

Russell Group position on the Horizon Europe proposals

We welcome the European Commission's proposals for the Horizon Europe Programme published in June 2018. Horizon Europe should build on the success of Horizon 2020 and in this respect we especially support its proposed structure, the focus on excellence and efforts to try to simplify the Programme.

Russell Group universities have been very active participants in EU Framework Programmes. We welcome the opportunity to help bolster European science and innovation by making constructive suggestions for how the Horizon Europe proposals could be strengthened to ensure the Programme is as efficient and effective as possible. In turn this will help maximise the social, economic, scientific and other benefits the Programme can bring for citizens, societies and the economy.

This paper includes comments across 12 key areas (**proposed amendments are collated on pp.13-19**):

1. **Open to the world** – ensuring fair rules for association to the Programme and flexibility to work with excellent partners across the globe to drive excellence and maximise impact
2. **Focus on excellence** – making excellence even more explicit in the Regulations and ensure sufficient support for ERC and Marie Skłodowska-Curie Actions to boost the quality of Europe's science base and enhance the return for public investment
3. **Simplification** – delivering efficiency gains through broader acceptance of beneficiaries' usual accounting practices; addressing success rates; limiting use of lump sum funding; and consulting with beneficiaries to draw up new guidelines and assess simplification on an ongoing basis
4. **Social Sciences and Humanities (SSH)** – engaging a wider range of stakeholders and the full breadth of research capability across Europe by ensuring SSH expertise in writing and evaluating calls and embedding SSH research in missions and clusters
5. **Strengthening the entire research and innovation ecosystem** – ensuring an effective balance of funding between fundamental, curiosity-driven research and closer-to-market activities, especially in Pillar 2, and considering alternative classifications to 'TRL'
6. **Impact** – considering the wide range of impacts delivered by R&I and relevant timescales
7. **Evaluation** – guaranteeing expert evaluation, with clear and transparent rules for applicants
8. **Sharing excellence** – maintaining dedicated actions to help widen participation and supporting more flexible, bottom-up initiatives to encourage innovative approaches to sharing excellence
9. **European Innovation Council** – recognising the role universities can play to strengthen the EIC and using EIC Fellowships to support training that bridges academia and industry
10. **Open Research Data** – providing clarity around data requirements and considering costs
11. **Missions** – ensuring missions are broad, with multi-disciplinary opportunities, and developed in a transparent way through appropriate consultation; involving a broad range of appropriate experts in mission boards, including relevant academic experts
12. **Improving the gender dimension** – considering schemes around mentoring, return-to-work fellowships, caring costs and core hours policy to enhance support for female researchers

Context

The Russell Group represents 24 leading UK universities which are committed to maintaining the very best research, an outstanding teaching and learning experience and unrivalled links with business and the public sector.

Russell Group universities are very active participants in Horizon 2020:

- Nearly a fifth of projects involve a Russell Group university as a partner or coordinator
- 11% of projects are coordinated or hosted by Russell Group members
- Our universities have fostered over 20,500 links with universities, businesses and research organisations in every member state and associated country and many third countries
- Since 2007, the 24 Russell Group members have won 17% of ERC grants

Although the UK is preparing to leave the EU, the Russell Group wants to continue to help bolster European science through our contributions to EU research. Our universities are experienced participants in EU research and innovation programmes and we hope to draw on this experience to make constructive suggestions for how Horizon Europe Programme could be strengthened and improved even further so as to maximise the benefits for European citizens, society, science and economies. **We have collated our proposed amendments to the text at the end of this paper (pp. 13-19).**

If not specified, article references are to those in the 'Proposal for a Regulation of the European Parliament and of the Council establishing Horizon Europe – the Framework Programme for Research and Innovation, laying down its rules for participation and dissemination', henceforth the '**Main Regulation**'. We refer to the 'Proposal for a Decision of the European Parliament and of the Council on establishing the specific programme implementing Horizon Europe – the Framework Programme for Research and Innovation' as the '**Specific Programme**'.

1. Open to the world

- 1.1 International collaboration is integral to creating world-class research with impact, but it is also necessary to address the biggest global challenges which impact on all parts of the globe. Designing Horizon Europe in a way which is truly open to the world, with increased flexibility to work with excellent partners in non-EU countries, would facilitate research collaboration with a wider pool of top international researchers and expertise, improving outcomes and boosting jobs, growth and productivity.
- 1.2 Opening up the Programme also supports increased access to global scientific expertise, not only in those carrying out the research, but in those who play an important role evaluating proposals, thus ensuring the Programme is based on true international excellence.² Horizon 2020 already supports collaboration with partners outside the EU, but we are pleased that the proposed rules in **Article 12** would make the Programme open to a wider range of third countries.
- 1.3 We are concerned that some of the amendments tabled by the Rapporteur to the main proposal for a Regulation would significantly limit associated countries' participation in the Programme. We suggest some alternative amendments (collated at the end of this paper) to clarify what we propose would be fair rules for associated countries, which would benefit European science and innovation by strengthening the international excellence of the Programme. Making Horizon Europe attractive to talented researchers and organisations from across the world will send a signal to the EU's key competitors that this is an ambitious programme that will make its mark globally.

¹ <https://www.leru.org/files/News/Horizon-Europe-University-Associations-Proposed-Amendments.pdf>

² For example, the ERC is open to excellent researchers of any nationality provided they are hosted in a member state or associated country. The 4th most common nationality of ERC grantees hosted at Russell Group universities is American. The ERC 2017 Annual Report also shows that between 2007 and 2017, experts from the US carried out the 4th highest number of participations in ERC peer review (after those from the UK, Germany and France).

- 1.4 We propose a new paragraph to **Article 12** to make it explicit in the legislative texts that associated countries would be eligible to coordinate projects and participate in monobeneficiary parts of the Programme (counter to amendments 148 and 152 proposed by the Rapporteur). This is currently the case under Horizon 2020 and should continue under Horizon Europe. In addition, we propose the assessment of a “fair balance” of contributions and benefits should be reviewed holistically on a multi-annual basis (contrary to amendment 147 of the Rapporteur). This would provide the necessary flexibility for both the EU and the associated country and would take into account fluctuations across the Programme’s cycle. It would also help ensure excellence remains at the heart of assessment criteria. A review of financial contributions could be conducted at the same time as the interim evaluation of the Programme.
- 1.5 We believe that maintaining a positive relationship between the UK and the EU on research and innovation after Brexit will be mutually beneficial to the science bases, economies and societies across the EU and in the UK. As part of this, the Russell Group wants the UK to pursue full association to all parts of Horizon Europe. We understand that a specific association agreement would need to be negotiated with the EU and this will take place in the context of the wider negotiations about the UK’s future relationship with the EU.

