



### **(C) Main recommendations for improvements**

**(1) Better present the EIT's distinct role and actions in the context of other innovation support programmes.** To facilitate accessibility for the non-expert reader, the report should clarify the role of the EIT and the functioning of the three existing KICs. The EIT's synergies and complementarities with other innovation initiatives and instruments must be explained in a manner that demonstrates the added value of the EIT and the KICs, and their unique position in supporting innovation. Possible overlaps with other initiatives, and opportunities for streamlining should also be discussed.

**(2) Strengthen the problem definition and definition of 'critical mass'.** The report should avoid discussing the general problems affecting the field of innovation, but instead base its problem definition on the specific issues and problems identified in the first years of the EIT's/KICs' operations, and on a review of the findings of the external evaluation. The problem definition should be based upon concrete examples of how the EIT Regulation could be improved, on the challenges and difficulties so far faced by the KICs, and upon a balanced presentation of the positive and negative conclusions of the external evaluation. In this context, the report should also clarify the use of other evaluations in related policy areas (notably research). Problems mentioned such as 'limited economies of scale', administrative inefficiency, and high costs of KIC formation, should be clearly explained on the basis of existing evidence. The report should then establish a clear link between the objectives and identified problems. Finally, the report should be much clearer in defining what is meant by 'critical mass' and on the methodology that has been used to determine it.

**(3) Clarify the presentation of the policy options and provide a clear breakdown of EIT/KIC funding.** The report should improve the presentation of the policy options, clarifying the nature of the additional activities envisaged for option three ("Progressive Growth") and explaining the reason for discarding the option of combining the baseline with 'extended activities for the EIT'. The report should also consider expanding the number of policy options discussed, for instance by considering additional sub-options of option three, and by exploring different scenarios in terms of the number of KICs, mitigating measures, and future priority fields. Based upon a clearer working definition of critical mass, the report should demonstrate how this concept can be used to justify the proposed expansion to nine KICs by 2020, also taking into account the recommendations of the external evaluation that a period of consolidation and delivery should be envisaged. The report should also explain how administrative efficiency could be improved by expanding the number of KICs. Finally, the report should provide a clearer comparison of the policy options based upon a breakdown of the programme budgets, and using the baseline as a key reference point. The funding model for each of the options should also be discussed, based upon a comparison with the current funding model for which a detailed breakdown should be provided in the baseline and in an Annex.

**(4) Better respond to the ex-ante evaluation requirements of the Financial Regulation.** The report should demonstrate more clearly how it has responded to the ex-ante requirements of the Financial Regulation. In particular, the report should provide a clearer analysis of the costs (budgetary and administrative), outputs, and effectiveness of each of the options.

**(5) Strengthen the monitoring and evaluation provisions.** The report should more clearly present the recommendations of the external evaluator regarding monitoring and evaluation and explain how they will be taken into account. In so doing, the report should

show how a common set of indicators clearly measuring KICs and EIT deliverables could be designed.

*Some more technical comments have been transmitted directly to the author DG and are expected to be incorporated in the final version of the impact assessment report.*

**(D) Procedure and presentation.**

The report should avoid the use of policy or EU-specific terminology which is unintelligible to the lay reader. Where necessary, acronyms and policy specific concepts such as 'brain circulation' and 'knowledge triangle' should be added to a glossary. The body of the text should be shortened to meet the requirements of the IA guidelines, and the text size should be standardised.

**(E) IAB scrutiny process**

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External expertise used	No
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