put in place in the relevant parts of the Work programme. Similarly, for the EIC open calls, details on necessary security requirements, if any, will be specified in the Work Programme.

As stated above, ethics, security and international participation rules (including expected research-security) will apply to all actions regardless of whether they stem from ‘dual use by design’, civilian-only or open (bottom-up) calls/topics.

The question of compliance needs of Horizon Europe beneficiaries with the Export Control Regulation of 2021 (Regulation (EU) 2021/821) will need to be addressed, taking into account its ongoing evaluation, which commenced in early 2026.

6. Project monitoring

At project level, the Commission plans to monitor proposals and projects both for top-down and bottom-up calls, in line with the Performance Regulation. Within the EIC, dual use technologies will be covered by the technology portfolio management by programme managers, considering also opportunities for spin-in or spin-out between the distinct paths for defence and dual use disruptive technologies.

Finally, open science practices will be adhered to, taking into account the need to balance openness with specific aspects of a given project, such as the involvement of classified or sensitive information and/or legitimate interests, including commercial interests, or other constraints.

7. Next steps

In view of the preparation of the first Work Programmes of Horizon Europe 2028-2034, the Commission will further develop 1) the above-mentioned procedures and 2) a more detailed guidance for applicants, engaging Member States and stakeholders where relevant.