

'Close, but no cigar'

LERU's first response to the EC proposals for the new Horizon Europe, the European Competitiveness Fund and the next Multiannual Financial Framework

Introduction

This is LERU's first response to the European Commission (EC) proposals, published on 16 July 2025, for the [next Multiannual Financial Framework \(MFF\)](#), the [new EU Framework Programme \(FP\) for Research and Innovation \(R&I\)](#) and the [European Competitiveness Fund \(ECF\)](#). A more detailed reaction will follow in due course and will aim at contributing to the position of and the negotiation process between the Council and the European Parliament. Despite the many novelties in these proposals, we hope the final MFF, Horizon Europe and ECF will be adopted at the latest mid 2027, allowing for a timely start of the new programmes.

Over the past year, LERU has published several papers and notes with recommendations for the next EU FP for R&I¹ (hereafter referred to as FP10, to avoid confusion with the current FP). We have also (co)published statements and opinion pieces expressing support for specific aspects of the FP that we felt required additional attention, such as the Marie Skłodowska Curie Actions (MSCA)², the European Research Council (ERC)³ and how the ECF and FP10 can be distinct and complementary⁴. Also the need for an ambitious FP budget has of course been an important point of attention for LERU.

Today, LERU is very pleased that there will indeed be a self-standing framework programme for R&I, embedded in an autonomous (draft) regulation, establishing the next Horizon Europe, the 10th EU Framework Programme for Research and Innovation, and a (draft) Council Decision, presenting a Specific Programme implementing this 10th framework programme. As expected, both texts are much shorter than the ones establishing and implementing FP9, the current Horizon Europe, because they are limited to the basic principles and many details have been left out. This makes it difficult to fully assess the proposals. Because, as always, the devil is in the detail.

¹ [LERU FP10 paper](#), [LERU note on Precompetitive, collaborative research](#), [LERU note on simplification](#)

² <https://www.leru.org/news/no-directionality-in-msca> and <https://www.leru.org/news/leading-research-innovation-organisations-unite-to-support-the-marie-skłodowska-curie-actions-msca>

³ <https://www.leru.org/news/a-call-for-clarity>

⁴ https://www.leru.org/files/Joint-paper-on-FP10_Final.pdf

We are equally pleased that the EC has honoured the request to double the EU's R&I investments and is proposing, in its draft MFF 2028-2034, an ambitious budget for the next Horizon Europe. LERU has repeatedly stated that a budget of €200 bn is needed to fund the many excellent projects that are currently unfunded (and underfunded) and to enable European R&I to contribute more to societal and economic progress. The proposed FP10 budget of €175 bn does not fully match what LERU called for, but we acknowledge that the proposed budget is already an important step in the right direction of a more ambitious investment in R&I. We call on the European Council, the ECOFIN Council, the Competitiveness Council, and the European Parliament to support the EC's ambitions for R&I and the proposed budget for FP10.

As announced, and now published, the EC proposes to tightly connect the European Competitiveness Fund (ECF) to FP10. However, the vagueness of the proposed connections between both and the extreme complexity of the proposed ECF Regulation in general, are not really helpful to fully understand the links between FP10 and the ECF at this point in time. We hope the co-legislators will find ways to provide more clarity and detail and take away some of our doubts, without endangering the increased agility and flexibility the EC seeks to realise.

1. Comments on the proposed MFF 2028-2034

The MFF proposal presented by the EC on 16 July amounts to almost €2 trillion, or 1.26% of the EU's gross national income on average between 2028 and 2034. This framework should equip the EU with a long-term investment budget matching its ambitions to be an independent, prosperous, secure and thriving society and economy over the coming decade.

The second heading of the proposed MFF, dealing with competitiveness, prosperity and security (including the European Competitiveness Fund and Horizon Europe) is the most important heading for Europe's R&I community. The relevant budget figures will be tackled below.

