

PROPOSAL FOR AMENDMENTS TO THE COUNCIL DECISION & REGULATION OF THE EUROPEAN PARLIAMENT AND COUNCIL

on establishing the
10th Framework Programme for Research and Innovation

2026



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EUROPE
Shaping the future of research

Science Europe Proposals for Amendments to the Legislative Documents on Horizon Europe 2028–2034

Context

Science Europe has been actively shaping its vision for Horizon Europe, the 10th Framework Programme for Research and Innovation (FP10), since the start of its development. This document provides a brief overview of its [advocacy efforts](#) and key priorities, and proposes a number of amendments to the legislative documents that will establish and implement the Programme.

In July 2024, Science Europe laid the foundations of its advocacy efforts by outlining [ten key characteristics](#) for FP10 to appropriately support R&I in the EU and beyond. It initiated dialogues between Heads and experts of national research funding and performing organisations, policy makers, and other key stakeholders, while the European Commission developed the first proposal for FP10 and the 2028–34 Multiannual Financial Framework.

These dialogues were informed by the EU's competitiveness agenda and led to a broadening of the concept of 'competitiveness' (June 2025). In light of the publication of the proposals for Horizon Europe and the European Competitiveness Fund (ECF) in July 2025, Science Europe further developed this understanding in its November 2025 position. It emphasised that "beyond short-term economic priorities, [competitiveness should entail](#) long-term, sustainable benefits to all aspects of society – scientific, economic, societal, cultural – and citizens in Europe and beyond." This perspective provides a key foundation

for Science Europe's vision for a self-standing Horizon Europe and its relationship with the ECF. Horizon Europe should be driven by scientific excellence and not be defined solely by economic competitiveness criteria.

The following recommendations for amendments to both legislative proposals build on the positions outlined above. Science Europe developed them following continuous dialogue with the Heads of its Member Organisations, its Governing Board, and the experts in its Working Groups. Many of the proposals align with recommendations by other key stakeholders in the R&I policy sector, such as universities and research institutes.

Horizon Europe must contribute to the EU's scientific base, as well as to its competitiveness and strategic objectives. It should do so by supporting the entire research value chain, as well as open, international research collaboration. It must retain its scientific autonomy and focus on R&I to link effectively with the European Competitiveness Fund.

Key focus areas of proposed amendments by Science Europe

The proposed amendments are based on the following advocacy priorities:

1. Increase clarity to align with a broader notion of competitiveness that reaches "beyond short-term economic priorities: it should enable sustainable growth, reinforce societal and technological innovation, improve education and cultural development, and benefit all sectors and citizens of Europe." (Science Europe, Nov 2025). This should enable better complementarity between the Horizon Europe and the ECF.
2. Enable the appropriate involvement of the R&I community in the programme's governance, including in the priority setting and implementation of the policy windows shared with the ECF.
3. Promote the diversity of scientific disciplines and the freedom of scientific enquiry in all fields. This calls not only for the full horizontal integration of Social Sciences, Humanities and Arts (SSHA), but also for specifically enabling projects focused on humanities, arts, cultural development, and creativity. These can bring about significant societal and cultural benefits that are difficult to measure in solely economy-focused metrics.
4. Underscore the importance of bottom-up research (based on the freedom of scientific enquiry), and fundamental science (i.e. at low Technology Readiness Levels (TRLs)). Specific recommendations are therefore made to safeguard the independence and self-governance of the European Research Council (ERC), as well as the researcher-driven nature of the Marie Skłodowska-Curie Actions (MSCA), in parallel with a general emphasis on long-term perspectives.
5. Refocus the Programme's objectives to reinforce the role of scientific excellence and strengthen the EU's research base as fundamental goals. Furthermore, programmes should reinforce European R&I integration to help reduce disparities, and support capacity building and talent circulation.
6. Ensure the Programme's autonomy by increasing and safeguarding the budget and avoid links to the ECF that may risk Horizon Europe's overall autonomy. The goal should be to achieve balanced links between the programmes; this should be done by tailored approaches, rather than one-size-fits-all solutions.
7. Foster open, reciprocal, and responsible international collaboration that enables access based on the alignment of values and policy priorities.
8. Enable swift access to the Programme as key trusted partners for previously-associated countries. This will contribute to excellent EU R&I through reciprocal, open collaboration and aligned policies. Association processes to both Horizon Europe and the ECF should be possible.

Science Europe believes that the following proposed amendments will contribute to the development of a Framework Programme that will effectively further the EU's and Associated Countries' knowledge base. It welcomes continued dialogue with other stakeholders, the European Commission, European Parliament and the Council of the EU. Continuing the fruitful discussions so far, and meaningfully involving the research community during the trilogue period, will be highly beneficial for R&I in Europe and beyond.

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**PROPOSAL FOR AMENDMENTS TO THE
REGULATION
OF THE EUROPEAN PARLIAMENT AND COUNCIL**

establishing Horizon Europe - the Framework Programme for Research and Innovation for the period 2028-2034, laying down its rules for participation and dissemination, repealing Regulation (EU) 2021/695

Recitals

The European Parliament and the Council of the European Union,		AMENDMENT PROPOSAL(S)	RATIONALE / COMMENTS
(2) To deliver scientific, technological, economic, environmental and societal impact and to maximise the added value of the Union's R&I investments, the Union should invest in research and innovation through Horizon Europe - the Framework Programme for Research and Innovation for the period 2028-2034 (the 'Programme'), which should strengthen competitiveness, resilience, sustainability, technological leadership, and social cohesion.	(2) [...] which should strengthen the research base of the EU, scientific excellence , competitiveness, resilience, sustainability, technological leadership, and social cohesion.		
(3) The Programme should be tightly connected with Regulation (EU) [XXX]* of the European Parliament and of the Council [European Competitiveness Fund] ¹ by placing research and innovation at the heart of the Union's economy and investment strategy.	(3) The Programme should be tightly connected with Regulation (EU) [XXX]* of the European Parliament and of the Council [European Competitiveness Fund] ¹ to exploit areas that benefit both programmes, and provide long-term competitiveness and prosperity by ensuring coherence and complementarity by placing research and innovation at the heart of the Union's economy and investment strategy.		<i>The tight connection should not be present for the sake of connection itself – rather for the overarching reasons clarified in the amendment.</i>
(4) The Union should furthermore aim to eliminate inequalities, and to promote equality, between men and women, as well as to combat discrimination in accordance with Article 8 and Article 10 of the Treaty on the Functioning of the European Union (TFEU) and the Charter of Fundamental Rights of the European Union.	(4) The Union should furthermore aim to eliminate inequalities, and to promote equality between men and women, diversity and inclusion in all aspects of R&I with regard to gender, age, disability, race and ethnicity, religion or belief, and sexual orientation , as well as to combat discrimination in accordance with [...]		<i>While working for the elimination of inequalities, the active promotion of diversity – described in a more comprehensive manner in the amendment – is recommended.</i>

Legend

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<p>(5) In a rapidly changing economic, social and geopolitical environment, recent experience has shown the need for a more flexible multiannual financial framework and its Union spending programmes. To that effect, and in line with the objectives of the Programme, the funding should duly consider the evolving policy needs and Union's priorities as identified in relevant documents published by the Commission, European Parliament resolutions and in Council conclusions, while ensuring sufficient predictability for the budget implementation.</p>	<p>(5) [...] Union's priorities as identified in relevant documents published by the Commission, European Parliament resolutions and in Council conclusions, while ensuring sufficient predictability for carrying out long- and short-term R&I activities, especially in fundamental research, as well as for the budget implementation.</p>	<p><i>Responsiveness is important, however, it should not be detrimental to the reliability needed for long-term R&I, neither for bottom-up R&I.</i></p>
<p>(8) As in Horizon Europe, the OECD definitions regarding technological readiness levels (TRLs) should continue to be taken into account in the classification of technological research, product development and demonstration activities, and in the definition of types of action available in calls for proposals. Grants should not be awarded for actions where activities go above TRL 8. It should be possible for the work programme to allow grants for large-scale product validation and market replication for a given call under the part 'Competitiveness and Society'.</p>	<p>(8) [...] where activities go above TRL 8. It should be possible for the work programme to allow grants for large-scale product validation and market replication for a given call under the part 'Competitiveness and Society'. The programme shall cover the entire R&I pipeline. It shall enable seamless, flexible transition between TRLs, without arbitrary barriers.</p>	<p><i>In addition to defining the framework (TRL system), the transition between the levels is also important. This transition may not be unidirectional – hence the recommendation for flexibility.</i> <i>The framework programme should not allow for grants for large-scale product validation and market replication. Those grants should be covered by the ECF.</i></p>
<p>(10) The European Partnerships, including in the form of Joint Undertakings, as an essential tool to deliver on industrial involvement and investment in collaborative research and innovation, should [...] contribute to the specific policy objectives of the policy windows of the European Competitiveness Fund, and be supported through it, where necessary, to complete these objectives.</p>	<p>(10) [...] contribute to both defining and achieving the specific policy objectives of the policy windows of the European Competitiveness Fund, and be supported through it, including the preparatory phase, where necessary, to complete these objectives.</p>	<p><i>Partnerships should synergise with R&I priorities as well as societal, and member state interests.</i></p>
<p>(13) The European Research Council (ERC) should provide attractive and flexible funding, thereby enabling talented and creative individual researchers—with a deliberate emphasis on nurturing early-stage researchers—to pursue the most promising avenues at the frontier of science. This commitment to investigator-driven research, selected through Union-wide competition based solely on the criterion of excellence and open to talent regardless of nationality or origin, is fundamental to attracting the world's brightest minds and further establishing Europe as a world-leading centre for research and innovation.</p>	<p>(13) [...] and creative individual researchers—with a deliberate emphasis on nurturing early-stage researchers—to pursue the most promising avenues at the frontier of science. This commitment to an autonomous instrument that enables bottom-up, investigator-driven research, selected through Union-wide competition [...]</p>	<p><i>While supporting early-career researchers is important, there are better avenues than the ERC for this. Therefore, the deliberate emphasis of the ERC on early-stage researchers should be weakened or deleted.</i></p>

