



Australian Government
Department of Industry, Science and Resources

By consultation hub: consult.industry.gov.au/horizon-europe-implementation

18 September 2026

Dear Horizon Europe Implementation Team,

Subject: BCSDA submission - Horizon Europe implementation

The Business Council for Sustainable Development Australia (BCSDA) welcomes Australia's association with Horizon Europe and the Department of Industry, Science and Resources' focus on the practical structures needed to make participation work from 1 January 2027. BCSDA is the Australian Global Network Partner of the World Business Council for Sustainable Development (WBCSD) and represents businesses and other organisations working across climate, nature, equity, circularity and corporate performance. [1]

Our central submission is that formal eligibility will not be enough. Australia will obtain greater scientific, economic and strategic value from association if applicants can move quickly from identifying a relevant EU opportunity, to understanding their role, to finding credible consortium partners, to accessing specialist advice and submitting a competitive proposal. For business, the implementation model must also make the value proposition visible: access to European partners and customers, knowledge and methodologies, demonstration opportunities, shared innovation risk and pathways to stronger international capability. The implementation model should therefore concentrate scarce capability on national triage, thematic expertise and active brokerage, while using existing research, industry and intermediary networks for reach. [1, 2, 13, 14, 22]

BCSDA's recommendations draw on the Discussion Paper, Australian stakeholder input gathered in September 2026, WBCSD practitioner experience, associated-country models, BCSDA's participation in the DISR implementation roundtable on 9 September 2026, and additional practitioner evidence gathered on 16 September 2026. [1, 13, 14, 22]

Yours faithfully,

A handwritten signature in dark ink, appearing to read "Andrew Petersen", with a long horizontal line extending to the right.

Andrew Petersen

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Executive summary

BCSDA supports the direction of Australia's Horizon Europe implementation and recommends a lean, adaptive support architecture designed around applicant outcomes rather than organisational layers. The Discussion Paper correctly identifies that Australian entities may need help to identify opportunities, develop competitive proposals, form consortia and build long-term capability. BCSDA's stakeholder work, the 9 September roundtable and subsequent practitioner evidence indicate that the largest practical risks are fragmented navigation, late access to consortium networks, weak articulation of the business value proposition, uneven business and SME capability, and support structures that duplicate existing expertise rather than connecting it. [1, 13, 14, 22]

1. Establish one national triage pathway backed by thematic expertise. DISR should provide national coordination, service standards, data and accountability. Tier 2 capability should be primarily organised around Horizon Europe Pillar II clusters and specialist legal/financial functions, not duplicated geographically.

2. Make consortium brokerage and business-value translation explicit implementation functions. NCPs and trusted intermediaries should do more than distribute information: they should help applicants understand why participation may be commercially relevant, interpret calls, identify the distinctive value they can bring, find credible partners, understand possible consortium roles and obtain warm introductions through European and associated-country networks. [22]

3. Use existing networks for reach, with clear boundaries between specialist and volunteer functions. Universities, academies, research institutes, industry bodies and peak bodies can extend reach and generate demand. Volunteers should focus on awareness, signposting, local engagement and feedback; specialist eligibility, financial, legal, audit and proposal advice should remain with accountable NCPs or commissioned experts.

4. Target financial and non-financial support at evidenced participation frictions. If financial support is used, BCSDA favours a time-limited, evaluated proposal-development / consortium-building pilot aimed at SMEs, first-time applicants and organisations facing demonstrable transaction-cost barriers, rather than a broad subsidy or a rigid priority list. Funding and co-funding requirements vary by Horizon Europe action type and call conditions and should be explained clearly to business applicants. [24]

5. Measure national benefit, not funding won alone. Performance should include participation and success rates, but also first-time and SME participation, time to specialist support, consortium roles, partner matches, repeat participation, durable European relationships, business/customer relationships, technology and methodology transfer, demonstration/commercial readiness, Indo-Pacific connections, breadth/equity of access and capability built for FP10. [22, 23]

BCSDA position

BCSDA supports Australia's association with Horizon Europe and supports the creation of an Australian implementation support system. Our support for the proposed architecture is conditional on the system remaining lean, nationally coordinated, business-accessible and evidence-led. We do not support creating parallel geographic replicas of specialist capability where national thematic expertise and existing networks can provide reach more efficiently. We also caution against defining 'alignment with national priorities' too narrowly: Horizon Europe calls are set within EU priorities, so the practical task is to identify where EU priorities and Australian capabilities and interests intersect. [1, 7–11, 13, 14]