LERU has an important concern with regard to the first heading of the proposed MFF, which receives the largest share of the budget, and covers economic, social and territorial cohesion, agriculture, rural and maritime prosperity and security: the 27 national and regional partnership plans, necessary to make the money under this heading flow to the member states, are a highly contested *modus operandi*. The European Court of Auditors and the European Parliament had already before the publication of the proposal expressed their opposition to such plans. So, if those plans would perish during the Parliament and Council deliberations and negotiations, the MFF homework will have to be redone. This would have serious implications for the other headings, including the budget for FP10 and the ECF. LERU would hate to see this happening. A timely adoption of the MFF is crucial for a timely start of different programmes, including FP10, programmes which are crucial for Europe's future.

2. Comments on the EC proposal for a Regulation establishing the new Horizon Europe (FP10), and the proposal for a Council Decision on the Specific Programme (SP) implementing FP10

a) Introduction

LERU warmly welcomes the proposal for FP10. It is a good midway between an evolution and a revolution, and it is important that the cornerstones and important principles of the FP which we identified in the LERU FP10 paper⁵, feature prominently in the proposal.

We also welcome the proposed structure for FP10 with four pillars. A recognisable structure is helpful for applicants that are already familiar with the FP. We are pleased to see indications in the proposed regulation that the EC has been receptive to ideas and concerns set out in the [LERU FP10 paper](#) and our more recent notes on [Precompetitive, collaborative R&I in FP10](#) and on [Simplification](#). However, both the proposed FP10 regulation and the Specific Programme are very short and provide little details on how these positive elements will be realised or guaranteed. In addition, some other concerns persist, and new ones have arisen.

One of these new concerns relates to the governance of FP10: the agility and flexibility that the EC wants to achieve by limiting the proposals to headlines, will create uncertainty with potential applicants and gives a lot of leeway to the EC to decide what they see fit as priorities or intervention areas for R&I. Especially for the Competitiveness areas proposed under pillar II of FP10 and linked to the ECF, the governance mechanisms are very unclear. We reiterate strongly that experts need to be in the driving seat to identify the areas of intervention for R&I and the unforeseen and emerging priorities referred to in the proposals. Also, we want to highlight that, for FP10 in general but for pillar II's Competitiveness part in particular, it is crucial to keep policy makers with experience in the research policy domain and with the Framework Programme(s) on board. These policy makers and officials, from the Commission, Parliament and Council, need to be involved both in the negotiations on the R&I parts of the ECF's competitiveness windows, as well as in the support for, and control of, the implementation of this part of FP10's pillar II.

b) Budget division

LERU is surprised that the budget division in the proposed FP10 regulation is not complete: the proposal does not indicate how much funding from pillar I 'Excellent Science' will be allocated to the European Research Council (ERC) and how much to Marie Skłodowska Curie Actions (MSCA). The proposal also does not include how much funding from pillar III

⁵ <https://www.leru.org/files/Publications/LERU-paper-blueprint-EU-FrameworkProgramma-FP10.pdf>

‘Innovation’ will be allocated to the European Innovation Council and how much funding is foreseen for the Innovation Ecosystems. This leaves stakeholders a bit in limbo to fully assess the impact of the proposal. It would have been better for the EC to take the approach of seven years ago, namely, to allow some time between the publication of the MFF proposal and the publication of the proposals of the different programmes. This would have avoided hasty decisions and limited figures.

Unofficially, we have been informed that the proposed budget for the ERC will be €31.5 bn which is (quasi) a doubling of the budget compared to the current programme. This is in line with the expansion of the ERC announced by EC President von der Leyen last year and the call for doubling ERC funding in the Draghi and the Heitor reports. This budget proposal is very much welcomed and long overdue. However, the share of ERC funding compared to the full proposed FP10 budget stays more or less the same, since the proposed FP10 budget is almost the double of the FP9 budget. So, whether this doubling of ERC funding is an “expansion” or not, depends on the interpretation.

