

## Unifi's detailed messages for FP10 preparation

The Council of Rectors of Finnish Universities, Unifi, published the key messages for the preparation of the 10th Framework Programme in autumn 2024. Since then, reports by Draghi, Letta, and Heitor have proposed various actions and objectives, thus Unifi has formulated refined messages to respond to these current proposals. The messages will be updated as necessary.

### Unifi's key messages

1. Increasing R&D investments is in the interest of both the EU and Finland.
2. Excellence in R&I and competitive calls should be a cross-cutting priority.
3. Prerequisites for scientific leadership and groundbreaking research should be strengthened.
4. Continuity of programme structures and more streamlined instruments must be promoted.
5. The program should enable international cooperation.
6. The same criteria of excellence should be applied to dual-use research.
7. Synergies between programmes that support research and innovation should be strengthened.

### Unifi's detailed messages

#### 1. General comments on the importance of the Framework Programme for Europe

- In the current geopolitical situation, we cannot rely on "like-minded" partners remaining so. European research values, such as freedom of research, equality, and non-discrimination, must be defended persistently and more strongly through the framework program.
- The framework program is a unique platform for multilateral international collaborations. It is a decisive competitive advantage for Europe that the framework program unites expertise and experts across national borders. This should be cherished.
- Innovations and new solutions arise from creativity. The framework program should remain broad in its themes and should increasingly be based on research collaboration that creates new knowledge at all TRL levels. A broad research and knowledge base is not only a competitive advantage for Europe but also a resilience factor.

#### 2. European Competitiveness Fund and the status of the future Framework Programme

- **The future framework program should remain an self-standing R&D funding program. Including the framework program in a broader competitiveness fund would jeopardize its significance as a enabler of basic research based on excellence.** If combined with the Competitiveness fund, the regulatory framework will, at worst, be the same for all calls and cannot be excellence-based. Therefore, FP10 should be independent or at least have its own independent regulatory framework within the Competitiveness Fund.

- While harmonizing the rules of different funds is generally supported, merging programs is not. Unifi believes that instead of attempting to merge programs supporting the EU's strategic competitiveness into one large entity, it is essential for competitiveness that these programs are made more R&D-focused and the quality criteria for program funding are strengthened and unified.
- The framework program is a unique platform for many key international collaborations. It is a crucial competitive advantage for Europe that the framework program unites expertise and experts across national borders. This should be cherished. The framework program has broad participation and associated agreements with countries outside Europe, which is vital for research and innovation activities but not necessarily desirable in other programs proposed for the competitiveness fund.
- **Setting the FP10 R&D agenda should not be policy-driven but should be based on open competition and high quality.** Researchers and innovators should be at the center of the framework program's implementation. Trust in science, researchers' expertise, and the possibility of creating new things enable the emergence of bold and innovative ideas that Europe urgently needs. **Unifi particularly emphasizes the independence of the ERC – the ERC should not be tied to strategic initiatives and the EIC.**
- There should be a straightforward, clear, and sufficiently well-funded path to the market for low TRL projects. The competitiveness is suited to promoting high TRL projects for bringing ideas, products, and to the market.
- It is important to ensure that the future framework program funding is fully allocated to R&D activities and is protected from transfers to different program sections and new priorities. Funding for various competitiveness activities/programs should be earmarked to ensure predictability, long-term commitment, and to avoid transfers. EU funding for R&D activities should be in the form of grants.
- **Innovations and new solutions arise from creativity. The framework program should remain broad in its themes and should increasingly be based on research instruments that create new knowledge.** Unifi proposes a new instrument for research collaboration that creates new knowledge, "Research Action" (RA). This would increase the long-term impact of the framework program and strengthen Europe's ability to understand and prepare for future challenges. Companies have also expressed the need for collaboration projects to include research at TRL levels 1-4, which they can apply and commercialize.
- Security issues are important to consider in European research, but they should be placed in a parallel program to the framework program and should not consume the FP10 budget.

