



Non-paper on fee-related support measures for micro-entities and fee policy

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Introduction

It is a major goal for the EPO to support the growth and development of European small entities by helping them obtain sound patent protection and thus enabling them to commercialise their intellectual assets across Europe and globally. Smaller entities are a backbone of the European economy, constituting 99% of EU businesses, employing two out of every three employees, and producing 57% of the European Union's GDP. However, a joint study by the EPO and the EUIPO found that only a small proportion of those firms account for a disproportionate share of employment and turnover growth in the SME sector, and that those SMEs that apply for patents have a greater probability of experiencing growth than SMEs that do not.

A number of circumstances, including the past pandemic, supply chain issues, the military aggression by the Russian Federation against Ukraine and the subsequent energy crisis have caused exceptional high levels of inflation. These circumstances are not only a burden on the EPO, but also on the innovative economy and especially on smaller entities. These entities in particular face unprecedented economic uncertainty and turbulence as they struggle with, among other things, drastic and rapid price increases in many of their inputs. At the same time, they must also master the transition to a digital and sustainable economy, while making a vital contribution to shaping it thanks to their innovative power.

Against this background, the EPO is committed to further enhancing the attractiveness of the European patent system by making it even more accessible for innovative smaller entities. The attractiveness of the EPO's fee system for these entities was also raised in recent meetings of the Budget and Finance Committee (BFC 129) and the Administrative Council (AC 173) in the context of the current and forecasted inflation and the upcoming start of the Unitary Patent system.

To achieve this goal, this paper considers new fee-related measures well beyond those already in place. More specifically, the EPO intends to provide further support for these entities by means of dedicated fee reductions, targeting in particular innovative companies with little experience of the European patent system. **It is intended to increase the current financial support by a factor of four.**

Furthermore, in line with the overall objective, a **simplification of the fee structure** is proposed in order to reduce bureaucracy and complexity, while at the same time seizing the opportunity to create incentives for the digitalisation of processes.

Also, the inflation adjustment step of 5% in 2024 as provisionally foreseen in CA/50/22, equivalent to EUR 75m of further income, will not be realised. Instead, it is proposed to have a **targeted increase of certain procedural fees and the internal renewal fees (IRFs)**, which would also fund the proposed support measures, while at the same time addressing recent trends and developments, which are mainly due to the improvement of timeliness at the EPO.

In a nutshell, the EPO proposes four options as a basis for discussion that can be summarised in simplified terms as follows:

Option	Micro Entity support	Procedural fee adjustment	Simplification of the fee structure
Option 1	20% reduction on filing, search, examination, designation, grant and internal renewal fees	5% increase on search, examination, designation and grant	Elimination of 7 rarely used fees
Option 2	20% reduction on filing, search, examination, designation, grant and internal renewal fees	4% increase on search, examination, designation and grant	Elimination of 7 rarely used fees
Option 3	30% reduction on filing, search, examination, designation, grant and internal renewal fees	4% increase on search, examination, designation and grant	Elimination of 7 rarely used fees
Option 4	30% reduction on filing, search, examination, designation, grant and internal renewal fees	0% increase on search, examination, designation and grant	Elimination of 7 rarely used fees

1. The main drivers supporting an evolution of the EPO fee policy

A challenging inflationary environment: In view of the fact that the EU inflation rate, as measured by the Harmonised Index of Consumer Prices (HICP), had already reached 9.6% for the period from June 2021 to June 2022 and is currently forecast by the ECB to be around 17% for the period from June 2021 to June 2023, it has been decided to exceptionally increase the procedural fees and renewal fees for applications by 5% with effect from 1 April 2023, outside the normal biennial cycle.

This exceptional increase was also the occasion to bring forward consideration of "the adequacy of the current EPO fee structure and possible measures to better support small entities in accessing to the patent system" as already proposed in CA/18/20 and announced in document CA/72/22 (paragraphs 11 and 21-23), not least with a view to making the EPO more attractive to users by providing incentives to certain smaller entities and further simplifying the EPO's fee system.