<p>(14) In a knowledge-based global economy, the Union's long-term competitiveness, technological leadership and capacity to address global challenges should depend notably on its ability to develop, attract and retain a highly skilled and internationally connected research workforce. Strategic investment in excellent researchers, in their training, mobility and career prospects, within and outside academia, is essential to sustain innovation, economic resilience and societal well-being. In line with the principles of the European Charter for researchers, the Marie Skłodowska-Curie Actions (MSCA) are instrumental in advancing this objective. The Programme should reinforce links between universities and innovation ecosystems, including the private sector. It should enable the completion of the European Research Area, including via development of European higher education sector capacity to compete with global counterparts through collaboration, nurturing and attracting talent and leveraging more private investments, including through higher education initiatives like European Universities Alliances, in synergy with Erasmus+, and in line with the objectives and activities of this Regulation.</p>	<p>(14) [...] Strategic investment in excellent researchers, in their training, mobility, stable and attractive career prospects, and integration, within and outside academia, is essential to sustain fostering scientific breakthroughs, which lead to innovation, economic resilience and societal well-being. In line with the principles of the European Charter for researchers, the Marie Skłodowska-Curie Actions (MSCA) are instrumental in advancing this objective in a bottom-up and autonomous manner. The Programme should support excellent research and reinforce links between universities, research performing organisations and innovation ecosystems, including the private sector. [...]</p>	
<p>(15) [...] The EIC should aim to bridge, integrate and accelerate through its instruments the innovator's journey from research to market and enable the Union to have leading companies in emerging areas of technology to meet its social and economic objectives and avoid dependencies on other regions. The EIC should support high risk, high-potential innovations and companies presenting such technological, scientific, financial, management or market risks that they are not yet considered to be fully bankable and therefore cannot raise the necessary level of investments to be globally competitive from the market. This should incorporate both an 'open' (bottom-up) and a 'challenge' driven approach, in close coordination and synergy with the European Competitiveness Fund and its policy windows. It should include a 'DARPA'-like approach dedicated to supporting defence and dual use startups and their scaling up operating in full complementarity with the ECF InvestEU Instrument and the EU Defence Innovation Scheme (EUDIS) and CASSINI (Space entrepreneurship initiative) activities. The implementation should be done in close synergy and coordination with the European Competitiveness Fund.</p>	<p>(15) [...] The EIC should aim to de-risk, bridge, integrate and accelerate through its instruments the innovator's journey from fundamental/early-stage research to market and [...]</p> <p>This should incorporate both an 'open' (bottom-up) and a 'challenge' driven approach, and encourage interdisciplinary approaches, in close coordination [...]</p>	

<p>(18) The Programme should ensure the effective promotion and protection of values and principles of the European Research Area and the Pact for Research and Innovation¹, notably ethics and integrity in research and innovation, freedom of scientific research, science for policy, gender equality and equal opportunities, non-discrimination, open science and the promotion of attractive research careers and mobility. [...]</p>	<p>(18) The Programme should ensure the effective promotion and protection of values and principles of the European Research Area, as well as horizontal principles on environmental sustainability, DNSH and EDI, outlined in XXX [reference to monitoring/horizontal regulations legislation] and the Pact for Research and Innovation [...]</p>	
<p>(19) The Programme should support European research infrastructures and technology infrastructures in driving scientific and technological excellence and industrial competitiveness, by supporting the continuum of the research and innovation cycle from basic to applied research towards societal and market deployment.</p>	<p>(19) The Programme should enhance access to, and support European research infrastructures and technology infrastructures, duly taking into account the work of the European Strategic Forum for Research Infrastructures (ESFRI) in driving scientific and technological excellence and industrial competitiveness, by supporting the continuum of the research and innovation cycle from basic to applied research towards societal and market deployment. In doing so, it shall ensure the complementarity of RIs and TIs, and establish clearly allocated resources to each, in order to prevent competition for resources.</p>	<p><i>A clear, EU-level strategy for funding construction costs of RTIs should be developed. This should include a clear overall budget, selection process, and rationale for funding construction costs in FP10 as opposed to other suitable programmes.</i></p>

<p>(20) The Programme should implement concrete measures in support of capacity building in widening countries and strengthening collaborative links across the Union enhancing the research and innovation capacity in widening and transition countries, leading to a more cohesive and integrated European R&I system and contributing to the target to invest at least 3% of GDP in research and development. The eligible Member States from the 2021-2027 period should be divided into two groups for the whole duration of the Programme, on the basis of the Innovation Scoreboard Index and the relative financial return per Gross National Income (GNI), based on the following criteria: i) 'Transition countries', with both an Innovation Scoreboard Index (2023-2025) above 75% of the Union average and positive relative financial return per GNI (2021-2025) under Horizon Europe; ii) 'Widening countries', all other Member States eligible under the 2021-2027 period.</p>		<p><i>Widening should be linked with capacity building, while ultimately focusing on achieving an even playing field for a holistic, and fully integrated European R&I ecosystem.</i></p> <p><i>The progression from 'widening' category to 'transitioning' category should rely primarily on incentives, rather than penalties. The achievement of R&I policy objectives that leads to category shift should be therefore incentivised in some way.</i></p>
<p>(21) Acknowledging the benefit derived from international cooperation towards addressing, among others, shared technological, economic, environmental and societal concerns, the Programme, should promote cooperation with third countries. International cooperation should aim to strengthen the Union's competitiveness and excellence in R&I, including its capacity to attract and retain the best talents worldwide. Geo-political considerations including economic security should be at the centre of the approach and varying degrees of cooperation should be considered based on an overall assessment of the benefit that could be derived by the Union towards addressing its priorities and global challenges while safeguarding the Union's values and interests. Association to all or parts of the Programme should remain the most comprehensive form of cooperation. For EIC defence related activities, only entities established in third countries associated with the European Competitiveness Fund for defence activities should be eligible for funding. The Programme may support activities financed by the Global Europe programme provided they comply with the rules and objectives of this Regulation in line with the provisions on synergies.</p>	<p>(21) [...] economic, environmental and societal concerns, the Programme, should promote reciprocal cooperation with third countries. International cooperation should be based on shared values and principles and aim to strengthen [...] its capacity to attract and retain the best talents worldwide, contributing to strengthening the EU's global standing and science diplomacy efforts. Geo-political considerations including economic research security, with specific focus on economic security, should be at the centre of [...] For EIC defence related activities, only entities established in third countries associated with the European Competitiveness Fund for defence activities should be eligible for funding.</p>	<p><i>The removed section (on EIC defence related activities) is providing a risk of exclusion of third countries from HEU, based on whether they are associated to ECF, thus explicitly linking ECF and HEU association.</i></p> <p><i>While the importance of research security is acknowledged, such general restrictions would be detrimental to countries which may be associated to Horizon Europe, but not to the ECF. Therefore, a case-by-case approach (reminiscent of art. 22.5 of the current Framework Programme) is recommended.</i></p>

<p>(22) To reinforce the Union's strategic autonomy and ensure long-term sustainable economic growth, it is essential to bolster its global competitiveness while safeguarding its strategic assets and interests as outlined in the European Economic Security Strategy¹. Article 136 of Regulation (EU, Euratom) 2024/2509 as complemented by Article 10 of Regulation (EU) XXX [European Competitiveness Fund] promote the competitiveness of the Union and protect its economic security. The application of these provisions for the purpose of the Programme should provide an appropriate legal framework to allow, where necessary, for the establishment of specific conditions regarding award procedures that promote research-driven competitiveness and protect the interests and strategic autonomy of the Union, including measures aimed at restricting participation or protecting results and ensuring coherence and consistency with specific rules under the European Competitiveness Fund windows. Where necessary, a risk-based approach should be applied to ensure that risks related to research and innovation are identified, assessed, and addressed through proportionate and effective measures¹. In accordance with Article 136 of the Financial Regulation, eligibility restrictions should apply to high-risk suppliers, for security reasons.</p>	<p>(22) [...] to bolster its global competitiveness, on long- and short term, including non-economic aspects of competitiveness, while maintaining its robust research base and safeguarding its strategic [...] establishment of specific conditions regarding award procedures that promote research- and excellence-driven competitiveness and protect the interests and strategic autonomy of the Union, including measures aimed at restricting participation or protecting results and ensuring coherence and consistency with specific rules under the European Competitiveness Fund windows if duly justified. Where necessary, [...]</p>	<p>Definition for 'competitiveness' added in 'definitions' section below.</p> <p>Horizon Europe's governance should be rooted in excellence and scholarly values, rather than being governed by a single rulebook – ECF priorities should not compromise this. The work programmes for policy windows in Pillar 2 should be developed under Horizon Europe, with involvement from the R&I community. If the ECF would develop these work programmes without appropriate input from the R&I community, the balance of TRLs, and their R&I focus could be at risk.</p>
<p>(23) In light of increasing risks linked to natural hazards, health emergencies, technological accidents, evolving security threats, and other disruptions, it is essential to enhance the Union's and Member States' capability to anticipate, prepare for, and respond to crises and disasters. The Programme should support research that strengthens disaster risk and crisis management, invest in climate resilience, and enhance the resilience of vital societal functions, and build a more resilient, secure, and prepared Union, in line with the objectives of the EU Preparedness Union Strategy.</p>	<p>(23) [...] Member States' capability to anticipate, prepare for, when possible, prevent, and respond to crises and disasters. [...]</p>	
<p>(24) Activities should reflect the importance of tackling the dramatic loss of biodiversity and contribute to the preservation and restoration of nature, ecosystems and their services. The integration of environmental science in activities is necessary to avoid damage to the environment, to maintain clean environment and to restore healthy ecosystems.</p>	<p>(24) The integration of environmental science in activities, in line with the do no significant harm principle, outlined in [XXXX (performance tracking and horizontal rules)] is necessary [...]</p>	<p>While DNSH is outlined as a horizontal principle in another document, direct references, especially about implementation specific to R&I are welcome. Practical guidelines on DNSH may not be available until 2027 – this may pose issues.</p>

<p>(26) Simplification in the Programme's implementation is essential to ensure its accessibility and efficiency, particularly by reducing the administrative burden on beneficiaries and minimising the risk of errors. To this end, the Programme should primarily rely on lump sums as the default form of Union funding. Advancing efforts over the previous Framework Programmes to streamline funding rules and minimise errors, the reimbursement of personnel costs should also be further simplified by using personnel unit costs, which reduces complexity for participants and facilitates reporting.</p>	<p>(26) [...] reducing the administrative burden on beneficiaries and minimising the risk of errors, while maintaining high scientific and ethical standards as well as fundamental EU values. To this end, the programme should rely on lump sums as the default form of Union funding where appropriate, while retaining the opportunity of using alternatives in a flexible manner. Advancing efforts over the previous Framework Programmes to support smaller or newer beneficiaries, streamline funding rules and minimise errors [...]</p>	<p><i>The Horizon proposal outlines Lump Sums as the default funding model. While this could contribute to simplification, especially for smaller or new beneficiaries, lump sum funding may not be appropriate in all cases.</i></p> <p><i>The potential disadvantages associated with lump sum funding could entail increased uncertainty/insecurity, the risks associated with the lack of compliance by partners, as well as the artificially high number of work programmes or the potential misuse of the personnel cost dashboard.</i></p> <p><i>The programme should provide different type of funding opportunities, flexibly responding to applicant needs. Especially in larger projects, reimbursement-based alternatives should remain an option.</i></p>
<p>(27) To accommodate specific organisational set-up, especially encountered in the Research and Innovation activities, it should be possible to declare as eligible costs in-kind contributions from third parties. To incentivise valorisation of results, it should be clarified that this should not be counted as revenues of the action.</p>		<p><i>In addition to incentivisation, researchers/institutions should be also adequately supported in the process of valorisation.</i></p>
<p>(28) In view of strengthening the Union's competitiveness and maximising the uptake and deployment of the results in general, beneficiaries owning results should manage their results in accordance with their obligations established under this Regulation regarding valorisation and dissemination. Those obligations may be adjusted in the work programme, call conditions or grant agreement where appropriate based on policy considerations, including related to economic security, but should encompass requirements to protect, give access, valorise results and make them public as appropriate and justified, including through open science practices. To facilitate and accelerate the valorisation process, support instruments and tools should be put in place in line with the Commission's valorisation strategy as developed under the European Competitiveness Fund and any such support and services provided for in its Chapter III.</p>		<p><i>While economic security is related to research security, an explicit mention of the latter would be welcome here.</i></p> <p><i>Highlighted section: While valorisation is relevant to the ECF, the highlighted section may cause concerns with regards to the self-standing nature of Horizon Europe.</i></p>