### 3. Collaborative projects (current Pillar II) and proposed new councils

1. The Importance of Framework Programme Collaborative Projects (Current Pillar II) for Universities
  - **Unifi emphasizes that Pillar II should be retained in the next framework program. Pillar II is a key funding instrument for universities. It supports extensive R&D collaboration globally and across sectors. The projects have produced commercial innovations and significant solutions to societal challenges and supported the UN's sustainable development goals through high-quality research, while also providing participating companies with opportunities to develop new products and processes and increase exports.**
  - **Pillar II projects are a significant way to conduct unique collaboration between research institutions, companies, and societal actors. The projects involve hundreds of European companies and a significant number of Finnish SMEs, for whom the projects are a unique pathway to this level of collaboration. Universities locally engage Finnish SMEs, creating impact.**
  - **Pillar II should promote research and innovation in all fields and allocate resources also to themes that do not directly relate to economic competitiveness, such as societal solutions.**
  - **The TRL levels of Pillar II topics should reflect a path from basic research to the market. Unifi emphasizes the importance of high-quality research in collaboration with industry, even at lower technology readiness levels. A general change in mindset is needed for industry to recognize the potential of research results and benefit from investing in further research and projects. Pillar II has a significant role in this.**
  - **Overly precise pre-definition of project outcomes at the application stage hinders creative new solutions. Although topics are selected strategically and policy-driven, consortia should be given leeway to leverage their best expertise and ideas.**
  - **The rules for partnerships should be simplified and harmonized, especially for institutional and co-funded partnerships. EU-level coordination and communication should be improved to facilitate access to projects and increase visibility. Co-designed partnerships have improved inclusivity and implementation, but the overall structure remains complex. The rules for institutional partnerships are complicated and inconsistent, and co-funded partnerships suffer from country-specific rules and cumbersome processes.**
  - **Pillar II has been criticized, but in fact, the interim report of the Horizon Europe program will be published only in April. A comprehensive assessment has not yet been made.**

## 2. Heitor's report proposes to create two new councils within Pillar II: the Industrial Competitiveness and Technology Council and the Societal Challenges Council.

- Unifi approaches the proposal cautiously. It is necessary to strengthen the competitiveness of European industry and respond more effectively to societal challenges, and the genuine participation of SSH fields should be enhanced. However, the new structures of the program should promote interdisciplinary cooperation rather than hinder it. Industrial competitiveness and societal challenges cannot be effectively addressed in isolation; they require collaboration between different sectors and disciplines. Dividing the current Pillar II into two separate councils could create unnecessary silos and further separate the themes of the industrial sector and societal challenges, weakening efforts to build bridges between the two. There is also a risk that the Industrial Competitiveness Council will gain more influence than the Societal Challenges Council if priorities are set against each other.
- It is also important to remember that the ERC and EIC are primarily bottom-up in nature, meaning the councils do not present predefined thematic priorities but fund the best research, technology, and companies regardless of the field. If councils are proposed for competitiveness and societal challenges, they should also include bottom-up calls to identify new opportunities and respond to emerging challenges.
- It is crucial that stakeholder representation and guidance are central in the new councils. It is unclear what the significance and structure of the councils will be, and the current program committee model allows for broad national influence and societal discussion.

## 3. Pillar II cluster structure

- **The current cluster structure itself is functional. The organization of topics helps applicants find suitable calls and track the development of a specific topic area. The current cluster structure is also familiar to actors and is based on the major strategic challenges set by the EU Commission. Additionally, the cluster structure helps identify expert evaluators and national contact points (NCP) to support the preparation of applications.**
- However, the cluster structure is imbalanced: some clusters are large (e.g., Cluster 4) and others very small (e.g., Cluster 3). Some calls are very specific and broad, others vague, and the budget is not always aligned with the requirements of the call text. Themes should be reconsidered, and the budgets of the calls should be better aligned with the requirements of the call texts.
- There is a need to support consortia and projects of various sizes within the pillar. This could mean separate funding calls for smaller research projects that complement larger consortia and increase the agility, dynamism, and impact of projects. Calls are needed to fund more projects for this purpose.
- The cluster structure should have a stronger emphasis on social sciences and humanities (SSH). SSH should be given an appropriate position and equitable funding

