



Preliminary Position of the Ministry of Education and Science to the Preparation of the Tenth EU Framework Programme for Research and Innovation*

The Framework programme (FP) for Research and Innovation of the EU, encoded in Art. 182 of the TFEU, is amongst the strategic European funding instruments contributing to achieving higher of competitiveness and prosperity, and creating high-quality jobs and career opportunities, especially in R&I, throughout the Union. The FP will be evermore fundamental vis-à-vis the contemporary and future global challenges, as the Letta and Draghi reports underlined the crucial role of R&I as the engine for closing the innovation gap with competing economies.

Based on the lessons learned from the past Framework Programmes, the Ministry of Education and Science of the Republic of Bulgaria considers the 10th EU Framework Programme for Research and Innovation (FP10) 2028-2034 should continue building on its past achievements, while at the same time being open to new methods of implementation and priorities that respond to the socio-economic and political environment. At its core the FP10 architecture should aim at building **a stronger, quality driven and impactful European research and innovation ecosystem** while also boosting Europe's **competitiveness, strengthening resilience and preparedness** to face future crises, and supporting Europe's competitive edge in the global race for new knowledge and technologies. The core of the program should be based on the researchers' expertise, creativity and ideas, and the efforts to increase their potential in all EU Member States. This requires a **stable fit-for purpose budget** proportionate to the ambition and goals of FP10. In achieving to this, we believe it should incorporate the following aspects:

* This document outlines FP10 preparation incorporating insights from Bulgarian stakeholders. It refrains from preempting Bulgaria's position during the negotiations on the next Multiannual Financial Framework or FP10

Simplification and alignment

FP10 needs to introduce **further coherence, consolidation and simplification**, both in terms of architecture and its overall governance. Further streamline program and project management, simplify the application-evaluation-reporting processes, significantly reduce bureaucratic burdens, further expand the use of lump sums, and thus boost its inclusiveness, accessibility and reduce administration and financial errors, especially for newcomers to the FP. Aligning assessment with research practices is crucial together with supporting ambitious projects in emerging fields and research groups with innovative approaches. At the same time, it is expected evaluation results feedback to include detailed breakdowns, incl. ESRs.

More efforts are needed to promote and implement **genuine and timely synergies** and overcome obstacles by ensuring **strategic complementarity by design and joint programming** among the various European programmes and funds, as a means to maximise the impact and leverage of R&I and R&I-related investments from all available sources. This would also require improving coordination and collaboration among the Commission services throughout the design and implementation phases.

The persisting innovation divide across EU Member States remains too big and closing this divide will be crucial to boost the European R&I ecosystem's competitiveness and coherence. This requires a greater explicit efforts and **coordination at all levels**.

European Research Area

FP10 should continue its overarching goal of achieving the vision for a European research area (ERA) through strengthening European research and its impact, building on national efforts for social benefit and increased competitiveness, including generating new intellectual capital. This is even more pertinent within the context of the upcoming legislative proposal for a European Research Area, which is set to **guarantee the fifth freedom** – free movement of researchers, scientific knowledge and technology and reduce fragmentation of research across the EU. Administrative and other

barriers hindering academic mobility should be properly addressed.

FP10 should support Open Science and the removal of legal barriers to research within ERA, including the ERA Policy agenda. Open science and open access policies and practices should continue to be promoted, including incentivizing a more fair research publication framework.

Finally, the connection between the ERA Policy Agenda and FP10 should be strengthened. Improving the alignment between national policies and ERA Actions will contribute for a

coherent approach that leverages best practices, encourages cross-border collaboration, and promotes socioeconomic development,

ensuring diverse stakeholders work synergistically to achieve long-term outcomes benefiting both Member States and European Research Area.

Capitalizing on excellence throughout the Union

EU R&I policy must aim to foster excellence and ensure better alignment of national R&I policies. Excellence should remain the core principle of FP10 to guarantee highest-quality research and scientific leadership, as well as better **diffusion of R&I in Europe**. The Union's competitiveness is dependent on strengthening its R&I capacities, grounded in scientific excellence and competitive innovation policies across Europe, as well as on boosting underutilised potential and national R&I systems. **At the same time, FP10 should enable and support mitigating and overcoming the persistent research and innovation divide, e.g.** through its so-called 'Widening' instruments. EU can only move towards closing the gap vis-a-vis its global competitors if all EU Member States progress forward. Inclusive approach needs to be promoted so that all excellent researchers can participate and from which all can benefit, since excellence is located throughout the whole Union.