<p>(29) Support measures are needed to strengthen and better connect innovation ecosystems. Such measures should support organisations and innovators to create competitive, robust and connected innovation ecosystems and improve framework conditions through cooperation and knowledge exchange. They should help connect national, regional, and local ecosystems by removing barriers in the single market such as market fragmentation, limited capital access and segmented national capital markets, slow innovation uptake and the underutilisation of innovation procurement.</p>		<p><i>These measures do not seem to be specified anywhere.</i></p>
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Title I. The Framework Programme for Research and Innovation

CHAPTER I. GENERAL PROVISIONS

Article 2 Definitions	AMENDMENT PROPOSAL(S)	RATIONALE / COMMENTS
<p>For the purposes of this Regulation, the following definitions apply:</p>	<p>Add</p> <p>(25) 'competitiveness', encompasses short- and long-term economic benefits and sustainable, lasting, and regenerative growth, including technological, cultural, and societal development, and welfare. It ensures resilience, adaptability, and sustainable success within a dynamic environment of limited resources and evolving challenges.</p> <p>(26) 'Seal of Excellence' means a quality label awarded to a proposal submitted to a call for proposals that exceeded all of the evaluation thresholds set out in the work programme, but could not be funded due to lack of budget available for that call for proposals in the work programme and might receive support from other Union or national sources of funding;</p> <p>(27) 'Competitiveness Seal' means a quality label awarded to a project or a proposal submitted to a call for proposals that meets all the quality requirements set out in the award procedure but might receive support from other Union or national sources of funding;</p>	<p><i>The notion of competitiveness is not defined, which may lead to incoherence with the ECF. Additionally, lacking a comprehensive definition, the concept may retain a short-term focus, thus it may be detrimental to long-term and bottom-up R&I.</i></p> <p><i>The concept of the competitiveness seal is welcome, but it may not be fit for purpose for all R&I products, and it does not sufficiently substitute the current 'Seal of Excellence'.</i></p> <p><i>In line with this, the restoration of the Seal of Excellence is recommended, which then could work in complementarity with the competitiveness seal.</i></p> <p><i>The two seals should be defined in a clear and distinct way, to ensure that no complexities arise with regards to their applicability.</i></p>

	<p>(28) 'research data' means documents in a digital form, other than scientific publications, which are collected or produced in the course of research activities and are used as evidence in the research process, or are commonly accepted in the research community as necessary to validate research findings and results.</p>	
(2) 'research infrastructures' are facilities that provide resources and services to conduct research and foster innovation in their fields;	<p>(2) research infrastructures are facilities-that provide, resources and services to, and capabilities that enable research communities to conduct high-quality research and foster innovation in their fields by providing reliable, long-term access to advanced services supported by specialised expertise. Research infrastructures are essential for achieving scientific excellence, are typically open to external users and may be single-sited, distributed, or virtual;</p>	<p>Definition updated to better align with ESFRI and to better distinguish the usage of infrastructures as RI or TI.</p>
(3) 'technology infrastructures' are facilities, equipment, capabilities and resources required to develop, test, upscale and validate technology - from pre-competitive applied research services up to demonstration and validation;	<p>(3) 'technology infrastructures' are facilities, equipment, capabilities and resources required to test, upscale and validate technology - from pre-competitive applied research services up to demonstration and validation that enable the development, testing, upscaling, and validation of technologies to advance them towards societal and market adoption, with the primary purpose of accelerating technological innovation and industrial competitiveness;</p>	<p>Definition updated to better distinguish the usage of infrastructures as RI or TI.</p>

(8) 'open access' means online access to results, provided free to the end user;	(8) 'open access' means is the practice of granting free online access to research outputs and results, - provided free to the end user; allowing their access and re-use by the research community and society at large without barriers and clear license regulations regarding re-use; licences shall be granted by the author or creator.	Definitions for open access should be more comprehensive, and emphasise characteristics to the overall structural changes, beyond free access. It is particularly important for open access – especially against the backdrop of AI developments – that clear licensing regulations for subsequent use are included in the definition and that it is made clear that authors/creators should have the final say on this matter.
(9) 'open science' means an approach to the scientific process that includes early and open sharing of research, open access to and responsible management of results, reproducibility measures, and involving citizens and end users in research and innovation;	(9) 'open science' means is an approach to the scientific process that includes early and open sharing of research, science and research that fosters openness and transparency, reproducibility and cooperation across the research cycle, including open access to, and responsible management of results research outputs , reproducibility measures, and involving citizens and end users in research and innovation and research information, and in addition supports reasonable and meaningful engagement with society at large;	Better alignment with established open science principles
(13) 'valorisation' means the use of results in further activities other than those covered by the action concerned, including commercial deployment;	(13) 'valorisation' means the use of results in further activities other than those covered by the action concerned, including commercial deployment, and non-commercial and policy-related activities to bring about societal benefits;	

Article 3 Programme objectives	AMENDMENT PROPOSAL(S)	RATIONALE / COMMENTS
<p>1. In line with the general and specific objectives of the European Competitiveness Fund, the Programme shall strengthen the EU's competitiveness, scientific technological base, and address global challenges based on excellent research and innovation.</p>	<p>1. In line with the general and specific objectives of the European Competitiveness Fund, the Programme shall strengthen the EU's competitiveness, scientific technological base, and address global challenges of the Programme are to create new knowledge and strengthen the scientific and technological base of the Union, based on excellent research and innovation, thereby delivering the scientific, technological, economic, societal and environmental impact from the Union's investments in R&I needed to foster the Union's long-term competitiveness, complementing other programmes, especially the European Competitiveness Fund. The objectives of the programme can only be effectively realised through cooperation with associated countries and partners.</p>	<p><i>This amended paragraph better highlights the programme's autonomy, and the position of R&I in relation to competitiveness.</i></p>
<p>2. The specific objectives of the Programme are:</p> <ul style="list-style-type: none"> - Create high-quality knowledge, skills and attractive careers for researchers and support the realisation of the European Research Area (ERA). - Increase EU-wide and international collaborative research, knowledge sharing and valorisation. - Align EU, national and regional priorities to create a pan-European research and innovation ecosystem. - Reduce national and regional disparities in research and innovation capacity, skills, and talent to strengthen innovation ecosystems. 	<ul style="list-style-type: none"> - Create Develop, promote and advance scientific excellence to support the creation of high-quality knowledge, skills and attractive careers [...] - Increase EU-wide and international, interdisciplinary collaborative research, knowledge sharing and valorisation. - Reduce national and regional disparities in research and innovation capacity, skills and talent to strengthen innovation ecosystems by fostering excellence-based participation from all Member States, including low R&I performing countries, in the Programme. 	

<ul style="list-style-type: none"> - Improve the Union's position in innovation, with a specific focus on strategic technologies and disruptive innovation, facilitate the diffusion of innovative solutions through standardisation activities to foster competitiveness and address key societal challenges. - De-risk and mobilise more private research and innovation financing, particularly for supporting deep tech and the scaling up of innovative startups and SMEs. - Contribute to increasing public and private investment in research and innovation in Member States, thereby contributing to reach an overall expenditure of at least 3% of Union Gross Domestic Product ('GDP') in research and development. 	<ul style="list-style-type: none"> - Improve the Union's position in innovation, with a specific focus on strategic technologies and disruptive innovation, facilitate the diffusion of innovative solutions through standardisation activities to foster competitiveness and address key societal challenges, while supporting fundamental and researcher- driven approaches to maintain long term competitiveness. <p>Add</p> <ul style="list-style-type: none"> - Protect the freedom of scientific inquiry - Strengthen the scientific and technological bases of the European Union, as well as its partners, by fostering and advancing scientific excellence'. - Enable the circulation of talent within Europe and from third countries.
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ARTICLE 4 Programme structure	AMENDMENT PROPOSAL(S)	RATIONALE / COMMENTS
<p>3. For the purposes of the Specific Programme referred to in Article 1(2), the Programme shall be structured in parts as follows, which contribute to the general and specific objectives set out in Article 3 and the policy windows of Regulation (EU) XXX [European Competitiveness Fund]:</p> <p>(b) Part II 'Competitiveness and Society', with the following components, in particular:</p> <p>i) 'Competitiveness', including research and innovation activities in support of policies under the European Competitiveness Fund, such as:</p> <p>(1) collaborative research and innovation activities under Chapter IV 'Clean Transition and Industrial Decarbonisation' of the European Competitiveness Fund;</p>		<p><i>The division between the components of Pillar 2 is unbalanced, and in certain cases, may be arbitrary. It is important to take a balanced approach to competitiveness and societal challenges.</i></p> <p><i>Policy windows should not be overtly prescriptive. Furthermore, it is crucial to have a possibility to insert areas not explicitly covered by the articles of the policy windows at a later stage, if deemed scientifically relevant.</i></p> <p><i>The 'Global societal challenges' component is vaguely defined, as well as its relation to the continuation to missions. The areas covered by this component could be expanded upon in an annex, as it was done in FP9. This component should</i></p>

<ul style="list-style-type: none"> (2) collaborative research and innovation activities under Chapter V 'Health, Biotech, Agriculture and Bioeconomy' of the European Competitiveness Fund; (3) collaborative research and innovation activities under Chapter VI 'Digital Leadership' of the European Competitiveness Fund; (4) collaborative research and innovation activities under Chapter VII 'Resilience and Security, Defence Industry and Space' of the European Competitiveness Fund. <p>ii) 'Society', including research and innovation activities, such as:</p> <ul style="list-style-type: none"> (1) global societal challenges; (2) EU Missions; 	<p><i>enable R&I into emergent topics in all disciplines, and themes that are not directly linked with policy priorities, potentially including collaborative bottom-up R&I.</i></p> <p><i>Social Sciences, Humanities and Arts (SSHA) perspectives should be also featured horizontally both components. In the 'competitiveness' component, they should support societal readiness for innovations. However, the horizontal embedding of SSHA should not substitute specific SSHA projects, especially those focused on humanities and arts.</i></p> <p><i>The role of arts is also somewhat neglected in the proposal, as the text refers to SSH only. SSHA altogether covers human culture, behaviour and expression. Therefore, as a general comment, the usage of the acronym 'SSHA' would be preferable all across the document, in order to allow the programme to embody a holistic approach.</i></p> <p><i>R&I activities supported by Pillar 2 should be open to all TRLs, including opportunities for fundamental research collaborations.</i></p>
<p>(d) Part IV 'European Research Area', with the following components, in particular:</p> <ul style="list-style-type: none"> (i) reforming and enhancing the European R&I system 	<p>(i) reforming <i>and</i>, enhancing <i>and</i> integrating the European R&I system</p>