Priority recommendations

Recommendation	Primary actor	Timing	Success test
National triage + thematic NCP model	DISR + appointed Tier 2 NCPs	Design in 2026; operational for 2027 calls	Applicants reach the right expertise quickly regardless of geography.
Explicit consortium brokerage + business-value translation	Tier 2 NCPs + trusted intermediaries	From launch; refine after first cycle	More early partner matches, clearer business roles and competitive proposals.
Bound volunteer Tier 3 role	DISR + host networks	At network establishment	Volunteers extend reach without giving unsupported specialist advice.
Targeted pump-priming pilot	DISR, subject to funding decision	First 2027 participation cycle	Broader SME/first-time participation and measurable reduction in proposal/consortium barriers.
National-benefit performance framework	DISR	Measures set before launch; review after first meaningful cycle	Participation quality, commercial/partnership depth, equity, Indo-Pacific links and FP10 readiness improve.

Responses to the consultation questions

BCSDA responds to all 19 questions because the questions are interdependent. Where our evidence is strongest, we provide a detailed position; where it is more limited, we recommend design principles and further testing rather than false precision.

Question 1. What is the best way to structure the NCP network in Australia: by cluster, industry sector, geography, thematic or another approach?

BCSDA recommends a nationally coordinated model with Tier 2 NCPs organised primarily by Horizon Europe Pillar II cluster, supplemented by specialist legal/financial and other cross-cutting capability. Geographic reach should come through Tier 3 contacts and existing networks rather than through duplicated state and territory specialist NCP structures. This approach best balances national consistency, expertise, scalability and cost. [1, 4, 5, 14]

The 9 September roundtable independently echoed and sharpened this direction: several participants questioned a geographic model and emphasised thematic expertise, triage and equitable reach. DISR should retain flexibility to add specialist capability where evidence shows a gap, but should avoid hard-wiring unnecessary organisational layers before Australian participation patterns are known. [14]

Question 2. Which of the NCP functions will be most important, and what is the best model for delivering?

The most important functions are: (1) triage and call-fit guidance; (2) eligibility, contractual, legal, financial and audit advice; (3) consortium and partner search; (4) proposal-readiness guidance; and (5) feedback to DISR on recurring barriers and capability gaps. [1, 2, 4–6, 13]

Delivery should combine a clear national front door with accountable thematic specialists. BCSDA places particular weight on business-facing brokerage. A portal can identify calls but cannot, by itself, explain why participation is commercially relevant, validate partners, establish trust or help a business understand what distinctive role it can credibly play in a consortium. Associated-country models and practitioner experience indicate that targeted introductions, role-definition and partner-search support are core implementation functions, not optional extras. [2, 4–6, 13, 14, 22]

Question 3. What existing functions undertaken by government or sector organisations could support entities participate in Horizon Europe?

Australia should build on existing capability rather than create a wholly new ecosystem. Relevant functions already exist across DISR and other government programs, university research offices, academies, research institutes, industry associations, peak bodies and the ARC/CRC ecosystem. European infrastructure - including

the Funding & Tenders Portal, the NCP network and existing brokerage mechanisms - should be used first where it already solves the problem. [1, 7–11, 13, 14]

The Australian layer should focus on integration: translating EU opportunities for Australian audiences, routing applicants, connecting research and industry capability, and identifying where a specific Australian gap justifies additional support.

Question 4. Would it be most effective to locate the Tier 2 NCPs within government, in the research sector, in industry organisations, peak bodies, or a hybrid?

BCSDA favours a hybrid model with DISR retaining national coordination, standards, performance oversight and accountability, while Tier 2 specialist functions are hosted or contracted on capability grounds. No single institutional type is likely to hold all required expertise. [1, 4–6, 14]

Appointments should be capability-based and transparent rather than institution-based. The host model should also prevent the support system becoming research-sector-centric where the policy objective includes business, SME, not-for-profit and industry-body participation.

Question 5. In addition to the expectations for NCPs outlined above, what expertise should every Tier 2 NCP possess?