A **balanced approach** is needed towards supporting projects across all Technology Readiness Levels, with a focus on strengthening the impact of investments in **fundamental research** to nurture research excellence and enhancing European scientific leadership. Building effective synergies between **fundamental and applied**

research, as well as innovation, is key to achieve these goals. Additionally, boosting technology transfer outputs is required to further enhance the dissemination and demonstration activities of innovative projects. Higher TRL levels, which are close to the market, could be supported largely by the beneficiary/country, which will obtain the financial benefit from the research results achieved with the public (FP10) funding. The Framework programme, and especially its 'Widening participation and spreading excellence' component, has played a key role in decreasing **the R&I divide in Europe** and bridging the **participation gap** in the framework programme itself by enabling and promoting newer EU Member States to catch up and get their performance up to speed. Nevertheless, further efforts are needed to address this. Closing the divide and resolving the systemic root issues need to be addressed by EU-level solutions/approach. This approach can be enhanced via both (1) horizontal measures, such as further simplification and decreasing access costs, e.g. expanded use of two-phase proposals for larger-scale projects, as well as ensuring an unbiased and level playing field, e.g. via broader use of blind evaluation; and (2) tailor made and fit-for-purpose tools, e.g. existing capacity building, networking and partnering-up

instruments, as well as specific support to potential applicants and for institutional reforms and transformation, and expanding the hop-on scheme.

The existing 'Widening' instruments should be **improved and concentrated avoiding overlapping** in FP10 for addressing the systemic factors hindering the potential of the widening Member States, as well as tackling the brain drain, e.g. by enhancing COST, and increasing skills of researchers needed for excellent science. Existing widening instruments need improvement, concentration, and enhanced agility. They should enable cooperation at the research group level rather than favouring broad institution-based collaboration.

Additionally, robust safeguards must ensure these instruments do not introduce biases during initial project evaluations, considering widening is intended as a "second chance" for promising initiatives. 'Widening participation' under FP10 needs a **substantially increased fit-for-purpose** budget share to achieve its main goal. In particular, the ERA Chair and Twinning projects should be supported through more frequent calls to increase cooperation options. Explicit focus is also needed on strengthening, interlinking and opening up innovation ecosystems, such as through expanding the existing relevant instruments.

Collaborative research

We expect that FP10 retains the well-known **three pillar structure**. Specifically, **Pillar II** needs improved coordination and greater flexibility of its clusters to effectively address emerging threats and challenges and should focus on strategic EU priorities and socio-economic challenges across all disciplines for a better collective impact and EU added value. Fundamental research is undoubtedly vital to further support the EU's long-term competitiveness. Nevertheless, FP10 should focus on excellent cross-border collaborative R&D&I activities with the active participation of industry. New to the market. Pillar II should continue promoting overcoming fragmentation and knowledge transfer and valorisation between and within the private and public sectors, as well

as between fundamental and applied research. Pillar II should ensure a balance between collaborative and other types of projects, as well as between **bottom-up and top-down calls** and **smaller and larger projects** throughout the FP. Furthermore, Pillar II should focus on further building open, trust-based collaborations between a wide range of European R&D&I actors. This ensures that new technologies are taken up by industry and scaled up into new solutions, products and services, improving people's well-being and quality of life and increasing Europe's long-term competitiveness. Project proposal calls should be less descriptive and foster real competition amongst participants. It is central that FP10 increases the share of low-TRL in Pillar II as to support developing the necessary

European knowledge base and strengthen breakthrough, fundamental collaborative research to tackle global European challenges.

FP10 should aim to enhance cooperation between innovation leaders and modest innovators to prevent further regional disparities and fragmentation. Stimulating private investment is needed by ensuring strong EU support for technology-intensive sectors while also maintaining European technological neutrality.

This will potentially incentivize the industry to invest in Europe rather than abroad.

FP10 should incorporate innovative, flexible mechanisms that enable swift mobilization of scientific resources and timely, coordinated responses to emerging crises. Additionally, Social Sciences and Humanities need better prioritization, including via dedicated funding instruments, emphasizing their applied role, such as promoting cultural heritage.

International cooperation

We fully support **fostering international R&I collaboration** in FP10, which should be based on EU principles and values as well as Europe's strategic autonomy. The programme should remain the world's most attractive R&I programme and promote attracting talents and multilateral international R&I cooperation by allowing association of **like-minded** third countries.

Nevertheless, specific attention is needed to safeguard potentially **sensitive** topics and technologies. This could be addressed by introducing new and improving existing tools e.g. restricting the participation in such projects to only EU Member States.