2. Focus on excellence

- 2.1 We welcome the emphasis on excellence in Horizon Europe. Public funding for research is most effective when distributed on the basis of true international excellence. An excellence-based programme drives up the quality of research by fostering competition and ensures the whole of Europe benefits from innovation, brain circulation and internationalisation. We would suggest this could be brought out more explicitly through amendments to **Articles 3 and 4** (in line with those proposed jointly by the group of 13 pan-European university associations³):
- 2.2 The continuity between pillar 1 of Horizon 2020 and Horizon Europe is welcome. The ERC in particular is one of the great successes of Horizon 2020 and it demonstrates the real value of focusing EU funding on excellent, bottom-up research. This research is likely to have the greatest impact in the long term, underpinning major shifts in technology and innovation and forming the basis for whole new fields of knowledge. Indeed, an independent study carried out for the ERC showed that 79% of ERC-funded projects made scientific breakthroughs or major advances.⁴
- 2.3 We strongly support the continuity of the European Research Council (ERC) under Horizon Europe and maintaining an independent Scientific Council, as outlined in **Articles 6 and 7** of the Specific Programme.
- 2.4 Marie Skłodowska-Curie Actions (MSCA) provide valuable training and mobility opportunities to excellent young researchers. These actions develop key research skills, grow expertise, build networks and provide important career opportunities for the early-career researchers Europe needs to help build the knowledge economy of the future.
- 2.5 The ERC and MSCA should both continue to be a central part of Horizon Europe and with an enhanced budget they could deliver even more impactful research across the EU. Regrettably, the draft budget proposal would see **the proportion of the Programme’s funding allocated to MSCA decrease in Horizon Europe** compared to Horizon 2020, despite the Explanatory Memorandum of the Regulation noting clearly that stakeholders recommended “Successful individual researchers’ schemes (ERC, MSCA) need increased budgets” (p.5). The budget allocations should be reconsidered, particularly as the ERC and MSCA have a clear track record as popular, effective and excellent schemes, whilst other elements of the Programme proposals are newer and as yet relatively untested.

³ 13 European university associations have collectively proposed a series of amendments. We share many of the priorities and concerns they have highlighted and echo several of their key points and amendments in this paper:

<https://www.leru.org/files/News/Horizon-Europe-University-Associations-Proposed-Amendments.pdf>

⁴ https://erc.europa.eu/news/impact_study_breakthroughs_major_advances

2.6 We are interested in the proposal in paragraph 15 of **Annex IV to the Proposal for a Regulation** (Synergies with other programmes) that the Euratom Research and Training Programme will ensure:

the Programme and the Euratom Research and Training Programme develop comprehensive actions supporting education and training (including Marie Skłodowska-Curie Actions) with the aim of maintaining and developing relevant skills in Europe

We would support an approach to this whereby Euratom funding for any MSCAs is administered via Horizon Europe to ensure consistency and avoid adding additional administrative burdens.

2.7 There is also a proposal in **Annex I to the Specific Programme** (p.11) that:

If specific needs arise and additional funding sources become available, the MSCA may target certain activities in specific challenges (incl. identified missions), types of research and innovation institutions, or geographical locations in order to respond to the evolution of Europe's requirements in terms of skills, research training, career development and knowledge sharing.

We would welcome further details on the intention here and stress the importance of preserving the bottom-up approach to MSCAs. Any move away from bottom-up to targeted MSCAs should be seen as the exception rather than the rule and only be considered if there is extra funding available.

3. Simplification

3.1 The European Commission made helpful efforts to simplify Horizon 2020 compared to FP7 and we welcome their ambition to continue to simplify EU research and innovation funding under Horizon Europe. In this respect, we especially welcome the following measures:

- (a) Maintaining a three-pillar structure, with particular continuity for pillar 1
- (b) Maintaining the simple, single rate funding model as set out in **Articles 30 and 31**
- (c) Maintaining the Participant Portal, which has been very helpful for managing information about calls and bids

3.2 Success rates for Horizon 2020 are notably lower than in the previous Programme, with particular challenges under the Excellent Science pillar. This needs to be addressed to continue to encourage high-quality applications. In addition to increasing the overall budget, which will allow the European Commission to fund more projects, we suggest that success rates could also be improved by making changes to the two-stage proposal system. For example, a higher threshold could be set for passing stage one and the second stage should be much more meaningful, with a good chance of success. A further simplification the European Commission should consider is **where two-stage application processes are used, the evaluation from the first stage should carry forward to the second stage, with only the new content evaluated at stage two** (rather than re-evaluating elements which have already been evaluated). This would generate efficiencies for both researchers and evaluators by reducing duplication of effort and workload.

3.3 Overall, it is **essential that the Regulations, the Model Grant Agreement and any guidance are published well in advance of the new Programme starting**. This was not the case for Horizon 2020 and led to teething problems at the start of the Programme. For example, because the annotated Model Grant Agreement was not published in time, beneficiaries signed up to grants at the early stages of the Programme without being given complete clarity on all the terms and conditions. This led to uncertainty around how to account for costs (notably staff time and facilities) and resulted in retrospective changes having to be made, creating additional burden.

3.4 A collaborative approach to drawing up new guidelines between the European Commission, experienced beneficiaries, the Research Executive Agency and auditors would be helpful. In addition, the European Commission should seek close engagement with experienced beneficiaries, including universities, to understand and assess how proposed changes under Horizon Europe are

working in practice once the Programme is underway. This could be done on an ongoing basis and Russell Group universities would be pleased to help provide practical feedback.

Broader acceptance of beneficiaries' usual accounting practices

- 3.5 The European Commission has identified broader acceptance of beneficiaries' usual accounting practices as an area of simplification and, if it can be implemented successfully in practice, would be a genuinely useful mechanism to improve interaction with the programme. The proposal to use a systems and process audit ([Article 48, paragraph 3 - Audits](#)) would seem to be a helpful intervention in this respect.
- 3.6 There needs to be proper accountability for the use of EU funds, but an efficient audit system should acknowledge best practice and trust institutional practice, especially where there is a proven track record of participation and clean audit in EU programmes and when processes and procedures are also audited robustly by national governments.
- 3.7 Auditing institutions' internal practices and processing would be a much more efficient approach, particularly for beneficiaries who participate in relatively high volumes of projects. For example, if an institution's internal systems for timesheets or depreciation of equipment (etc.), had been investigated and approved, this could be recorded and trusted for future projects, rather than having all processes reinvestigated from scratch each time. Currently, each audit is dealt with entirely separately so beneficiaries have to explain and justify the same process and systems repeatedly. This sometimes result in different outcomes and recommendations from different auditors, which can undermine the validity of the audit process. Some form of institutional accreditation by Commission-nominated auditors could be considered, which would reduce the administrative burden to beneficiaries and to the European Commission.
- 3.8 **The European Commission should consider how it could go further in accepting national accounting standards**, where these are proven to be at least equally robust as EU standards. This would mean that beneficiaries could apply the same standards used for national research grants, preventing the need for additional bespoke or manual systems to manage EU funds.