Article 5 Horizontal principles	AMENDMENT PROPOSAL(S)	RATIONALE / COMMENTS
<p>The Programme shall:</p>	<p>Add</p> <p>(d) promote equality, diversity and inclusion in all aspects of R&I with regard to gender, age, disability, race and ethnicity, religion or belief, and sexual orientation, and promote gender mainstreaming, including in the conduct of R&I activities, inclusive gender analysis, and combating sexual and gender-based violence.</p> <p>(f) promote the conduct of activities aligned with the 'do no significant harm' principle.</p>	<p>Horizontal principles could make at least a reference to sustainability/DNSH and DEI – or, the very least, a reference to the document on the monitoring framework in which these are elaborated upon.</p>
<p>(a) ensure a multidisciplinary approach, where appropriate, and provide for the integration of social sciences and humanities (SSH) across all components under the Programme, including specific calls for proposals on SSH related topics.</p>	<p>(a) [...] and provide for the full, horizontal integration of [...]</p>	<p>The role of arts is also somewhat neglected in the proposal, as the text refers to SSH only. SSHA altogether covers human culture, behaviour and expression. Therefore, as a general comment, the usage of the acronym 'SSHA' would be preferable all across the document, in order to allow the programme to embody a holistic approach.</p>
<p>(c) encourage open science practices including by ensuring open access to peer-reviewed scientific publications regarding results, as well as open access to research data and other results following the principle 'as open as possible, as closed as necessary'.</p>	<p>(c) encourage open science practices including by as an approach to the scientific process based on openness, collaboration, and responsible knowledge sharing. This includes ensuring responsible open access to all research outputs, including peer-reviewed scientific publications, as well as open-access to research data, software and other results following in accordance with the principle "as open as possible, as closed as necessary". Responsible management of research data shall be ensured in line with the FAIR principles, with due attention to long-term preservation, security and appropriate use.</p>	

ARTICLE	AMENDMENT PROPOSAL(S)	RATIONALE / COMMENTS
Article 6 Budget		
4. The indicative financial envelope of the Programme for the period 1 January 2028 to 31 December 2034 shall be EUR 175 002 000 in current prices.	4. [...] shall be EUR 175 002 000 <ins>200 000 000 000</ins> in current prices. Unspent funds should be reallocated to the initial envelopes.	
The indicative distribution of the amount referred to in paragraph 1 of this Article for the Specific Programme referred to in Article 1(2) (a), shall be: <ul style="list-style-type: none"> (a) EUR 44 079 000 000 for Part I 'Excellent Science', of which EUR 2 600 000 000 for non-nuclear direct actions of Joint Research Centre (JRC). [...] (d) EUR 16 262 000 000 for Part IV 'European Research Area', of which EUR 5 387 000 000 for widening participation and spreading excellence. 		<p><i>The budgets for the ERC, MSCA, the different parts of the Society part, the EIC, innovation ecosystems, research and technology infrastructures and for reforming and enhancing the R&I system should be flagged out separately.</i></p> <p><i>If this budget should cover the building cost of RTIs as well, it may not be sufficient.</i></p>
Article 7 Additional resources		
1. Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or other third parties, may make additional financial or non-financial contributions to the Programme. Additional financial contributions shall constitute external assigned revenue within the meaning of Article 21(2), points (a), (d), or (e) or Article 21(5) of Regulation (EU, Euratom) 2024/2509.	1. [...] may make additional financial or non-financial contributions to the Programme. Such contributions shall be without prejudice to, and shall not replace or reduce, the budget established under Article [X] of this Regulation. Additional financial contributions [...]	
Article 8 Alternative, combined and cumulative funding		
		<p><i>Additional funding is welcome, but it should not provide grounds for diverging a project from its R&I focus</i></p>

<p>1. The Programme shall be implemented in synergy with other Union programmes. An action that has received a Union contribution from another programme may also receive a contribution under this Programme. The rules of the relevant Union programme shall apply to the corresponding contribution or a single set of rules may be applied to all contributions and a single legal commitment may be concluded. [...]</p>	<p>1. [...] apply to the corresponding contribution or a single set of Horizon Europe rules may be [...]</p>	<p><i>There are risks associated with the single rulebook, as applying non-appropriate rules to R&I activities could be detrimental for them: projects that have no short-term, or quantifiable benefits may be in a disadvantaged position without a set of rules tailored for R&I. R&I activities should have rules tailored for R&I.</i></p>
<p>3. Under this programme, in addition to the conditions set out in Article 8(1) and (2) of Regulation (EU) XXX [European Competitiveness Fund], a Competitiveness Seal shall be awarded only to high-quality actions that have not been financed under the Programme due to budgetary constraints.</p>	<p>3. Under this programme, in addition to the conditions set out in Article 8(1) and (2) of Regulation (EU) XXX [European Competitiveness Fund], a Competitiveness Seal shall two seals can be awarded only to high-quality actions that have not been financed under the Programme due to budgetary constraints.:</p> <p>(a) The Seal of Excellence may be awarded for proposals resulting from calls specified in the work programme, and which shall comply with the following conditions:</p> <p>(i) they have been evaluated in a call for proposals under the Programme; and</p> <p>(ii) they comply with the minimum quality requirements of that call for proposals and exceeded all the evaluation thresholds set out in the work programme; and</p> <p>(iii) they have not been financed under that call for proposals only due to budgetary constraints.</p> <p>(b) The Competitiveness Seal referred to in Article 8 of Regulation XXX/XXX [ECF Regulation] may be awarded for proposals resulting from calls for proposals specified in the work programme.</p>	<p><i>The concept of the competitiveness seal is welcome, but it may not be fit for purpose for all R&I product, and it does not sufficiently substitute the current 'Seal of Excellence'.</i></p> <p><i>In line with this, the restoration of the Seal of Excellence is recommended, which then could work in complementarity with the competitiveness seal.</i></p> <p><i>The two seals should be defined in a clear and distinct way, to ensure that no complexities arise with regards to their applicability.</i></p>

Article 9 Third countries associated to the Programme	AMENDMENT PROPOSAL(S)	RATIONALE / COMMENTS
		<i>More clarity is needed on the implications of the ECF on association. Ideally, HEU & ECF association should remain separate and the lack of association to the ECF should not limit the access the countries only associated to HEU.</i>
<p>1. The Programme may be opened to the participation of the following third countries through full or partial association, in accordance with the objectives laid down in Article 3 and in accordance with the relevant international agreements or any decisions adopted under the framework of those agreements and applicable to:</p>		<p><i>The programme shall provide the possibility of swift association to previously associated countries with aligned policies, shared values, including in security, with the EU, and provide accelerated association to the programme. This should be provided if the countries were associated to the previous programme, and align with the criteria outlined in art 9.4 of this Regulation.</i></p> <p><i>In this context, the contributions, and the swift association of Switzerland and the United Kingdom are significant, as their respective association forms part of a larger framework agreement with the EU. This warrants a discussion on the establishment of a new category, with the aim to accelerate the association of those and other relevant countries, and not exclude them from call topics on the grounds of protecting the EU's strategic and economic security, unless this is duly justified.</i></p>
<p>(a) members of the European Free Trade Association which are members of the European Economic Area, as well as European micro-states;</p>	<p>(a) members of the European Free Trade Association which are members of the European Economic Area, as well as European micro-states in accordance with the conditions laid down in the Agreement on the European Economic Area;</p>	<p><i>The EEA EFTA States, Norway, Iceland, and Liechtenstein, should be clearly distinguished from third countries with other association arrangements. Grouping the EEA EFTA States together with countries such as Andorra, Monaco, San Marino, and Vatican City State, or other countries with other association arrangements, risks undermining recognition of the EEA Agreement as the legal basis for the EEA EFTA States' programme association.</i></p>
<p>2. The association agreements for participation in the Programme shall:</p>	<p>New</p> <p>(e) Guarantee observer role of decision-making processes, where appropriate.</p>	<p><i>Observer roles in the governance of the programme should be guaranteed (including relevant parts of ECF). Where MS participate in PCs, ACs shall get observer roles.</i></p>

<p>(d) guarantee the rights of the Union to ensure sound financial management and to protect its financial interests.</p>	<p>(d) guarantee the rights of the Union to ensure financial management and to protect its financial interests, where duly justified, and taking into account established cooperation.</p>	
<p>3. For the purposes of paragraph 2, point (d), the third country shall grant the necessary rights and access required under Regulations (EU, Euratom) 2024/2509 and (EU, Euratom) No 883/2013, and guarantee that enforcement decisions imposing a pecuniary obligation on the basis of Article 299 TFEU, as well as judgments and orders of the Court of Justice of the European Union, are enforceable.</p>	<p>3. [...] of the European Union, are enforceable, in accordance with each third country's and EU's applicable law in their respective territories.</p>	
<p>(c) active promotion of policies to improve the economic and social well-being of citizens.</p>	<p>(c) active promotion of respect towards fundamental academic freedoms and values, and policies to improve the economic and social well-being of citizens, and to protect researchers from coercion by political pressure.</p>	
<p>5. The scope of association of each third country to the Programme shall take into account an analysis of the risks, notably those likely to affect the Union's public order and security in relevant policy areas, including economic and research security, as well as benefits and the broader objective of driving economic growth and competitiveness of the Union through innovation. Accordingly, with the exception of EEA members, acceding countries, candidate countries and potential candidate countries, third countries may be excluded from parts of the Programme in accordance with this Regulation or the association agreement itself.</p>		<p><i>While exclusions may be necessary from a research security perspective, these should not be disruptive of established international collaborations. In defining criteria with regards to participation or exclusion, previous longstanding collaboration should be considered, and the reduction of participation of partners that contributed significantly to Horizon Europe should be minimised</i></p>
<p>6. The association agreement setting out the conditions for participation in the Programme, shall, as far as possible, provide for the reciprocal participation of legal entities established in the Union in equivalent programmes of associated countries in accordance with the conditions laid down in those programmes.</p>	<p>Add</p> <p>6a. The Commission shall establish a simplified and expedited procedure for countries previously associated to the programme, and aligned with criteria outlined in paragraph 4 of this article, renewing their association.</p>	

<p>7. The conditions determining the level of the financial contributions referred to in paragraph 2, point (b) shall ensure a regular automatic correction of any significant imbalance compared to the amount that entities established in the associated country receive through participation in the Programme, taking into account the costs in the management, execution and operation of the Programme. The allocation of the financial contributions shall take into account the level of participation of the legal entities of the associated countries in each part of the Programme.</p>	<p>7. [...] operation of the Programme, as referred to in paragraph 2, point (a). The allocation of [...]</p> <p>[...] each part of the Programme. Further to this, the conditions determining the level of financial contributions shall only take into account programme parts to which associated countries can participate.</p> <p>Where countries have been associated to Framework Programme 9, the association agreements setting out the conditions for participation in the Programme, shall, as far as possible, allow the immediate participation of entities from these aforementioned associated countries, with equivalent treatment to Member State beneficiaries from the start of the programme.</p>	<p><i>Proposed new text to ensure that consortia partners across the Union can identify a provision in the regulation, which will give sufficient confidence to allow the building of consortia with AC entities from the very start of the programme and that AC are treated as beneficiaries.</i></p>
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ARTICLE	AMENDMENT PROPOSAL(S)	RATIONALE / COMMENTS
Article 10 Implementation and forms of Union funding	<p>Use wording from recitals</p> <p>4. [...] or as simplified cost options in particular through lump sums as well as unit costs for personnel, in accordance with Regulation (EU, Euratom) 2024/2509. Funding may be provided in the form of actual eligible cost reimbursement only where the objectives of an action cannot be achieved otherwise. Where it is necessary to enable other sources of funding including co-investments with national resources subject to State aid rules, funding shall be provided in the form of actual eligible cost reimbursement or simplified cost options.</p>	<p><i>The Horizon proposal outlines lump sums as the default funding model. While this could contribute to simplification, especially for smaller or new beneficiaries, lump sum funding may not be appropriate in all cases.</i></p> <p><i>The potential disadvantages associated with lump sum funding could entail increased uncertainty/insecurity, the risks associated with the lack of compliance by partners, as well as the artificially high number of work programmes or the potential misuse of the personnel cost dashboard.</i></p> <p><i>The programme should provide different type of funding opportunities, flexibly responding to applicant needs. Especially in larger projects, reimbursement-based alternatives should remain an option.</i></p>
	<p>5. [...] the evaluation committee may shall be composed partially or fully, or, in duly justified cases, partially [...]</p>	