The evolution of the EPO income structure during the last decade: In October 2020, when the Office presented for the first time a complete overview of its income structure and its evolution (CA/F 27/20), a number of important considerations were expressed with the objective to support future reviews of the EPO fee structure. These included in particular:

- to take into account the evolution from a backlog situation to an office operating at "cruising speed" in terms of workload in the patent grant procedure, leading to an increase in the weight of national renewal fees compared to internal renewal fees;
- to further simplify the fee structure;
- to facilitate the evolution towards a digital environment by steering applicant's behaviour through fee incentives/disincentives;
- to strengthen the support for certain categories of applicants, especially individuals, SMEs, universities and research centres.

2. Overview of current fee-related support measures at the EPO

Over the years, the EPO has been attentive to the situation of smaller entities and has introduced a number of mechanisms to ease patenting costs. This includes the following measures:

- Rule 6 EPC offers a 30% reduction of filing and/or examination fee for small entities, i.e. small and medium-sized enterprises¹, natural persons, non-profit organisations, universities and public research organisations. It is related to translations and fee reductions for European applicants using a different language than the three official EPO languages.

¹ As defined in EU Recommendation 2003/361, i.e. small enterprise: <50 employees and ≤ EUR 10m turnover or balance sheet sum, no subsidiary or owned by larger enterprise; medium-sized enterprise: <250 employees and ≤ EUR 50m turnover or ≤ EUR 43m balance sheet sum, no subsidiary or owned by larger enterprise.

- In addition, the EPO has introduced in 2018 a freeze of the appeal's fee for the same category of applicants . The freeze results in a reduction of approximately 30% on the appeal fee for such entities, in comparison to other applicants, and this in order to promote access to justice.
- In the context of the working agreements on search cooperation concluded with national patent offices (NPOs) where the EPO is performing searches on behalf of NPOs, small entities benefit are charged a national search fee amounting to a maximum of currently EUR 467, which is at least 80% lower than the regular fees for a national search.
- Finally, the EPO is administering a translation compensation scheme for the Unitary Patent. It applies to SMEs, natural persons, non-profit organisations, universities and public research organisations having their residence or principal place of business within a Member State. Eligible applicants filing patent applications at the EPO in one of the official languages of the EU that is not an official language, are entitled to receive a lump sum of EUR 500.

3. Proposed evolution of support measures

One of the aims of this paper is to explore concrete proposals to further facilitate access to European patents by certain categories of applicants.

3.1. Eligible entities

It is proposed to introduce a **fee reduction for so-called micro-entities**, i.e. micro-enterprises², natural persons, non-profit organisations, universities and public research organisations. This is the same group of beneficiaries as in Rule 6 EPC, but excluding enterprises with 10 or more employees and a turnover or balance sheet sum exceeding EUR 2m.

Unlike the discount under Rule 6 EPC, which concerns only filing and examination fees, the **fee reduction would apply to all main procedural fees (filing, search, examination, designation, grant fees) and the IRF.**

3.2. Possible scenarios based on different levels of fee discount and adjustment

In principle, four scenarios can be considered, ranging from an approach with a discount of 20% which is fully compensated by a parallel increase of fees (Options 1 and 2) to scenarios with 30% discounts and only a partial compensation (Options 3 and 4).

² As defined in EU Recommendation 2003/361, i.e. <10 employees and ≤ EUR 2m turnover or balance sheet sum, no subsidiary or owned by larger enterprise

The fee discount would be complementary to the EPO's current fee-related support measures mentioned above and would not replace them, which can be particularly beneficial, not least for applicants who file an EP application following, e.g. a search conducted in the context of the working agreements on search or entering the European phase after an international search carried out at the EPO.³

In order to avoid double funding, the proposed fee reductions cannot be cumulated with other non-EPO support programmes related to European patent applications, such as the financing of European patent applications in the context of the European Commission's SME Fund 2023. **ANNEX 1** provides an overview of a number of support measures at national, EU and WIPO level.

4. Simplification of the fee system

In order to further improve the user-friendliness of the EPO's fee system and, at the same time, to reduce red tape, which can have a deterrent effect, especially for small entities, it is proposed to eliminate a noticeable amount of rarely used fees. This corresponds to the recent policy of the EPO to reduce the number of its administrative fees and to carry out a regular review to assess whether certain fees could be merged or even eliminated when they are no longer justified (see decision dated 20 February 2019, OJ EPO 2019, A14).

