

Addendum note

Topic:	Addendum to CESAER contribution to ' Public consultation on the past, present and future of the European Research & Innovation Framework programmes 2014-2027'
Date:	22 February 2023
To:	EU institutions, relevant partners and stakeholders
From:	CESAER

The leading universities of science and technology united within CESAER welcome the opportunity to provide input for the [public consultation](#) on the past, present and future of the European Research & Innovation framework programmes 2014-2027.

We have prepared and submitted a response to the online questionnaire, and with this technical input note we offer more detailed explanations and recommendations. We reiterate that we are ready to provide the support and expertise of our association and our Members to advance all these important issues related to the Horizon programmes. This note also complements and expands on our [First experiences with EU Funding Programmes from 2021 to 2027](#) of April 2022.

The areas below are structured according to the online questionnaire. Specifically, we include explanations behind any 'strongly disagree' answers provided in the online questionnaire, and provide recommendations for how to address these, while also providing our association's views on a range of other important programme-related issues.

While there are areas to improve, we highlight that the EU funding programmes remain highly valued by our community and we therefore welcome the public consultation as an opportunity to work together to make these programmes even more attractive.

EU Framework Programmes past, present and future - key issues directly covered in sections B and C

Our association has provided a response to both 'Section B. Performance of the past programme Horizon 2020 (input for the Horizon 2020 ex-post evaluation)' and 'Section C. Performance of Horizon Europe (input for the Horizon Europe interim evaluation)'. In some areas, the option 'not agree at all' or equivalent was selected to underline key areas of high priority to address. This section provides explanations and practical recommendations to improve current implementation and shape the future funding programme.

This concerns the following topics (following the order in the questionnaire):

- Integration of Social Science and Humanities (SSH) across Horizon Europe;
- Acceptance of usual accounting practices;
- Two-stage calls;
- Roll-out of lump sum funding;
- Co-creation process for the Horizon Europe Strategic Plan;
- First experiences with the Missions and Partnerships;
- Balance between top-down and bottom-up calls for proposals;
- Gender equality provisions;

- Clarity of the rules for participation and the cost calculation rules and support received.

Integration of Social Sciences and Humanities

As indicated in our previous [input note 'First experiences with EU Funding Programmes from 2021 to 2027'](#), we underline the importance of further strengthening approaches to support qualitative inter-, trans- and multidisciplinary in research and innovation. This is especially true when it comes to anchoring the contribution of social sciences and humanities research and innovation.

We recommend to:

- start indicating in the Horizon Europe work programmes when it is not an obligation to consider collaborating with SSH researchers (instead of using the 'SSH sentence'), inspired by the way of working for gender;
- increase the communication, interaction and cooperation with SSH communities, in order to achieve qualitative SSH integration from the drafting phase of orientation papers and work programmes;
- provide examples of pathways to impact relating to SSH, as current examples only focus on technological disciplines.

Align with usual accounting practices

We reiterate our [previous call](#) that simplification efforts should aim, above all, to improve the beneficiaries' experience in the programme, including by:

- ensuring effective implementation of the acceptance of usual cost accounting practices;
- enabling cross-reliance of audits.

Two-stage application process

In Horizon Europe, there is currently a good balance between single-stage and two-stage application processes. While two-stage applications are often presented as simplification, this is not always the case, since Research Support Offices (and similar structures) may have to provide double the amount of support during proposal preparation, while researchers often get to know each other less well during the first stage of two-stage calls. This may well have a negative impact in the project phase. As a result, it is important that this good balance is maintained.

We therefore recommend to:

- keep the balanced approach in using the two-stage application process;
- avoid combining within calls a two-stage application process with new features such as lump sum funding before the full evaluation has been finalised.

Lump-sum funding

As underlined in our previous joint statement [Caution needed on interim analysis of lump sum pilot](#), we reiterate the vital importance to await the final and thorough evaluation of the current pilot before the broader use of lump sum funding is rolled out further. Evidently, simplification efforts should aim to improve the beneficiaries' experience in the programme. To prepare the drafting of the final report of the Horizon 2020 lump sum pilot,

we recommend:

- that Financial Signatories as well as project coordinators and partners should be interviewed as part of the finalisation of the pilot.