ARTICLE	AMENDMENT PROPOSAL(S)	RATIONALE / COMMENTS	
Article 11 European Partnerships	<p>2. European Partnerships shall be based on a Memorandum of Understanding, agreed and signed between the partners, stipulating:</p> <ul style="list-style-type: none"> (a) the results to be delivered, which shall be clear, measurable, time-bound; (b) reporting requirements; (c) the related commitments from all partners; (d) governance arrangements with a mechanism for partners to discuss and agree on the partnerships' programming and activities. 	<p>2. European Partnerships shall be based on a Memorandum of Understanding or contractual arrangements, agreed and signed between the partners, stipulating:</p> <ul style="list-style-type: none"> [...] (b) a single set of reporting requirements; <p>New</p> <p>(e) relevance to R&I</p>	<p><i>The instructions are rather vague, which could result in complexity in partnerships.</i></p> <p><i>MoUs may not serve as legally binding agreements. Alternative contractual/legally binding bases for partnerships are necessary.</i></p> <p><i>The role of the Commission in the MoUs must be clarified.</i></p>

<p>European Partnerships shall:</p> <p>[...]</p> <p>(d) be selected in a competitive manner based on a set of quantifiable lifecycle criteria and a strong portfolio approach, resulting in a coherent set of initiatives.</p> <p>(e) be based on ex ante, long-term and formal commitments from all partners to contribute financially to the resources of the European Partnership, which shall be centrally managed, except in duly justified cases.</p> <p>[...]</p>	<p>(d) be selected in a competitive, transparent manner based on [...]</p> <p>(e) [...] to contribute financially to the resources of the European Partnership, which shall be centrally managed, except in duly justified cases.</p> <p>New</p> <p>(g) not possess overlapping objectives and minimise overlaps.</p> <p>(h) strive for minimising resource use to achieve desired impact.</p> <p>(i) strive for maintaining synergies with other EU instruments.</p> <p>(j) maintain their primary focus on R&I.</p>	<p><i>It is important that all stakeholders are involved in partnerships from priority setting, through implementation. Central management should not be a limiting factor in this.</i></p>
<p>6. Contributions from Partners other than the Union shall take the following forms:</p> <p>(a) financial contributions to the operational budget of the initiative;</p> <p>(b) co-financing by the Partners of their own participation, or that of their members, in projects funded through the initiative.</p>	<p>(a) financial contributions to the operational budget of the initiative, including the preparation phase;</p> <p>(b) in-kind contributions through co-financing by the Partners of their own participation, or that of their members, in projects funded through the initiative.</p>	<p><i>Flexible & reliable financing is necessary from the preparatory phase, with clarity and transparency to be ensured.</i></p>

CHAPTER II. EXCELLENT SCIENCE

Article 12 European Research Council	AMENDMENT PROPOSAL(S)	RATIONALE / COMMENTS
<p>1. The European Research Council shall provide attractive and flexible funding to enable talented and creative individual researchers, with an emphasis on early- stage researchers, and their teams to pursue the most promising avenues at the frontier of science, regardless of their nationality and country of origin and on the basis of competition based solely on the criterion of excellence.</p>	<p>1. [...] individual researchers with an emphasis on early-stage researchers and their teams to pursue the most promising avenues at the frontier of science in a bottom-up, researcher driven manner, regardless of their nationality and country of origin and on the basis of competition based solely on the criterion of excellence. The ERC shall possess the necessary autonomy to carry out its objectives.</p>	<p><i>Proposed amendments to reinforce the autonomy of the ERC, as well as its expert-led nature</i></p> <p><i>While supporting early-career researchers is important, there are better avenues than the ERC for this.</i></p>
<p>2. The ERC shall attract the most talented researchers from all over the world and establish the Union as a world-leading centre for research and innovation.</p>	<p>2. The ERC shall attract and retain the most talented [...]</p>	

Article 13 Marie Skłodowska-Curie Actions	AMENDMENT PROPOSAL(S)	RATIONALE / COMMENTS
<p>1. The Marie Skłodowska-Curie Actions shall support the career at all stages, skills development, and mobility of researchers from all over the world subject to security considerations. MSCA shall foster research excellence, attract and retain excellent research talents, and support sustainable research careers in the Union with the aim to increase the Union's competitiveness in research and innovation.</p>	<p>1. [...] shall support the career research careers at all stages, skills development, and mobility of researchers from all over the world-subject to security considerations. MSCA shall be a bottom-up instrument that fosters research excellence [...]</p> <p>[...] the aim to increase the Union's research base and scientific excellence in a bottom-up manner, thus contributing to the EU's competitiveness in research and innovation.</p>	
<p>2. The MSCA shall fund excellent doctoral networks, post-doctoral fellowships, R&I staff exchanges, as well as support mechanisms to foster sustainable careers in view of attracting and retaining the most promising talents. A strong focus shall be put on international, inter-sectoral and inter-disciplinary cooperation as well as science outreach. The funding shall support cutting edge research and focus on developing research talent, with targeted support for early career researchers. It shall support to establish the Union as a leading destination for researchers.</p>	<p>2. [...] The funding shall be awarded on the basis of excellence. It should support cutting edge research [...]</p>	

CHAPTER III. COMPETITIVENESS AND SOCIETY

Article 15 Collaborative research	AMENDMENT PROPOSAL(S)	RATIONALE / COMMENTS
<p>1. Collaborative research shall support the creation of transnational research and innovation cooperation networks, bringing together entities of different disciplines, to support the development and swift diffusion of high-quality results in favour of the Union's industrial competitiveness, space, security, clean transition, preparedness and resilience, and addressing societal challenges, including culture and creativity, and to strengthen the impact of research in developing and supporting Union policies.</p>	<p>1. Collaborative research in all research stages shall support the creation of excellent, transnational, transdisciplinary research [...]</p>	<p><i>The division between the competitiveness- and society related components of Pillar 2 is unbalanced, and in certain cases, may be arbitrary.</i></p>
<p>3. This Programme shall include the collaborative research and innovation activities in a specific dedicated part of the work programmes adopted under Chapters IV to VII of the Regulation (EU) XXX European Competitiveness Fund. Those work programmes shall be adopted in accordance with Article 15 of the Regulation (EU) XXX [European Competitiveness Fund Regulation].</p>	<p>3. This Programme shall include the collaborative research and innovation activities in a specific dedicated part of the work programmes adopted of the policy windows under Chapters IV to VII of the Regulation (EU) XXX European Competitiveness Fund. Those collaborative research and innovation activities shall be included in dedicated work programmes addressing each of the policy windows, shall be adopted in accordance with Article 15 4 of the Regulation (EU) XXX [European Competitiveness Fund Regulation] the Specific Programme.</p>	<p><i>Horizon Europe's governance should be rooted in excellence and scholarly values, rather than being governed by a single rulebook - ECF priorities should not compromise this. The R&I parts of the work programmes for policy windows in Pillar 2 should be developed under Horizon Europe, with involvement from the R&I community. If the ECF would develop these work programmes without appropriate R&I input, the balance of TRLs, and their R&I focus could be at risk. This amendment proposal presents an approach to keep policy window WP development under the aegis of Horizon Europe.</i></p>

<p>4. The Programme shall support activities to tackle global societal challenges in the areas of strengthening democratic values and tackling disinformation, including rule of law and fundamental rights; promoting socio-economic transformations that contribute to inclusion and growth, addressing demographic and intergenerational challenges, including from a youth perspective and including migration management and integration of migrants.</p>	<p>4. [...] socio-economic transformations that contribute to inclusion and sustainable growth, addressing the triple planetary crisis, demographic and [...]</p> <p>Add</p> <p>The two components shall be developed in a coherent manner to ensure mutual reinforcement and seamless coverage of the research and innovation landscape for a strong and resilient Union.</p>	<p><i>The focus areas of 'global societal challenges' component should be expanded. This component should enable R&I into emergent topics in all disciplines, and themes that are not directly linked with policy priorities, potentially including collaborative bottom-up R&I.</i></p> <p><i>Social Sciences, Humanities and Arts (SHHA) perspectives should be also featured horizontally both components. In the 'competitiveness' component, they should support societal readiness for innovations. However, the horizontal embedding of SSHA should not substitute specific SSHA projects, especially those focused on humanities and arts.</i></p> <p><i>The role of arts is also somewhat neglected in the proposal, as there is a focus on SSH only. SSHA altogether covers human culture, behaviour and expression. Therefore, as a general comment, the usage of the acronym 'SSHA' would be preferable all across the document, in order to allow the programme to embody a holistic approach.</i></p>
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CHAPTER V. EUROPEAN RESEARCH AREA

Article 18 European Research Area and infrastructures	AMENDMENT PROPOSAL(S)	RATIONALE / COMMENTS
<p>1. The objective of the European Research Area ('ERA') is to create a single, borderless market for research, innovation and technology across the Union, in which researchers, scientific knowledge and technology circulate freely.</p> <p>2. The Programme shall ensure the effective promotion and protection of values and principles of the ERA and the Pact for research and innovation, notably ethics and integrity in research and innovation, freedom of scientific research and gender equality and equal opportunities, and the promotion of attractive research careers and mobility. The funding of the Research and Technology Infrastructures shall contribute to equip the Union with a strong and coherent ecosystem of world-class sustainable facilities and services, building on prioritised pan-European infrastructures and complementary state-of-the-art national capacities and using funding instruments, including European partnerships. The Programme shall contribute up to 20% of the building costs of critical new world-class capacities of European research and technology infrastructures.</p>	<p>1. [...] is to create a single, integrated, borderless market for research [...]</p> <p>2. [...] The funding of the Research and Technology Infrastructures shall be based on the criteria of excellence. It shall contribute to equip the Union-European Research Area with a strong and coherent ecosystem [...]</p> <p>[...] The Programme shall may contribute up to 20% of the building costs of critical new world-class capacities of European research and technology infrastructures.</p>	<p><i>A clear, EU level strategy for funding construction costs of RTIs should be developed. This should include a clear overall budget, selection process, and rationale for funding construction costs in FP10 as opposed to other suitable programmes.</i></p> <p><i>RTIs should develop stronger connections with broader R&I priorities, as well as improve the attractiveness of research careers. Long-term sustainability strategies and a life-cycle funding approach is needed, as well as improved access for researchers in support of mobility (trans-national access) and equality (inclusive access processes).</i></p> <p><i>Placing RTIs in the novel 4th pillar, alongside widening measures and ERA coordination can contribute to horizontal R&I integration. However, this should not compromise excellence in RTIs, which should remain a key criterion, despite their relocation from Pillar 1.</i></p>