Out of the 34 fees at the EPO, it is proposed that the following **7 rarely used procedural and administrative fees be eliminated**, which represents an elimination of 20% of all fees:

- setting the conversion fee to zero⁴;
- elimination of the fee for awarding of costs;
- elimination of the fee for conservation of evidence;
- elimination of the fee for publishing a new specification;
- elimination of the surcharge for late performance of the acts required to maintain the European patent in amended form;
- cancelling the service covered by Rule 146 EPC – communication of information from files;
- elimination of the fee for additional copies of the documents cited in the European search report.⁵

³ In the international phase, the fee reduction cannot be applied directly to the PCT search fee, which is collected at RO level (i.e. potentially 100 different offices that cannot be asked assess whether our eligibility criteria are met). Instead, the fee reduction is only realised in the event of a subsequent entry into the European phase, when examination fees are payable. The discount applies to the actual search fee paid, net of refunds. The combined refund and discount schemes thereby provide a strong incentive to enter the European phase after a PCT search has been conducted.

⁴ The conversion fee appears under Art. 135(3) EPC and therefore cannot be eliminated, contrary to the other fees, which appear in the Implementing Regulations and can therefore be eliminated.

⁵ The elimination of this fee is proposed once all search reports (including PCT search reports) are sent in electronic form.

Under its Strategic Plan 2023 the EPO is working towards a digital transformation that will deliver new online tools to better address user needs. In line with that goal, the EPO is launching MyEPO Portfolio, a secure, web-based online service for parties to proceedings before the EPO.

It is designed to improve accessibility, enable the exchange of digital information and provide improved procedural guidance.

Users that use **MyEPO** and thereby help the EPO to avoid unnecessary administrative work whilst ensuring that EPO's register stays up-to-date can be rewarded by **setting corresponding fees to zero**. These fees include::

- Registration of transfer
- Registration or cancellation of licences and other rights
- Certified copy (application, priority document, patent certificate, other documents)

An overview of the EPO fee structure and the proposed eliminations as well as further background information on the EPO's fee system is provided in **ANNEX 2**.

5. Financing measure

The support scheme could be financed by adjusting the IRF annuities, possibly combined with an increase in certain procedural fees. This also provides the opportunity for a review of the fee policy to "reflect on the adequacy of the current EPO fee structure"⁶, with new proposals reflecting the changing paradigm from the EPO being a "backlog office" to one operating at "cruising speed".

An inflation adjustment step of 5% in 2024 was provisionally foreseen in the 2023 budget (CA/D1/22). It is now proposed **not to pursue such a general inflation adjustment** for 2024.

Four scenarios have been prepared and are presented below in detail.

5.1. Current trends – Evolution in timeliness

For a European patent application, internal renewal fees (IRF) are due by the applicant to the EPO in respect of the third and each subsequent year, calculated from the date of filing. After grant of the European patent, and in order to maintain it, national renewal fees (NRF) are payable to the respective offices of the designated states in which the patent owner has validated the European patent. Each contracting state is competent for determining the respective level of NRFs and the EPO receives 50% of the NRF amounts.

The implementation of Early Certainty since 2014 and efficiency gains from SP2023 have led to a shift in revenue streams, as the EPO has moved away from a backlog situation to an office operating at "cruising speed".

The average age of the EPO's stock of pending applications can be visualised by the average ordinal year of IRF fee payments (see **ANNEX 3**). Since 2014, a decline of 0.9 years can be observed. During the same time, the number of granted patents increased from 64 578 in 2014 to a peak of 137 768 in 2019.⁷

Example: a typical case that previously generated IRF for years three to six now generates IRF for years three to five and NRF for year six.

For 1 April 2023, assuming a post-grant validation in Germany, France, UK and Italy, which are the four countries where European patents are most validated, the total amount of NRFs in these countries **for year six is EUR 420** (DE: 150€ + FR: 76€ + UK: 104€ + IT: 90€). EPO's 50% share of NRF is EUR 210 compared to an **IRF amount of EUR 1 180 for year six**.