#### 4. RDI-continuum and Balance of TRL Levels

- **Most important is that all TRL levels are covered in the future program and that the path from lower TRL levels to the market is open.** In practice, RIA calls could also include lower TRL level projects, allowing smaller consortia, for example, to continue straightforwardly to higher TRL levels. On the other hand, joining and/or leaving projects (hop on/off) should be facilitated flexibly. Funding should not be entirely earmarked for projects that pass the first phase, but the budget should also be reserved for new openings at higher TRL levels.
- The continuum between Pillar II and III should be ensured. For example, lower TRL level projects could be offered ERC POC-type funding within Pillar III. The EIC approach could be expanded to provide follow-up funding to raise TRL levels.
- Unifi encourages the European Commission to emphasize the importance of excellent research in collaboration with industry, even at lower technology readiness levels, so that the value of such collaboration is recognized and can succeed. A change in mindset is needed for industry to recognize the potential of research results and benefit from investing in additional research activities and projects.
- The path through TRL levels to commercialization should not, however, exclude new ideas/technologies or lead solely to incremental development. In addition to politically driven priorities (top-down), the framework program should include non-defined calls (bottom-up) that enable new openings also in Pillar II.
- The future framework program should promote research and innovation in all fields and allocate resources to themes that do not directly relate to economic competitiveness.

#### 5. Better integration of interdisciplinarity, humanities and social sciences (SSH) in collaborative projects

- The program should promote research and innovation in all fields, including SSH sciences, cultural and creative sectors, and allocate resources to themes that do not directly relate to economic competitiveness.
- The visibility and significance of SSH fields should be emphasized in calls to ensure they are not overlooked in consortia. A multidisciplinary and cross-sectoral approach, with an agenda driven by SSH or fully integrated SSH, can produce new innovations and give Europe a competitive edge. Follow-up funding should be considered to ensure that project results are utilized not only commercially but also socially, for example through European cohesion funding.

#### 4. European scientific leadership – universities' views on proposals

##### 1. Strengthening the MSCA Budget in the future Framework Program

- Unifi supports strengthening the budget, although the focus of funding can only be truly discussed once the total budget is known. High-quality and attractive research careers play a crucial role in achieving the 3% R&D target. Marie Skłodowska-Curie Actions (MSCA) must be

strengthened as the EU's flagship program to attract and retain European and global talent. MSCA funding is a key pathway for researchers, for example to ERC funding. Additionally, Doctoral Networks is a unique program that enables the development of new, emerging research fields and top talent.

- The program should support researcher training through mobility, promote career development for researchers at all stages, provide opportunities for high-quality research regardless of the field, and support interdisciplinary and cross-sectoral research collaboration.
- The MSCA program should continue to support researcher mobility and career development in the FP10 program. MSCA actions should not be transferred to another program, such as Erasmus+. Although MSCA projects include a training component, they are fundamentally research projects and should remain in Pillar 1.
- MSCA Choose Europe: potential challenges and opportunities
- Heitor's report proposes the 'Choose Europe' initiative to improve the attractiveness of European young researchers' careers with a co-funded 5-year postdoc position, where the recruiting organization commits to opening a permanent position at the end of the EU funding period. This is proposed to be piloted in the last work program of Horizon Europe by extending the existing MSCA COFUND postdoctoral program by 2-3 years, so that the total duration of the fellowship would be 4-6 years. The initiative is reportedly designed to attract top researchers to Europe and/or to stay in Europe.
- Unifi cautiously welcomes the goal of extending the duration of the postdoc position but emphasizes the importance of clear criteria. The opening of the position should be based on specific criteria, such as scientific activity and applying for complementary funding, as well as the labor laws and recruitment practices of each country. It should also be ensured that the autonomy of the discipline and the university in selection is maintained.
- Proposal to Strengthen the ERC (Larger Budget and Maintaining Autonomy) in the Future Framework Program
- Draghi and Heitor's reports propose that the ERC budget should be doubled in the future framework program. The draft report of the European Parliament's ITRE Committee proposes that the EIC and ERC share would be 50% of the total FP10 budget.
- The ERC should continue being independent and autonomous, and its activities should still be based on bottom-up collaboration.
- The framework program budget needs massive additional investments (double the budget) and doubling the budgets of all sections. Unifi supports strengthening the ERC from the perspective of maintaining autonomy.

