

A Reliable Financial Framework and a Robust R&I Programme for Europe's Scientific Leadership

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Science Europe, representing national research funding and research performing organisations, welcomes the European Commission's proposal for the 2028–2034 Multiannual Financial Framework. It is pleased to see a self-standing 10th EU Framework Programme for Research and Innovation (as requested in several policy positions) but notes the lack of clarity with regard to the 'Policy Windows' in Pillar 2, which may threaten the programme's independent nature. It agrees with retaining the prestigious 'Horizon Europe' name, which brings a legacy of driving research policies rooted in academic excellence, promoting freedom of scientific enquiry, and supporting an integrated, collaborative, and inclusive R&I ecosystem built on a diversity of research cultures.

In parallel, European research and innovation must also serve as an engine for European competitiveness and support the Union's strategic autonomy. Although Horizon Europe will remain a self-standing programme following the recommendation of the R&I community, Science Europe acknowledges the need for it to closely align with the European Competitiveness Fund (ECF). However, it is critical that this alignment does not restrain collaborative research, which should include bottom-up approaches and fundamental research collaborations. It is essential that all components of the programme remain driven by the principles of scientific excellence.

Science Europe trusts that the 2028–2034 Multiannual Financial Framework and Horizon Europe will successfully maintain excellent, free, and competitive research, encompassing research and innovation with societal and long-term goals, as well as blue-sky approaches. In this way, it will provide the strongest support to European competitiveness. Building on its previous positions¹ and continued dialogue with its Member Organisations, Science Europe recommends that:

The Multiannual Financial Framework

- Provides a **reliable and transparent budget** for R&I
- **Broadens** the notion of competitiveness

The 10th EU Framework Programme for R&I

- Reinforces support to **fundamental and blue-sky research**
- Retains **research as a driving force** of Pillar 2, to boost collaboration and competitiveness
- Keeps research **open and secure**, with awareness of sensitive areas
- Achieves **integrated European R&I**
- **Simplifies**, while maintaining high standards

1 [Overview of FP10 developments and Science Europe outputs](#)

The Multiannual Financial Framework (MFF) should be one of the foundational frameworks that brings Europe together. It must provide added European value to all relevant fields and should enable reliable, ambitious budgets for key policy areas. Research and innovation are nothing less than critical for the future of the EU. The MFF should therefore:

Provide a reliable, and transparent budget for R&I

The MFF has allocated a budget of €175bn to Horizon Europe. While this does not yet match the recommended budget of €200bn, this increase is welcome. Its full implementation is now urgently required to enhance R&I in Europe.

In addition, the ringfencing of R&I funds is critical. As the Horizon Europe budget is part of the ECF, there are concerns that this could create the possibility to divert R&I funds towards other priorities. Science Europe reiterates that the budget allocated to Horizon Europe should exclusively fund R&I-related activities, in a transparent and accountable manner.

While a strong, transparent, and ringfenced budget is essential, the MFF should also promote the strategic alignment between national, regional, and EU funds to maximise European added value. It should help to achieve the target of 3% of national GDP being invested into research, and support bridging the innovation gap within the EU.

Broaden the notion of competitiveness

Science Europe acknowledges the importance of strategic autonomy, for which a highly competitive EU is necessary. Although the Multiannual Financial Framework lays down the foundations to foster the EU's competitiveness, it is important to address what contributes to a truly competitive Europe, beyond short-term economic gains. To achieve a broad definition of competitiveness and strategic autonomy, evidence-based policies, cohesion, and societal and technological innovation are necessary. The research community can – and is willing to – contribute to this by providing knowledge and long-term perspectives.

For this, wide support of all types of R&I activities is critical. Science can and should provide responses to emerging societal and environmental challenges, including through bottom-up approaches, given appropriate and well-structured funding by the MFF. This includes – in addition to an ambitious budget – supporting world-class research infrastructures, excellent research cultures, creating attractive research careers, and fostering an inclusive and diverse R&I community.

Horizon Europe, the 10th EU Framework Programme for R&I, seems to lay the groundwork to meet these ambitions as part of the MFF. We strongly welcome the continuation of a dedicated European Framework Programme for R&I. This programme has been instrumental in fostering scientific excellence, supporting groundbreaking innovation and strengthening Europe's global competitiveness.

In addition to building on the successes of the previous programmes, this Framework Programme aims to link closely to the European Competitiveness Fund. Although a thorough analysis of how the two funds will relate to each other is necessary, the continuity and the preservation of the pillar structure (with the introduction of a fourth pillar) are welcome. Science Europe hopes that the programme will reflect the call of the R&I community for “evolution, not revolution.”

Reinforce support to fundamental and blue-sky research

Strong support for bottom-up, fundamental research is essential. Science Europe welcomes the increase of funds for Pillar 1, and indications towards expanding the European Research Council (ERC). However, a stable, and independent governance model is essential. The support towards

the Marie Skłodowska-Curie Actions (MSCA) is highly appreciated as well, respecting its typical bottom-up approach. The freedom of scientific enquiry is a cornerstone of a strong Framework Programme.

The overall reinforcement of Pillar 1 benefits fundamental and bottom-up research, which is essential for long term-competitiveness. With this in mind, Science Europe recommends that fundamental research is not constrained to Pillar 1 only. As outlined in the proposal, Pillar 2 should maintain a balance between the different Technology Readiness Levels (TRLs); it is important that this includes low-TRL collaborative research.

