

Provide clarity on DNSH to boost contribution of science & technology

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The leading universities of Science and Technology (S&T) united in [CESAER](#) welcome the focus of the European Commission on supporting the [Green Transition](#), including the findings from the Technical Expert Group on sustainable finance ([TEG](#)) which published its [final report](#) introducing an 'EU Taxonomy' to advance 'the transition to a low-carbon, resilient and resource-efficient economy'. The 'Do No Significant Harm' (DNSH) principle was introduced in this taxonomy as one of the 'technical screening criteria' for economic activities. Chapter 15 of the [Programme Guide](#) describes its application in Horizon Europe.

Recalling the joint [call to action](#) for research and education communities to help tackle global challenges; the [joint report](#) reiterating commitments for linking green objectives with societal development; the [vital role of scientific knowledge](#) and [key technologies](#) for recovery and to build resilience in pursuit of ecological, economic and social sustainability; and the need to [boost disruptive innovation](#) as a lever to achieve a safe, secure and sustainable future; we reaffirm that contributing to sustainability is a responsibility of universities of S&T.

Current application of DNSH principle risks slowing down contribution of S&T to help tackle local and global challenges

The DNSH principle is often applied in the context of large, billion-euro financial investment projects, such as infrastructure projects, to facilitate the recovery from the Covid-19 pandemic. The principle is now also used in Horizon Europe, which typically funds activities on a smaller scale and with a more risky character. In Horizon Europe, the DNSH principle aims to (i) raise awareness of sustainability amongst researchers, and (ii) encourage, where relevant, identification and mitigation of potential environmental harms from the outset. In this sense, it could be seen as an approach for integrating ethical considerations already in the design of a project (i.e., 'ethics by design') for projects working on environmental aspects and funded under Horizon Europe. For funding areas such as large-scale infrastructure projects, there are clear expectations and methodologies for the identification and mitigation of environmental harms from the outset, and expected outcomes are described with a high degree of certainty. In contrast, in areas such as early-stage research into new and emerging S&T, there is a high degree of uncertainty in potential outcomes and impacts. This is by design: the 'high-risk high-gain' approach is foundational for pursuing ground-breaking research and disruptive innovation. A solid foundation provided by clear and certain funding and framework conditions enhances the ability of researchers to pursue the most ground-breaking and disruptive ideas.

The way the DNSH principle is currently being rolled out in Horizon Europe is inadvertently making the foundation less solid and more shaky. For example, the approach taken has created new administrative burdens, it appears to be less voluntary than originally stated, and it is an evaluation criterion for parts of the European Innovation Council, while in Horizon Europe clusters 4, 5 and 6 it is an obligation to take the principle into account in the project proposal. This is exacerbated by a lack of clear guidance for applicants and reviewers, which

is causing confusion among researchers, innovators and research support staff. The need for compliance of a project with the DNSH principle is not sufficiently clearly delineated, related to the potential impact on the environmental objectives of (i) the methodology and (ii) the potential outcomes and applications of the project. Due to the introduction of these extra burdens, complexities and uncertainties, there is a risk that the DNSH principle is slowing down, instead of advancing, the contribution of S&T to help tackle local and global challenges.

Recommendations to ensure DNSH principle boosts contribution of S&T

We call upon the European Commission to:

- Harmonise approaches and reduce burden through an 'ethics by design approach' by strengthening the use of the ethical checklist in the design phase of projects thus integrating the essence of the DNSH principle;
- Apply the DNSH principle through this ethics by design approach as an obligation only where it is already applied (Horizon Europe clusters 4, 5 and 6 and parts of the European Innovation Council), using the ethics by design approach to assure that early-stage, ground-breaking research and disruptive innovation are not impeded;
- Improve the guidelines in order to (i) make it clearer when certain types of scientific research is covered by the principle, (ii) support researchers, innovators and research support staff in assessing when a certain methodology or (potential) outcome significantly impacts one or more of the environmental criteria, and (iii) better inform researchers and innovators on the related evaluation criteria;
- Improve the proposal evaluator and project reviewer briefings in order to clarify when the DNSH principle can or needs to be taken into account;
- Provide further and clearer training, including for scientific and ethical project reviewers, of how this should be addressed in the project design phase and therefore in the project proposal;
- Until the burdens, complexities and uncertainties are removed in relation to Horizon Europe, refrain from a broader roll-out and implementation of the DNSH principle in this context (e.g., through the Financial Regulation).

We offer our commitment and expertise to support all efforts towards the implementation of these recommendations.

For more information and enquiries please [contact](#) our Deputy Secretary General Mattias Björnmalm. This document is published under a [CC BY licence](#). Please reference this document using <https://doi.org/10.5281/zenodo.7224786>

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