- Unifi supports the proposal to increase funding for high-quality basic research, and the ERC is a key instrument for this. We view the increase in the ERC budget from the FP10 total budget positively, but the focus of funding can only be truly discussed once the total budget is known.
- Draghi's Proposal: ERC for Institutions
- "ERC-I should build on the high number of well-established European research institutions that rank in the middle to high tiers of the global distribution and propel some of them to the very top of academic excellence. ERC-I could promote excellence and research, also by leveraging the European University Alliances. Because institutions progress slowly, funding should be committed over a relatively long-term horizon. Funding commitments for ERC-I should be subject to conditions and formal revision. Access to the program should be open on a recurrent, competitive basis. Although the objective of the program is to push academic and research institutions, the ERC-I should fund specific research units (e.g., a research center, a lab, or a whole department)."
- Unifi approaches the proposal with great caution. The new instrument should not reduce the budget for ERC individual grants.
- Focusing on "well-established European research institutions that rank in the middle to high tiers of the global distribution" overlooks pockets of excellence in organizations that are not yet at the required levels overall.
- Mention of the European Parliament's ITRE Committee report to develop European University Alliances into "European Scientific Institutions" supported by the Framework Program
- [https://www.europarl.europa.eu/doceo/document/ITRE-PR-765325\\_EN.pdf](https://www.europarl.europa.eu/doceo/document/ITRE-PR-765325_EN.pdf)
- Unifi does not support the initiative.
- University alliances need support to develop all three main tasks of universities also at the alliance level: research, education, and societal cooperation and impact. So far, the main funding mechanism has been based on relatively short-term Erasmus+ funding, which only partially supports the activities expected from universities/alliances, and capacity building Horizon funding. Continuity and resources are needed to consolidate the lessons learned from capacity building pilots. Strengthening research collaboration is a key goal for research-intensive alliances. At the same time, competitive research funding should not be directed to alliances as earmarked funding, as it would not serve the development of European science and competitiveness. Researchers should strive to collaborate based on quality, renewal, and innovation, not institutionally defined.
- There are over 60 alliances, and they are very different from each other, for example, in terms of research intensity. The instruments and practices used cannot be the same for all. Profiling and focusing should be the next phase/direction in the development of alliances. Through profiling, the diversity and strengths of alliances can be better highlighted.

- The goal of university alliances is to dismantle barriers to cooperation between existing institutions and to leverage complementary strengths. If they are made into European scientific institutions, this raises concerns about creating rigid superstructures.

## 5. Simplification, program implementation efficiency, and reducing the burden on applicants

1. Heitor's report proposes to reform the governance structures, strategic guidance, implementation, and monitoring of Pillar II with two new councils: the Industrial Competitiveness and Technology Council and the Societal Challenges Council (modeled after the current ERC Scientific Council and EIC Board)

- We approach the proposal to establish two new councils cautiously. While the idea is interesting, it may complicate funding structures and cause overlaps. We are also concerned that separating industry and academia into their own councils could lead to fragmentation, siloing of projects, and hinder collaboration. Generally, the idea of two new councils taking a leading role in setting research and innovation priorities could be beneficial if it replaces part of the current slow and complex framework program management and priority-setting process. However, the key issue is how and with what profile the council experts are selected. If such councils are established, it must be ensured that they promote the simplification of the funding program rather than adding a new layer to the already heavy administration and bureaucracy.
- The new governance structure of the program must encourage rather than hinder cross-sectoral collaboration. Industrial competitiveness and societal challenges cannot be effectively addressed in isolation. These are intertwined and require collaboration between different sectors and disciplines. There is a risk that dividing the current Pillar II's strategic governance into two separate councils could create unnecessary silos. There is also a risk that the Industrial Competitiveness Council will gain more influence than the Societal Challenges Council if priorities are set against each other.

