

LERU key messages for the current and future European R&I Framework Programmes

Introduction

LERU welcomes the opportunity to provide input on the ex-post evaluation of Horizon 2020, the Horizon Europe interim evaluation, the development of the next Horizon Europe strategic plan 2025-2027 and ideas for a future framework programme.

LERU member universities are and have been for many framework programmes, among the top beneficiaries of European Research & Innovation funding. These key messages are based on their extensive experience and insights.

To start, LERU wishes to underline that Horizon Europe must remain the main strategic framework for research and innovation funding. Redirecting funding from Horizon to other programmes should be avoided. Horizon Europe and its different parts need budget stability and certainty, to be as impactful as they were intended, contributing to knowledge development, European competitiveness, to addressing the twin transitions – green and digital and the Sustainable Development Goals.

1. On the identification of funding priorities

In general the continuity between Horizon 2020 and Horizon Europe was welcome. This has, however, led to new approaches being added on top of older ones, instead of replacing them. This has resulted in Horizon Europe and in particular pillar II being 'over-programmed': There is the Horizon Europe specific programme which is negotiated and adopted by the legislators together with the programme's regulation. There is the co-designed strategic plan resulting in strategic orientations with impact areas across the clusters of Horizon Europe, including missions and co-programmed and co-funded partnerships. And there are political priorities (like the Chips Act or the new Mediterranean Initiative) which influence the work programmes within the timespan of a strategic plan. With large part of pillar II funding going to partnerships and missions, only limited funding is available for 'normal' collaborative R&I projects. Too much programming of relatively small budgets will not have the desired impact and should be avoided.

For Horizon Europe, no more additional programming layers/new priorities should be added. In the future, the EC should rethink its approach to the specific and strategic programme. It could, e.g., consider merging both programmes by developing the first strategic programme involving stakeholders, researchers, citizens, Council and EP, while negotiating the regulation and adopting it before the start of the FP. At the same a new programming approach should be combined with allowing some flexibility, e.g. in the form of unprogrammed funding, to address crises such as the covid-19 pandemic.

Consequences of over-programming also extends to the project level; calls with unrealistic impact demands relative to their budget will exclude both those institutions that have no access to additional alternative resources to realise these impact demands and excellent consortia, which may turn away from Horizon.

The programming process from the various strategic documents down to the drafting and approval of the Work Programmes, calls and topics – including the timeline and procedures – should be more open and not only available to the happy few. This would make the programme more understandable and predictable, and therefore, more attractive for newcomers especially from the widening countries.

Synergies with other programmes

Despite the political rhetoric on the need for more synergies, the practice in Horizon Europe has not changed much compared to Horizon 2020. There is too little or no alignment of rules and procedures of funding programmes such as Digital Europe, EU4Health, Erasmus+ or the Defence Fund and no established clear pathways between programmes. Additionally, the very low indirect costs rate (7%) as well as the mandatory cofunding in the project budget (for example 20% in the EU4Health programme), will continue to preclude many research institutions/ universities from participation even if alignment of rules and procedures is realised, as the cofunding required is not affordable or structurally supported.

There is also, still, no alignment between Horizon and the structural funds, making actual synergies very difficult. Whilst we acknowledge that the EC has recently published a guidance document¹ outlining how ERDF funding can be in synergy with Horizon Europe, we also note the message in the European Court of Auditors - Special report “Synergies between Horizon 2020 and European Structural and Investment Funds”² which stated that for synergies to materialise, they need to be appropriately envisaged in strategic planning documents from an early stage. Otherwise, the ESIF managing authorities simply do not know how to create synergies.

2. Programmes and funding offered / intervention modes and types of action

A) Pillar I and pillar III

LERU researchers keenly participate in ERC, MSCA and EIC (pathfinder and transition activities). These programmes are and continue to be very attractive. The bottom-up nature of the funding foreseen in these parts of Horizon Europe is key to their attractiveness.