For the patentee, the cost has fallen from EUR 1 180 to EUR 420, **a reduction of EUR 760 per patent**. This is in addition to the benefits of having a patent being granted earlier.

For the Office, the income has fallen from EUR 1 180 to EUR 210, **a decrease of income of EUR 970 per patent**. It must be underlined that year six corresponds to a high volume of European patents, meaning the overall financial impact is quite important.

Looking at the annual accounts, it can be seen that the combined income from the IRF and NRF has not kept pace with inflation, despite the increase in production, the regular inflation adjustments to the IRF and some adjustments to the NRF.

Part of the loss can be compensated by the NRF thanks to the high number of grants in recent years, but this of course also implies a higher dependence on EPC contracting states' decisions on their national renewal fees, as the ratio of NRF to IRF revenues increased from 0.93 in 2017 to 1.48 in 2021.

5.2. Linear progression of IRF annuities

The current review of the fee policy also provides an opportunity to revisit the structure of the IRF annuities, which has become frayed over the decades as a result of various adjustments⁸, and to bring it back to an appropriate structure.

It is therefore proposed to adopt a linear progression of IRFs. The proposed IRF fees (see **ANNEX 4**) reach the same amount for ordinal years 10-20 as today and follow a linear progression until year 10.

The strongest change compared to the IRF of 1 April 2023 would be for ordinal years three to five.

For options 3 and 4, the discounts for micro-entities are higher; as a result, discounted fees are below the discounted fees of the other options and below the current fee values.

⁷ The recent lower level of 81 755 grants in 2022 is still 27% above the number of grants in year 2014.

⁸ The IRF annuities progression as of 1 Apr 2023 are as follows: Y3-Y4: EUR 130; Y4-5: EUR 265; Y5-Y6: EUR 255; Y6-Y7: EUR 125 ; Y7-Y8: EUR 135; Y8-Y9: EUR 130; Y9-Y10: EUR 205.

In view of the savings made by patentees due to timeliness, and the missing inflation compensation, such IRF increases are possible without deteriorating patentees' situation compared to 2016.

Options 1 and 2 are those having the highest increase of IRF amounts in years three to five. Even in this case, EPO renewal fee income in 2024 would still be slightly below the amount in 2016 in nominal terms, let alone including inflation.

5.3. Procedural fee adjustments

The following procedural fee adjustments are proposed for the four options:

- Option 1: Increase of search, examination, designation and grant fees by 5%
- Option 2: Increase of search, examination, designation and grant fees by 4%
- Option 3: Increase of search, examination, designation and grant fees by 4%
- Option 4: no increase of procedural fees

In order to maintain access to justice, opposition and appeal fees remain at the current level.

In sum, the option with the lowest fee increases is Option 4, which combines a change in IRF values to a linear line between EUR 655 for year 3 and EUR 1775 for year 10, and a 30% discount for micro-entities. However, this option does not compensate for the development of timeliness, let alone the 25% inflation since 2016 for the IRF. Moreover, the absence of an increase in procedural fees implies that there is no compensation for an inflation of 17% in two years, which under normal circumstances would require a further adjustment of 11.4% in 2024. This would not be compatible with the overarching goal of the financial sustainability of the EPO.

Option 3 differs from the previous option in that it proposes a 4% increase in procedural fees and linear IRF amounts starting at EUR 690. This option requires a financial effort from the EPO in the order of magnitude of the proposed support measures. Although this option only partially compensates for inflation, it is the Office's preferred option as it strikes a fair balance between the interests of users, effective support for micro-entities and the financial sustainability of the EPO.

Option 2 offers smaller fee reductions for micro-entities compared to Option 3, as well as an IRF value starting from the higher amount of EUR 725 for year 3. This results in an improved financial impact for the EPO.

Option 1, which provides for a 5% increase in procedural fees instead of the 4% proposed in Option 1, results in a larger surplus for the EPO.

Concluding, it is worth recalling that, even in a purely hypothetical case of a combination of Option 1 with no fee reduction available, the fee increase would be 10.5%, which is still below expected inflation.