2. The Commission is pushing for administrative simplification by expanding the use of lump sum funding

- The model is generally supported. We support the Commission's efforts to simplify the management of framework program agreements and project financial management, and ideally, lump sum funding would offer flexibility and reduce bureaucracy for projects. However, there is limited experience with the functionality of lump sum funding during projects, and expanding the lump sum funding model based on current evidence is not topical yet.
- Unifi is concerned about the potential unintended negative impacts of lump sum funding on consortium dynamics. In its current form, lump sum funding particularly hinders large collaboration projects because, to minimize risks, the project is built around many work packages and separate tasks, which reduces collaboration between project partners and the added value of consortium projects. EARTO has published a good paper on the challenges of



lump sum funding, many of which also apply to universities: <https://www.earto.eu/wp-content/uploads/EARTO-Position-Paper-on-Lump-Sums-Dashboard-8-January-2024-Final.pdf>.

- The lump sum model can also bring unintended financial risks: 1) Lump sum significantly increases the general costs required for preparation, meaning that work used to prepare the project proposal, which was previously part of the project's implementation and eligible costs, is now required. Most proposals (80-90%) do not receive funding. Thus, the time spent preparing the proposal is wasted and incurs real costs for the applicant institutions. 2) Another concern is the risk that beneficiaries may be partially unfunded if a work package cannot be completed for reasons beyond the control of an individual legal entity/beneficiary (joint liability).
- In the lump sum model, the costs of future actions become part of the proposal evaluation. This can lead to competition aimed at lowering the budget, the so-called "race to the bottom" phenomenon, which may negatively affect the participation of "more expensive" Nordic countries in proposals.

### 3. Project types (Research and Innovation Action (RIA), Innovation Action (IA), and Coordination and Support Action (CSA))

- **No changes are needed for these instruments.** Their familiarity with actors is also important. RIA is particularly important for universities, and IA works well too.
- Currently, CSAs are not very attractive due to their small budget and inflexibility, but they could have a significant impact if implemented thoughtfully. They could be more focused on maximizing the impact of funded projects and bringing partnerships to leverage the results generated in RIA/IA projects.
- Innovations and new solutions arise from creativity. Unifi proposes a new instrument for research collaboration that creates new knowledge, "Research Action" (RA). This would increase the long-term impact of the framework program and strengthen Europe's ability to understand and prepare for future challenges.

### 4. Collaborative projects, size (Total Budget, Consortium Size, Project Duration, etc.)

- Collaboration projects are currently very diverse, reflecting different project-specific budgets and objectives defined in call texts. **The diversity of collaboration projects is a richness that should be preserved.** Scientific excellence should remain the primary evaluation criterion for funding.
- There is a need to support consortia and projects of various sizes. This could mean separate funding calls for smaller research projects that complement larger consortia and increase the agility, dynamism, and impact of projects. Calls are needed to fund more projects for this purpose.
- Generally, consortia should not be inflated too much.

- Longer projects, e.g., 5-year projects, should also be possible.
- The requirements of the reference text should be reasonable for small budgets. Currently, call texts and budgets do not always match, and projects can vary greatly in consortium size and, for example, the implementation of pilots or demos. The European Commission could analyze available data to identify factors that critically affect the achievement of project and application objectives. If such critical factors are identified, the Commission should 1) inform the community and applicants widely, 2) offer tailored assistance to projects, and 3) consider requiring extensive project management expertise from the coordinating institution where necessary.