Unfortunately, the proposed budget for MSCA is not a doubling. Although we are pleased that the MSCA budget is proposed to increase to €10 bn, we consider it a painful, missed opportunity not to increase the funding more substantially, given the doubling of FP funding. MSCA funding has a clear EU added value and the different actions can easily fund more excellent projects. It is an extremely attractive programme for researchers and academia throughout the EU and beyond and should be recognised as such.

According to the unofficial sources, the proposed budget of the EIC would be €34.5 bn which is more than a tripling of the budget. LERU is very supportive of the EIC, and especially its pathfinder and transition schemes. However, we miss detail on how this large budget will be spread over the different parts of the EIC and hence cannot assess if and to what extent the budget increase will benefit researchers and universities.

As for pillar II ‘Competitiveness and Society’, we question the relatively low budget of the Societies part (EUR 7.606 bn), compared to the Competitiveness part (EUR 68 270 bn). This is funding for crucial areas, such as migration, disinformation, democracy and social cohesion, and should receive more funding from this pillar.

Another budget that has more than doubled is that of pillar IV ‘European Research Area’, in the F10 proposal at EUR 16.854 bn. Given the limited information in the proposals on how this funding will be spent, it is impossible to assess how this increase, is motivated. Especially more insights are needed on the funding for Research and Technology Infrastructures and how this might be different from how the FP has funded research infrastructures until now.

c) Pillar I “Excellent Science”

We are pleased to see the **Marie Skłodowska Curie Actions (MSCA)** still to be included in pillar I of FP10 and that the proposed regulation mentions the continuation of funding for current actions, especially the doctoral networks and post-doctoral fellowships. However, MSCA needs to be strengthened, with more budget, not just ‘continued’, as indicated above. Also, we are very concerned with the opening made in the Specific Programme to deviate from the pure bottom-up character of MSCA. As indicated repeatedly in statements⁶ over the past weeks, any directionality in MSCA needs to be avoided. Since the draft Regulation does not mention this potential directionality, one can question the legality of introducing it through the draft Council Decision, which has its legal basis in the draft Regulation.

We warmly welcome the confirmation that the **European Research Council (ERC)** will be expanded in FP10 and that ERC funding will be awarded solely on the basis of the criterion of excellence, which has been the case since the ERC was set up in 2007. We hope the “expansion” only refers to the increased budget (however, see comments above) and does not imply that more funding schemes will be “imposed” on the ERC, like the super grants which are now proposed in the 2026-2027 work programme. Deciding on ERC funding schemes is and should remain the absolute prerogative of the ERC Scientific Council. Any interference with this, be it through the steering of ERC funding by the EC or by using ERC funding to co-fund other FP initiatives such as “moonshots”, is a no-go for LERU.

The independence of the ERC Scientific Council is key to the ERC’s continued success. It is good to see this being explicitly protected in the proposed regulation and Specific Programme. However, we are concerned with what appears to be a weakening of the position of the ERC President. First, there is the reduction of the term of office of the ERC President to two years with an optional additional two years. Second, there are the provisions on the position of the ERC president, that are now in the annex of the FP9 Specific Programme, but have disappeared completely in the FP10 proposal. These include that the ERC president needs to reside in Brussels, needs to spend at least 80% of his/her time on ERC business, and what the remuneration of, and the support for, the ERC president will be. While the removal of these articles can be the result of an innocent shortening of the legislative documents, LERU would nevertheless like to see these provisions to reappear in the FP10 Specific Programme. Together with restoring the term of office, this would help to guarantee the important position of the ERC president, and his/her independence from the European Commission.

d) Pillar II “Competitiveness and Society”

General

⁶ See <https://www.leru.org/news/no-directionality-in-msca> and https://www.leru.org/files/Joint-paper-on-FP10_Final.pdf

LERU is pleased with the two parts this pillar consists of, one focused on Competitiveness (covering the R&I activities of the four ECF policy windows) and one on Society. We are especially pleased that the Society part is not linked to the ECF but is fully independent from it.