Lump sum funding

- 3.9 We welcome the continuity provided in maintaining the flat rate funding model for collaborative R&I projects (100% direct costs + 25% contribution towards indirect costs for universities). This should remain the primary method of funding for collaborative projects, with lump sum funding only used in a limited number of specific cases. There is currently a pilot underway on the use of lump sum funding and we would urge the European Commission to ensure this is evaluated robustly, drawing on feedback from participants directly involved in the pilot, before lump sum funding is rolled out any more widely in Horizon Europe.
- 3.10 The concerns around lump sum funding include:
- (a) The risk that beneficiaries do not receive enough money to fund the research
 - (b) The increased burden on coordinators in deciding how to distribute lump sums between consortium partners (because the lump sum is awarded on a project basis)
 - (c) The increased risk of not receiving payments. Under Horizon 2020, beneficiaries receive payment for the deliverables they have successfully achieved (e.g. if project officers deem the project has successfully delivered 7 out of 8 deliverables, then beneficiaries receive funding for 7 out of 8). However, with lump sums the payment is dependent on successful delivery overall, so there is a possibility that beneficiaries may not receive any funding for work carried out if the project officer considers the anticipated outcome has not been met. This introduces significant uncertainty for beneficiaries and would require a strict set of guidelines on the criteria (what constitutes a successful delivery) used by Project Officers and monitoring.
- 3.11 Lump sum funding is not a suitable instrument for simplification if it means the responsibility for monitoring shifts from the European Commission to the project participants themselves, increasing the burden for the academics, universities, businesses and others. In many cases participants are

reluctant to change their financial monitoring processes even where lump sums are awarded in case they will be subject to audit, so this does not achieve the desired reduction in burden.

4. Social sciences and humanities (SSH)

- 4.1 Research across the full breadth and range of Social Sciences and Humanities (SSH) disciplines can deliver crucial insights into today's major cultural, social and political challenges as it is fundamentally concerned with understanding the nature, history, and variability of human experience. SSH research explores the ideas, narratives, and artefacts that constitute and reflect our lives and our place in the world; it observes and analyses the practices and processes that govern our individual and collective behaviour.
- 4.2 The European Commission is proposing a Programme which should involve a wider range of stakeholders, including civil society, and increased interaction between EU research and innovation and citizens. This is brought out clearly in **Recital 26** of the Regulation proposal (e.g. "with the aim of deepening the relationship between science and society and maximising benefits of their interactions, the Programme should engage and involve citizens and civil society organisations in co-designing and co-creating responsible research and innovation agendas and contents ... The programme should also seek to remove barriers and boost synergies between science, technology, culture and the arts to obtain a new quality of sustainable innovation").
- 4.3 Embedding social sciences and humanities into Horizon Europe more effectively than has been the case in Horizon 2020 will help make the Programme more accessible to these new groups the European Commission wishes to engage. It should focus both on funding SSH research and recognising the valuable contribution these disciplines play across the programme objectives for driving policy to tackle global research challenges.
- 4.4 Supporting collaborative research across all disciplines in the Global Challenges Pillar will help maximise potential impacts, but will require proactive efforts to integrate SSH across the thematic clusters. Likewise, SSH disciplines will have a lot to offer the new missions and in line with Mariana Mazzucato's recommendation, consideration must be given to how missions can "be framed in such a way as to spark activity across, and among, multiple scientific disciplines (including social sciences and humanities)".⁵ SSH could be brought out more explicitly in the Programme through amendments to **Article 2 – Operational objectives** of the Specific Programme and **Article 7 - missions** of the main Regulation.
- 4.5 The European Commission could also improve the way in which some call topics are framed and described. In many cases, the focus is primarily on the physical sciences, with the SSH element seeming to be an 'add-on' in a minor supporting role. SSH research should more often be considered a core element of the call.
- 4.6 Use of terminology in the calls that is more appropriate for other disciplines e.g. references to technology readiness levels (TRLs) does not help. **The European Commission should consider whether TRLs are the most appropriate classification to use**, or whether a broader, more qualitative description of different types of desired impacts or outputs from a call would be more appropriate to ensure that a range of societal, policy and other impacts are captured. This would also help encourage greater inclusion and integration of social sciences and humanities research.
- 4.7 To fully embed SSH in Horizon Europe, the European Commission should **ensure there is sufficient SSH expertise** when writing the calls and appropriate representation of the SSH community in those evaluating proposals. This could be reflected in an amendments to **Article 26 - Evaluation**. It could be worth exploring whether there should be a minimum number/proportion of SSH evaluators on each panel, for example, and ensuring appropriate representation across the

⁵ 'Mission-Oriented Research & Innovation in the European Union: A problem-solving approach to fuel innovation-led growth' (February 2018).

breadth of disciplines (e.g. an economist is unlikely to be best placed to evaluate philosophy research proposals).

- 4.8 The European Commission should continue to publish regular reports on the integration of SSH in the Programme and this could be required under [Article 47 – Programme evaluation](#). We have proposed an amendment to this effect.

5. Strengthening the entire research and innovation pipeline

- 5.1 Horizon Europe should retain a comprehensive approach to the research and innovation pipeline to facilitate the development of new ideas, products and services which bring jobs and growth across Europe. We support the European Commission's ambitions to ensure Europe is maximising its potential in innovation and we understand the rationale for creating the new European Innovation Council as part of this aim. However, fundamental, blue skies research is a key driver of innovation because it leads to crucial new solutions and breakthroughs.
- 5.2 It is therefore critical that Horizon Europe prioritises continued investment in fundamental, curiosity-driven research to ensure there is a sustainable pipeline of new ideas to underpin future innovations and address global challenges. By allowing space for longer-term basic research, the potential benefits to EU citizens, society and the economy are likely to be even greater. We therefore support the amendment to [Article 6](#) proposed by the 13 European university associations (see new paragraph 10) and wish to reiterate the importance of ensuring the Programme delivers **an appropriate balance between funding for basic, frontier research as well as more development/innovation activities**.
- 5.3 Outside the Excellent Science pillar of Horizon 2020, there has been a trend towards the EU funding more large-scale, high technology readiness level (TRL) projects. Analysis by the League of European Research Universities (LERU) of TRLs in Horizon 2020 calls in the 2014-15 and 2016-17 work programmes shows that TRLs of 4 and above (when a technology is already validated) were most commonly requested in Industrial Leadership and Societal Challenges calls.⁶
- 5.4 Since the new Pillar 2 in Horizon Europe (Global Challenges and Industrial Competitiveness) brings together elements of pillar 2 (Industrial Leadership) and pillar 3 (Societal Challenges) from Horizon 2020, it is even more important to ensure there is an appropriate balance between basic and more applied research. The programme should not seek to focus on closer-to-market projects at the expense of basic research.