Article 19 Widening	AMENDMENT PROPOSAL(S)	RATIONALE / COMMENTS
<p>2. 'Transition countries' are Cyprus, Estonia, Greece, Malta, Portugal and Slovenia, for the purposes of funding the actions under paragraph 5, point b).</p>		<p><i>The categorisation should include a dynamic factor so that widening countries can qualify for it if their performance on the Innovation Scoreboard improves during the timespan of FP10.</i></p>

<p>5. 'Widening' includes the following:</p> <p>(b) measures supporting networking, knowledge valorisation, countering brain drain and dedicated National Contact Points (NCP) support.</p>	<p>(b) measures supporting research careers, networking, knowledge valorisation, countering brain drain and dedicated National Contact Points (NCP) support.</p>	
<p>6. The Programme shall assist widening and transition countries to increase their participation and to promote a broad geographical coverage in excellent collaborative projects. Those efforts shall be mirrored by proportional measures by Member States.</p>		<p><i>Widening should be linked with capacity building, while ultimately focusing on achieving an even playing field for a holistic, and fully integrated European R&I ecosystem.</i></p> <p><i>The progression from 'widening' category to 'transitioning' category should rely primarily on incentives, rather than penalties. The achievement of R&I policy objectives that leads to category shift should be therefore incentivised in some way.</i></p>
<p>7. From 2030 onwards access to capacity building measures is restricted to those widening countries that have increased their real expenditure of public investment in research and development in the latest known year compared to the year prior to it.</p>		<p><i>Horizon should incentivise increasing national R&D funding with transition specific benefits, rather than sanctions, with regard to participation in the widening programmes.</i></p>

Title II. Rules for participation and dissemination

CHAPTER I. GENERAL PROVISIONS

Article 20 ECF rules	AMENDMENT PROPOSAL(S)	RATIONALE / COMMENTS
<p>1. Article 10(2), 10(3) on EU Preference, Article 13 on Application of the rules on classified information and sensitive information and Article 20 on Accelerated and Targeted Action for Competitiveness of Regulation (EU) XXX [European Competitiveness Fund] shall apply for the purpose of this Regulation, unless otherwise specified.</p>	<p>1. Article 10(2), 10(3) on EU Preference, Article 13 on Application of the rules on classified information and sensitive information and Article 20 on Accelerated and Targeted Action for Competitiveness of Regulation (EU) XXX [European Competitiveness Fund] shall apply for the purpose of this Regulation, unless otherwise specified.</p>	<p><i>The direct references to the ECF regulation create a dependence that is detrimental to Horizon Europe's autonomy.</i></p> <p><i>This amendment limits the influence of the ECF in HEU, which is in line with supporting a self-standing programme, therefore is supported by Science Europe.</i></p>

Article 21 Eligibility	AMENDMENT PROPOSAL(S)	RATIONALE / COMMENTS
<p>1. Eligibility criteria shall be set to support achievement of the general and specific objectives laid down in Article 3, in accordance with Regulation (EU, Euratom) 2024/2509 and apply to all award procedures under the Programme.</p>		<p><i>In addition to the general objectives, the criteria should also reflect horizontal principles – including environmental sustainability and inclusivity. The latter would also give ground for enabling Gender Equality Plans in context of eligibility. Furthermore, a reference could be made to the operational objectives in art 2 the implementing decision, in which an amendment on EDI was made as well.</i></p>
<p>3. Except when the work programme otherwise provides, to be eligible for participation in grant actions legal entities shall form a consortium that includes as beneficiaries three legal entities independent of each other and each established in different countries as follows:</p> <p>(a) at least two legal entities established in different Member States; and</p> <p>(b) at least one other legal entity established in another Member State or an associated country.</p>	<p>(a) at least two <ins>one</ins> legal entity established in different Member States; and</p> <p>(b) at least one <ins>two</ins> other legal entities established in another Member State or an associated country.</p>	<p><i>The proposed elevation of the threshold for associated countries when forming consortia in grant actions under Horizon Europe is regrettable. In the current programme, two legal entities established in associated countries may collaborate with a single entity established in an EU Member State. Under the new proposal, however, at least two partner entities from EU Member States would be required. This change would contradict the principle of equal rights and obligations for participants from MS and AC.</i></p>

<p>11. In addition to the grounds set out in Article 132 of Regulation (EU, Euratom) 2024/2509, award procedures and resulting legal commitments shall allow for termination where the objectives of the action are unlikely to be achieved at all or within the set timelines, or the action has lost its policy relevance.</p>	<p>11. [...] are unlikely to be achieved at all or within the set timelines, or the action has lost its policy relevance where incorrect performance of the action is detected and verified, or the action's cessation is duly justified by scientific or technological reasons. A procedure with the action coordinator and with independent external experts shall be carried out before deciding to terminate an action.</p>	<p><i>"Lost its policy relevance" is very vague and can lead to undesirable precedents. The proposed amendment elaborates on the conditions of termination, which should be duly justified.</i></p>
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Article 22 Ethics and research integrity	AMENDMENT PROPOSAL(S)	RATIONALE / COMMENTS
<p>2. For award procedures identified in the work programme, legal entities participating in an action shall fulfil all the following requirements:</p>	<p>Add</p> <p>(f) ensure the responsible use of generative artificial intelligence (AI) in research activities, in line with applicable Union legislation and ethical standards, by upholding principles of integrity, transparency, accountability, human oversight, data protection, fairness and environmental responsibility. Action participants shall reflect these measures in their ethics self-assessment and ensure ongoing monitoring of compliance throughout the duration of the action.</p>	<p><i>It is important to ensure the ethical use of AI. This paragraph could also reference to a common document/set of standards on guidelines, endorsed by key stakeholders, such as the ERA Forum Stakeholders Document 'Living Guidelines on the Responsible Use of Generative AI in Research'.</i></p>

CHAPTER II. GRANTS

ARTICLE	AMENDMENT PROPOSAL(S)	RATIONALE / COMMENTS
Article 23 Calls for proposals	<p>2. The work programme shall specify calls for proposals for which Competitiveness Seals may be awarded. Information concerning the application and the evaluation may be shared with interested financing authorities, subject to the conclusion of confidentiality agreements unless explicitly objected by the applicant.</p>	<p>2. The work programme shall specify calls for proposals for which Seals of Excellence or Competitiveness Seals may be awarded. Seals of Excellence should be awarded on the basis of scientific excellence. Information concerning [...]</p> <p><i>The concept of the competitiveness seal is welcome, but it may not be fit for purpose for all R&I products, and it does not sufficiently substitute the current 'Seal of Excellence'.</i></p> <p><i>In line with this, the restoration of the Seal of Excellence is recommended, which then could work in complementarity with the competitiveness seal.</i></p> <p><i>The two seals should be defined in a clear and distinct way, to ensure that no complexities arise with regards to their applicability.</i></p>
Article 32 Valorisation and dissemination	<p>(c) undertake best efforts to valorise their results, either directly or indirectly, including through transfer or licensing; if results are not valorised within a given period, the Commission may identify instruments and tools, such as those serving the valorisation strategy set out in Chapter III of Regulation (EU) XXX [European Competitiveness Fund], that the beneficiaries concerned shall use to facilitate the valorisation of those results;</p> <p>(e) adhere to open science practices, including by:</p> <p>[...]</p> <p>(ii) managing responsibly the research data in the action and other results in line with the principles 'findability', 'accessibility', 'interoperability' and 'reusability' (the FAIR principles) as well as ensuring open access thereto unless doing so would be against legitimate interests, including commercial interests, or other constraints.</p>	<p>AMENDMENT PROPOSAL(S)</p> <p>(ii) [...] as well as ensuring open access thereto unless doing so would be against applicable legislation and legitimate interests, including commercial interests, or other constraints.</p> <p><i>EU-level support in the process of valorisation should be provided.</i></p>

PROPOSAL FOR AMENDMENTS TO THE COUNCIL DECISION

on establishing the Specific Programme implementing Horizon Europe - the Framework Programme for Research and Innovation for the period 2028-2034, laying down the rules for participation and dissemination under that Programme, and repealing Decision (EU) 2021/764

Chapter I. General Provisions

Article 2 Operational objectives	AMENDMENT PROPOSAL(S)	RATIONALE / COMMENTS
<p>1. The Specific Programme shall contribute to the general and specific objectives set out in Article 3 of Regulation XXX [reference to the Horizon Europe Regulation]</p> <p>2. The Specific Programme has the following operational objectives:</p> <ul style="list-style-type: none"> (a) foster the production of high-quality scientific research and world-leading research institutions; (b) support the mobility and training and career development of researchers; (c) attract and retain excellent researchers in Europe; (d) foster collaboration and multidisciplinarity, including with Social Sciences and Humanities (SSH) to generate new knowledge; (e) enhance knowledge valorisation; (f) connect and develop research and technology infrastructures across the European Research Area (ERA) to provide transnational access; (g) support the creation and scale-up of deep tech and innovative start-ups; (h) foster technology uptake and demonstration of disruptive innovation; (i) increasing the participation of research organisation from the widening countries and transition countries referred to in Article 19 of Regulation XXX [reference to the Horizon Europe Regulation]; (j) foster open science and ensure visibility to the public and open access to results where possible. 	<p>(a) foster the production of all stages of high-quality excellent fundamental and applied scientific research and world-leading research institutions in a sustainable manner;</p> <p>(c) attract and retain excellent researchers talent in Europe, by providing favourable conditions for research, innovation, and collaboration;</p> <p>(e) enhance knowledge valorisation, ensuring the effective translation of research results into economic, social, cultural, and policy impact;</p> <p>(g) support innovation, by the creation and scale-up of deep tech and innovative start-ups; as well as social innovation;</p> <p>(i) increase the excellence-based participation of research organisations from the widening countries and transition countries [...];</p> <p>New</p> <p>(k) address European and global societal challenges;</p> <p>(l) Promote equality, diversity, and inclusion in all aspects of R&I;</p> <p>(m) Reinforce international academic collaboration</p>	

<p>3. The Specific Programme shall also address collaborative research activities under the policy windows of the European Competitiveness Fund.</p>		<p><i>While the importance of linking R&I and competitiveness is acknowledged, the links between the legislative bases must be balanced, and Horizon Europe must remain autonomous, and not subjugated to the ECF.</i></p> <p><i>See also the key Science Europe recommendations on linking the Horizon Europe and the Competitiveness Fund.</i></p>
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Article 3 Budget	AMENDMENT PROPOSAL(S)	RATIONALE / COMMENTS
<p>1. In accordance with Article 6(1) of Regulation XXX [reference to the Horizon Europe Regulation], the indicative financial envelope for the implementation of the Specific Programme for the period 2028 to 2034 is set at EUR 175 002 000 000 in current prices.</p>	<p>1. [...] is set at EUR 175 002 000 000 <ins>200 000 000 000</ins> in current prices.</p>	