Every Tier 2 NCP should understand the relevant Horizon Europe work program and call architecture; applicant eligibility and funding rules; consortium formation and partner-search channels; proposal evaluation logic; and Australian capability in the relevant domain. They should also be able to recognise when legal, financial, audit, research-security, IP, data-protection or ethical issues require referral to specialist expertise. [1, 2, 4–6, 13]

A critical competency is brokerage judgement: understanding whether an Australian organisation has a credible and distinctive role in a consortium and being able to route it to the right European or associated-country contacts. [22]

Question 6. How should performance of Tier 2 NCPs be measured?

Performance should be measured on applicant outcomes and service quality, not activity volumes alone. Measures should include time from enquiry to appropriate specialist support; number and quality of partner matches; first-time applicants supported; SME/business participation; progression from enquiry to consortium/proposal; Australian coordinator, work-package or specialist roles; proposal success; repeat participation; and applicant feedback on whether support reduced friction. Performance should also test whether early NCP triage helps applicants avoid investing significant time and resources in weak or ineligible proposals, including through applicant feedback on avoided effort and evidence of appropriate early redirection. [1, 14, 22]

DISR should publish common service standards and use one national participation dataset so performance can be compared across NCP functions and improved after the first participation cycle.

Question 7. How should conflicts of interest be managed where NCPs are hosted by applicant organisations?

Conflict management should be designed into the host model. At minimum, hosts should disclose relevant institutional interests; separate confidential applicant support from the host institution's own bid teams; apply transparent referral and service standards; avoid preferential access to calls, partners or information; and maintain auditable records of support provided. [1]

Where a conflict cannot be adequately managed, the applicant should be routed to another NCP or specialist. DISR should retain oversight and the ability to review patterns that indicate preferential treatment or access barriers.

Question 8. What organisations or industry sectors could most effectively deliver the NCP network and how could they be engaged to do so?

BCSDA recommends that DISR select delivery partners through an open capability-based process rather than pre-designating institutions. The strongest model is likely to combine government coordination, cluster-level

specialists hosted in organisations with demonstrated Horizon Europe and sector expertise, and a broader Tier 3 network across universities, academies, research organisations, industry bodies, peak bodies and relevant companies. [1, 7–11, 14]

For BCSDA members, immediate high-relevance domains include digital/industry/space; climate/energy/mobility; and food/bioeconomy/natural resources/agriculture/environment. Practitioner evidence also suggests that sustainability, decarbonisation, climate-risk, water and waste investment conversations can provide a practical business entry point because they connect existing corporate problems with collaborative R&I opportunities. This should be used as an engagement pathway, not as an assumption that existing compliance or sustainability budgets automatically fund Horizon Europe participation. [22]

Question 9. What are the trade-offs and risks the government should be aware of with the NCP structures and establishment of the network?

Key risks are duplication of existing capability; over-engineering the network before demand is known; geographic or institutional fragmentation; capture by large universities or already-connected organisations; confusion between volunteer and specialist advice; conflicts where hosts are applicants; inconsistent service quality; and a model that measures events and enquiries rather than participation outcomes. [1, 13, 14]

There is also a timing risk. Australia has a short FP9 participation window. The initial model should therefore be deliberately adaptive: establish a minimum viable architecture quickly, measure where applicants are getting stuck, and adjust before FP10 rather than attempting to perfect every layer at launch.

Question 10. What level of activity could reasonably be delivered through a volunteer-based Tier 3 network?

A volunteer Tier 3 network can reasonably distribute verified information, raise awareness, identify potential participants, convene local or sector conversations, make warm referrals, signpost applicants to the national triage pathway and provide feedback to DISR on emerging barriers. [1, 13, 14]

Volunteer capacity should not be assumed to be uniform. The model should not rely on volunteers for time-intensive proposal development, detailed eligibility judgements, legal/financial advice, audit/compliance guidance or confidential bid assessment. Those functions require accountable specialist capability.

Question 11. What activities are appropriate for volunteers versus specialist NCPs?