6. Impact

- 6.1 Projects under Horizon 2020 are currently assessed on excellence, impact, and quality and efficiency of the implementation. The European Commission needs to adopt a broad definition of impact under Horizon Europe and differentiate between impact measured at the project level with that at the programme level.
- 6.2 We welcome the focus in [Article 3, paragraph 1](#) on the objective for the Programme to deliver "scientific, economic and societal impact." [Annex V](#) to the main Regulation sets out key impact pathway indicators. Whilst we understand the rationale for using proxy indicators, we would caution against over-reliance on simply measuring what can be measured (e.g. numbers of publications or innovations), which may not capture the full breadth of impacts and may simply reflect quantity rather than quality.
- 6.3 When considering impact as part of assessing project proposals, a broad treatment of impact should also be used to recognise the potential scientific, economic, social, health, quality of life, environmental, policy and cultural impacts, amongst others. A single piece of research can deliver multiple types of impact, sometimes with unexpected outcomes.

⁶ LERU – 'The strength of collaborative research for discovery in Horizon 2020' (2016).

- 6.4 The process of undertaking and developing research to the point where it has the potential to impact on the economy, health, society or culture (etc.) can take many years. The exact impact of blue skies research cannot be predicted in advance, but even where research sets out to explore an idea with obvious potential impact, it may take years of further investigation to develop the idea to the point where impact is able to be realised.
- 6.5 Analysis of research impact case studies from Russell Group universities shows that ‘time-to impact’ from the start of research (measured by project start date, initial publication date or initial grant date) to the delivery of the first main non-academic impact is on average eight years, with time differences ranging from less than one year to 29 years.⁷ Research that is closer to market can in some cases deliver impact much more rapidly, but this can often be reliant on fundamental, longer-term research. It is essential therefore that Horizon Europe takes into consideration the long time frames that can sometimes be needed before fundamental research delivers tangible impacts.
- 6.6 In light of this, we would welcome further clarification about the European Commission’s intentions for [Article 29, paragraph 3](#), which would allow actions to be terminated where expected results have lost their relevance for the Union. This paragraph could potentially create uncertainty for beneficiaries and may neglect to take into account longer-term impacts that could arise from the research in favour of short-term returns. We would suggest that actions should only be terminated on the advice of independent experts and if beneficiaries are given sufficient notice; we propose an amendment to this effect.

7. Evaluation

- 7.1 The Horizon 2020 evaluation system functions well and ensures quality by drawing on a range of expert evaluators from numerous different countries, organisations and disciplines. We welcome the proposal for excellence to continue to be at the heart of the evaluation criteria, but as part of maintaining quality evaluation, there are several areas relating to [Article 26 \(Evaluation\)](#) where we would welcome further clarity from the European Commission:
- (a) What “specific policy objectives” might be considered as part of ranking proposals (as noted in paragraph 2)?
 - (b) Exactly what is meant by the evaluation committee being able to propose “substantial adjustments” to the proposals in as far as needed for the consistency of the portfolio? On what basis will the evaluation committee decide? Will they be in a position to consider the full range of other projects across different parts of the programme which may be part of the same “portfolio”?
 - (c) Does this represent a deliberate move away from the “as is” evaluation used in Horizon 2020 and will this result in a return to “grant negotiation” rather than the current grant preparation?
- 7.2 The contribution to “a consistent portfolio of projects” should be explicitly tied to missions only and we propose amendments to [Article 26](#) to this effect. However, there are questions about how this will be done in practice, particularly over the seven-year span of the Programme. Where projects are considered in the context of a portfolio, there should be transparency about the decisions that are taken.
- 7.3 Expert evaluation is central to ensuring the programme is focused on excellence. It supports the principle at the heart of the world’s leading scientific systems: that decisions on individual research proposals are best taken following an evaluation of the quality and likely impact of the proposals through a peer review process. To ensure fair, transparent processes, expert evaluators should always be appointed following a call for expressions of interest. We therefore propose amendments to [Article 44](#) to specify that alternative processes can only be used if a call fails to identify suitable candidates. Where a call is not used for justifiable reasons, transparency and accountability must be ensured.
- 7.4 The European Commission has used on-site consensus panel meetings less frequently in Horizon 2020 and should consider reintroducing these to ensure consistency and quality in evaluations,

⁷ ‘Engines of growth: The impact of research at Russell Group universities’ (November 2015)

especially where calls are very competitive e.g. for MSCA ITNs. Where consensus panels are used, the names of the panel members should be publicly available to enhance transparency.

8. Sharing excellence

- 8.1 Building research capacity in lower research-intensity Member States will benefit the whole of the EU's research excellence. The introduction of the 'Spreading excellence and widening participation' element in Horizon 2020 is helping to boost research capacity across Europe and we support the continued focus on this in Horizon Europe.
- 8.2 Horizon Europe should help facilitate partnerships between organisations in more and less research-intensive regions through a sharing of knowledge, expertise and ideas. These actions are complementary to European Structural and Investment Funds, which are and should remain the primary source of EU funding that Member States can use to develop research and innovation capacity. The European Commission's aim to improve synergies between different funding programmes by expanding the Seal of Excellence is welcome. It is particularly helpful that the European Regional Development Fund, the Cohesion Fund, the European Social Fund+ and the European Agricultural Fund for Rural Development are explicitly mentioned in [Article 11](#).
- 8.3 As with Horizon 2020, we support having a dedicated budget line for widening participation in Horizon Europe and we support the proposed increase to this budget line. Initiatives for spreading excellence and widening participation could be made more effective and more flexible through **bottom-up programmes** which foster innovative approaches, especially to research management support and networking. Establishing a strong research support infrastructure and training staff in research offices in less research-intensive regions will be crucial to achieve a sustained improvement in their research performance. An evaluation of new bottom-up proposals could help the European Commission to identify some of the more effective projects and good practice could then be shared with other organisations and countries. In light of this, we are interested to explore the suggestion of the two Rapporteurs around applying a "fast track logic" for spreading excellence.

9. European Innovation Council (EIC)

- 9.1 We support the European Commission's plans to enhance the EU's innovation capacity and rationalise existing innovation instruments through the creation of a European Innovation Council (EIC). Universities should be at the heart of its development and implementation, alongside industry and other partners. Knowledge exchange is a priority for Russell Group universities and we share the European Commission's aim to ensure those with bright ideas and the ambition to scale up internationally have the right support.
- 9.2 Universities are well placed to nurture breakthrough innovators and innovations and they are a key source of start-ups (in 2015/16, Russell Group universities alone generated 688 new spin-offs, start-ups and social enterprises). We support the bottom-up nature of the *Pathfinder for advanced research* to support the earliest stages of technology development, and welcome that it will be open to all types of innovators, including universities (as specified in [Annex I to the Specific Programme](#), p. 62).
- 9.3 Annex 2 of the [Impact Assessment](#) (p. 17) notes that stakeholders support strengthening the Future and Emerging Technology (FET) actions and have highlighted concerns around over-subscription of FET Open in particular. We understand the proposal for Horizon Europe is for FET Open to be taken up in the EIC Pathfinder. Considering that these actions are tested, have been judged to be successful and have been considerably over-subscribed so far, the European Commission should ensure the Pathfinder has a sufficient and significant proportion of the EIC budget.
- 9.4 The relationship between the EIC and the ERC will be central to enhancing innovation in the EU. We welcome the language in the [Annex I to Specific Programme](#) p. 62 that the *Pathfinder* will work "in close coordination with other parts of Horizon Europe". In addition, Annex 8 of the [Impact Assessment part 1.3](#) (page 80) notes that:

The Accelerator will be open to all innovators, start-ups, SMEs and midcaps, but will also accelerate innovations / spin-offs / start-ups generated within the Pathfinder **as well as from any other parts of the Framework Programme such as European Research Council (ERC)**, the European Institute of Innovation and Technology's (EIT) Knowledge and Innovation Communities (KICs) and R&I missions.

