Subject: SNETP response to European Research Area Act Consultation

As a European association dedicated to research and development in nuclear fission, as well as being a European Technology & Innovation Platform (ETIP), SNETP supports the European Commission's initiative to consult on the European Research Area Act (ERA Act). As the European Union's commitment to energy transition is one of its major objectives, SNETP believes it is important that research on this topic remains one of the priorities of this act. The ERA Act must guarantee that strategic low-carbon energy technologies, such as advanced nuclear systems and existing nuclear systems, are explicitly considered in the EU's research and innovation priorities.

National commitments to reach the 3% R&D target: The proposal to increase national R&D spending as a share of GDP is a positive step, provided it aligns with Europe's strategic priorities. SNETP reminds that the nuclear sector needs long-term investments in unique infrastructure, such as accelerators, experimental reactors and high-security laboratories, whose costs exceed the capacity of any single member state. The ERA Act should therefore include dedicated mechanisms to support large pan-European research infrastructures, ensuring that national contributions are effectively coordinated, pooled, and recognised as part of the collective European effort towards the 3% target.

Better alignment of investments and policies: To fully achieve the objectives of the ERA Act, nuclear research must be explicitly included in national and European strategic priorities, given its essential role in decarbonisation, energy security, industrial competitiveness, and health. While respecting national prerogatives in energy policy, Europe should establish clear framework and approach to guarantee a balanced distribution of resources among various industries:

- **Cross-border cooperation:** Certain studies on the long term operation of current energy facilities, emerging technologies, or healthcare could gain by adopting a cross-border perspective. This would help ensure Europe's global competitiveness and technical independence. Furthermore, encouraging joint ventures and transnational collaboration, especially amongst small businesses and innovative startups, can significantly benefit all parties involved.
- **Policy coherence:** Current divergences in regulation and funding create barriers to cooperation and slow the deployment of innovations. A stronger coordination between national strategies, Euratom, and the EU Framework Programmes (e.g. FP10) is needed to unlock synergies.
- **Integrated ERA-Euratom:** The association supports an integrated ERA-Euratom approach, ensuring that nuclear research priorities (fission, fusion, particle physics, radiation protection) are better aligned with broader European policies (energy, industry, climate change mitigation, etc.). Numerous cutting-edge technologies, including materials, digital twins, robotics, and digitization, hold potential across various sectors, including nuclear power generation. Therefore, it is crucial for the ERA Act to clearly define potential synergies and provide guidance on their implementation.

Improvements in framework conditions for research(ers) and research organisations in Europe : SNETP welcomes the ERA-Act's efforts to improve framework conditions for researchers and organizations. Nuclear research depends on highly qualified experts, researchers and students who must be able to move freely between countries and facilities in order to share their expertise and improve their practice. SNETP recommends simplifying and harmonising the recognition of qualifications, working conditions and visa procedures for international researchers. Due to its cross-sectoral use (energy, health, defence, etc.), the

nuclear sector needs a balance between open science and the protection of sensitive data (security, non-proliferation). The ERA Act should establish clear research security standards that do not compromise scientific collaboration. This would guarantee academic freedom and attractive careers, which are essential for retaining young researchers and enhancing Europe's attractiveness.

The SNETP Secretariat