Research infrastructures

FP10 should **enable the full exploitation of the potential** of existing and new Research Infrastructures (RIs) by ensuring and promoting streamlined inclusive access for researchers and industry and establishing a genuine pan-European ecosystem of research infrastructures and services. This would entail adapting existing and introducing new tools in developing skills and attracting talent to accommodate the diverse needs of the European research community.

Achieving this and ensuring their long-term sustainability and resilience requires **revisiting the existing funding models**, including through the promotion of synergies with national research infrastructures and joint investments, as well as increasing the direct funding for operational support. An **improved monitoring and coordination** of the RIs landscape is needed, including prioritization of the RI services and their operation and governance through existing structures,

such as the European Strategy Forum of Research Infrastructures (ESFRI) and the ERIC Forum.

The European approach towards Technology Infrastructures should be based on a clear EU added value, and

be as inclusive and accessible as possible, promoting the functioning of such infrastructures across the Union. To accelerate industrial R&I and its scale-up, we need to introduce a push-pull approach, due to the specific user base of technology infrastructures.

European Partnerships and European Missions

FP10 should aim to avoid any **duplications and overlapping** of instruments, such as the European Partnerships and EU Missions. Partnerships must be further simplified to increase their impact and leverage, while efforts towards opening up so-called 'closed clubs' should continue. They need to adopt a **portfolio approach** with a clear EU-added value and **lifecycle** concept and avoid thematic **overlapping**. The governance models of partnerships should be improved and streamlined. **Accessibility and transparency** of all European partnerships is still an issue that needs to be addressed if we are to achieve further consolidation of resources to deliver the envisaged impact.

EU Missions are still underperforming and underdelivering. They continue to

lack a **precise and effective coordination and implementation mechanism** hindering European stakeholders from participating and contributing to their end goal. Radical simplification and a genuine portfolio approach are needed. Ownership must be ensured by both the relevant Commission services and by the Member States' authorities. Since their concept would continue to require a mix of instruments and funding sources for supporting a very wide variety of actions and projects, we believe the success of the EU Missions relies on truly making them an EU-level initiative by lifting them out of the FP to ensure synergies and complementarities among relevant EU programs. In line with the ERAC opinion on FP10, funding from the FP would be strictly limited to R&I components of future missions.

ERC, EIC and MSCA

Innovation and market uptakes must not overshadow the importance of advancing the frontiers of science and technology and know how important it is to continue supporting all R&I, from basic research to disruptive innovations. It is essential that FP10

should continue to enhance its support for generating knowledge and innovation uptake. Thus, the opportunities under ERC, EIC and MSCA should be strengthened and expanded with **further simplifications**, including **improved time-to-grant and**

accessibility, and inclusiveness measures and onboarding opportunities addressing the research and innovation divide to increase the number of applications from less performing countries.

We view the **European Research Council** (ERC) as an essential component of FP10, which should further increase the focus on enhancing the **ERC Synergy grants** as a means of achieving greater impact of European added value and allowing genuine collaborative pan-European 'blue sky' research. The rest of the ERC grants would highly benefit from an 'ERA Fellowships'-like scheme. Contributing to diversification of the countries hosting ERC grants can be achieved through applying a synergetic approach to individual ERC grants, with shared funding of grants between the FP and national funding of the country hosting the grantee, as this would increase the success rates. Increasing the funding available, thus the success rates of individual ERC grants, synergies with national research councils could be envisioned.

Fostering smooth mobility of talents are fundamental for excellent research across the Union, supporting the next generation of European researchers and promoting the brain circulation. This is why the **Marie Skłodowska-Curie Actions** (MSCA) should further enhance accessibility, specifically through

discarding country correction coefficients, which do not reflect the salary rates in the high added value private sector companies. Addressing the brain drain and allowing and promoting brain circulation is pivotal for sustaining and enhancing R&I capacities in all Member States.

The role of the **European Innovation Council** (EIC) as a tool supporting innovation in Europe should be preserved but also further simplified and developed, mainly building on a "bottom-up" approach. Furthermore, in line with the conclusion of the Draghi report that the fragmentation of the EU innovation ecosystem is amongst the key causes for Europe's weakened innovation performance, the EIC should be a key tool to build a risk-tolerant European innovation ecosystem. This can be achieved through means of introducing a decreased time of the funding cycle along with reduced administrative work, coupled with improved mechanisms to boost attracting private investments. The **European Institute of Innovation and Technology** (EIT) could also enhance its complementarity with the EIC in facilitating innovative projects, or progressions of startups supported by EIT to EIC instruments including through different accelerator programs to ensure scaling innovation and supporting companies in their scale-up phases.