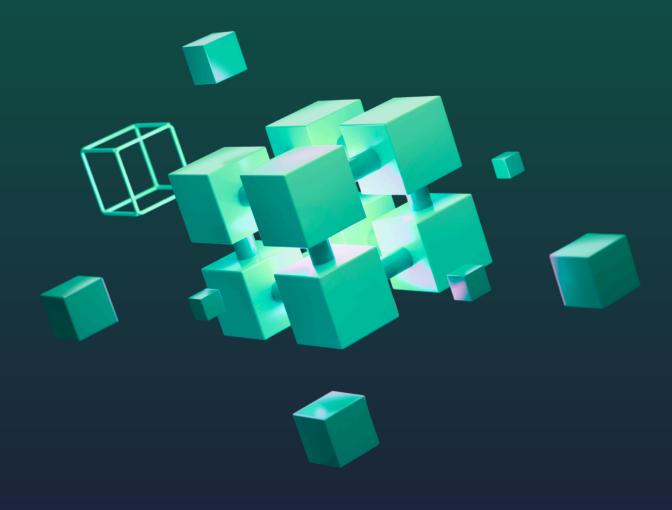




# The American Chamber of Commerce Ireland The Voice of US-Ireland Business

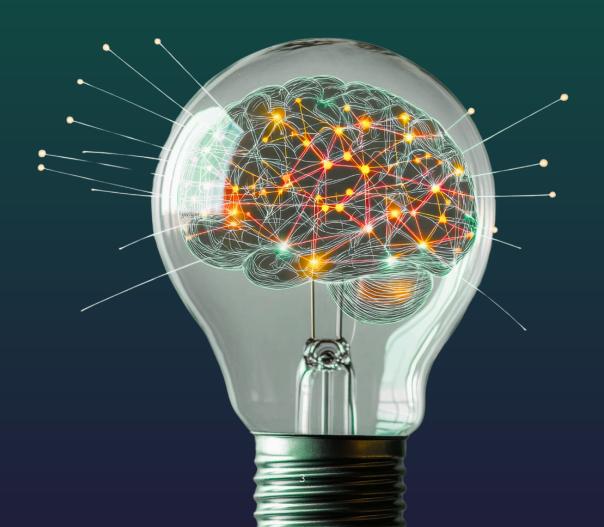
The American Chamber of Commerce Ireland (AmCham) is the collective voice of US companies in Ireland and the leading international business organisation supporting the Transatlantic business relationship. Our members are the Irish operations of all the major US companies in every sector present here, Irish companies with operations in the United States and organisations with close linkages to US-Ireland trade and investment.





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## **Key Recommendations:**

## **Enhancing the European and Domestic RD&I Landscapes:**

- Enhancing national coordination and communication around upcoming Horizon Europe work programmes and stakeholder consultations.
- Strengthening the role of NCPs and government departments in facilitating early engagement by MNC's, academia and private enterprise.

## Harnessing European Supports to Drive Innovation from Ireland:

- Ensuring Government Departments publish participation dashboards (by company-type, sector, region) and track how Horizon-backed projects convert to jobs, investment and procurement wins.
- Ensuring NCPs and Government Departments are aligned and empowered to work at senior level with MNCs with clearly defined engagement timelines to support applicants in preparing competitive proposals and navigating both EU and domestic requirements.

## Addressing Barriers to Participation in Horizon Europe:

- Actively showcasing wins by business and organisations and MNC's that avail of Horizon Europe Funding to inspire confidence and demonstrate Ireland's capability as a leader in this space.
- Ensuring Ireland is "FP10-ready" by delivering a more coordinated national pre-clearance and advisory mechanism that streamlines domestic steps while ensuring timely preparation for mandatory EU-level State Aid assessments.
- Ensuring calls under FP10 are open to collaboration with trusted international partners, including companies headquartered in like-minded countries such as the US, to participate in research and innovation initiatives, and that barriers to participation are reduced.

#### **Ensuring RD&I Enhances Ireland's Economic Future:**

- Reducing the administrative burden and providing simpler eligibility rules with clearer documentation and guidance.
- Ensuring more coherence between climate, digital, health and policies that increase and grow national competitiveness strategies in line with future FP10 funding.
- Reducing and simplifying restrictive participation rules that limits Europe's access to world-class research, technology, and investment.
- Maintaining international collaboration as a core principle of FP10 in order to enhance the quality of European innovation but also secure Ireland's and Europe's position as a global hub for research and industrial development.



