General Comments and proposals for amendments to the

“Proposal for a Regulation of the European Parliament and of the Council establishing Horizon Europe – the Framework Programme for Research and Innovation”

of the EU Commission (7.6.2018)

1. Structure and Goals

“Specifically, Horizon Europe will strengthen the Union’s scientific and technological bases in order to help tackle the major global challenges of our time and contribute to achieving the Sustainable Development Goals (SDGs). At the same time, the programme will boost the Union’s competitiveness, including that of its industries. Horizon Europe will help deliver on the Union’s strategic priorities and support the development and implementation of Union policies.” [Proposal, p 1] **HRK supports this broad set of goals that the Proposal for Horizon Europe is striving to achieve.** Yet, HRK points to the inconsistency in the terminology that is underpinning these goals. **HRK** very much supports the broad definition of innovation “that covers social innovation”. [18] Unfortunately, the Proposal then continues to make the Technological Readiness Levels (TRL) in the definition of OECD the main yardstick for measuring and classifying research activities undertaken. This is not helpful for classifying social innovation that maybe as helpful as technological innovation to solve Global challenges. **Therefore HRK is pushing for a more general yardstick than TRL in the text of the Proposal that is able to cover also society related research and innovation.**

**HRK** in line with the European University Association (EUA) demands the **systematic inclusion of experts in Social Sciences and Humanities in all phases of the programming process, including problem formulation, work programme drafting and**
topic design; this should be formally acknowledged as task in the process of drafting the final Proposal.

Over the last 2 years a new understanding of the significance of universities for the future of Europe and their importance as main actors in the knowledge triangle can be observed in European political circles. This is however not mirrored to any degree in the Proposal which continues to speak about “modernizing European universities” [p. 11], a terminology that even DG EAC has stopped using. HRK strongly disagrees with such a generalizing and undifferentiated approach towards more than 3000 universities and higher education institutions in Europe with very different profiles. HRK has already approached Commissioner Moedas regarding these false generalizations which lead to inadequate policies. HRK and many other university associations are asking for policies and a Horizon Europe programme that live up to the importance of universities and to their key role in the knowledge triangle of education, research and innovation. **The term “modernizing” should be replaced by “strengthening” in the expression “modernizing European universities”**.

In tune with and as member of the Alliance of Science Organisations in Germany HRK welcomes the commitment of the EU Commission for Open Science. HRK is leading the push for Open Access to scientific literature. Nevertheless, it is pivotal to make clear distinctions between the terms open science and excellent science which should not be considered congruent concepts. **The first pillar of Horizon Europe should continue to be named Excellent Science or Fundamental Science. It should not be branded Open Science, as planned in the EU Commission’s proposal [11]**.

The Proposal states that “smaller-scale collaborative projects are important for widening participation.” [5] HRK has numerous stated in tune with the broad majority of science organizations and also many business institutions that “EU research funding should concentrate on collaborative projects that have been successful in a competitive process. New scientific findings and innovations need free competition between different approaches and ideas”. HRK has criticised that “EU funding policy

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1 HRK, Resolution of the General Meeting of the HRK on November 2016, p.12-13; EUA, Horizon Europe: EUA analysis of the European Commission proposal 2018, p. 4-5
2 Living Up to the Significance of Universities for the Future of the EU. Proposals for Future Funding Programmes by the French, German and Polish Rectors’ Conferences (CPU, HRK KRASp) and officially supported by the Czech, Slovenian, Slovak and Serbian rector’s conferences, 18.05.2018, p. 1-2
3 Renewed agenda
4 Open Letter
5 Statement by the Alliance of Science Organisations in Germany, 26 June 2018, p. 2
has been focusing on large and long-term partnerships that aim at bringing all relevant stakeholders under one umbrella6 and therefore limit competition. Therefore HRK asks for rephrasing this sentence in a much broader sense making smaller and medium sized collaborative projects a core instrument of Horizon Europe: smaller and medium-scale collaborative projects are important for a dynamic and highly competitive programme and are also widening participation. Statistical evidence for the implementation of this demand should be continuously collected during the course of the Framework programme and this should therefore be mentioned in the directive. The project proposals should mostly be developed bottom up by science and industry in tune with the goals defined as global challenges and missions. The small and medium collaborative projects in the second column of societal challenges should also permit knowledge creating fundamental research.

2. Finances

The budget proposed in real terms means an increase over Horizon 2020 of 10 percent. This has been commented by HRK as “Right direction, but vested rights still too protected.” HRK supports the European Parliament that voted for an increase of the Horizon Europe budget up to 120 billion Euros for the period 2021-2027.7

Whereas the increase of the ERC-budget would be in line with the general increase of Horizon Europe, the MSCA-increase is below the average resulting in a relative loss in comparison to other instruments. However, in the MSCA the success rate of sub-programmes such as ITN have been particularly low and the number of first class applications without funding particularly high. MSCA are of high importance for the career development of European researchers and HRK urges to raise the budget in tune with the general increase.

HRK demands to separate the fields of security research and research for inclusive societies.

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All forms of partnership programmes should not receive their financial resources upfront for the whole framework programme. They should only receive half of their funding and after three years a review by the European Commission, European Parliament and the Council should decide if the partnership has been successful and should be continued.