- 9.5 We would hope this means the Programme will facilitate a smooth transition for researchers to access the EIC as a follow-on from an ERC Proof of Concept grant, for example.
- 9.6 **Article 43, paragraph 5** of the main regulation indicates that proposals may be directly submitted for evaluation to the EIC's Accelerator based on previous project review, either under Horizon 2020, Horizon Europe, or a national programme similar to the EIC's Pathfinder. This should mean proposals do not need to be evaluated a second time, allowing for a faster and simpler process.
- 9.7 The expertise of researchers and academic experts can enhance the management and implementation of the EIC. **Annex I to Specific Programme** (p. 66) notes that EIC programme managers "will come from multiple spheres, including companies, **universities**, national laboratories and research centres" – we support and encourage this type of diversity among the programme managers and the explicit inclusion of universities. In addition, the EIC Board should ensure it captures the full breadth of relevant expertise, including academic experts (e.g. technology transfer specialists): we propose an amendment to the **Specific programme, Article 10** to this effect.
- 9.8 Training is key if the EU wants to foster the next generation of entrepreneurs. We welcome the proposal to introduce EIC fellowships (**Annex I to the Specific Programme** – p. 65) and would suggest that these could be used to support talented individuals who straddle academia and the private sector, with a focus on ensuring they are nurturing others to bridge that gap and sharing good practice in how to do so. Another idea would be to award prizes for doctoral/post-doctoral entrepreneurship, to incentivise and reward early career researchers to develop important commercial skills through starting new businesses.

10. Open access and open research data

- 10.1 The European Commission has presented an ambitious proposal for open access (OA) to publications and data for Horizon Europe. Whilst we support the aim to make outputs and data more accessible, there are a number of pragmatic considerations to reflect on, particularly with regard to open access to research data, which is less developed than OA publications.

Open research data

- 10.2 The research community in the UK has worked together to develop a concordat on open research data, which sets out 10 clear and practical principles for working with research data, which could form a useful reference point for EU activity in this area as a way of sharing good practice and learning from different countries.⁸ There are numerous questions to consider around open research data, including how to define 'data', the scope of which data should be made open, how it will be managed and stored, for how long it should be preserved etc. There should be clear guidance and support to help applicants when considering the open research data requirements.
- 10.3 We would welcome greater clarity from the European Commission about the expectations around what 'data' should (where possible) be made open. Different national policies set different expectations around this, but in many cases, the emphasis is on **data that underpins publications**; this would seem like a reasonable starting point for Horizon Europe. We propose to reflect this via amendments to **Articles 10 and 35**.
- 10.4 There are sound reasons why not all research data can be open and we welcome the recognition in **Article 35** that there will be exceptions to this where justified. Access may need to be managed in order to maintain confidentiality, protect individuals' privacy, respect consent terms, as well as

⁸ <https://www.ukri.org/files/legacy/documents/concordatonopenresearchdata-pdf/>

managing security or other risks. Open access to research data will incur potentially significant costs, including for IT infrastructure and services, administrative and specialist support staff, training and researchers' time. Costs must therefore be a key consideration of any obligation to make data open, particularly as some costs will fall outside of the timeframe of a project (e.g. for long-term data preservation). In addition to the justified reasons for managing access already listed, we would suggest that guarding against unreasonable costs should also be added and propose an amendment to reflect this in [Article 35](#).

10.5 We would welcome more information from the European Commission about how it will help support costs of open access to research data.

11. Missions

- 11.1 We support the mission-oriented approach to research and innovation as proposed in Mariana Mazzucato's report as a tool to drive economic growth, bringing together different actors in the system and fostering collaboration across sectors at a scale which provides real EU added value. It is important to ensure effective communication of missions and make the most of the opportunities to engage the wider public.
- 11.2 Research and innovation missions should be clearly defined in the work programmes to encourage quality applications. As Mazzucato notes, it is necessary to clearly frame missions with specific targets and timing to determine their success. We support Mazzucato's proposal that there is no 'one-size-fits-all' for missions and the scope and priorities of missions should be decided following expert advice from across disciplines and stakeholder consultation, drawing on lessons from the Societal Challenges pillar of Horizon 2020 and regular evaluation of missions to inform future iterations. Although it is helpful to identify priority research areas, the missions should be broad and allow for flexibility for bottom-up proposals and emerging global priorities.
- 11.3 The design of the missions should also encourage and facilitate interdisciplinary research, bringing together specialist skills and expertise from a very wide range of academic disciplines, including social sciences and humanities (as noted above), as well as from different parts of the research and innovation system and different sectors.
- 11.4 A stand-alone project with clustering of different disciplines through a "hub and spoke" model could help maximise the opportunities from interdisciplinary research. Multiple, smaller consortia could help to make missions more inclusive than creating a monopoly via fewer, larger consortia. Missions should also ensure they are focused on excellence. We support the amendment proposed by the European university associations to [Article 7](#) to reflect these priorities.
- 11.5 The Specific Programme explains that a **mission board** may be established for each mission. The European Commission will need to ensure they have an appropriate range of expertise on the boards and this should include **relevant academic experts**, as well as representatives with communications expertise to successfully be able to advise on the range of criteria set out in [Article 5 – Missions](#) of the Specific Programme. Appointment of mission board members needs to be transparent and open. We propose an amendment to [Article 5](#) to reflect this.

12. Improving the gender dimension

- 12.1 [Article 6, paragraph 9](#) of the Regulation sets out that the Programme should ensure the effective promotion of gender equality. There are some useful examples already, including the MSCA Career Restart panel and the ability for researcher show have taken maternity leave to extend the period during which they need to demonstrate their track record by 18 months.
- 12.2 Some other specific policies the European Commission could consider to help promote female researchers in Horizon Europe could include:

- **A ‘return to work’ / ‘career re-entry’ fellowship:** drawing on the example of the MSCA Career Restart and others which operate nationally across Europe⁹, and considering how such a scheme could work across other parts of the Programme too, researchers could apply for a specific fellowship following a continuous break from research. The scheme could be available to both men and women but since women are more likely to take career breaks than men the expectation would be that they would benefit to a greater extent from such a scheme.
- **A female researchers’ mentoring scheme:** this could apply across different disciplines but could be especially targeted for areas of science where there are particularly few women. The idea would be to identify female mentors at the appropriate stage in their career where they can be a real role model for more junior female researchers. The European Commission could create an online platform which would help more junior researchers identify potential mentors and help connect to them. To increase the EU added value of such a scheme, funding could also be used to support mobility to connect mentors and mentees in different countries, especially as evidence shows female researchers are less internationally mobile than their male peers.¹⁰
- **The costs of childcare and other types of care could be counted as eligible costs** on grants when researchers make academic visits or attend conferences relating to their Horizon Europe project. Women take on a disproportionate amount of childcare as well as caring for ill/disabled/elderly family members and this can be a barrier to mobility, particularly when it involves international travel.
- **Core hours policy:** if meetings, seminars or events are arranged at times when people are primarily undertaking caring duties, this can be an obstacle and can limit networking opportunities. The European Commission could set an expectation that when Horizon Europe funds are used for meetings and seminars they should take place during ‘core hours’ (e.g. 9.30-16.00) and that this would be monitored and reported on in end of grant reports (e.g. the percentage of events that were held after core hours, with a justification). This could become part of the European Commission’s public monitoring of the Programme. Since meetings and seminars have to be publicly advertised it should be relatively easy to monitor. Such a policy would make it easier for those with caring responsibilities to decline to attend meetings outside of core hours without the implication that they do not care about their research.

12.3 We support the European Commission’s focus on the ‘gender dimension’ as opposed to simply ‘gender balance’. This broader term not only focuses on the number/proportion of female researchers, but also how gender is considered and embedded within research and innovation actions, for example, how the impacts of research and innovation funded by the Programme might benefit women as well as men.

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⁹ The Royal Society of Biology in the UK has collated information on similar schemes here: <https://www.rsb.org.uk/policy/groups-and-committees/returners-to-bioscience-group/returners-resources>

¹⁰ For example see ‘Gender in the global research landscape’ report by Elsevier (February 2017) https://www.elsevier.com/_data/assets/pdf_file/0008/265661/ElsevierGenderReport_final_for-web.pdf

Proposed amendments

Main regulation

Article 3 – Programme objectives	
Original text	Proposed amendment
<p>1. The Programme’s general objective is to deliver scientific, economic and societal impact from the Union’s investments in research and innovation so as to strengthen the scientific and technological bases of the <i>Union</i> and foster its competitiveness, including in its industry, deliver on the Union strategic priorities, and contribute to tackling global challenges, including the Sustainable Development Goals.</p> <p>2. The Programme has the following specific objectives:</p> <p>(a) to support the creation and diffusion of high-quality new knowledge, skills, technologies and solutions to global challenges;</p> <p>(b) to strengthen the <i>impact</i> of research and innovation in developing, supporting and implementing Union policies, and support the uptake of innovative solutions in industry and society to address global challenges;</p> <p>(c) to foster all forms of innovation, including breakthrough innovation, and strengthen <i>market</i> deployment of innovative solutions;</p> <p>(d) to optimise the Programme's delivery for <i>increased impact within a strengthened</i> European Research Area.</p>	<p>1. The Programme’s general objective is to deliver scientific, economic and societal impact from the Union’s investments in research and innovation so as to strengthen the scientific and technological bases of the <i>European Research Area</i> and foster its competitiveness, including in its <i>research excellence, fundamental research and</i> industry, deliver on the Union strategic priorities, and contribute to tackling global challenges, including the Sustainable Development Goals.</p> <p>2. The Programme has the following specific objectives:</p> <p>(a) to <i>promote scientific excellence and</i> support the creation and diffusion of high-quality new knowledge, skills, technologies and solutions to global challenges;</p> <p>(b) to strengthen the <i>role</i> of research and innovation in developing, supporting and implementing Union policies, and support the uptake of innovative solutions in industry and society to address global challenges;</p> <p>(c) to foster all forms of innovation, including breakthrough innovation, <i>social and economic innovation</i>, and strengthen deployment of <i>knowledge and</i> innovative solutions;</p> <p>(d) to optimise the Programme's delivery for <i>strengthening the</i> European Research Area.</p> <p><i>(e) to support research excellence, researcher mobility, fundamental and frontier research, European research collaboration and strengthening international collaboration and networking</i></p>
<p>Explanatory note</p> <p>The Regulation should emphasise the importance of promoting scientific excellence and fundamental research. In addition, it should include more nuanced language around the <u>role</u> as R&I (as a more neutral term to capture the full and long-term benefits of R&I) and a more inclusive definition of innovation. The suggested new point (e) aims to capture the objectives of Pillar 1 more explicitly.</p>	

Article 4, paragraph 1 – Programme structure	
Original text	Proposed amendment
<p>1. The Programme is structured in the following parts contributing to the general and specific objectives set out in in Article 3:</p> <p>(1) Pillar I 'Open Science', pursuing the specific objective set out in Article 3(2)(a) and also supporting specific objectives set out in Article 3(2)(b) and (c), with the following components:</p>	<p>1. The Programme is structured in the following parts contributing to the general and specific objectives set out in in Article 3:</p> <p>(1) Pillar I 'Open <i>and Excellent</i> Science', pursuing the specific objective set out in Article 3(2)(a) and also supporting specific objectives set out in Article 3(2)(b) and (c), with the following components:.</p>
<p>To note, this amendment would also need to be reflected in the following articles which refer to the ‘Open Science’ pillar: Recital (9) and Article 9, paragraph 2 of the main Regulation. Article 3, paragraph 1 (1) and Article 6, paragraph (1) of the Specific Programme. Annex I (1) to the main Regulation. Annex I (Pillar 1 – Open Science, p. 5) to the Specific Programme.</p>	
<p>Explanatory note</p> <p>We support this amendment proposed by the 13 European university associations to emphasise the importance of excellence and avoid confusion with the cross-cutting policy objective of Open Science.</p>	

Article 6, paragraph 6 – Implementation and forms of EU funding	
Original text	Proposed amendment
6. The implementation of the specific programme ²⁹ shall be based on a transparent and strategic multiannual planning of research and innovation activities, in particular for the pillar 'Global Challenges and Industrial Competitiveness', following consultations with stakeholders about priorities and the suitable types of action and forms of implementation to use. This shall ensure alignment with other relevant Union programmes.	6. The implementation of the specific programme ²⁹ shall be based on a transparent and strategic multiannual planning of research and innovation activities, in particular for the pillar 'Global Challenges and Industrial Competitiveness', following consultations with stakeholders about priorities and the suitable types of action and forms of implementation to use, <i>including through advice provided by independent advisory groups of high-level experts.</i> This shall ensure alignment with other relevant Union programmes.
Explanatory note	
We support this amendment proposed by the 13 European university associations and their rationale: This addition is based on the Horizon 2020 regulation. It is essential that the European Commission engages in a structured dialogue and co-creation of the programme implementation with stakeholders, such as the academia. Without advisory groups and other forms of structured interaction the programme could lose its close links with the latest developments in different disciplines. It is crucial that Horizon Europe fosters even more interaction with the main groups of beneficiaries, to guarantee its position at the forefront of research and innovation in Europe.	