#### **Foreword**

Horizon Europe is the EU's flagship research and innovation programme and will soon evolve into the European Union's tenth Framework Package for research and innovation (FP10), an even larger, more ambitious €175 billion initiative running from 2028 to 2034. This will act as a strategic gateway for industrial R&D scaling across the EU aimed at addressing major societal challenges and strengthening industrial competitiveness across Member States.

The phased rollout of lump-sum funding across Horizon Europe is already underway, with broader implementation expected in 2026–2027. Supporting a renewed approach would place Ireland in-step with EU-wide simplification efforts, reducing financial reporting burdens and encouraging cross collaboration between business, research and academia.

Horizon Europe is a directly managed EU programme. The European Commission is responsible for setting the strategic orientations, publishing calls for proposals and overseeing evaluation and funding decisions. These calls are made publicly available on the Commission's Funding and Tenders Portal.

The publication of multiannual and annual work programmes, often in draft form before formal adoption which provides early insight into future calls, allows potential applicants to plan project ideas well in advance.

Horizon Europe offers large-scale collaboration, co-funding and market access opportunities that matter to multinational companies (MNCs) including American companies with operations in Ireland and Europe.

At the same time, shifts in EU policy (for instance in strategic autonomy, security screening, and restricted calls) alongside national practical administrative barriers, are changing the impetus for businesses and organisations in Ireland in deciding whether to invest scarce internal time and resources into EU Horizon funding proposals.

The lived reality for AmCham members is that persistent barriers to access the Horizon Europe funding framework exist. This is particularly the case in terms of Cluster 3 (Civil Security for Society) and Cluster 4 (Digital, Security and Space). Such barriers include eligibility limits (Article 22.5 of the Horizon Europe regulation); guarantee mechanics; administrative overheads; unclear IP/public-private rules; awareness limits in industry; domestic process gaps at government agency level; and onerous and unnecessary application procedures.





These factors are holding back broader participation in the RD&I landscape by business, academia and research. Addressing these factors would further unlock the cascading benefits of thriving industry clusters and support what is already a highly skilled talent base.

This white paper provides a snapshot of the current ecosystem and impact, identifies the EU and domestic barriers which businesses face, highlights considerations related to the economic opportunities presented by RD&I, and sets out targeted, actionable recommendations for Government to support Ireland's ambition with regard to research, development and innovation, and drawing down related EU funding.





## **Enhancing the European & Domestic RD&I Landscapes**

The Irish National Contact Points operate a shared Horizon Europe website (horizoneurope.ie), which provides regularly updated information on all programmes, upcoming calls, events and consultations. This includes a dedicated events portal and a publicly accessible monthly newsletter archive. These resources support early visibility of opportunities, though further coordinated engagement with MNCs and industry stakeholders could strengthen uptake. National streamlining can help pre-notification and internal coordination. However, it cannot replace the European Commission's formal notification, decision-making role or statutory timelines.

Multinational businesses, industry, and academic institutions have already won significant Horizon funding to date (over €836 million awarded to Irish organisations since 2021), showing Ireland can compete. However, participation is uneven and the prize from FP10 is materially larger if current barriers are removed. In practical terms, restrictions to the participation of foreign-owned companies, including US companies, were limited in the 2024 work programme. However, for example with Cluster 4 funding, restrictions on participation in calls for funding significantly increased in the 2025 work programme. As a result, significant concern exists with regard to the application of Article 22.5 restrictions to the 2026/27 work programme.

The imposition of such barriers to calls for funding creates barriers to innovation taking place in Ireland, and across the EU, preventing collaboration between US MNCs, indigenous business, and academic institutions. In an ever-changing geopolitical environment on the global stage, action to remove and limit such barriers is of the utmost importance to support Ireland, and the EU, as locations in which to invest and grow.

To realise Ireland's ambition to be a European innovation hub, and the EU's goal to be to the forefront of global RD&I, it is necessary to act now, and to support research and innovation partnerships with like-minded partners. European competitiveness depends on how quickly ideas move from inception to market. Multinational and large corporate partners bring the infrastructure, supply chains, regulatory experience, and global routes to market that make innovation real. Without their participation, Europe risks generating research without realising its benefits.

