Contribution to the EU consultation on the present and future of the European Research and Innovation Framework Programmes

Feedback on strategic-political aspects

The significance of the European Framework Programmes for Research and Innovation (FP) cannot be overstated, as it is the main instrument for the implementation of the European Research Area (ERA) and important EU priorities such as the Green Deal and the Digital Transformation. It is within these frameworks that researchers, non-academic stakeholders, and policy makers connect and cooperate to bring the vision of Europe as a Union to life. Especially in times of crisis and austerity, FP-funded cross-border research collaborations build bridges between nations and offer unparalleled added value for researchers. The association of third countries to the FP is essential for the promotion of key areas of knowledge and should be a top priority, especially in the case of the United Kingdom and Switzerland. The Leibniz Association recommends concluding negotiations of the terms of the associations before the start of the next FP. This will provide the scientific community and policy makers with the assurances needed to plan ahead. In view of the multiple global challenges that are addressed by the Horizon Europe strategic plan, research cooperation with international partners must be further expanded and deepened. Values such as scientific freedom, good scientific practice and funding decisions based solely on research excellence must be the guiding principles of the FP, while European interests should be safeguarded.

The pandemic has shown the crucial role fundamental research plays in solving today’s societal challenges and crises. The FP must provide a framework that allows for the integration of all relevant ERA actors while maintaining the balance between support for excellent knowledge-based research and technological innovation-oriented projects throughout the entire programme, i.e. also within the policy-driven calls. Fundamental research builds the basis for future innovation and technological development and its impact goes far beyond the short-term economic stimulus. At the same time, research funded by the European Research Council (ERC) must continue to be committed solely to the criterion of scientific excellence. In addition, the missions, which are designed to bring about tangible change in the societal challenges, which European citizens face, should include funding for knowledge-based research. The missions’ budget, as part of the FP, should be spent on research rather than on policy actions. The overall strategies of the existing missions – how they are anchored within Horizon Europe, their concrete aims and mode of cooperation between Member States and all relevant stakeholders – need to be better defined and more transparent. Any decision to introduce further missions should be carefully weighed against the available financial resources and the goals they can effectively achieve. The set-up and impact of the current five missions should be assessed before they are continued in the next FP.

Research needs to span the whole disciplinary spectrum from the natural sciences to the humanities. This truly interdisciplinary approach is decisive in producing knowledge and innovation in all disciplines that benefits the economy but also society. To maximise impact and unfold the FPs’ full potential, all disciplines including social sciences and humanities
SSH need to be integrated as a core aspect of R&I activities throughout Horizon Europe, including its missions. Truly interdisciplinary research that promotes mutual understanding and bridges disciplinary divides – especially between the SSH and natural sciences – should be a top priority of the current and future FP. This needs to be reflected in the evaluation of research projects, as well.

With its Council Conclusions of 2 December, 2022, the EU Member States acknowledged that European research infrastructures (RI) are one of the corner stones of the ERA. The RI funding scheme must therefore remain one of the top priorities of the FP, while research infrastructures and access to them must be further strengthened and expanded. Also, the Leibniz Association calls for the re-introduction of the INFRAIA funding instrument to provide support for the integration of RIs and their communities in emerging research fields, in particular with regard to transnational access. In addition, the Leibniz Association suggests that the European Commission make publicly available an overview of best-practice access models for RIs, considering the different research disciplines and other key elements. In view of the ESFRI Roadmap 2025 and a coherent European RI agenda, it is essential that EU Member States develop national RI roadmaps and commit to long-term RI funding. Such a commitment is needed by RI operators for the further development, planning and funding of their research infrastructures.

Finally, an adequate budget is necessary to ensure that these key aspects can be addressed in the remaining years of Horizon Europe as well as in the next FP. It must be clear from the outset, however, that this budget cannot be diverted from the established research areas and funding schemes for other emerging issues and initiatives — as has been discussed recently for the Chips Act or the New European Bauhaus, for example. Furthermore, unspent parts of the budget committed by Member States to the FP should not be returned to the Member States but reinvested in the FP. Only in this way can the EU's policy objectives be reached. In particular, the Leibniz Association requests an increase in funding for the ERC, a global benchmark for ground-breaking science, and the Marie Skłodowska-Curie Actions (MSCA), which are indispensable for the further development of the ERA as they promote transnational mobility and training of a highly skilled European workforce in the academic and non-academic sectors.

Feedback on the implementation of Horizon Europe projects (2021-2022)

The Leibniz Association has been involved in Horizon Europe from the very beginning. Our researchers appreciate the many improvements made with each subsequent FP and in particular the fact that many practices that have proven successful have been maintained. In the following, we would like to make further suggestions for improvement.