Volunteers are appropriate for outreach, demand generation, basic navigation, opportunity awareness, local/sector convening, warm introductions and feedback loops. Specialist NCPs should handle call fit, eligibility, contractual and financial rules, proposal strategy, consortium-role guidance, research security, audit/compliance and referrals to legal/IP/data/ethics expertise. [1, 13, 14]

The boundary should be published clearly so applicants know when advice is authoritative and who is accountable.

Question 12. Are there speciality skills/areas of focus that the NCP network could include, such as engaging First Nations communities, regional/rural access issues, administration and financial guidance, audit and compliance or others?

Yes. BCSDA supports dedicated legal/financial/audit capability and recommends that DISR test the need for specialist First Nations and regional/remote participation capability rather than assuming generic NCP coverage will deliver equitable access. New Zealand's dedicated Māori NCP provides a useful comparator, but the Australian design should be developed with relevant First Nations science, innovation and community organisations rather than copied mechanically. [1, 5]

Other useful cross-cutting skills include research security, foreign-interference and sensitive-technology guidance; consortium agreements and IP; data protection and ethics; and specialist support for SMEs and first-time applicants.

Question 13. Can financial incentives drive success and alignment with national priorities? If so, what approach would be most effective?

Potentially, but BCSDA recommends treating financial incentives as a targeted implementation tool rather than the organising principle. If DISR proceeds, the strongest initial case is a time-limited proposal-development and consortium-building pilot for SMEs, first-time applicants and organisations facing demonstrable participation transaction costs. Support could fund partner-search travel, consortium formation, specialist proposal review or other clearly defined bid-development costs. [1, 4, 13, 14] Any financial mechanism would be subject to government resourcing and approval; DISR's immediate task is to establish the evidence and design options.

Support should follow the intersection of EU call priorities and Australian capability. A rigid domestic priority list risks encouraging effort toward calls that are not well matched to EU objectives. Any pilot should be evaluated against additional participation and capability created, not merely the amount of funding distributed.

Comparator evidence supports this cautious design. Canada's Destination Horizon Grants provide up to C\$15,000 for one year to build networks and consortia for Horizon Europe Pillar II applications, with host institutions required to provide matching support. This demonstrates a practical precedent for bounded pre-application support, but not that such support will necessarily improve Australian business participation or success. BCSDA therefore recommends any Australian mechanism be piloted, targeted and evaluated before expansion. [18]

Business applicants also need accurate information about the underlying Horizon Europe funding model. Funding rates vary by action type and specific call conditions: Research and Innovation Actions can fund up to 100% of eligible costs, while Innovation Actions generally fund for-profit legal entities up to 70%, with call-specific conditions able to vary. This reinforces the need for specialist financial guidance rather than a blanket assumption that all business participants face the same co-funding requirement. [24]

Question 14. What unintended consequences should government be aware of when thinking about incentivising alignment with national priorities?

Risks include diverting applicants from high-fit EU calls outside a narrow domestic priority list; concentrating benefits among institutions already capable of absorbing application costs; creating a new grant-administration layer that delays participation; encouraging applications to chase incentives rather than consortium fit; crowding out existing institutional investment; and producing artificial clustering around areas government has named. [1, 14]

DISR should therefore keep priority signalling broad enough to accommodate changing EU work programs, publish transparent eligibility criteria, and review whether incentives are broadening participation or simply subsidising applicants who would have applied anyway.

Question 15. What barriers do Australian SMEs and industry face in participating in Horizon Europe and how can they be overcome?

BCSDA's evidence now points to five connected business barriers: (1) insufficient awareness of the specific commercial and capability value of participation, as well as relevant calls; (2) uncertainty about the distinctive value a company can bring and the consortium role it can credibly play; (3) weak or late access to European partners and consortium networks; (4) the time, project-management capacity and financial/resource commitment associated with proposal and project participation; and (5) unfamiliarity with the research landscape and Horizon Europe legal, financial and administrative requirements. These barriers are particularly significant for SMEs and first-time applicants without established European relationships. [1, 7–14, 22]

Independent European evidence strengthens the transaction-cost assessment. The European Commission's 2025 interim evaluation estimates average Horizon Europe application costs at approximately €21,000–€32,000 per proposal; consortium coordinators typically spend 36–45 person-days preparing a proposal and consortium partners 16–25 person-days. A 2024 European Parliament study also identified administrative complexity and the need for tailored SME support as material participation issues. These findings suggest that time, transaction cost and internal proposal capability are real participation constraints, not simply awareness problems. [15, 16]