Annex 1 Overview of a number of support measures at national and EU level

	Name	Type	Details (amounts in €)	Applies to	EP	EU countries	Non EU
Germany	WIPANO	50% costs, ex post	Novelty (800), economic (800), strategy (1.000), attorney/fees (10.000), commercialisation (4.000)	SMEs, liberal professions	yes	DE	-
France	réduction INPI	50% fee reduction	mainly for search report 260 instead of 520, applies also for small other fees	SMEs, non profit, individuals	NA	FR	-
United Kingdom	CIPA IP clinics	Free advice	30min online consultation	unrepresented innovators	NA	-	GB
	IP pro Bono	pre-court Litigation	Case officer decides on type of help. SUSPENDED	SMEs, individuals	?	-	GB
Italy	Brevetti+	80% costs, ex post	Financial support of commercialisation subject to a merit examination.	SMEs	yes under conditions	IT (40% Southern IT)	-
Spain	Art. 186.1	50%/100% fee reduction	SMEs/individuals: 50% for nat. application, search, examin., annuities 3-5. Universities: 50%/100% on all annuities	SMEs, individuals / universities	no	ES	-
Austria	Patent Voucher	80% costs, ex post. Free advice/search	Support search at European NPO. If positive, support for examination and monitoring. Max. support (10.000).	tech startups, SMEs, individuals	no	AT	-
Belgium	Win4Expertise	15-50% costs, ex post	Fees (until grant) and attorney costs	SMEs with commercialisation in Wallonia	yes	BE (part of)	-
EUIPO	Free IP Support	pre-litigation/ Pro Bono	Alternative Dispute Resolution (EUIPO) or Pro Bono (external advice)	SMEs	NA	all	-
	SME Fund 2022	Voucher	Voucher 1 (1.500) for IP Scan, trade mark and design fees (budget DEPLETED). Voucher 2 (750): patents at NPO, WIPO or BOIP	SMEs	no	all	-
	SME Fund 2023	Voucher	Voucher 1 (1.350, 90%) for IP Scan, voucher II (1.000, 75% or 50%) trade mark and design fees. Voucher 3 (1500, 75%): patents/prior art search incl. EP. Voucher 4 (225, 50%)for plant varieties.	SMEs	yes	all	-
WIPO	Inventor Assistance Program (IAP)	Pro bono	connect pro bono patent attorneys with small entities for patent drafting and prosecution	SMEs, inventors	yes	-	CL, CO, EC, MA, PE, PH, ZA

Austria: [Patent.Scheck](#)

- Financial support for search at a European national patent office
- If a positive search is available, funding of further steps (examination, monitoring)
- Financial support up to 80% of costs, up to EUR 10 000 per year
- Funding of work done at the EPO is not supported

Belgium: [Win4Expertise-Brevets](#)

- Financial support for attorney and office fee costs for filing, examination and validation, as well as opposition
- Requires place of business in Wallonia

France:

- [50% lower fees](#) for Small Entities in national procedure
- Advertising [EUIPO's Fonds for SMEs](#)

Germany: [WIPANO](#)

- Primary focus on patents and utility models, but also in relation to trademarks and designs
- Restricted to place of business in Germany
- Financial support for
 - Consultancy/novelty check (EUR 800)
 - Economic assessment (EUR 800)
 - Patent strategy (EUR 1 000)
 - Fees for patent attorney and patent/trademark office fees (EUR 10 000)
 - Commercialisation (EUR 4 000)

United Kingdom:

- [CIPA advice clinics](#)
 - CIPA members provide free advice clinics at venues across the UK
 - Online support
- [CIPA-funded Pro Bono](#) (currently suspended)
 - Case officer decides on type of help and proposes attorney

EUIPO:

- [Free IP Support](#) (incl. [Pro Bono](#))
 - Support for EU-based SMEs
 - Either through alternative dispute Resolution or by means of a pro bono scheme with external advice (currently 260 providers)
- [SME fund 2023](#)
 - Support for EU-based SMEs
 - Reimbursement amounts: up to EUR 1 500 and 75% for prior-art search / patent application including European patents (voucher 3)