European Research Council (ERC)

LERU underlines that the ERC is clearly underfunded. As mentioned by Maria Leptin, President of the European Research Council, in an interview when she took office, almost half of the excellent projects do not receive funding because of budget restraints³. In addition to funding more excellent projects, an increase of funding could allow the ERC to increase the maximum contribution to grants provided by the ERC. This maximum contribution has not increased since the start of the ERC in 2007, meaning that researchers can now do much less for the same amount because of inflation. This is especially problematic for large-scale research projects.

LERU welcomes the changes proposed by ERC to allow for a more explanatory presentation of the research path of the PI, with focus on originality and more weight on the quality of the proposed work. LERU hopes this will also address concerns with regard to the unbalanced participation in ERC throughout European countries, without compromising on the quality of the proposed work and the ability of the PI to carry out what is proposed.

¹ https://research-and-innovation.ec.europa.eu/document/download/6c6230d0-de1a-4280-9289-67234d8e4e94_en?filename=c_2022_4747_1_en_annex.pdf

² <https://www.eca.europa.eu/en/Pages/DocItem.aspx?did=62446>

³ <https://sciencebusiness.net/news/maria-leptin-takes-post-head-erc-promising-long-term-drive-get-more-money-basic-research>

Marie Skłodowska Curie Actions (MSCA)

Recent inflation also affects MSCA where unit costs no longer suffice to cover salary costs, especially in those countries where salaries are quickly adapted to inflation. LERU recommends that a mechanism is installed to update those unit costs more frequently in periods of strong inflation. In addition, increased funding is also needed for MSCA as the under-funding of the MSCA doctoral networks continues to prevent full participation of institutions without funds available to subsidise (top-up for salaries, the 4th year of registration etc.) participation.

European Innovation Council (EIC)

Funding lines that match the innovation chain are welcomed, as is the case in pillar I and III, from ERC, via ERC proof of concept to EIC transition activities. In this context, LERU repeats that the exploitation of research results from EIC pathfinder or transition activities will not be stimulated through the concept of EIC inventors. LERU warns that where technology transfer activities are already professionally supported based on internationally, legally established inventorship standards, the broad approach introduced by the concept of EIC inventors will likely have an opposite effect⁴.

European Institute for Innovation and Technology (EIT)

The main concern in pillar III lies with the EIT. LERU universities' interest in joining activities of the EIT has decreased considerably over the last years. The administrative load in all phases of the project is huge and there is an overregulation of issues related to financial reporting. At the same time funding has decreased while co-funding and sustainability requirements have increased. Also, the increasingly centralised budgets are not helpful.

LERU has raised these concerns with the EIT and the KICs in June 2021. Since, there have been small improvements such as the multi-annuity of projects and the openness and renewed partnership policies, but with budgets still allocated yearly, monitoring practices too heavy, the schedule of grant payments too late and the unclear value proposition for partners of the KICs, the impact of these improvements is limited. The huge administrative load for relatively small grants remains problematic.

B) Collaborative research & innovation funding in pillar II

Interdisciplinarity and ASSH integration

Truly stimulating interdisciplinarity, and especially, the integration of research from the Arts, Social Sciences and Humanities (ASSH) has not improved since Horizon 2020. ASSH contribution continues to feel more like an add-on than being truly integrated. In addition, a good number of ASSH-flagged topics only seem to have minor relevance to ASSH research or it is insufficiently clear from the topic text where the ASSH component sits. LERU welcomes the EC dialogue with stakeholders to improve this and to identify other new ways to monitor ASSH integration.

LERU recommends the EC to engage directly with researchers from different domains, including but not limited to ASSH, to better understand their contribution and improve the flagging. In addition, it could also be beneficial to liaise with the ESFRI strategic working group on social and cultural innovation and use their expertise. However, the main outcome of these engagements should be a more balanced topic text with

⁴ https://www.leru.org/files/Publications/LERU-statement_EIC-inventors_2022-06-23.pdf

qualitative references to the required expertise. Also, information sessions on the different clusters could highlight better the added value of the integration of all relevant disciplines, including but not limited to those from ASSH.