Article 4 Work Programmes	AMENDMENT PROPOSAL(S)	RATIONALE / COMMENTS
<p>2. The Commission shall adopt separate work programmes, by means of implementing acts, for the implementation of actions under the following components, as set out in Article 1(3):</p> <p>(a) the European Research Council (ERC), for which the draft work programme shall be established by the ERC Scientific Council under Article 7(9)(a)(ii), in accordance with Article 18(3). The Commission shall depart from the draft work programme established by the ERC Scientific Council only in accordance with Article 7(4), second subparagraph; in that case, the Commission shall adopt the work programme by means of an implementing act in accordance with Article 18(4); the Commission shall duly motivate that;</p> <p>[...]</p> <p>(c) Marie Skłodowska-Curie Actions (MSCA), global societal challenges, EU Missions, New European Bauhaus Facility, innovation ecosystems, reforming and enhancing the European R&I system, research and technology infrastructures, widening participation and spreading excellence, in accordance with Article 18(4);</p>	<p>(a) the European Research Council (ERC), for which the draft work programme shall [...]</p> <p>(c) Marie Skłodowska-Curie Actions (MSCA), global societal challenges, EU Missions, New European Bauhaus Facility, innovation ecosystems, reforming and enhancing the European R&I system, research and technology infrastructures, widening participation and spreading excellence, in accordance with Article 18(4);</p> <p>New</p> <p>(e) the Society component of the 'Competitiveness and Society' Pillar in accordance with Article 18(4);</p> <p>(f) Collaborative research and innovation activities of the policy windows described in Chapters IV to</p>	<p><i>The work programmes for policy windows in Pillar 2 should be developed under Horizon Europe, with involvement from the R&I community. If the ECF would develop these work programmes without appropriate R&I input, the balance of TRLs, and their R&I focus could be at risk. The purpose of the advisory group referred to in the amendment is to ensure this, is expanded upon in art. 11.</i></p> <p><i>While MSCA, global societal challenges, EU Missions, NEB Facility, innovation ecosystems, and further instruments are grouped within subparagraph (c), it is essential that all these instruments, (especially MSCA) possess individual work programmes.</i></p>

VII of the European Competitiveness Fund. The work programme shall be prepared with the advice of the Strategic Stakeholders Board for Pillar II, composed of experts from universities, research performing organisations, industry and other stakeholders. The Commission shall adopt the work programme by means of an implementing act;

- (g) the European Innovation Council (EIC), for which the work programme shall be prepared following the advice of the EIC Board under Article 12(1)(b), in accordance with Article 18(4);**
- (h) Innovation ecosystems in accordance with Article 18(4);**
- (i) European Research Area and widening participation and spreading excellence, in accordance with Article 18(4);**
- (j) research and technology infrastructures, in accordance with Article 18(4).**

Article 5 European Partnerships	AMENDMENT PROPOSAL(S)	RATIONALE / COMMENTS
<p>1. European Partnerships shall follow a clear lifecycle approach, including their selection, implementation and monitoring, and transitioning out of Regulation XXX [reference to the Horizon Europe Regulation] on the basis of the following:</p>		
<p>(a) European Partnerships shall be selected following a competitive, open, non-discriminatory, and transparent procedure, on the basis of areas proposed by the Commission. In addition the requirements set out in Article 11 of Regulation (EU) Regulation XXX [reference to the Horizon Europe Regulation], candidate partnerships shall comply with the following selection criteria:</p>	<p>(a) European Partnerships shall be selected following a competitive, open, non-discriminatory, and transparent procedure, on the basis of areas proposed by the Commission, after thorough consultation with member states, associated countries and other stakeholders. In addition [...]</p> <p>New</p> <p>xv Portfolio shall have clear R&I orientation and relevance</p> <p>xvi synergises with other elements of the programme</p> <p>xvii all stakeholders, including member states and associated countries should be consulted in the process of proposing new partnerships, starting from the early stages</p>	<p><i>Only the Commission is mentioned as a stakeholder proposing areas for partnerships. Featuring other stakeholders defining these target areas is essential. Partnerships should not be solely and explicitly linked to the Commission's policy priorities and/or the policy windows – as this would heavily restrict them and limit their potential.</i></p>
<p>iii. partners' composition: unless duly justified, the participation of public entities from at least five Member States and private entities representing substantial segments of their respective ecosystems is required, ensuring a broad and balanced involvement of key stakeholders;</p>	<p>iii. [...] from at least five Member States or associated third countries, with a minimum of three Member States, and private entities representing [...]</p>	<p><i>The original text reduces the opportunity for AC participation, & risks making the programme less attractive to ACs. Consortia composition rules should not signal an increase in barriers to entry for ACs.</i></p>
<p>v. mission-orientation: partnerships shall formulate clear, measurable, time-bound objectives within the duration of Horizon Europe that will inform monitoring, assessment, and evaluation exercises;</p>	<p>v. [...] partnerships shall formulate clear, measurable, time-bound objectives, not significantly overlapping with other partnerships and elements of the programme within the duration of Horizon Europe [...]</p>	<p><i>It is not yet known what kinds of needs will arise during the programme period. Funding certain important / critical even overlapping themes might be necessary during the programme period, therefore the addition of 'significantly'.</i></p>

Chapter II. Excellent Science

ARTICLE 6 European Research Council	AMENDMENT PROPOSAL(S)	RATIONALE / COMMENTS
4. The ERC President shall be appointed by the Commission following a transparent recruitment process involving an independent dedicated search committee. The recruitment process and the candidate selected shall have the approval of the ERC Scientific Council. The term of office of the ERC President shall be limited to two years, extendable once for up to two years.	4. [...] The term of office of the ERC President shall be limited to two four years, extendable once for up to two four years. The ERC President shall reside in Brussels for the duration of the appointment and devote in principle at least 80% of their working time to ERC business. The ERC President shall be remunerated at a level commensurate with the Commission's top management and shall be provided by the ERC dedicated implementation structure with the necessary support to carry out their functions.	A number of stakeholders support reinstating criteria from FP9, that prescribes obligations to the ERC president and vice-presidents, to ensure that enough resources are devoted to directing an independent ERC. <i>The proposed amendments in this and the following paragraph reinstates the text from the FP9 legislation.</i>
6. The President shall be assisted by three Vice-Presidents chosen by the Scientific Council from among its members.	6. [...] from among its members. Support shall be provided to the three Vice-Presidents to ensure adequate local administrative assistance at their home institutes.	
7. The ERC shall operate according to its core principles which are scientific excellence, open science, autonomy, efficiency, effectiveness, transparency, accountability and research integrity, while respecting the corporate policies of the European Commission. It shall ensure continuity with ERC actions conducted under Council Decision (EU) 2021/764.	7. [...] while respecting the corporate policies of the European Commission [...]	"Corporate policies" is a vague wording. The uncertainty resulting from this phrasing may be detrimental to the autonomy of the ERC.
8. Through its activities, the ERC shall support, in a bottom-up manner, frontier research carried out across all fields by principal investigators and their teams in competition at European level, including early-stage career researchers.	8. Through its simple, transparent activities, developed autonomously, for the needs of frontier research , the ERC shall support, in a bottom-up researcher-driven manner [...]	

Article 7 ERC Scientific Council	AMENDMENT PROPOSAL(S)	RATIONALE / COMMENTS
<p>2. The term of office for members of the ERC Scientific Council shall be up to four years, extendable once by up to two years, based on a rotating system which shall ensure the continuity of the work of the ERC Scientific Council.</p>	<p>2. [...] extendable once by up to two <ins>four</ins> years, [...]</p>	
<p>4. The ERC Scientific Council shall exercise its tasks solely and exclusively within the scope and for the purposes of the Specific Programme. In that context, it shall establish:</p> <p>[...]</p> <p>(b) the draft work programme for the implementation of the ERC activities;</p> <p>[...]</p> <p>(d) its position on any matter which from a scientific perspective may enhance the achievements and impact of the ERC and the quality of the research carried out;</p>	<p>4. The ERC Scientific Council shall exercise its tasks <ins>autonomously, and</ins> solely and exclusively [...]</p> <p>(b) the draft work programme for the implementation of the ERC activities;</p> <p>(d) [...] the quality of the research carried out, <ins>and the implementation of ERC actions, including model documents, guidelines, IT systems, manuals, and instructions;</ins></p>	<p><i>Specifying the elements of the support system for the ERC further reinforces its independence.</i></p>
<p>The Commission shall depart from the positions established by the ERC Scientific Council in accordance with the first subparagraph only if it considers that this Decision has not been respected. In that case, the Commission shall adopt measures to maintain continuity in the implementation of the Specific Programme and the achievements of its objectives, setting out and duly motivating the points of departure from the ERC Scientific Council positions.</p> <p>6. The ERC Scientific Council and the Commission shall meet at least twice a year to have a broad and timely exchange of views in the context of the development of the ERC's strategy and the Commission's policy making.</p>	<p>6. The ERC Scientific Council and the Commission shall meet at least twice a year to have a broad and timely exchange of views in the context of the development of the ERC's strategy and the Commission's policy making.</p>	<p><i>Overall, very vague – what measures can be adopted and what the procedure for this intervention is, are not specified or referenced. This could heavily interfere with the independence of the ERC.</i></p>

Article 8 ERC dedicated implementation structure	AMENDMENT PROPOSAL(S)	RATIONALE / COMMENTS
<p>1. The ERC dedicated implementation structure shall be responsible for the administrative implementation and execution of this component of the Specific Programme. It shall, in particular, implement the evaluation procedures, peer review and selection process in accordance with the strategy established by the ERC Scientific Council and shall ensure the financial and scientific management of the grants.</p> <p>[...]</p> <p>To ensure an effective liaison with the ERC dedicated implementation structure on strategy and operational matters, the leadership of the ERC Scientific Council and the Director of the ERC dedicated implementation structure shall hold regular coordination meetings.</p>	<p>Add paragraph</p> <p>The management of the ERC will be carried out by staff recruited for that purpose including, where necessary, officials from the Union institutions, and will cover only the real administrative needs in order to assure the stability and continuity necessary for an effective administration.</p>	<p>Amendment on ERC possessing dedicated staff to ensure continuity, provide resources to address administrative necessities</p>
<p>(a) ensure the continuity and renewal of the ERC Scientific Council and provide support for a standing Identification Committee for the identification of future ERC Scientific Council members</p> <p>(b) ensure the continuity of the ERC dedicated implementation structure and the delegation of tasks and responsibilities to it, taking into account the views of the ERC Scientific Council;</p> <p>[...]</p> <p>(d) appoint the Director and the members of the management of the ERC dedicated implementation structure, taking into account the views of the ERC Scientific Council;</p> <p>(e) [...] taking into account the views of the ERC Scientific Council and the Commission's corporate policies implemented through the Specific Programme</p>	<p>(a) ensure the autonomy, continuity and renewal [...]</p> <p>(b) [...] delegation of tasks and responsibilities to it, taking into account the views following the guidance of the ERC Scientific Council;</p> <p>(d) appoint the Director and the members of the management of the ERC dedicated implementation structure, taking into account the views, ensuring transparency and following the guidance of the ERC Scientific Council;</p> <p>(e) taking into account the views of the ERC Scientific Council and the Commission's corporate policies implemented through the Specific Programme.</p> <p>Add</p> <p>(f) regularly and in a timely manner inform and consult the ERC Programme Committee on the implementation of the ERC activities;</p>	<p>a) The ERCEA should only respond to the ERC Scientific Council.</p>

