

Ms. Geoghegan-Quinn
Commissioner for Research, Innovation and
Science
European Commission
B-1049 Brussels

26 September 2011

Dear Commissioner Geoghegan-Quinn,

The publication of the Final Report of the High Level Group (HLG) on Key Enabling Technologies is a welcome contribution to the EU plan for growth and jobs as set by the Europe 2020 strategy. In line with the Report, we agree that policy solutions to bridge the gap between research and market deployment are urgently needed.

Putting forward a list of key technologies to be developed is a good starting point for discussion, but it should not prevent the amendment of this list in the future nor undermine support for other strategically important enabling technologies. An open and inclusive process is needed in order to allow a broader spectrum of stakeholders to follow up on the work of the HLG in the process of preparing for Horizon 2020.

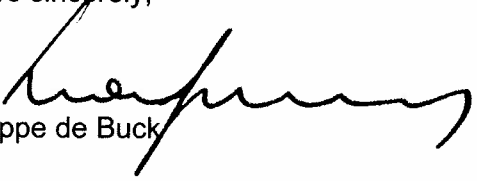
Regarding one of the main policy solutions proposed, we would like to voice our concern regarding the "in Europe first" Intellectual Property (IP) policy. The proposed measures would create confusion and provoke several unintended negative effects.

Stipulating that IP from EU-funded projects needs to first be exploited within the EU is incompatible with the way European companies operating in a global environment are organised and do business. These provisions would discourage the participation of a large fraction of global enterprises in Horizon 2020 and limit opportunities for EU based companies to co-innovate with other partners. As a result, employment creation in Europe could also be negatively affected.

The EU must aim at creating growth and jobs within Europe by strengthening the competitiveness of its enterprises and realising their full innovation potential also through the promotion of a globally competitive IP policy; however this must be implemented in the right way, ensuring that the EU remains an open economy in a globalising world and continues to advocate free trade.

We would appreciate the opportunity to further discuss these issues with you in order to discuss our views on appropriate policy measures in the IP field in more detail.

Yours sincerely,


Philippe de Buck