Fundamentally, despite information sessions and guidance from the Commission, the concrete implications of the introduction of the lump sum funding model remains uncertain. This uncertainty is worsened by discrepancies between what is communicated, and the rules and provisions set out in legal texts such as the Model Grant Agreement, which is not yet fully adjusted to the lump sum funding model. These uncertainties are largely related to financial liability, reporting, and audits (including 'double funding').

This may lead to a more complex, time-consuming, and conservative approach in managing lump sum-funded projects, thereby having the opposite effect to the intended simplification that the lump sum funding model is supposed to introduce.

We call on the Commission:

- to ensure all communication and legal documents are aligned and clear, addressing the aforementioned uncertainties.

Acknowledging that many beneficiaries maintain complex cost reporting (including time sheets) for a range of reasons, clearer wording on the specific elements that require reporting through timesheets would be welcome. In particular, while some EU-funded projects do not request the reporting of timesheets, many beneficiaries still need to maintain these according to their usual practices and for reasons other legal and financial obligations, such as related to auditing and/or 'double funding' questions.

Concretely, we call on the Commission to:

- rephrase communication around 'no time sheeting needed' to instead specify that 'no time sheet reporting will be requested by the Commission', while emphasising that time sheets may still be needed depending on the institutional approach and the financial and legal context of the beneficiary;
- clearly state how beneficiaries are expected to prove (including for audits by the European Court of Auditors) that the 'non-double funding principle' is respected, without maintaining full financial and legal reporting aligned with usual cost accounting practices and financial management.

From the preliminary [Assessment of the Lump Sum Pilot 2018 - 2020: Analysis of qualitative and quantitative feedback](#), it was indicated that lump sums are typically used within smaller projects, seemingly due to financial liability reasons. Given the experiences gained from Horizon 2020, we would urge that the following issues be given due consideration by the Commission services and the executive agencies:

- with whom in the beneficiary organisation does the financial liability lie, when no financial checks are carried out;
- where does the administrative reduction of burden for researchers and Research Support Offices (and equivalent structures) lie with Horizon Europe lump sum projects, especially for those whose internal accounting practices still involve timesheets due to other legal and financial obligations;
- how lump sum funding enables easier access to the programme for newcomers and small and medium-sized enterprises, in light of the finding that, amongst others, the workload in the proposal phase increases;
- develop a 'system check' on the beneficiaries' institutional lump sum approach upfront.

As a main driver for the lump sum approach as communicated by the Commission is also to reduce the error rate, alternative solutions to lower the error rate should be explored, including:

- ensuring effective implementation of the acceptance of usual cost accounting practices;
- enabling cross-reliance on audits;
- strengthening the Commission support to National Contact Point structures, specifically with a view to lowering the error rate;
- the introduction of a step for SMEs or newcomers, or both, to add a letter when submitting a Horizon Europe proposal, demonstrating that it has received financial support in the proposal-writing phase and will benefit from National Contact Point financial support services during the project lifetime.

Looking at the [Horizon Europe Dashboard for lump sum evaluations](#), the median and the 80th percentile are far from the reality of key beneficiary communities, causing substantial issues with the roll out of lump sum as real costs are not covered.

We recommend to the Commission:

- that data use to calculate the ranges are limited to the last three years and checked against inflation;
- to add the possibility to see the costs by staff category;
- to add the source of the data in the Dashboard;
- to add the date of the most recent update of the Dashboard;
- to explain how figures in this Dashboard are created.

Co-creation process for the Horizon Europe Strategic Plan

We strongly support the co-creation process underlying the Horizon Europe Strategic Plan 2022-2024, and it is encouraging to see that a similar process will be undertaken for the 2025-2027 iteration. At the same time, though we do not contest the usefulness of working together with citizens and policymakers in drafting the Strategic Plan, we consider the current process as too politically-oriented.