We value the Funding & Tenders Opportunities Portal as a useful and transparent tool for the application and project management of Horizon Europe projects. Communication has been improved, for example concerning automatic notifications to the legal representatives (LEAR) whenever a proposal is submitted by a researcher in the Portal or updates on changes in the Grant Agreement. Concerning communication with project beneficiaries, we would like to propose that the notifications clearly indicate to whom they are addressed within the consortium and which specific partner is being called upon to deliver the requested action.
Furthermore, we recommend that all project partners should be able to contact the project officer directly via the portal. It is a positive development that calls published within the European Partnerships are now included in the Portal. This streamlining of calls also needs to be applied to the rules for participation and the Grant Agreement (GA), which should be the same for all calls, including the European Partnerships and other EU funding programmes.

The Leibniz Association suggests that the number of pages of proposals be flexible depending on the size of the consortium or the complexity of the call. Large consortia should only be favoured in very few well-justified cases, as the management of smaller consortia is usually more efficient and allows more focus on research activities and less on management and administration. There should be more funding incentives to include newcomers (such as in funding schemes of the European Innovation Council (EIC)). Above all, the Leibniz Association calls for an application procedure in which a reasonable amount of the project applications submitted can be funded, due to the high effort involved in submitting applications and the low success rate.

The Leibniz Association welcomes that the budget and other project management topics have been integrated into the administrative part of a Horizon Europe proposal (Part A) in the Portal. As a next step, we recommend that the tables indicating the concrete implementation of the project are also transferred to Part A, so that Part B contains only the scientific aspects of the project. Our researchers value the excellent evaluation system of the European Commission. However, the quality of the Evaluation Summary Reports (ESR) varies. A stronger streamlining of high-quality feedback to the researchers would be much appreciated.

The introduction of lump sums for collaborative research projects results in a higher workload for applicants and coordinators during the proposal preparation phase, as cost calculations and related work packages have to be structured in much more detail. As a result, coordinators applying for a lump sum project would rely on network partners they already know and trust, rather than bringing newcomers into the project. The Leibniz Association proposes that consortia are given the option to choose between lump sum and actual cost-based funding when submitting the proposal.

Concerning project management, a trust-based approach needs to be established. This includes the acceptance of the beneficiaries’ accounting practices and cost categories as well as national cost reporting requirements. This will significantly lessen the administrative burden not only on beneficiaries but also on the European Commission and the auditors, consequently reducing accounting error rates. The Leibniz Association is alarmed about the fact that the workload in terms of project management in EU-funded projects has increased over the past years and now includes many horizontal issues that are not directly related to research (for ex. Data Stewardship, Ethics expertise, IP management). The problem already arises in the application phase, where paying for the external support of consultancies specialised in these cross-cutting issues have become a necessity for our researchers. This is not what the FP stands for and we therefore call for a renewed focus on research. Further bureaucratisation of research must be avoided at all costs.

The Leibniz Association urges the Commission to complete all second-level audits at the latest 9 months after the end of the project. If several audits are being carried out within the
same Framework Programme (e.g. 2021-2027), the **general part concerning the beneficiary** (accounting practices, in-house processes, legislation and processes for personnel costs etc.) **should not be duplicated for each individual audit**, even if the beneficiary has not undergone a System and Process Audit (SPA). The **Annotated Model Grant Agreement (AGA) should be published with the start of a new FP**. We recommend that the European Commission highlights more clearly that the AGA is merely a guide for applicants and beneficiaries and that, unlike the GA, it is not legally binding.

The Leibniz Association fully supports the ongoing efforts to further strengthen the principles of Open Science in the ERA. Nonetheless, **more flexibility** is needed when it comes to the implementation of the Commission's **Open Access Policy for Publications and Research Data**. The particularities of the different research fields and disciplines must be respected and taken into account. To support scientists' efforts to meet **open science** requirements, necessary **resources must be provided** both financially and in terms of infrastructure. In addition, policy actions at the European and national levels should be harmonised.

**The Leibniz Association**

The Leibniz Association connects 97 independent research institutions that range in focus from natural, engineering and environmental sciences to economics, spatial and social sciences and the humanities. Leibniz Institutes employ around 20,500 people, including 11,500 researchers, and address issues of social, economic and ecological relevance. They conduct knowledge-driven and applied basic research, maintain scientific infrastructure and provide research-based services. The financial volume amounts to 2 billion euros.

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