Annex 2 Background information on the structure of the fee system and overview of proposed fees for elimination

The European patent fee structure has an intrinsic element of complexity as it covers a very sophisticated centralised patent grant procedure with an important international dimension.⁹ Moreover, the continued diversification of services and tools offered by the EPO, driven by the integration of new technologies into the patent grant procedure (PGP), has led to an increase in the number of different fees collected by the EPO, which have different objectives.¹⁰

As elaborated in document CA/F 27/20, including the basic 8 fee codes for EP and 9 fee codes for Euro-PCT applications, fee codes can be grouped into six main categories:

- 14 fee codes for the procedural actions under the PCT;
- 30 fee codes aimed at influencing applicant behaviour: page fee, claim fee, filing fee for divisional applications, filing fee for filing on paper, surcharges for late payment of fees;
- 15 fee codes covering means of redress and means available to third parties against granted patents: appeal fee, re-establishment fee, fees for further processing, opposition fee;
- 20 fee codes for extension and validation procedures;
- 6 administrative fee codes: including for registration of a transfer or a licence, and for certified official copies;
- 18 renewal fee codes as of the 3rd year, plus 18 additional fee codes for late payment.

Though the EPO fee system contains the seemingly large number of 110 fee codes, the breaking down of the fee structure into said fee codes (such as the 18 different codes for the renewal fees) allows not only for precise statistics to be computed, but also facilitates the work of applicants who rely on these codes for efficient payment, tracking and billing. In addition, for the sake of comparison, it is useful to note that other offices, such as the German Patent and Trademark Office (DPMA) or the United States Patent and Trademark Office have a comparable number of fee codes for patent-related fees.¹¹ Counting fee codes, however, does not properly reflect the aim of the fees. Therefore, a more structured look into the EPO's fee system is required.

A table presented below takes the approach of classifying fees according to their role in the different procedures, i.e. Euro-direct and PCT procedures, instead of as a succession of fee codes. This grouping of fees elucidates that there are in fact 34 different types of fees in the two procedures, including administrative fees.

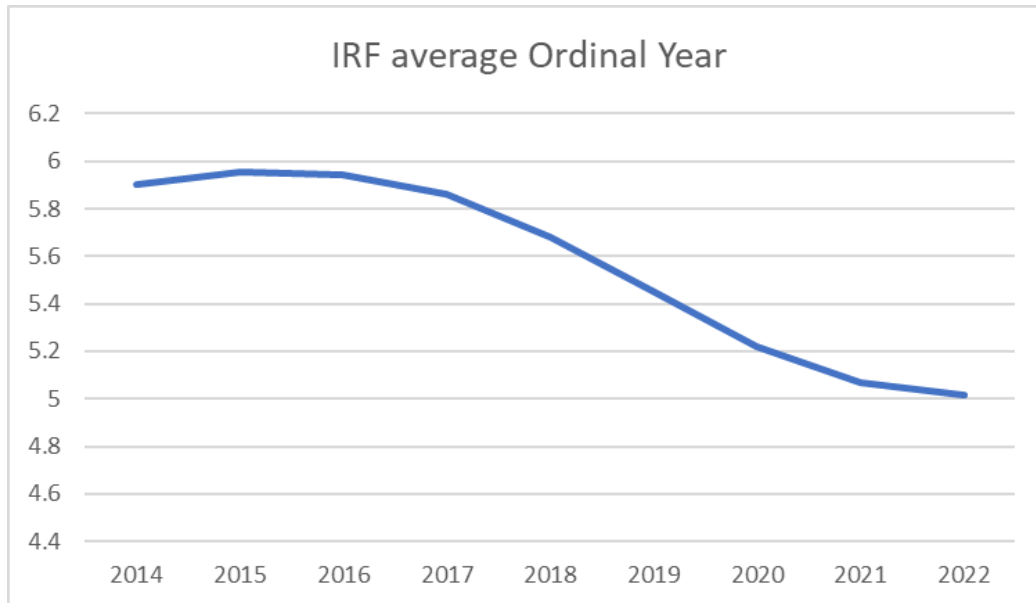
⁹ Almost two-thirds of European patent applications are filed via the PCT system.

