

A tool to implement the ERA in the framework programme

Position dated 30 April 2025

CESAER, the strong and united voice of universities of science and technology in Europe, welcomes the strengthened implementation of the European Research Area (ERA) through Horizon Europe and the ERA policy agendas. We reaffirm our strong commitment to supporting the European Commission and member states in [advancing the ERA](#) for the benefit of European research, innovation, education, and society at large.

However, the complexity of the way in which ERA-related requirements in Horizon Europe proposals and projects are implemented risks diminishing the positive and structuring impact of ERA developments, while diverting researchers' efforts away from conducting excellent research. To address this challenge, we recommend to:

1. Leverage the role of universities in implementing the ERA;
2. Adopt a trust-based, simplified approach to ERA compliance;
3. Enhance the role of LEARs;
4. Deploy the European Excellence Initiative to support institutional ERA policies.

1. Leverage the role of universities in implementing the ERA

Universities are central actors in achieving ERA goals through policies on open data, open science, copyright, research assessment, research careers, knowledge valorisation, standardisation, citizen science, greening travel, gender equality, research integrity and more. Yet, ERA-related obligations are increasingly introduced in project proposal and project-specific contexts, creating fragmentation, inconsistencies, and inefficiencies.

While these policies strengthen research impact, their inconsistent integration in Horizon Europe (e.g., open science under “additional dissemination obligations”, the European charter for researchers under “specific rules for carrying out the action” and the gender equality plan having its own heading with a box to be ticked) creates confusion and unnecessary administrative burden.

- We call on the European Commission and member states to leverage the role of universities as implementers of ERA policies. This must translate into processes that support universities' capacities to address ERA priorities strategically at an institutional level, rather than requiring fragmented, project-by-project compliance.

2. Adopt a trust-based, simplified approach to ERA compliance

Currently, compliance checks for ERA-related policies often rely on project-level controls, despite institutions having comprehensive ERA-compliant policies in place. This leads to unnecessary repetition, undermines institutional autonomy, and increases the administrative workload for researchers, research managers, university policy advisors and the European Commission.

A shift to a trust-first, confirm-later approach is urgently needed. By verifying institutional commitments and compliance at an organisational level through declarations or uploaded

documents, the European Commission can reduce unnecessary checks while strengthening accountability.

- We call on the European Commission to adopt a simplified, trust-based compliance approach for ERA requirements, verifying institutional compliance centrally and reducing project-level controls. This approach will minimise administrative burdens for beneficiaries and improve efficiency for everyone.

3. Enhance the role of LEARs

Legal Entity Appointed Representatives ([LEARs](#)) currently manage institutional data, like the address and VAT number of the institution or the European Horizon Europe and Erasmus project proposals and projects with institutional involvement, via the Participant Identification Code (PIC) system. Expanding their role can simplify and alleviate researchers from additional ERA-related administrative tasks.

Additionally, a distinction should be made between non-project-specific ERA policies, which are an institutional responsibility, and project-specific ERA policies, which still require individual reporting at the project level. For example, for a project-specific ERA policy such as open science, the LEAR would input the necessary institutional open science policy into a centralised ERA policy page, while researchers would continue to report specific open science-related aspects for their respective projects, like preparing a data management plan. Conversely, if a university has an established green travel policy, which is considered non-project-specific, researchers should no longer need to confirm compliance with green travel practices in each individual project. To bring stability, which ERA-policies are to be considered as non-project-specific and which ones as project specific, should be decided in collaboration with stakeholder organisations before the start of the next Framework Programme, and for its full duration.

We urge the European Commission to:

- Establish a centralised ERA policy page within the European Commission's funding & tenders' portal, linked to the PIC system, enabling automatic integration of institutional policies into proposals and grant agreements, without granting the right to proposal writers to change this information.
- Allow LEARs to upload institutional ERA policy documents, enabling automatic integration into proposals and grant agreements without requiring researchers to provide the same information.
- Allow LEARs to designate multiple internal contact points per ERA policy area (e.g., research managers for open science project support questions, policy advisors for institutional open science policy support questions), on the ERA policy page, to improve internal support for researchers.
- To facilitate internal support on the ERA and enhance the visibility of ERA policies among researchers, create an institutional ERA policy page, accessible only to university staff, consolidating all institutional ERA policy information in a clear visual overview.
- Distinguish between project-specific and non-project-specific ERA policies to ensure compliance without unnecessary repetition. This distinction should be clearly reflected on the institutional ERA policy page.

- Ensure that ERA policy information can be updated by LEARs throughout the entire programme's lifetime, allowing for adaptability and continuity while preventing administrative bottlenecks at the start of a new framework programme.

4. Deploy the European Excellence Initiative to support institutional ERA policies

To ensure universities can develop, update, and implement high-quality institutional ERA policies, adequate and targeted funding is essential from EU, national and regional sources. At European level, the European Excellence Initiative under Horizon Europe's Widening Participation and Strengthening the European Research Area (WIDERA) programme provides a proven mechanism to support institutional capacity building and should be used to fund ERA policy developments.

Examples of successful initiatives:

- SwafS calls under H2020 funded university open science and research data management policies;
- OpenAIRE project supported a professional network for research data management and open science policy development.

Similarly, dedicated calls should focus on helping institutions develop, harmonise, implement ERA policies and good managerial practices, fostering collaboration across universities to prevent duplication of efforts. Complementary measures, such as training and support for institutional policy officers, will enable effective implementation.

By strengthening institutional ERA policies and fostering institutional support for research careers in tandem, the European Excellence Initiative can play a central role in driving systemic excellence and reinforcing Europe's leadership in research and innovation.

We urge the European Commission to:

- Provide dedicated funding through calls under the European Excellence Initiative to support the development and implementation of institutional ERA policies for universities across Europe, ensuring broad access beyond just those in less research-intensive regions.
- Raise awareness of these calls among LEARs in their enhanced role.
- Develop targeted training and support services for policy advisors to raise awareness of specific ERA Actions and clarify what is expected from universities.

Conclusion and offer to collaborate

CESAER advocates for a simplified, trust-based approach to ERA policy implementation, led at the institutional level and coordinated through enhanced LEAR roles. By leveraging the role of universities as institutional ERA policy implementers, empowering LEARs, and providing targeted funding, we can reduce administrative burdens, enable researchers to focus on their science, while strengthening policy support to maximise the impact of the ERA.

This proposal is fully aligned with CESAER's ongoing commitment to simplification, as outlined in our contributions to [FP10](#), and the recommendation for beneficiary-centered simplification in the [Align, Act, Accelerate report](#). The simplification proposed in this position will not only reduce transaction costs but also ensure the European Commission delivers a

beneficiary-friendly solution that supports researchers and professional staff and drives Europe's excellence in research and innovation.

We stand ready to collaborate with the European Commission and member states to help make a distinction between project specific and non-project specific ERA policies and pilot and implement the above-mentioned proposals, ensuring a more efficient and effective ERA for all stakeholders.

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

Please reference this document using <https://zenodo.org/records/15309793>

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