While Horizon Europe should of course provide research and innovation solutions to those challenges identified as political priorities, we believe that Europe's citizens and researchers

would be better-served with a Strategic Plan that is focused primarily on research & innovation opportunities and needs - including the opportunities and needs identified by researchers. This should be reflected more prominently in the 2025-2027 Strategic Plan, not merely assuming an underlying role that is less central than high-level political packaging.

- We call upon the EU institutions to safeguard the role of researchers in the Strategic Planning process, assigning a thorough role to researchers in identifying future research topics, while the EU works together with citizens and policymakers.

EU Missions

We recall our [position](#) 'Boost synergies in research and innovation funding'; in which our association recommended to 'shape EU missions as synergy boosters', in leveraging the missions' ability to mobilise different funding sources with a small EU budget used to coordinate larger allocations from regional and national levels.

We therefore call upon the Commission to:

- refocus the missions squarely on research and innovation;
- identify simple and easily measurable mission goals;
- introduce an easier-to-understand governance structure.

On top of that, since we do not experience the impact of the missions yet due to their late start under Horizon Europe, we also call on the Commission to:

- refrain from increasing the current maximum of 10% of the annual budget of Pillar II for the missions in the remaining years of Horizon Europe.

New approach to Partnerships

While we appreciate the efforts towards simplification of the Horizon Europe partnerships landscape, we do not experience its impact yet due to their late start.

We call upon the Commission to:

- make sure the implementation of the new partnership approach starts to bring the promised simplification and opening, especially in terms of partnerships' accessibility to the research community in its variety of disciplines and their eventual impact;
- add to the Funding & Tenders Portal a single overview of all updated activity in the Horizon Europe partnerships, including institutionalised and co-funded partnerships;
- improve the user-friendliness of the Horizon Europe Dashboard interface, and continue developing both the Dashboard and the Funding & Tenders Portal with data on the Horizon Europe partnerships. This will allow beneficiaries to extract more complete statistics on total Horizon participation, including in projects funded via institutionalised and co-funded partnerships.

Balance between top-down and bottom-up calls for proposals

Together with the European University Association, we have published a [joint statement](#) expressing concern about the unbalanced share of funding for basic and applied research projects within the Horizon Europe clusters under the second pillar, in comparison to projects further along in their development and implementation phases. This impedes Europe's ability

to tackle pressing global challenges through effective research cooperation between universities and other types of organisations. Especially in deep-tech and emerging key technologies, success depends on our ability to link different types - and readiness levels - of science & technology across the full knowledge chain.

We therefore call on the Commission to:

- introduce Research Actions in the clusters under Pillar II;
- adopt a less prescriptive approach to lower TRL collaborative research projects, allowing researchers more scope to define their approach.

Gender equality provisions

We strongly welcome the strengthened approach to gender equality in Horizon Europe. We welcome the 'gender in research' approach as a good approach to enhance impact broadly, while we welcome Gender Equality Plans helping to create impact at institutional level.

The criterion on gender in the composition of consortia, implemented with the help of the 'researchers table' in project proposal forms, is not having the desired impact. To improve the current situation, we recommend:

- From the next calls onwards, change the 'gender *ex aequo* criterion' from 'gender in consortia' to 'gender in research' underlining the excellence of the project, in a way that it does not negatively impact proposals where gender is not relevant;
- Remove the 'researchers table' in project proposals right away;
- Remove the 'gender box' in the EIC Pathfinder in the work package table right away;
- Roll out a pilot to identify a new and improved way of working that has the desired impact on project proposals and project consortia as a whole (at consortium level).
- Inspired by the [Vision 2030 report](#), prepare for turning the current Gender Equality Plan into an *inclusive* Gender Equality Plan; this could be voluntary in the last years of Horizon Europe, before assessing whether it should be mandatory in the future.

Clarity of the rules for participation and cost calculation rules & support received from EC services during grant preparation and implementation

Due to the continuing lack of guidance documents, certain rules for participation including cost calculation rules are still not clear and, partly as a result of this, the support received by the Commission services during grant preparation and implementation is sub-optimal. It is urgent that a fully updated and adopted annotated Model Grant Agreement (aMGA) is published as soon as possible, in order to be able to start reporting.