The response should therefore begin with business-value translation and early role definition, then combine opportunity translation, national triage, active partner brokerage, consortium-readiness guidance and targeted specialist support. Industry and peak bodies can help motivate participation, identify capability and make warm introductions, but they should complement rather than replace formal NCP expertise. [2, 4–6, 13, 14, 22]

Practitioner evidence also indicates a potentially useful engagement route: Australian firms already investing to address decarbonisation, climate risk, waste, water and other transition challenges may have both a defined business problem and an internal investment conversation to which Horizon Europe collaboration can be relevant. This is an engagement opportunity, not evidence that existing compliance budgets can simply be reallocated to Horizon Europe participation. [22]

Question 16. At what stage in the application process would support be most helpful?

The highest-value intervention is early: when an organisation is deciding whether a call fits, what distinctive value it brings, who it needs in the consortium and what role it can realistically play. Support at this stage can prevent wasted proposal effort and improve the quality of partnerships. [1, 13, 14, 22]

Comparator systems also concentrate support early. Canada treats identification of suitable international partners as crucial to a strong Horizon Europe proposal and directs applicants to NCPs, the EU Partner Search, CORDIS, Enterprise Europe Network and matchmaking events. The UK similarly combines NCP advice with Innovate UK Business Connect and Innovate UK Business Growth for opportunity selection, partner-finding and proposal support. New Zealand separately provides specialist legal and financial NCP capability. This reinforces BCSDA's view that early call-fit and consortium formation should be treated as dedicated support functions rather than left until proposal drafting is underway. [17, 19, 21]

A second intervention point is proposal development, particularly specialist review, eligibility/financial/legal interpretation and consortium agreement issues. Support should be staged and triaged rather than offered as the same package to every applicant.

For first-time Australian business participants, guidance should also support phased entry. A business may sensibly begin as a consortium participant, task owner or work-package contributor before taking on project coordination. This can reduce initial administrative burden while allowing the organisation to learn the Horizon Europe model and build trusted relationships. It should be practical guidance, not a restriction on capable Australian coordinators. [22]

Question 17. How could we support participation from entities in regional and remote areas?

Regional access should be designed as a reach problem, not automatically as a reason to duplicate specialist NCPs geographically. A national digital front door, published service standards, remote access to thematic specialists and Tier 3 relationships through regional universities, industry groups and other trusted networks can provide reach while preserving scarce expertise. [1, 14]

DISR should also test whether targeted mobility or consortium-building support is needed where distance materially raises the cost of European networking. Participation data should be monitored so persistent regional gaps trigger a specific response.

Question 18. Where are the gaps in the current implementation approach and how could they be addressed?

BCSDA identifies six gaps to resolve before launch: (1) an explicit national triage function; (2) a clear business-facing value proposition and participation pathway; (3) formal recognition of consortium brokerage and role-definition as core functions; (4) defined boundaries and conflict controls for Tier 2/Tier 3 roles; (5) staged guidance for first-time business participation; and (6) an adaptive first-year review that uses FP9 participation to improve the model for FP10. [1, 13, 14, 22]

The approach should also test Australia's potential role as a bridge between Europe and the Indo-Pacific. Roundtable participants highlighted mutual benefit and the opportunity for Australian industry to gain access to EU researchers while European partners gain stronger pathways into Australian and Indo-Pacific networks. This should be treated as an implementation opportunity to measure, not a pre-assumed outcome. [1, 14]

Question 19. In addition to the measures of success already identified, what additional measures should be used (see page 6)?

BCSDA supports the measures already proposed and recommends adding: (1) first-time applicant participation; (2) enquiry-to-specialist response time; (3) partner matches and consortium invitations; (4) Australian coordinator/work-package/specialist roles; (5) progression from enquiry to proposal; (6) repeat participation; (7) durable European collaborations after a bid; (8) SME and smaller-institution participation; (9) user-reported reduction in friction; (10) capability retained for FP10; (11) durable European customer and market relationships; (12) technology, methodology or know-how transferred into Australian organisations; and (13) progression toward demonstration, commercial readiness or relevant standards pathways where applicable. [1, 14, 22, 23]

At the highest level, success should be tested against national benefit: whether association leaves Australia with stronger innovation capability, deeper European partnerships, wider and more equitable participation, stronger Australia-EU-Indo-Pacific connections and a support system that improves over time. Funding won is important, but it is not the only indicator of value.