3. European Universities

The Presidents of the Polish, German and French Rectors’ Conferences were told by a letter of the chief of cabinet of Commissioner Moedas that “the future Horizon Europe programme will, even more than today, seek synergies between different EU funding programmes, in particular ERASMUS+ in the case of universities. The new European University Initiative will become a strategic European flagship initiative. All Commission services are therefore closely working together to present a convincing and relevant proposal, respecting the different legal frameworks at European, national and regional level and the important autonomy of universities.”

However, in the Proposal this important affirmation is not reflected. Only the Annex IV “Synergies with other programmes” states that the “Programme will complement Erasmus programme support for the European Universities initiative, in particular its research dimension as part of developing new joint and integrated long term and sustainable strategies on education, research and innovation based on trans-disciplinary and cross-sectoral approaches to make the knowledge triangle a reality, providing impetus to economic growth”. HRK demands to mention this activity already in the directive. Concrete figures should be given. HRK demands to make seed money available for research project applications of the university networks envisaged in addition to the funding already announced for the strategic concept development of the networks in research and innovation.

In addition HRK in this context demands the deletion of any remarks in the annexes that point to a general need for “renewal of European universities” [Annex I] and similar notions that do not meet the realities of all university systems in Europe and create a feeling of outdatedness of universities and their activities in higher education, research and innovation. This point will be elaborated later in regard to the EIT.

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8 Answer of the head of cabinet Antonio Vincente to Commissioner Moedas to an Open letter of the three Presidents to Commissioner Moedas, 25.6.2018
9 No. 9 of the annex text
4. Open Innovation

HRK supports the effort to strengthen the funding and support for market creating innovations. The EIC will provide a “Pathfinder” instrument for advanced research in early stages of “to the market” development. This instrument should take up the experiences of the ERC: the possibility for researchers to take their ERC funding with them to other institutions has led to fruitful competition between universities and has improved the framework conditions for attracting researchers. Therefore, the EIC Pathfinder should follow the same principle to fund individual researchers and innovators and not institutions. HRK proposes: “The Pathfinder will be awarded to top innovators - from single beneficiaries to multi-disciplinary teams, who can pursue their funded projects individually, at universities, research organisations and in companies, in particular startups and SMEs.”

In addition, the ERC proof-of-concept should be the blueprint for an EIC instrument offering a wider range of researchers the opportunity to explore the commercial or societal potential of their research results.

HRK is proposing to consider to make the EIC start with a smaller budget allocation than planned so far. The EIC should prove its added value and should be evaluated after four years.

The Proposal suggests that in Europe the EIT and the KICs are engines of innovation. There is however not sufficient evidence to back these assertions so far. The KICs rather have the reputation of high administrative and bureaucratic complexity and they do not seem to achieve the aim to be self-sustainable. The high complexity and the funding mechanisms seem to support low risk activities in the communities. HRK therefore questions why the EIT is presented in the Proposal (Horizon Europe Annexes) as a success model for all European universities. The KICs in any case should not have a more exclusive access to the EIC accelerator or other parts of the programme than other innovation oriented networks.

5. Missions

HRK supports the Proposal in trying to use “Missions” as an instrument for solving Global challenges that is able to capture the imagination of citizens without, however, making promises that risk oriented research is not able to fulfill. HRK backs the
demands of the European University Association (EUA) that calls for these conditions in designing and implementing missions:

- Missions should be based on an approach driven by research excellence
- Missions require involving a broad and diverse range of stakeholders within and beyond the R&I community. However, the pre-requisite for success is their willingness to engage in dialogue based on mutual trust, transparency of actions and open mindsets.
- The portfolio of interlinked projects within missions should range in scale from large to small and should be collaborative, flexible and dynamic to bring about innovative change on specific targets.
- Clear, transparent and dynamic evaluation must take place to ensure that projects are on track in fulfilling the goals set in the overall architecture of the mission.\(^\text{10}\)

Moreover, HRK explicitly demands openness towards a mission that is based on solving global challenges by the means of Social Sciences and Humanities. Examples for such an approach have been presented among others by the German ROSE project that calls e.g. for a mission “Reducing the average unemployment rate among adolescents and young adults in Europe below 10% by 2035 through comprehensive research on new, not only technology-driven solutions for the labour market.”\(^\text{11}\)

6. Sharing Excellence

HRK welcomes the increased funding that Horizon Europe will be offering for sharing excellence and widening participation. In addition to the instruments presented in the Proposal HRK calls for integrating the proposal of now 7 European Rectors Conferences (France, Germany, Poland, Slovakia, Czech Republic, Slovenia and Serbia). Under Sharing Excellence the EU would support and fund the European evaluation processes of national excellence initiatives that Member states decided to carry out with national funds and ESIF cofounding where applicable. This would help “to develop the pockets of excellence in all member states and regions that decide to participate in the competition and would widen the opportunities for participation of all member states in excellence based programmes funded or co-funded by the EU.”\(^\text{12}\)

\(^{10}\) Horizon Europe: EUA Analysis of the European Commission proposal, June 2018, p. 7
\(^{11}\) ROSE_Cultivating Europe_Democratic_Social_Educated, June 2018, p.5
\(^{12}\) Living Up to the Significance of Universities for the Future of the EU. Proposals for Future Funding Programmes by the French, German and Polish Rectors’ Conferences, officially supported by the Czech, Slovenian, Slovak and Serbian rectors’ conferences, 18.05.2018, p. 4-5