Additionally, the evaluators briefings on interdisciplinarity should be improved. At the moment there is no slide dedicated to interdisciplinarity in the evaluators' briefings. Given the strong emphasis on interdisciplinarity in pillar II of Horizon Europe, such a slide would be highly recommended, even if interdisciplinarity is not required to address all call topics.

Funding along the innovation chain in pillar II for more impact

As mentioned above, funding along the innovation chain between pillars I and III is a positive development in Horizon Europe. This is missing in pillar II, despite it being explicitly mentioned in the Horizon Europe regulation⁵. LERU still very much supports the idea that was launched in the LERU FP9 paper⁶, of having a three stage funding approach in pillar II, with funding for collaborative projects at lower TRLs, medium TRLs and high TRLs. Interdisciplinarity should be strongly incentivised across the three stages. In this approach, broader, less prescriptive topics should be introduced for the lower and medium TRL calls, while the higher TRL calls should be more prescriptive about the expected outputs and impact. An increased use of two-stage evaluations would be welcome for lower and medium TRL calls.

Less prescriptive topics should not lead to less projects focusing on addressing political priorities, societal challenges or economic impact. As a recent ERC analysis has shown, many research projects, from bottom-up ERC calls, address political priorities and societal challenges⁷. High-qualitative, blue skies, bottom-up research as funded by the ERC, also clearly leads, in many cases, to breakthroughs and patents⁸.

LERU is convinced that such a three-stage approach would increase the attractiveness of the programme's pillar II and lead to more impactful and innovative research outcomes.

C) Missions

The Horizon Europe missions still need to prove they are worth the effort. So far, some aspects of missions, in particular the work on citizen engagement and linkages with different policy levels, are very interesting. However, the research and innovation dimension in the missions is disappointingly limited and most of the limited number of R&I related calls have a very narrow scope and are very high up the TRL scale. One would expect that disruptive research would be a key part of any mission, if they should drive system change or solve wicked problems. LERU calls on the mission boards and the mission managers to strengthen the disruptive and breakthrough character of missions by funding more low-TRL research. If this is not the case, the missions risk evolving into yet another type of institutionalised partnerships.

Having a mission on a certain topic should not lead to a reduction or cancellation of all funding for R&I projects on that topic, certainly as long as the R&I scope of the mission is so limited. For instance, there are currently no cancer-related calls in the Health cluster. If the Cancer mission would fund similar activities, that would be very logical, but given the big difference between the type of projects funded by the mission and by the cluster, this is very concerning and should be changed, avoiding gaps in calls for proposals.

A positive aspect is the long-term funding and planning perspective of the missions, beyond a framework programme. However, LERU questions the development and position of the missions in, and funding by Horizon Europe, given their focus clearly goes far beyond R&I. In their current form, the missions cannot be

⁵ Recital 24 of the Regulation establishing Horizon Europe <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021R0695&from=EN>

⁶ <https://www.leru.org/files/LERUs-Views-on-the-9th-Framework-Programme-for-Research-and-Innovation.pdf>

⁷ <https://erc.europa.eu/news-events/news/erc-reveals-mapping-its-funded-research>

⁸ <https://erc.europa.eu/news-events/news/new-study-reveals-how-frontier-research-spurs-patented-inventions>

successful without being included in Member States' national strategies, but it is not obvious whether the hoped-for inclusion has occurred (this may be linked to a lack of understanding of the way synergies can work – see above.)

For missions to be successful, more funding is needed. However, given all the concerns raised above, this should certainly not be additional funding drawn from other areas of Horizon Europe. LERU underlines that the cap of maximum 10% of the budget of pillar II to be spent on missions, should certainly be maintained.

