EUROPEAN COMMISSION

Brussels, 25.9.206
SEC(2026) 966 final

REGULATORY SCRUTINY BOARD OPINION

Proposal for a Regulation of the European Parliament and of the Council on a framework of measures for strengthening the Union's quantum ecosystem

(Quantum Act)

{COM(2026) 965 final}
{SWD(2026) 965 final}
{SWD(2026) 966 final}
{SWD(2026) 967 final}

EUROPEAN COMMISSION
REGULATORY SCRUTINY BOARD

Chair

Brussels, 25 September 2026
RSB/LR/cdd – rsb(2026)9611810

NOTE FOR THE ATTENTION OF
MR ROBERTO VIOLA, DIRECTOR-GENERAL OF DG CNECT

Subject: Submission of the Staff Working Document on the Quantum Act Impact Assessment

Please find in annex the positive opinion with reservations of the Regulatory Scrutiny Board on the draft impact assessment report on the above-mentioned subject. The report should be adjusted in accordance with the recommendations of the Board prior to launching the interservice consultation.

Please note that the impact assessment report and the Board's opinion should be added to the corresponding initiative as it goes into the inter-service consultation (ISC) and as it is presented to the College. Detailed instructions on which documents need to be uploaded in Decide when launching the ISC are available on GoPro.

Once the College has adopted the corresponding initiative, the Board's opinion will be published centrally by Secretariat-General on the Register of Commission Documents together with the related impact assessment report.

Electronically signed

Leopoldo Rubinacci

Encl. Opinion of the Regulatory Scrutiny Board

c.c.: B. Seibert, J. Petkova (President's Cabinet)
A. Timonen (Cabinet of Executive Vice-President Virkunnen)
M. Hager, D. Denning (Cabinet of Commissioner Dombrovskis)
J. Jakubová, W. Wijsmuller, T. Skordas, M. Figwer, K. Gross,
L. Jugel, F. Bismarck, O. Diez, L. Olislager, A. Gamito Guijarro,
K. Pyrgaki, P. Kleij, P. Ganoti, M. Vieira Cortada (CNECT)
I. Juhansone, P. Leardini, N. Behrndt, E. Roller, M. Wimmer, I. Gligor,
A. Cipollone, I. C. Condurat, M. Weiler (SG)
D. Givord-Strassel, M. Havrda, R. Höijer, A. Vannini, A. Gemberg-Wiesike,
E. Maincent, R. Schindler (RSB)
ve_cnect.c.2 (CNECT)
ve_cnect.c (CNECT)

Commission européenne, B-1049 Bruxelles / Europese Commissie, B-1049 Brussel - Belgium
regulatory-scrutiny-board@ec.europa.eu

Electronically signed on 25/09/2026 15:54 (UTC+02) in accordance with Article 11 of Commission Decision (EU) 2021/2121

EUROPEAN COMMISSION
REGULATORY SCRUTINY BOARD

Brussels,
RSB

Opinion

Title: Impact assessment / Quantum Act

Overall opinion: POSITIVE WITH RESERVATIONS

(A) Policy context

The Quantum Act aims to sustain the Union's scientific and technological leadership, strengthen its competitiveness and industrial deployment capacity in quantum technologies, and improve EU resilience, trusted and quantum-safe deployment and economic security.

(B) Key issues

The Board notes the additional information provided and commitments to make changes to the report.

However, the report still contains significant shortcomings. The Board gives a positive opinion with reservations because it expects the lead Service to rectify the following aspects:

(1) The problem and their drivers are not sufficiently assessed.

(2) The baseline is not comprehensive and does not sufficiently consider future technological developments.

(3) The measures, their implementation modalities and potential synergies are not described in sufficient detail.

(4) The analysis of coherence with other actions is insufficient.

(C) What to improve

(1) The assessment of the problem and its drivers should be further strengthened based on a comparative analysis of main global competitors, by combining relevant data and information already presented in various parts of the report and the annexes. The report should build more on the evidence gathered during the preparation of the Impact Assessment to provide more detail on the evolution and maturity of different quantum domains and technological approaches. The report should further analyse

This opinion concerns a draft impact assessment which may differ from the final version.

the drivers of the scaling-up gap and the potential for public intervention to address them.

(2) The dynamic baseline should take into account all relevant national and EU level policies and measures. The baseline should consider future technological developments and how they may impact quantum technologies, in particular related to AI.

(3) The synergies and coherence with recent or forthcoming EU initiatives, such as the European Innovation Act, the Public Procurement Act, the Chips Act 2 and ERA Act, should be analysed.

(4) The report should better describe how (competing) research and development pathways, including key scientific and technological bottlenecks and milestones, will be defined and updated. The description of the proposed measures should be expanded, providing clear information on the roles and responsibilities. The report should demonstrate how synergies among the measures will be ensured and fragmentation of the intervention is avoided. This concerns in particular the relationship between Quantum Grand Challenges (PM3), the Strategic Pilot Quantum Infrastructures and Strategic Quantum Projects (PM5), and Innovation Procurement (PM7). Similarly, the report should explain how services of different support structures (PM4, PM6, PM10, PM12, PM16) will interact and whether there will be a one-stop shop for EU firms and quantum science labs. The report should better explain to what extent existing structures, bodies and functions will be reused for the proposed measures. Further synergies between the envisaged measures should be explored to lower the number of distinct structures that would be established by the initiative.

(5) Assumptions which are not self-explanatory should be substantiated (e.g. 'voluntary participation share'). The annex should report the calculations of costs and cost savings with sufficient detail.

Some more technical comments have been sent directly to the author Service.

(D) Conclusion

The lead Service may proceed with the initiative.

The lead Service must revise the report and its executive summary in accordance with the Board's findings before launching the interservice consultation.

Full title	Quantum Act
Reference number	PLAN/2024/2881
Submitted to RSB on	3 September 2026
Date of RSB meeting	23 September 2026

Electronically signed on 25/09/2026 15:54 (UTC+02) in accordance with Article 11 of Commission Decision (EU) 2021/2121