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Feedback of

ACT | The App Association
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to the

European Commission

regarding the

EU Quantum Act

I. Introduction

ACT | The App Association (hereafter 'ACT') welcomes the opportunity to submit comments to the European Commission's consultation on the EU Quantum Act.

ACT is a trade association for the small business technology developer community. Our members are entrepreneurs, innovators, and independent developers within the global app ecosystem that engage with verticals across every industry. We work with and for our members to promote a policy environment that rewards and inspires innovation while providing resources that help them raise capital, create jobs, and continue to build incredible technology. Today, the ecosystem ACT represents—which we call the app economy—is valued at approximately €95.7 billion and is responsible for more than 1.4 million jobs in the European Union (EU).[1]

II. General Position on the EU Quantum Act

As Europe advances its ambition to secure global leadership in quantum technologies, it is essential that the EU Quantum Act provides a framework that recognises the indispensable role of small and medium-sized enterprises (SMEs) in driving innovation across the digital economy. Achieving the vision of a 'quantum continent' will require not only world-class research infrastructures but also a policy environment that ensures equitable access to funding, skills, and testing facilities for businesses of all sizes. ACT therefore urges the Commission to design funding instruments that are sufficiently accessible to SMEs, with simplified procedures and predictable, long-term support. Many small innovators face structural barriers when competing for large-scale grants, and without targeted mechanisms that lower administrative burdens and ensure SME participation, Europe risks limiting quantum development to a narrow group of well-resourced actors.

Beyond funding, the success of the EU's quantum strategy depends on the availability of a skilled workforce capable of supporting the rapid development and deployment of quantum technologies. Europe faces an acute shortage of experts in quantum engineering, software, cryptography, and applied quantum sciences. To address this, ACT encourages the Commission to invest in training initiatives that are accessible to SMEs, including short, modular programmes and micro-credentials that allow workers to upskill without leaving the labour market. Fostering mobility between research institutions, industry, and startups will also be essential to bridge the gap between academic research and practical industrial implementation.

In parallel, ensuring broad access to quantum infrastructure is critical. Many SMEs lack the resources to experiment with hardware-intensive quantum technologies. Publicly funded testbeds and regulatory sandboxes, and cloud-accessible quantum devices, therefore play a vital role in enabling smaller companies to innovate, test applications, and build early prototypes. Open and transparent access policies must accompany investments in these infrastructures so that they do not become de facto restricted to incumbents or large consortia. Interoperability across testbeds

[1] *See* https://actonline.org/wp-content/uploads/220912_ACT-App-EU-Report.pdf

and platforms should also be prioritised, creating an ecosystem where developers can work across different quantum architectures without unnecessary technical fragmentation.

ACT also emphasises the importance of robust, internationally aligned standardisation in quantum technologies and post-quantum cryptography. As the Commission has recognised, standards will determine how quantum technologies integrate into existing markets, how systems interoperate, and how trust and security are maintained. The EU must work closely with global standardisation bodies while ensuring that SMEs can meaningfully participate in these processes, despite limited resources. Reducing barriers to SME involvement in standards development will support a more diverse, innovative, and competitive quantum ecosystem in Europe.

Finally, Europe's quantum ambitions cannot be realised without strong pathways for commercialisation and global cooperation. Europe must not remain solely a research hub; it must translate scientific excellence into market-ready solutions. Facilitating technology transfer, supporting intellectual property management, and creating early demand through public procurement of innovative quantum technologies will all be important steps. At the same time, quantum development is inherently international. A balanced approach that safeguards European strategic interests while maintaining open, collaborative relationships, particularly with transatlantic partners, will help ensure interoperability, supply-chain security, and global trust in European quantum technologies.

In conclusion, ACT believes that the EU Quantum Act represents a unique opportunity to build a truly inclusive, competitive, and forward-looking quantum ecosystem. To realise this vision, SMEs must be placed at the centre of the strategy. By promoting accessible funding, strengthening skills, expanding open testbed access, advancing global standards, and supporting commercialisation, the EU can ensure that quantum innovation benefits the entire European economy and empowers the small businesses that form its foundation.

Sincerely,

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