D) Partnerships

LERU reminds the EC and the co-legislators of the goal for Horizon Europe to entail a more transparent landscape of fewer partnerships than in Horizon 2020. However, the intended simplification, improved accessibility and transparency has not been realised. Even finding an online overview of all updated activity in the Horizon Europe partnerships arena seems impossible to ascertain. Also, clarity on how universities and research centres can join partnerships at governance level, remains opaque. Clear guidance on participation at different levels should be available to all interested actors.

A positive development is the integration of the partnerships in the Horizon Europe Funding & Tender opportunities portal. This should further be encouraged and monitored given the large amount of funding from pillar II dedicated to these partnerships.

LERU suggests to further increase transparency by publishing the work programmes of the institutionalised and co-funded partnerships on the Portal together with the 'normal' Horizon Europe work programmes. Also, all projects funded through these partnerships should be added to the Horizon dashboard by name, not 'hidden' within the pillar II clusters. This would increase visibility and openness and allow beneficiaries to get more complete statistics on their total framework programme participation.

E) Widening participation

LERU is pleased that recent analysis shows that the success rate of applicants in Horizon Europe from widening countries is increasing⁹. Hopefully this will continue to improve in the second part of Horizon Europe.

The continuation in Horizon Europe of a specific widening programme with separate budget was appreciated. However, this was combined with the introduction of many new tools (types of projects) of which the complementarity to existing funding streams (within the Widening part or in other parts of the programme) and to each other is not always clear. These new tools should be carefully evaluated. It might be advisable to drop the tools that are shown less successful so that the funding is not spread too thinly.

The ERA fellowships are an example of a well-functioning scheme that can potentially contribute significantly to improving the research environment in institutions in widening countries in a bottom-up way. If many high-quality MSCA fellowship proposals in widening countries remain unfunded, the budget for the ERA fellowships' scheme could be increased, or rather more synergies with Structural Funds should be realised. As indicated above, LERU also calls for an increase of the MSCA budget which should also lead to more high-quality proposals being funded.

Other widening schemes that are considered useful by institutions in widening countries are Twinning and ERA chairs. To allow for optimal planning and proposal preparation by research organisations in widening countries, more regularity (and therefore predictability) of these calls would be useful – for example repeating the deadlines annually at approximately the same time of the year. The Twinning special calls focused on specific regions with the lowest participation within Horizon Europe (for example Twinning Western Balkan in

⁹ <https://sciencebusiness.net/news/Horizon-Europe/heres-what-first-two-years-horizon-europe-look-numbers>

2021) are highly appreciated and should be repeated. This area of support for widening countries is crucial for research and development at institutions in those countries.

LERU looks forward to seeing how the hop-on facility would work in practice. An evaluation of the mechanism, focusing on whether it is fulfilling its purpose effectively and whether it is used sufficiently, should be carried out after the first calls and repeated later on. Only if deemed successful, the continued inclusion and/or expansion of the mechanism could be considered.

3. Implementation of the programme/projects and procedures

A) Association and third country participation

In general, LERU strongly underlines that the rapidly changing international context and security situation or the strife for more strategic independence should not result in closing off Horizon Europe to international R&I cooperation with third countries, which remains a prerequisite for solving global challenges.

Association of the UK and CH

LERU urges the EC to move from its principled stance on association to Horizon Europe by the UK and Switzerland, a strategy which has not resulted in progress on other files but endangers the strong collaboration that has developed over the past decades between researchers from EU member states and their colleagues in the UK and Switzerland. Insecurity for researchers is problematic and results in them turning to other resources or funding options, away from the EU. LERU strongly calls for a swift association to safeguard short and long-term collaboration between EU researchers and UK and Swiss colleagues. It is in the EU's best interest to do this. Also, both countries should not be excluded from collaboration in strategic areas as both the UK and Switzerland share the EU's values and are trustworthy, highly valuable, very strong partners in the field of Research & Innovation. The EU cannot do without such partners to better address its societal and economic challenges, to gain more strategic independence and to contribute to the implementation of the SDGs.