Through action now to ensure key elements of European research and innovation funding are open to US owned companies, Ireland can not only enhance the level of research that takes place here but can also support the indigenous enterprise ecosystem given the associated investment and skills development that key research activities inevitably attract.



Funding applications are submitted directly to the European Commission or its implementing agencies and undergo independent evaluation by expert panels. National authorities do not approve or reject proposals. However, support structures such as the National Contact Points (NCPs), those provided by Enterprise Ireland, and relevant government departments, play a crucial facilitative role. They provide expert advice, promote collaboration opportunities, and help applicants navigate both EU and domestic requirements. Strengthening the relationship between these entities and multinational companies could enhance the quality and competitiveness of Ireland as a global leader in RD&I.

Taking this action will ensure Ireland is best placed to realise the ambition of the Government's Action Plan on Competitiveness and Productivity to "increase the drawdown of European Digital funding by Irish enterprise, including by removing barriers such as lack of security clearance and strengthening the Digital Europe Programme National Contact Network" alongside the goal to "develop and deliver a programme of 'research collaboration missions' to connect and develop strategic partnerships between Irish researchers and international businesses and research and innovation centres in key strategic sectors". <sup>1</sup>

- Enhancing national coordination and communication around upcoming Horizon Europe work programmes and stakeholder consultations.
- Strengthening the role of NCPs and government departments in facilitating early engagement by MNC's, academia and private enterprise.





<sup>&</sup>lt;sup>1</sup> Action Plan on Competitiveness and Productivity, Government of Ireland, September 2025



## Harnessing European Supports to Drive Innovation from Ireland

In line with the ambition of Government's Action Plan on Competitiveness and Productivity, Ireland can enhance its offering for FDI and ensure it is a foremost location for innovation within the EU. Achieving this requires action now. There is an opportunity for national stakeholders to play a stronger supporting role, particularly by improving early communication of upcoming priorities, coordinating engagement across sectors, and providing strategic input during stakeholder consultations on future work programmes. These measures can meaningfully increase participation by Irish enterprises, including multinational companies.

AmCham recognises Government's increase of the R&D tax credit, from 30% to 35%, in Budget 2026. However, Ireland must also be cognisant of the climate in which innovation occurs. Reducing barriers at both domestic and European level to innovation is important and can provide significant opportunity for Ireland in terms of investment and growth into the future.

With the right RD&I supports, and with access to European funding, huge opportunity exists for Ireland. The potential is there for Ireland to best position itself as the European hub for research and innovation as global RD&I investment grows. It should also be noted that if Ireland is serious about realising the ambitions contained within the recently published Action Plan on Competitiveness and Productivity, then ease of access to EU Horizon funding models should be a core support for businesses and organisations to scale, grow, and collaborate.

In addition, ensuring that companies see Horizon Europe funding as a key support in terms of scaling, and understand how to access such funding, is of the utmost importance in achieving Ireland's ambitions in this regard. As such, the provision of supports to enhance reach and sector-specific engagement across all of Ireland's regions and across all sectors would be beneficial in supporting Ireland as a location for investment and growth in research and innovation into the future.

With action now to address barriers to RD&I funding opportunities, Ireland can ensure it is to the forefront of European innovation and home to the next wave of industrial projects, jobs, and investment.

- Ensuring Government Departments publish participation dashboards (by company-type, sector, region) and track how Horizon-backed projects convert to jobs, investment and procurement wins.
- Ensuring NCPs and Government Departments are aligned and empowered to work at senior level with MNCs with clearly defined engagement timelines to support applicants in preparing competitive proposals and navigating both EU and domestic requirements.



## Addressing Barriers to Participation in Horizon Europe

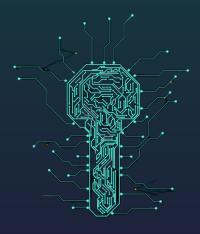
Article 22 (5) of Regulation (EU) 2021/695, which establishes Horizon Europe, allows the Commission to restrict participation in specific actions when strategic assets, autonomy or security are at stake. This creates uncertainty for businesses and organisations about eligibility (who can join, when restrictions apply), and can exclude some third party and associated countries from participation in relevant calls. This increases friction in partner selection and proposal design.