Article 9 Marie Skłodowska-Curie Actions	AMENDMENT PROPOSAL(S)	RATIONALE/COMMENTS
<p>1. The Marie Skłodowska-Curie Actions (MSCA) shall focus on investigator-driven research founded exclusively on scientific excellence to support researchers' career, skills development, and mobility at all career stages.</p>	<p>1. The Marie Skłodowska-Curie Actions (MSCA) shall focus on bottom-up investigator-driven research founded exclusively on scientific excellence to support researchers' careers, skills development, and mobility, with particular emphasis on early-career researchers, while remaining open to researchers at all career stages</p>	
<p>2. The MSCA shall be open to any scientific domain under the Treaty on the Functioning of the European Union and the Treaty establishing the European Atomic Energy Community. If specific needs arise, the MSCA may target certain activities in specific thematic priorities, types of research and innovation institutions, or geographical locations to respond to the evolving requirements and needs of the Union regarding skills, research training, career development and knowledge sharing, in pursuit of the Union strategic autonomy.</p>	<p>2. [...] If specific needs arise and additional funding becomes available, the MSCA may target certain activities [...]</p>	<p><i>Directionality should not be introduced to MSCA, as its researcher-led, bottom-up approach is the foundation of the success of the instrument.</i></p> <p><i>In case the introduction of directionality into MSCA is unavoidable, measures should be taken to ensure that MSCA activities with directionality are not detrimental to the fundamentals of the MSCA, and they should not be funded by the already limited budget of the instrument.</i></p>
<p>The implementation of the MSCA shall:</p> <ul style="list-style-type: none"> (a) offer attractive conditions and opportunities for career progression, helping to address systemic issues of career instability and precarity in the research sector. The MSCA shall actively support the principles set out in the European Charter for Researchers promoting fair recruitment, transparent procedures, and merit-based advancement¹; (b) ensure strategic synergies with the European Research Council (ERC) but also with Union instruments that foster innovation, such as the European Innovation Council (EIC) and the activities to foster the integration of the knowledge triangle – higher education, research and innovation, and business – across the Union as well as other Union programmes such as Erasmus+; (c) promote work-life balance, diversity, and inclusion, setting high standards for working conditions across the European Research Area. 	<p>(b) [...] as well as other Union programmes such as Erasmus+, while maintaining the instrument's autonomy and bottom-up nature;</p> <p>Add</p> <p>(d) support researcher mobility and careers.</p>	

Chapter III. Competitiveness and Society

Article 11 Collaborative research	AMENDMENT PROPOSAL(S)	RATIONALE / COMMENTS
Collaborative research activities referred to in Chapter I of Regulation XXX [reference to the <i>Horizon Europe Regulation</i>] shall cover, in particular, the following research and innovation activities:	<p>New article</p> <p>A Strategic Advisory Group for Pillar II is established. It shall provide advice on the overall direction for Pillar II of Horizon Europe, advice on long-term R&I trends in the areas covered by the Pillar, and where necessary, ensure coherence and complementarity with relevant Union initiatives and instruments, including the European Competitiveness Fund.</p> <p>(a) The Strategic Advisory Group is composed of members with recognised experience and expertise in research and innovation, including experts from universities, research performing organisations, and public and private R&I stakeholders.</p> <p>(b) The members of the Strategic Advisory Group shall be appointed by the Commission, following an open call for nominations / expressions of interest, taking into account the need for a balanced representation in terms of sector, organisation type, size, expertise, gender, age, and geographical distribution.</p> <p>(c) Their term of office shall be limited to four years, extendable once for up to four years.</p>	<p><i>The work programmes for Pillar 2, including its policy windows must be developed with appropriate input from the R&I community, to maintain scientific focus, the balance of TRLs, and their relevance to R&I in addition to policy priorities.</i></p> <p><i>The purpose of the advisory group in the amendment is to enable the R&I community's involvement from the very beginning / conceptual level of the development of policy priorities for the WPs.</i></p> <p><i>It would ensure the even playing field between the legislative bases of Horizon Europe and the ECF, as well as provide the necessary checks and balances during the priority setting of the Commission. These are essential to ensure that while linked to the ECF, Horizon Europe remains sufficiently autonomous.</i></p> <p><i>It is important that the introduction of the advisory group does not reduce the involvement of member states via the programme committees. The respective roles of the advisory board and SPC should therefore be clearly defined and delimited.</i></p>

	<p>(d) The Commission shall establish detailed rules on selection and composition, remuneration, rules of procedure, conflicts of interest and confidentiality for the Strategic Advisory Group. Members shall be bound by these terms.</p> <p>(e) The Commission shall ensure that the advice provided by the Strategic Advisory Group is duly considered in the preparation and revision of work programmes of Horizon Europe.</p> <p>(f) The Strategic Advisory Group shall regularly engage with the ECF advisory boards to exchange views and ensure coordination of activities where appropriate.</p>	
<p>(a) under 'Competitiveness', research and innovation activities of the policy windows described in Chapters IV to VII of the European Competitiveness Fund:</p>		<p><i>The work programmes for the R&I components of policy windows in Pillar 2 should be developed under Horizon Europe, with involvement from the R&I community. If the ECF would develop these programmes without appropriate R&I input, the TRLs' balance and R&I focus could be at risk.</i></p>
<p>(b) under 'Society', research and innovation activities, such as:</p>	<p>(b) under 'Society', research and innovation activities, including trans- and interdisciplinary, research, such as:</p> <p>New</p> <p>Addressing emergent themes within and across all disciplines, that fall outside of the scope of pre-established policy priorities</p>	<p><i>The 'Global societal challenges' component is vaguely defined, as well as its relation to the continuation to missions. The areas covered by this component could be expanded upon in an annex, as in FP9. This component should also enable R&I into emergent topics in all disciplines, and themes that are not directly linked with policy priorities.</i></p> <p><i>These emergent topics may include, but are no means limited to:</i></p> <ul style="list-style-type: none"> • <i>Addressing environmental sustainability within the conduct of research.</i> • <i>Potential bottom-up collaboration.</i> • <i>Research focused on humanities and arts, as well as social sciences, in addition to their transversal application.</i> • <i>Novel, yet unforeseen technologies, societal, and/or policy challenges and R&I with relevant but not quantifiable impact.</i>

Chapter IV. Innovation

ARTICLE 12 The European Innovation Council Board	AMENDMENT PROPOSAL(S)	RATIONALE / COMMENTS
1. The European Innovation Council Board (EIC Board) shall advise the Commission on: [...] (d) the profile of EIC Programme Managers;		<i>As in the 'ARPA' type high-risk-high reward instrument, the role of programme managers will be of high importance, the selection criteria and process must be transparent.</i>
2. The EIC Board may upon request from the Commission address recommendations to the Commission on: [...] (c) programming in other parts of the Specific Programme.		<i>EIC board members intervening in other parts of the specific programme should be explained and justified</i>
5. The members of the EIC Board shall be appointed by the Commission, following an open call for nominations or for expressions of interest, and taking into account the need for balance in expertise, gender, age and geographical distribution.	5. [...] the need for balance in expertise, gender, age and geographical distribution. The selection process shall be carried out with complete transparency.	
8. The EIC Board President shall have the status of an independent special adviser and shall be appointed by the Commission following a transparent recruitment process. The term of office of the EIC Board President shall be limited to a maximum of two years, extendable once for up to 2 years.	8. [...] The term of office of the EIC Board President shall be limited to a maximum of two <ins>four</ins> years, extendable once for up to 2 <ins>four</ins> years.	

Chapter V. European Research Area

ARTICLE	AMENDMENT PROPOSAL(S)	RATIONALE / COMMENTS
Article 14 Reforming and enhancing the European R&I system	To support the realisation of the European Research Area (ERA), the Specific Programme shall assist Member States in achieving the objectives set out in the Pact for Research and Innovation in Europe ² , by supporting actions aligned with ERA objectives and priority areas for joint action, and by promoting upholding ERA values and principles, as established in the Pact.	To support the realisation of the European Research Area (ERA), the Specific Programme shall incentivise and assist Member States in achieving [...]
Article 15 Widening participation and spreading excellence	The Specific Programme shall support a truly integrated and cohesive R&I ecosystem in the Union, addressing especially the third and fourth priority areas of the Pact for R&I, amplifying access to research and innovation excellence across the Union and prioritising investments and reforms. Disparities between leading and less advanced countries in terms of R&I performance shall be tackled through activities building a solid science base and connecting actors and ecosystems, and that encourage structural policy reforms at national and regional level aimed at, such as, improving the attractiveness of research careers, internationalisation, effectiveness of management and governance of R&I institutions or matching activities with Union initiatives.	[...] amplifying access to research and innovation excellence and build capacity across the Union [...]
Article 16 Research infrastructures	1. The Specific Programme shall support the construction, development and integration of research infrastructures of European Union interest.	1. [...] of European Union interest with the primary purpose of fostering excellent research.

<p>2. Research infrastructures activities shall focus on:</p> <p>[...]</p> <p>(b) reinforcing transnational access to research infrastructures across domains and sectors, and adapting to new emerging user communities;</p>	<p>(b) [...] and adapting to new emerging user communities, including industry users;</p> <p>Add</p> <p>(f) complementarity between national/transnational RIs/TIs;</p> <p>(g) Improving access, including through novel access mechanisms (virtual, secondary, clustered), and access support measures – training, expert technical support, data services;</p> <p>(h) Operationalisation;</p> <p>(i) Excellence.</p>	<p><i>Linking RI/TIs and Research careers could be explored</i></p>
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Article 17 Technology infrastructures	AMENDMENT PROPOSAL(S)	RATIONALE/COMMENTS
		<p><i>Co-ordination between RIs and TIs is necessary, as well as to ensure that RIs and TIs are not competing for resources.</i></p>
<p>1. The Specific Programme shall improve technology infrastructure capacities in the Union and facilitate access to the integrated services of such infrastructures for innovative companies, including start-ups and scale-ups.</p>	<p>The Specific Programme shall improve technology infrastructure capacities in the Union European Research Area and facilitate access to [...]</p>	<p><i>Given the lack of definitive boundary between the categories of RI and TI we recommend this is aligned with the approach to Research Infrastructures. As it stands, the language implies that ACs may not be able to participate in activities related to TIs.</i></p>
<p>2. Activities shall focus on:</p>	<p>Add</p> <p>(e) Collaborative research and innovation activities of each of the ECF policy windows;</p> <p>(f) Improving access, including through novel access mechanisms (virtual, secondary, clustered), and access support measures – training, expert technical support, data services.</p>	



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