Guidance on eligibility of UK participants

Providing clear guidance for researchers concerning the eligibility of UK entities to apply as beneficiaries (partners or coordinators) is required. While building consortia for Horizon Europe, the coordinators would like to refer to any official statement or documentation of European Commission concerning the eligibility of UK entities. General Annexes to the Work Programme 2023-2024 refers to the List of Participating Countries in Horizon Europe¹⁰. This List includes the United Kingdom. However, it speaks of the transitional arrangement set out in the General Annexes to the Work Programme 2021-2022 to explain the eligibility of the UK which may cause confusion. Thus, a clear reference to 2023-2024 Work Programmes is needed. Moreover, evaluators should be better briefed concerning the association status of UK and the eligibility of UK entities for applying to the 2023-2024 calls for proposals. These recommendations would help to reach a greater clarity concerning the eligibility of UK entities in Horizon Europe.

Also, LERU asks the EC to provide clear guidance to researchers and research support offices on the participation of Third Countries, particularly as more countries are likely to associate over the course of the remainder of the Horizon Europe programme.

¹⁰ https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/common/guidance/list-3rd-country-participation_horizon-euratom_en.pdf

Association of category ‘d’¹¹ countries

The European Commission presented the possible association of countries that are not EEA members, candidate or neighbourhood countries, as an important novelty in Horizon Europe. LERU is very disappointed to see that more than two years after the adoption of Horizon Europe very little to nothing has been achieved in this regard.

LERU also questions the limitation of access to Horizon Europe for these countries to pillar II. There is no reason to exclude these countries from pillars I and III as any possible hesitations can easily be dealt with in the association agreement. Therefore, LERU strongly calls on the EC to make progress in talks with these countries on association and to have them associate to the full programme, not only to pillar II.

For the future, LERU recommends the EC considers an easier, light touch approach to association, allowing strong R&I countries to join earlier on in the programme.

B) Recommendations/concerns on Horizon Europe

LERU published a report in September 2022 on first experiences with proposal preparation and submission in Horizon Europe¹². The findings of this report have been discussed with the European Commission in November 2022. The points raised below are drawn from the report and updated on the basis of the meeting with the EC and of input from various LERU policy groups, including on Open Science and Equality, Diversity and Inclusion.

Open science

To further strengthen the uptake and actual implementation of open science practices in Horizon Europe projects, LERU recommends the spreading of information to researchers on how they can get a higher score if they take on board some of the recommended practices and not only limit themselves to lip service on the mandatory practices. LERU also recommends the EC provides the evaluators with more tools to assess if researchers are merely paying lip service by including what is required or if they are truly incorporating open science practices in their research approach.

LERU recommends to better align European funding requirements and legislation. For instance, in Horizon Europe, immediate Open Access with a CC-BY license is mandatory for all peer reviewed publications. Rights Retention Strategy is one of the pathways to comply with the Open Access requirement, but the responsibility for RRS lies with the researcher. Researchers who sign contracts with publishers might find themselves stuck between funder requirements and contract law. Indeed, publisher contracts and guidelines might be misleading for researchers.

Impact statements

Pathway to impact is helping researchers to better understand the potential outcomes. It has the potential to make impact statements more tangible. However, it can also foster the provision of unrealistic statements about potential impacts as researchers seek to address all possible impact pathways to make their project look more competitive than another. To better support researchers to marry realism with ambition in the impact section, better guidance and more examples from different disciplines would be useful, especially for Arts, Social Sciences and Humanities. This is especially relevant for the assessment of economic and societal impact of research.

¹¹ Article 16 of the Regulation establishing Horizon Europe (<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021R0695&from=EN>)

¹² <https://www.leru.org/publications/leru-report-on-first-experiences-with-proposal-preparation-and-submission-in-horizon-europe>

Also, the quality of the evaluation of the pathways to impact needs to be improved. The Evaluation Summary Reports show that evaluators often comment on impact in more general terms, not on the pathways to impact.