Article 6, paragraph 10 (new) – Implementation and forms of EU funding	
Original text	Proposed amendment
	<i>10. All pillars and their respective components should foresee ample room for basic research in pursuit of its contribution towards a knowledge-based learning society and the related objective set out in Article 3(2)(a)</i>
Explanatory note	
We support this amendment proposed by the 13 European university associations and agree with their rationale: in pursuit of the overarching objective towards a knowledge-centred learning society and the complementary objective of supporting the creation and diffusion of high-quality new knowledge and skills, fundamental research has to be spread evenly across all pillars of Horizon Europe.	

Article 7, paragraph 3 - Missions	
Original text	Proposed amendment
3. Missions shall: (a) have a clear EU-added value and contribute to reaching Union priorities; (b) be bold and inspirational, and hence have wide societal or economic relevance; (c) indicate a clear direction and be targeted, measurable and time-bound; (d) be centered on ambitious <i>but realistic research</i> and innovation activities; (e) spark activity across disciplines, sectors and actors; (f) be open to multiple, bottom-up solutions.	3. Missions shall: (a) have a clear EU-added value and contribute to reaching Union priorities; (b) be bold and inspirational, and hence have wide societal or economic relevance; (c) indicate a clear direction and be targeted, measurable and time-bound; (d) be centered on ambitious, <i>excellence-driven</i> research and innovation activities <i>across all stages of development</i> ; (e) spark activity across disciplines (<i>including social science and humanities</i>), sectors and actors; (f) be open to multiple, bottom-up solutions.
Explanatory note	
It is important that missions maintain the focus on excellence that is at the heart of the rest of the Programme. Missions need to take into account research at very early stages right through to more applied work. Incorporating social sciences and humanities will be critical to their success.	

Article 10, paragraph 1 – Open access and open data

Original text	Proposed amendment
1. Open access to scientific publications resulting from research funded under the Programme shall be ensured in accordance with Article 35(3). Open access to research data shall be ensured in line with the principle 'as open as possible, as closed as necessary'. Open access to other research outputs shall be encouraged.	1. Open access to scientific publications resulting from research funded under the Programme shall be ensured in accordance with Article 35(3). Open access to research data <i>underlying published research findings</i> shall be ensured in line with the principle 'as open as possible, as closed as necessary'. Open access to other research outputs <i>and other relevant research data</i> shall be encouraged.
Explanatory note	
The priority should be for data supporting and underlying published research findings (i.e. the data needed to validate the results presented in scientific publications) to be made open as soon as possible, notwithstanding where there are justifiable reasons not to. See also amendment to Article 35.	

Article 12, paragraph 4 – Third countries associated to the Programme

Original text	Proposed amendment
4. The conditions determining the level of financial contribution shall ensure an automatic correction of any significant imbalance compared to the amount that entities established in the associated country receive through participation in the Programme, taking into account the costs in the management, execution and operation of the Programme.	4. The conditions determining the level of financial contribution shall ensure an automatic correction of any significant imbalance compared to the amount that entities established in the associated country receive through participation in the Programme, taking into account the costs in the management, execution and operation of the Programme. <i>The balance of the financial contribution of associated countries shall be considered over the life span of the Programme. Associated countries and the Commission shall review the balance at the interim evaluation of the Programme referred to in Article 47 (2) and any adjustment will be indicated in the subsequent statement of appropriations for the Programme.</i>
Explanatory note	
Article 12, paragraph 1 (d) notes that association agreements should ensure a “fair balance” as regards the contributions and benefits of the third country participating in the programme. When considering the balance of funding, this should be done on a multi-annual basis as this would provide the necessary flexibility for both the EU and the associated country and ensure excellence remains at the heart of assessment criteria. A review of the contribution could be conducted at the same time as the interim evaluation of the programme.	

Article 12, paragraph 5 (new) – Third countries associated to the Programme

Original text	Proposed amendment
	<i>5. Associated countries shall have the right to coordinate an action and the right to participate in monobeneficiary parts of the Programme.</i>
Explanatory note	
This is currently the case under Horizon 2020 and should continue under Horizon Europe. We have proposed this new paragraph to make it explicit in the legislative texts that this is the case, counter to amendments 148 and 152 proposed by the Rapporteur.	

Article 26 – Evaluation

Original text	Proposed amendment
<p>1. Proposals shall be evaluated by the evaluation committee which <i>may</i> be:</p> <ul style="list-style-type: none"> – <i>fully or partially</i> composed of external independent experts, – composed of representatives of Union Institutions or bodies as referred to in Article 150 of the Financial Regulation. <p>The evaluation committee may be assisted by independent experts.</p> <p>2. Where necessary, the evaluation committee shall rank the proposals having passed the applicable thresholds, according to:</p> <ul style="list-style-type: none"> – the evaluation scores, – their contribution to the achievement of specific policy objectives, including the constitution of a consistent portfolio of projects. <p>The evaluation committee may also propose <i>any substantial</i> adjustments to the proposals in as far as needed for the consistency of the portfolio.</p>	<p>1. Proposals shall be evaluated by the evaluation committee which <i>shall</i> be:</p> <ul style="list-style-type: none"> – composed of external independent experts, <i>including, as appropriate, from social sciences and humanities disciplines</i> – <i>In the case of the EIC</i> composed of representatives of Union Institutions or bodies as referred to in Article 150 of the Financial Regulation. <p>The evaluation committee may be assisted by independent experts.</p> <p>2. Where necessary, the evaluation committee shall rank the proposals having passed the applicable thresholds, according to:</p> <ul style="list-style-type: none"> – the evaluation scores <i>based on how the proposal meets the criteria of the call,</i> – <i>for missions,</i> their contribution to the achievement of specific policy objectives, including the constitution of a consistent portfolio of projects. <p><i>For missions,</i> the evaluation committee may also propose adjustments to the proposals in as far as needed for the consistency of the portfolio.</p>

Explanatory note

It is important that there is sufficient representation of SSH experts on evaluation committees, particularly to ensure multi-disciplinary proposals are evaluated fairly and effectively and to help embed SSH research in the Programme. An additional way to support SSH research is to ensure proposals are ranked based on a scoring system that fully takes into account all aspects mentioned in the call text. As noted by the 13 European university associations, this is especially important to ensure the effective implementation of cross-cutting themes, including the integration of SSH.

The portfolio approach is only relevant in the context of missions, and this should be specified in the article to avoid uncertainty regarding the implementation of the approach.

Article 29, paragraph 3 – Implementation of the grant

Original text	Proposed amendment
<p>3. The action may also be terminated where expected results have lost their relevance for the Union due to scientific, technological or economic reasons, including in the case of EIC and missions, their relevance as part of a portfolio of actions</p>	<p>3. <i>Following consultation with independent experts and provided sufficient notice is given to beneficiaries,</i> the action may also be terminated where expected results have lost their relevance for the Union due to scientific, technological or economic reasons, including in the case of EIC and missions, their relevance as part of a portfolio of actions</p>

Explanatory note

This paragraph could create significant uncertainty for beneficiaries and may neglect to take into account longer-term impacts that could arise from the research in favour of short-term returns. Whilst the European Commission may need some flexibility to be able to terminate actions which are not delivering, decisions on this should be informed by expert advice and beneficiaries need to be given sufficient time to conclude activities and plan accordingly.