BCSDA also recommends distinguishing participation volume from participation quality. The performance framework should identify whether Australian businesses are entering consortia early enough to secure meaningful coordinator, work-package or specialist roles; whether partner and customer relationships endure beyond a single bid; whether projects are helping Australian participants move technologies and methods toward real-world application; and whether the support system is producing repeat participation. European Commission guidance recognises standardisation as an important channel for transferring, commercialising and valorising research results, so standards-related outcomes may also be relevant for projects where this is material. [17, 19, 22, 23]

Implementation, responsibilities, timing and cost

BCSDA recommends a staged implementation model:

- DISR establishes the national office, triage pathway, business-facing value proposition, service standards, conflict framework and common performance measures in 2026.
- Tier 2 cluster and specialist capability is appointed on a capability basis, with role descriptions and escalation pathways published before the first substantive Australian participation cycle.
- Tier 3 networks are activated for reach, demand generation and referrals, with explicit boundaries on volunteer advice.
- Business-facing guidance includes early role-definition, matchmaking and a phased participation pathway for first-time applicants.
- Any financial support is launched as a bounded pilot with an evidence-based target cohort and a pre-defined review point.
- DISR reviews system performance after the first meaningful participation cycle and adjusts the model for later 2027 calls and FP10.

Cost discipline should favour existing EU and Australian infrastructure first, with additional expenditure directed to functions that evidence shows are missing or under-supplied. The central design question should be whether each additional layer changes applicant outcomes, not whether it increases program activity.

Evidence and stakeholder experience

BCSDA's preparation combined public Australian stakeholder positions, comparator-country models, practitioner evidence and targeted stakeholder input. The strongest recurring themes were that:

- partner-finding is a material business bottleneck;
- specialist NCP functions need to include more than information distribution;
- business applicants need a clearer value proposition and a way to identify the distinctive role they can bring;
- support should be proportionate to applicant capability; and

- success should be measured beyond funding won. [7–14, 22]

At the 9 September roundtable, these propositions were independently echoed and sharpened. Participants repeatedly returned to triage, the difficulty of SME participation, use of existing capability, thematic rather than geographic specialist structures, and the need to distinguish Australian priorities from the EU priorities that shape Horizon Europe calls. The roundtable also strengthened the case for testing national benefit, mutual Australia-EU benefit and Indo-Pacific leverage. [14]

Additional practitioner evidence gathered on 16 September sharpened the business-side case. It highlighted business-value awareness, matchmaking, role definition, access to European customers and methodologies, real-world testing and technology-readiness progression, value-chain consortium design and phased participation as practical issues for Australian business engagement. BCSDA uses this evidence on a de-identified basis pending any explicit permission for attribution. [22]

First Nations, regional and equitable participation

Equitable participation should be a design objective rather than an assumption. DISR's proposed measures already include regional participation and participation of First Nations scientists. BCSDA recommends that these measures be connected to explicit service pathways and review triggers. For First Nations participation, the appropriate model should be developed with relevant First Nations organisations and experts, including consideration of whether dedicated NCP or specialist capability is warranted. For regional and remote participation, the first preference should be national access to specialist capability through digital and intermediary networks, supplemented by targeted support where distance creates a demonstrable barrier. [1, 5]

Conclusion

Australia has already made the strategic decision to associate with Horizon Europe. The implementation test is now practical: can an Australian organisation understand why participation is valuable, identify the right opportunity and its distinctive role, find credible partners, reach the right expertise and submit a viable proposal without unnecessary friction? If Australia can answer that question well - and measure where the system is not working - the final FP9 participation year can become a disciplined test-bed for a stronger FP10 model.

Disclosures

BCSDA has drawn on public sources, comparator-country material, stakeholder input and practitioner evidence. Any attributable Member or stakeholder evidence is only included in the submission where permission is clear. Practitioner evidence gathered on 16 September 2026 is used on a de-identified basis. Silence has not been treated as endorsement. The final submission is a BCSDA submission and may not represent every Member's individual position.

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