We call on the Commission to:

- ensure that currently missing finalised and full guidance documents are made available as soon as possible, especially the aMGA and an indicative audit programme including one for lump sum projects;
- provide substantial flexibility on reporting requirements, given the continuing unavailability of a finalised aMGA;
- ensure that key reference and guidance documents (such as aMGA) are available at the start of the programming period.

EU Framework Programmes past, present and future - other key issues

This section covers additional key issues of particular importance for our association in engaging with the Framework Programme.

Do No Significant Harm principle

As indicated in our recent position paper '[Provide clarity on DNSH to boost contribution of science & technology](#)', we make the following recommendations on the application of this principle within Horizon Europe:

- Introduce an 'ethics by design approach' by strengthening the use of the ethical checklist in the design phase of projects;
- Use an 'ethics by design' approach as an obligation *only* where it is already applied (Horizon Europe clusters 4, 5 and 6; parts of the EIC), to ensure that early-stage, ground-breaking research and disruptive innovation are not impeded;
- Improve the guidelines in order to (i) clarify when certain types of scientific research are 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;
- 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 needs to be taken into account;
- Provide more substantial training, including for scientific and ethics project reviewers, on how this aspect should be addressed in the project design phase;
- Until these additional burdens, complexities and uncertainties are removed, refrain from a broader roll-out and implementation of the DNSH principle in this context (i.e. through the Financial Regulation).

Widening participation

From the feedback from the calls of the first Horizon Europe hop-on facility, this new funding possibility is still to prove its added value - at the current time, only a few such projects have started and the new instrument is still not widely known.

- We call on the Commission to continue efforts to support the NCP systems for all types of Horizon Europe projects, including the hop-on facility, more specifically in EU-13 countries.

Portfolio approach

We stress that it is key to develop an open transparent project portfolio approach, both for parts of the European Innovation Council and the Missions, and during these processes, to communicate in detail and in due time with the Programme Committees.

- We call on the Commission to, in alignment with the Horizon Europe legislation, develop and implement an open and transparent portfolio approach, in close coordination with the EIC Programme Managers and the Mission Managers.

Open entrepreneurship concept of innovation

We welcome the focus of the New European Innovation Agenda on the sustainable and resilient recovery and the green and digital transition and highlight the importance of [supporting the transformation into products of disruptive innovations](#) stemming from research projects in education and research.

We highlight that a key challenge in Europe is to transform research-based knowledge and results into commercial and non-commercial value creation, which should be done to a greater extent at European level by nurturing a pipeline of projects in key thematic priority areas which investors can readily understand (rather than creating new initiatives). This should be a key driver of the activities under pillar 3 of Horizon Europe.

Acknowledging the [vital role](#) of investigator-led, frontier research for disruptive innovation, we underline that [boosting synergies in research and innovation](#) is crucial in order to unlock the full potential of S&T, and welcome the [increasing collaboration](#) between the European Research Council (ERC) and the European Innovation Council (EIC). Further action at European level is needed, especially to support talented researchers and innovators.

We call on the Commission to:

- review the fundamental conditions for supporting innovations capacities, especially in Pillar III;
- encourage an open entrepreneurship approach where programmes, funds, companies and investors can understand and identify knowledge as an opportunity;
- We reiterate our [previous call](#) to establish an 'EIC Young Innovator' funding programme under the European Innovation Council to 'develop talents to advance innovation', mirroring the success of the Marie Skłodowska-Curie Actions in 'developing talents to advance research' and enhancing and facilitating transformation of excellent research into disruptive innovations.

EIC inventor access rights

We repeat that we welcome and reinforce our prior [joint statement](#) on access rights to new solutions generated via European Innovation Council funding.

- We call on the Commission to harmonise the IP provisions related to EIC in the model grant agreement for Horizon Europe to align with current best practice and by doing so to bring this in line with ERA Action 7 policy developments.

For more information and enquiries, please [contact](#) our Senior Advisor for Research, Edward Ricketts, and our Advisor for Innovation & Sustainability, Louise Drogoul.