Article 35, paragraph 3, subparagraph 2 – Exploitation and dissemination	
Original text	Proposed amendment
Open access to research data shall be the general rule under the terms and conditions laid down in the grant agreement, but exceptions shall apply if justified, taking into consideration the legitimate interests of the beneficiaries and any other constraints, such as data protection rules, security rules <i>or</i> intellectual property rights.	Open access to research data <i>underlying published research findings</i> shall be the general rule under the terms and conditions laid down in the grant agreement, but exceptions shall apply if justified, taking into consideration the legitimate interests of the beneficiaries and any other constraints, such as data protection rules, security rules, intellectual property rights, or <i>where the costs of preserving or supplying the data are disproportionate</i> .
Explanatory note	
The priority should be for data supporting and underlying published research findings to be made open as soon as possible (see also amendment to Article 10).	
There are a range of reasons why it may not be appropriate to make data open and given the potentially significant costs of curating, hosting and preserving research data, disproportionately high cost should be a valid consideration.	

Article 44, paragraph 1 – Appointment of external experts	
Original text	Proposed amendment
1. By derogation from Article 237(3) of the Financial Regulation, external experts may be selected without a call for expressions of interest, if justified and <i>the selection is</i> carried out in a transparent manner.	1. By derogation from Article 237(3) of the Financial Regulation, external experts may be selected without a call for expressions of interest, <i>only if a call for expressions of interest did not identify suitable external experts. Any selection of external experts without a call for expressions of interest must be duly</i> justified and carried out in a transparent manner.
Explanatory note	
Experts should always be appointed following a call for expressions of interest unless a call fails to identify suitable candidates. Where a call is not used, transparency and accountability must be ensured.	

Article 47, paragraph 5 (new) – Programme evaluation	
Original text	Proposed amendment
	<i>5. The Commission shall publish annually a monitoring report on progress to integrate the humanities and social sciences into the Programme.</i>
Explanatory note	
The European Commission currently publishes regular reports on 'Integration of social sciences and humanities' in Horizon 2020. It would be beneficial to continue to publish these to monitor progress in SSH integration and identify areas for improvement.	

Specific Programme

Specific Programme, Article 2, paragraph 2 – Operational objectives	
Original text	Proposed amendment
<p>The Specific Programme has the following operational objectives:</p> <p>(a) reinforcing and spreading excellence;</p> <p>(b) increasing collaboration across sectors and disciplines;</p> <p>(c) connecting and developing research infrastructures across the European research area;</p> <p>(d) strengthening international cooperation;</p> <p>(e) attracting, training and retaining researchers and innovators in the European Research Area, including through mobility of researchers;</p> <p>(f) fostering open science and ensuring visibility to the public and open access to results;</p> <p>(g) actively disseminating and exploiting results, in particular for policy development;</p> <p>(h) supporting the implementation of Union policy priorities;</p> <p>(i) reinforcing the link between research and innovation and other policies, including Sustainable Development Goals;</p> <p>(j) delivering, through R&I missions, on ambitious goals within a set timeframe;</p> <p>(k) involving citizens and end-users in co-design and co-creation processes;</p> <p>(l) improving science communication.</p> <p>(m) accelerating industrial transformation;</p> <p>(n) improving skills for innovation;</p> <p>(o) stimulating the creation and scale-up of innovative companies, in particular SMEs;</p> <p>(p) improving access to risk finance, in particular where the market does not provide viable financing.</p>	<p>The Specific Programme has the following operational objectives:</p> <p>(a) <i>strengthening Europe's scientific base and</i> reinforcing and spreading excellence;</p> <p>(b) increasing collaboration across sectors and disciplines, <i>including social sciences and humanities;</i></p> <p>(c) connecting, developing <i>and facilitating wide access to</i> research infrastructures across the European research area;</p> <p>(d) strengthening international cooperation;</p> <p>(e) attracting, training and retaining researchers and innovators in the European Research Area, including through mobility of researchers;</p> <p>(f) fostering open science and ensuring visibility to the public and open access to results;</p> <p>(g) actively disseminating and exploiting results, in particular for policy development;</p> <p>(h) supporting the implementation of Union policy priorities;</p> <p>(i) reinforcing the link between research, innovation <i>and education,</i> and other policies, including Sustainable Development Goals;</p> <p>(j) delivering, through R&I missions, on ambitious goals within a set timeframe;</p> <p>(k) involving citizens and end-users in co-design and co-creation processes;</p> <p>(l) improving science communication.</p> <p>(m) accelerating industrial transformation;</p> <p>(n) improving skills for research and innovation;</p> <p>(o) stimulating the creation and scale-up of innovative companies, in particular SMEs;</p> <p>(p) improving access to risk finance, in particular where the market does not provide viable financing.</p>
<p>Explanatory Note</p> <p>We support these amendments proposed by the 13 European university associations to explicitly mention social sciences and humanities across all parts of the programme and to make clearer the link between research, innovation and education.</p>	

Specific Programme – Article 5, paragraph 1 - Missions	
Original text	Proposed amendment
<p>For each mission, a mission board may be established. It shall be composed of around 15 high level individuals including relevant end-users' representatives. The mission board shall advise upon the following:</p>	<p>For each mission, a mission board may be established. It shall be composed of around 15 <i>independent,</i> high level individuals including relevant end-users' representatives <i>and academic experts from different disciplines. Any mission board will be established following an open call for nominations or for an expression of interest.</i> The mission board shall advise upon the following:</p>
<p>Explanatory note</p> <p>We support the amendment proposed by the 13 European university associations and their rationale: missions boards responsible for co-designing the missions and steering their implementation processes should consist of various institutional and sectoral actors, including meaningful representation from universities and research institutions. Expertise should be the guiding criterium for the appointment of the mission board members. The missions should comply with the high standards of excellence in research and innovation, like all the other parts of Horizon Europe. This is why it is crucial that the main beneficiaries included in the implementation of the research and innovation missions form the majority of the mission boards. In order to ensure transparency and inclusiveness in the establishment of the mission board, there must be an open call for nominations or for expression of interest.</p>	

Specific programme, Article 10, paragraph 3 – The EIC Board

Original text	Proposed amendment
3. The EIC Board shall be composed of 15 to 20 high level individuals drawn from various parts of Europe's innovation ecosystem, including entrepreneurs, corporate leaders, investors and researchers.	3. The EIC Board shall be composed of 15 to 20 high level individuals drawn from various parts of Europe's research and innovation ecosystem, including entrepreneurs, corporate leaders, investors, academic experts and researchers.
Explanatory note Universities play an important role in the innovation ecosystem and including academic experts would ensure the full breadth of relevant expertise can be utilised (e.g. knowledge exchange or technology transfer experts who may not be researchers).	

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