Retain research as a driving force of Pillar 2, to boost collaboration and competitiveness

Horizon Europe must remain focused on R&I, steered by policies with a scientific focus. The bottom-up component in Pillar 2 is therefore welcome. However, its 'Policy Windows' (targeted areas for support, falling under shared jurisdiction of both Horizon Europe and the Competitiveness Fund) may pose risks to the self-standing nature of the programme. Furthermore, keeping research contained within these windows may constrain the scope of the pillar.

The proposals outline the use of a 'Competitiveness Co-ordination Tool' and indicate that the general provisions of the ECF (a 'single rulebook') will apply within the Horizon Europe programme. Science Europe recommends an exception to this: when a project's primary focus is R&I, its governance should remain flexible under the remit of Horizon Europe. Furthermore, the close links, overlaps, and hierarchies between Pillar 2 and the ECF, and its Stakeholders Board, as well as the provisions of the 'single rulebook' and the co-ordination tool should be further clarified.

Science Europe does welcome the collaborative aspects of the 'Policy Windows', as they encourage multi- and interdisciplinary research collaborations, as well as cross-border solutions. Such collaborations should rely on a broad notion of competitiveness which, as outlined above, accounts for long-term, strategic, and societal benefits. This should build on broadly defined challenges, while enabling bottom-up approaches, low-TRL collaboration and moonshot projects. However, the risk of limiting the versatility of research addressing societal benefits, global challenges, and competitiveness, by restricting them to fit 'Policy Windows' should be avoided. In addition, the implications of these 'windows' on the programme's additional components – such as Partnerships or Joint Undertakings – should be considered. The R&I-related priorities should fall under the purview of Horizon Europe.

Keep research open and secure, with awareness of sensitive areas

Research is an international endeavour. Given the global nature of the Framework Programme, promoting collaboration with associated countries, countries aspiring to associate or third countries in a reciprocal, responsible, and open way is essential. Furthermore, swift association processes for interested countries will enable a better, integrated R&I ecosystem within, and beyond Europe.

Nevertheless, the importance of research security must be acknowledged when addressing collaboration with these categories of countries. In addition to the Economic Security Strategy referred to in the proposal, the programme should include measures specifically related to research security. These could take the shape of high-level guidance from the European Commission that establishes due-diligence guidelines by outlining key definitions and responsibilities.

With regard to Pillar 3 and the European Innovation Council (EIC), these measures should be reinforced and tailored to adequately address the new dual-use component. The changing geopolitical climate and the approach outlined in the ['Align, Act, Accelerate' report](#), stating that dual

use occurs because of the ubiquitous nature of research,² justifies the involvement of research that is not exclusively civilian in Horizon Europe. However, this should not impede openness and collaboration, which should be safeguarded, and allowed to be conducted in a secure manner by such measures. Furthermore, more clarity would be welcome on how the EIC's dual use activities will link to other dual-use related components, namely the 'policy window' on defence and resilience within Pillar 2, and the European Defence Fund, within the ECF.

Achieve integrated European R&I

Horizon Europe should encourage an increase in national R&I investment, trigger changes in research culture, boost talent attraction and retainment, strengthen capacity, support expertise, enhance opportunities for mutual learning and networking, and promote diversity.³ Strengthening these measures whilst appreciating diversity in, and domestic imperatives of, associated countries to create favourable conditions for greater engagement as the part of the newly introduced fourth pillar will help achieve a truly integrated R&I system. Specifically addressing capacity building, the proposal for co-funding up to 20% of large international infrastructure is welcome.

Meanwhile, the rationale behind the categorisation of countries as 'widening' or 'transitioning' is somewhat unclear, as well as the implications for Member States of falling into the different categories. The criteria used should be scrutinised and more clarity on the consequences of belonging to different categories is needed.

In general, rather than creating silos of 'widening', 'transitioning', or 'non-widening' countries, a more nuanced approach would be desirable. The measures should ultimately focus on achieving an even playing field for a holistic European R&I ecosystem. In line with this, the term 'R&I integration' should be used over 'widening' to describe the measures outlined above. Reinforcing these measures by elevating them to become a part of Pillar 4 will contribute to bridging the R&I gap in the EU, while building on the success of existing widening measures.

Simplify, while maintaining high standards

With regard to reducing complexity, the principles of applicant-focused simplification and faster implementation are welcome, as well as more open, less prescriptive calls. However, the provisions for simplification should be scrutinised, and applied only if they do not compromise key academic values or high ethical, sustainability, and inclusivity standards.

In addition, the high ambitions outlined in the proposal, including the much-needed simplification of partnerships and reducing the time-to-grant, should be further detailed. Information on what specific measures will simplify and accelerate these processes is currently not provided.

The introduction of high-risk, low-regulation components in Pillar 3 can bring benefits and indeed foster and streamline disruptive innovation. However, essentially transplanting the ARPA model into a European context requires careful implementation; this should be further elaborated.

To successfully implement the above recommendations, Science Europe calls for continued engagement with the European R&I community over the course of the trilogue period. Securing the excellence of European R&I for the coming years is a shared interest of all stakeholders and institutions. Science Europe calls for the European Parliament, and the Council of the EU to continue its support of an excellent, inclusive and competitive European R&I ecosystem.

² [Science Europe Recommendations to Reduce R&I Disparities and Foster Brain Circulation](#) (Nov 2022)

³ [Align, Act, Accelerate](#), p. 111.