Gender, equality, diversity and inclusion

LERU underwrites the importance of more diverse and inclusive consortia but flags that the current evaluation practice of a strict 50-50 gender balance among the researchers in a consortium has certain negative and unwanted side-effects, even if this aspect is only evaluated for equally scoring projects. There is a risk that this practice leads to partly “artificial” consortia where some members mainly serve to fulfil the 50-50 (sub)criterion and not because of their optimal expertise or complementarity within the consortium. Thus, LERU recommends that the EC moves to a 40-60 rule in order to minimise this risk, while simultaneously signaling a strong commitment to building a union of equality, and financing state-of the-art research based on scientific specialisation and expertise.

LERU supports Horizon Europe’s focus on gendered research and innovation and advocates for a continued evaluation practice that requires consortia to demonstrate scientific expertise relative to gender in the specific area of research and innovation.

With the introduction of the Gender Equality Plans (GEPs) as an eligibility criterion for Horizon Europe, the EC has put a strong emphasis on the need for increased diversity in R&I at institutional level. LERU welcomes the GEPs criterion in principle, and all LERU members have an ambitious GEP. However, there is currently no robust mechanism in place for GEPs assessment, while it is imperative that GEPs are thoroughly evaluated in terms of their content and monitored in terms of their implementation. Only in this way they will drive and enable change at institutional level.

Rebuttal procedure

LERU sees the potential of the rebuttal procedure as developed by the EC in Horizon Europe, but underlines the need for the EC to inform applicants better on the scope, structure and timing of this procedure. Clear and transparent instructions for formulating admissible rebuttals, including examples, would be beneficial and helpful to researchers.

In view of optimal quality of the project proposals and to allow for thorough and timely contract negotiations resulting in high quality project agreements, LERU suggests avoiding, as much as possible, deadlines and rebuttals during or immediately after important holiday periods, like the beginning of January.

Proposal template

LERU is pleased with the page limit of the proposal template but recommends the EC to remove the “subcontracting costs” items tables, “purchase costs” items tables, and “in-kind contributions” tables from the Implementation section. Instead, they should be included, clearly identifiable, in a separate document without a page limit or become part of the A-forms alongside the budget template. This will give small and large consortia the same number of pages for describing Excellence and Impact.

Annotated Model Grant Agreement

LERU recommends that the EC publishes a fully-fledged annotated model grant agreement as soon as possible.

Evaluation summary reports

In a two-stage evaluation process, the evaluation summary reports (ESRs) from the first stage should be available to the applicants before the second stage needs to be submitted. This would allow applicants to increase the quality of their second stage proposal.

Moreover, reviewers involved at second stage must receive the first stage ESR or the evaluators committee could be the same for both the steps.

LERU also suggests that LEARs should be allowed to download the ESRs from (all) the proposals of the organisation. This would, in the long run, lead to better support and better proposals, learning from mistakes and from good practices.

Increased use of lump sums

LERU repeats¹³ that monitoring of the unwanted side effects of the increased use of lump sums in Horizon Europe is necessary. Also, the application process for lump sum projects will be different and potentially more burdensome. An assessment, involving applicants, in due course is necessary.

Do not harm principle

LERU reminds the EC that they committed not to use the 'do not harm principle' at project level, but only at programme level. The principle could possibly be used as guidance to applicants, but it should not be used as an eligibility or an evaluation criterion, as there is no legal basis for it.

4. Next steps

To continue to improve Horizon Europe, it is necessary to carefully evaluate new tools, initiatives and approaches and dare to adjust or discontinue what is not deemed successful. Taking time to consult and discuss with researchers, research administrators and stakeholders, also before introducing new schemes and approaches, is key to a successful FP. LERU remains fully committed to work with the European institutions to make European R&I funding more impactful and successful in the future.

¹³ See LERU statement of December 2021: <https://www.leru.org/files/News/LERU-Note-Recommendations-for-the-further-roll-out-of-lump-sums-in-Horizon-Europe.pdf>