¹⁰ See CA/F 27/20, p. 3 et seq.

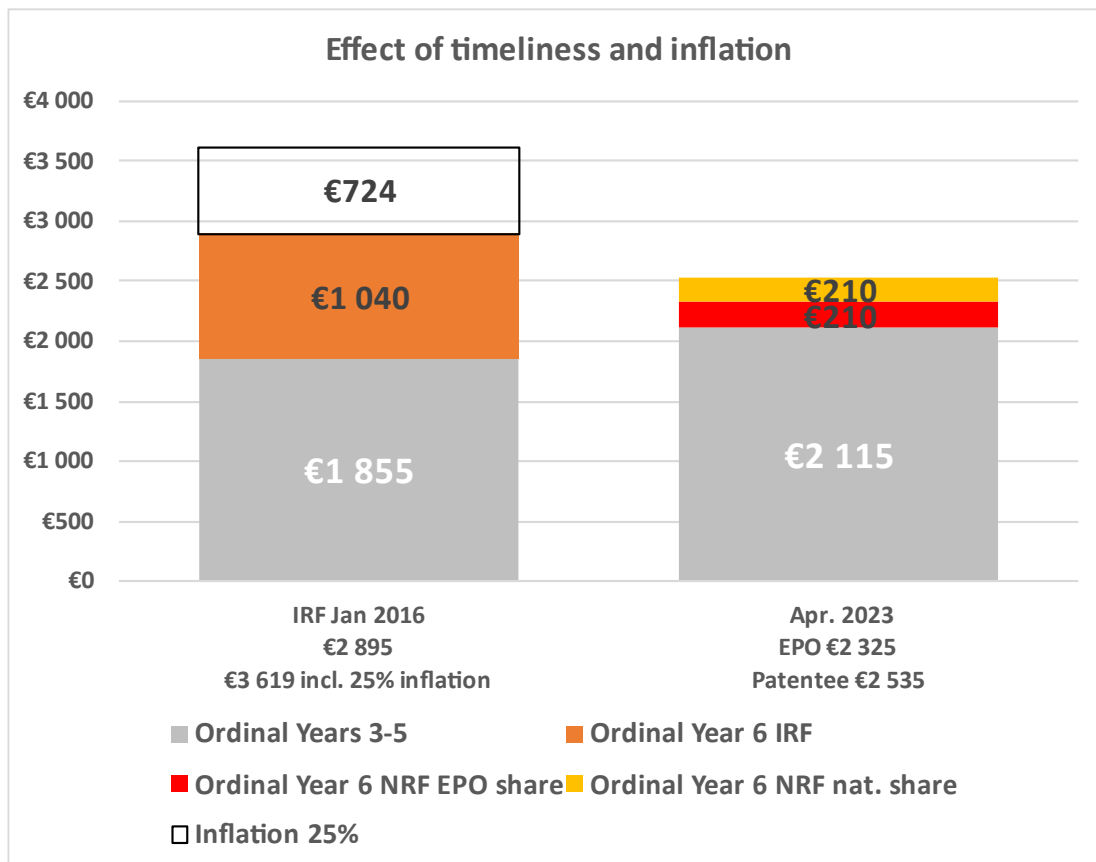
¹¹ There are 102 patent-related fee codes at the DPMA and 117 patent-related fee codes at the USPTO.