Over previous calls, such restrictions have increased, reducing the proportion of calls that companies, included US headquartered companies, can participate in. This can have a significant impact on the attractiveness of the EU for investment in RD&I. Given the presence of significant US companies in Ireland, such restrictions can adversely impact the proportion of research funding that can be accessed by the Irish operations of these companies which would support innovation occurring in Ireland.

Further, in relation to complex IP & data rules, multinationals struggle to reconcile corporate IP strategies with Horizon exploitation requirements. In respect of financial & audit complexity, heavy compliance burdens deter corporate participation in large-scale applications. Therefore, it would be beneficial to ensure these barriers are addressed to support both Ireland, and the EU, as locations for research and innovation.

While delays in domestic State Aid clearance can create uncertainty for applicants, it is important to note that all Member States remain subject to the European Commission's formal notification, assessment and decision-making procedures. The Commission operates a two-month preliminary review window (shorter for simplified cases), though complex notifications or formal investigations may take longer. Therefore, national reforms can streamline pre-notification coordination and improve predictability but cannot substitute EU-level processes.

The Department of Further and Higher Education, Research, Innovation and Science have strategic lead, however AmCham members have reported that departmental processes are slow or not fully aligned with commercial timeframes. Streamlining and clarifying these practices could reduce complexity without altering core EU rules.





- Actively showcasing wins by business and organisations and MNC's that avail of Horizon Europe Funding to inspire confidence and demonstrate Ireland's capability as a leader in this space.
- Ensuring Ireland is "FP10-ready" by delivering a more coordinated national preclearance and advisory mechanism that streamlines domestic steps while ensuring timely preparation for mandatory EU-level State Aid assessments.
- Ensuring calls under FP10 are open to collaboration with trusted international partners, including companies headquartered in like-minded countries such as the US, to participate in research and innovation initiatives, and that barriers to participation are reduced.





## **Ensuring RD&I Enhances Ireland's Economic Future**

American and other multinational firms make location decisions based on predictability, speed, and clarity. If Horizon participation in Ireland remains slow and complex, projects will migrate to jurisdictions with faster approvals and business-friendly frameworks.

Ireland's reputation as a destination of choice within the EU for investment is at stake. Complex rules, uncertainty, and domestic bottlenecks undermine our narrative as a probusiness, pro-innovation economy. This is counterproductive to Ireland's position as a preferred European HQ and RD&I hub. From 1 January 2026, Ireland, and all Member States, will be required to record de minimis aid in a centralised EU register. This reform may streamline certain aspects of compliance and improve transparency for applicants, though its full impact will depend on practical implementation.

In terms of harnessing the power of RD&I, Ireland is at a critical inflection point. We must act now to remove barriers, simplify processes, and position Ireland to lead and secure high-value industrial capture. Thus, helping future-proof Ireland's RD&I offering in an increasingly contested and competitive international investment environment. Reduced Irish participation in RD&I will lead to a weaker voice in EU standard-setting and policy making and the erosion of Ireland's global brand as a top-tier destination for innovation.

Capturing and fully utilising Horizon Europe funding will lead to long-term job creation and deepened technology clusters aligned with EU priorities. Ireland can remain Europe's most attractive innovation hub, enhancing its global competitiveness and FDI offering and safeguarding Ireland's role on the global innovation stage.

A strategic opportunity now exists for Ireland. FP10 will focus on burgeoning policy areas such as AI, climate, health, energy, and cybersecurity - all areas where Ireland can lead. Delayed or missed participation means losing influence in shaping EU standards and policies that will govern global markets for decades.

Other countries (for example Czechia and Greece) are already shaping their FP10 national positions—calling for administrative simplification like lump-sum funding, ERASMUS-like continuity (for example ERC and MSCA), and streamlined operations.

It is imperative that policy makers, and Government, champion immediate measures to simplify Horizon Europe processes, provide clear corporate engagement pathways, and adopt a one-stop national clearance mechanism. By acting now, Ireland will secure its place as a leader, not a bystander, in Europe's most ambitious R&D programme.



- Reducing the administrative burden and providing simpler eligibility rules with clearer documentation and guidance.
- Ensuring more coherence between climate, digital, health and policies that increase and grow national competitiveness strategies in line with future FP10 funding.
- Reducing and simplifying restrictive participation rules that limits Europe's access to world-class research, technology, and investment.
- Maintaining international collaboration as a core principle of FP10 in order to enhance the quality of European innovation but also secure Ireland's and Europe's position as a global hub for research and industrial development.