	Fees	Legal basis	Code	Impact/role	Amounts as of 04/2023
EP procedure					
1	Filing fee	Art 78(2)	001 020	Basic procedural fee (paper,pdf,xml)	3 levels : 105€ , 135€ , 285€
2	Page fee	R 38(2)	501, 520 , 008	Limit the text of the description	17€/page > 35
3	Fee for divisional	R 38(4)	552,553,554,555	Limit the misuse of generations of divisionals	235€, 480€, 715€, 955€
4	EP search fee	Art 78(2) R64(1) Art 153(7)	002	Basic procedural fee	1460€, 1000€
5	Designation fee	Art 79 (2)	005	Basic procedural fee	660€, 115€
6	Examination fee	Art 94 (1)	006	Basic procedural fee	1840€, 2055€
7	Fee for grant	R 71(3)	007	Basic procedural fee (paper,pdf,xml)	930€, 1040€
8	Fee for publishing new spec.	R82(2) R95(3)	009	Proposed deletion	85€
9	Surcharge late performance	R82(3) R95(3)	056	Proposed deletion	135€
10	Internal Renewal fees	Art 86 (1)	18 codes 033-050	Basic procedural fee	530€, 660€, 925€, 1180€, 1305€, 1440€, 1570€, 1775€
11	Surcharge late payment IRF	R51(2)	18 codes 093-110	Paris convention obligation	50% of the IRF
12	Opposition fee	Art 99(1)	010	Fees covering means of redress and means available to third parties	880€
13	Limitation/revocation fee	Art 105(1)	131 141	Introduced by EPC 2000	1305€, 590€
14	Appeal fee	Art 108	011	Fees covering means of redress and means available to third parties	2925€, 2015€
15	Fee for further processing	R 135(1)	121, 122, 123	Fees covering means of redress and means available to third parties	290€, 50% of the relevant fee
16	Fee for reestablishment of rights	R 136 (1)	013	Fees covering means of redress and means available to third parties	720€
17	Conversion fee	Art 135(3)	014	Fee level reduced to zero	85€
18	Fee for late furnishing Sequence	R 30(3)	067 066	Fee to limit delay in search when SQL is missing	255€
19	Claims fee	R 45(1,) R71(4)	015 016	Fee to limit the complexity of the scope for search	265€ claim 16 to 50 , 660€ claim above 51
20	Fee for the awarding of costs	R 88(3)	017	Proposed deletion	85€
21	Fee for the conservation of evidence	R 123(3)	018	Proposed deletion	85€
22	Validation and Extension fees		19 codes 400-453		102€, 180€, 200€, 240€, 51€, 90€, 100€, 120€
23	Fee for a technical opinion	Art 25	060	Service rarely requested by National Courts	4385€
PCT procedure					
24	PCT search fee	R 16.1 PCT, R45bis3(a) PCT	003	PCT fee , amounts fixed by EPO= ISA	1775€
25	Inter type search fee	Art 15(5) PCT	004	PCT fee , amounts fixed by EPO= ISA	1360€, 2125€
26	Transmittal fee	R 157(4) EPC	019	Fee : paper or xml format	145€, 0€
27	Internat. examination fee	R 58 PCT	021	PCT fee , amounts fixed by EPO= IPEA	1840€
28	Protest Review fees	R 40.2 PCT, R 45bis PCT	062 069	PCT fee , amounts fixed by EPO= ISA or IPEA	980€
29	Late payment search and exam fee	R16bis PCT, R58bis PCT	063 064	PCT fee , amounts fixed by EPO= ISA or IPEA	max 682€ , 410€
Administrative fee					
30	Registration of tranfers	R 22(2)	022	Administrative fee	115€
31	Registration of licences	R 23	023	Administrative fee	115€
32	Certified copy	R 54, R 74	029	Administrative fee	115€
33	Communication of information	R 146	030	Proposed deletion	115€
34	Additional copy search reports		055	Proposal deletion when all search report sent online	115€

Annex 3 Current situation – Impact of timeliness and inflation



Due to timeliness, the average Ordinal Year for which IRF is paid has gone down.



As a consequence of timeliness, for a typical case, costs for applicants decrease from EUR 2 895 in 2016 to EUR 2 535 in April 2023.

EPO income decreased even more, as the EPO receives 50% of the National Renewal Fees.

Annex 4 Proposed IRF amounts

Ordinal year	3	4	5	6	7	8	9	10-20
IRF as of 1 April 2023	530	660	925	1 180	1 305	1 440	1 570	1 775
Options 1 and 2 with discount	725	875	1 025	1 175	1 325	1 475	1 625	1 775
Option 3 with discount	690	845	1 000	1 155	1 310	1 465	1 620	1 775
Option 4 with discount	655	815	975	1 135	1 295	1 455	1 615	1 775