We applaud the explicit inclusion in the draft FP10 regulation of an article on collaborative research, with the explicit aim to support transnational, interdisciplinary and cross-sectoral research. We are also pleased that multi-disciplinarity – where appropriate-, the integration of Social Sciences and Humanities (SSH) across all components of the programme, and the encouragement of Open Science practices, are part of the horizontal principles of FP10. We hope that the integration of SSH in FP10 will be more successful than this is currently the case.

LERU welcomes the inclusion of a provision on having a balanced TRL approach in this pillar, like what is included in the FP9 regulation. However, like the provision on multi-disciplinarity and SSH integration, also this provision needs to be implemented more thoroughly than is currently the case. In FP9 there are only few opportunities for adequate low TRL research in pillar II and those opportunities risk to be even fewer in FP10 because of the close link to the ECF. If the EU really wants to make a leapfrog in competitiveness areas, funding for precompetitive, lower and middle TRL research will be key.

The provision highlighting the further reinforcing of international collaboration in the next Horizon programme is also very much welcomed. We hope that the close link with competitiveness for the larger part of this pillar, will not hinder this (see below).

Competitiveness

This part of pillar II is “tightly connected” to the ECF and will provide funding for the R&I activities of the four policy windows of the ECF: ‘Clean Transition and Industrial Decarbonisation’, ‘Health, Biotech, Agriculture and Bioeconomy’, ‘Digital Leadership’, ‘Resilience and Security, Defence Industry and Space’. These four policy areas are mirrored in both programmes and will be linked with each other but have their own budgets in FP10 and in the ECF. However, these linkages lack details, making it difficult to assess how strong the ECF steering or influence will be on the R&I activities in these areas in FP10.

Based on the information available, there are some concerns:

- First, although the article on a balance of TRL levels also applies to the Competitiveness part of pillar II, we fear a strong focus on high TRL levels, leading to even less funding for low and medium TRL R&I projects than is the case in FP9. As indicated above, low and medium TRLs are essential for the EU’s competitiveness and should be funded through this part of FP10’s pillar II.

- Second, we need guarantees on the governance of these four competitiveness components of pillar II in FP10: people with expertise on R&I, be it in the EC or possibly through comitology, need to write WP for the R&I activities of the competitiveness components. Also, scientific expertise needs to inform this process. While LERU is not in favour of long, multi-layered processes, we stress that involving researchers in the agenda-setting of FP10 but also of the ECF, is key to ensure the latest research insights are taken into account.
- Third, the political steering of the ECF could lead to R&I activities in the four competitiveness policy windows that are even more prescriptive than the ones we have today. We underline the need for the EC to realise less prescriptive programming and open topics as default also for the four competitiveness components of pillar II. In this regard, we would like to see the open calls to be included in the legislation of FP10, not only in the explanatory memorandum.
- Fourth, we would welcome clarity on the extent to which the ECF can dictate changes to the competitiveness part of FP10's pillar II: for instance, what happens in FP10's pillar II if there is a shift of weight of priority and budget in the ECF policy windows? While we appreciate that a 7-year programme needs a degree of flexibility, it would not be helpful to see too large shifts in the R&I part. Predictability and continuity of funding opportunities are very important for R&I, as the EC rightly points out itself in the FP10 proposals.
- Fifth, multi-disciplinary and integration of SSH where relevant, should also apply to this "competitiveness" part of pillar II.

For LERU, linkages between this part of pillar II and the ECF should in fact be the other way around: while it makes sense that the competitiveness components of FP10 mirror the ECF competitiveness windows, FP10 should fund R&I independently from the political steer of the ECF and the R&I outcomes should feed into and co-shape the ECF. It is important to have scientific and societal needs driving the priority-setting of this top-down funding besides political ambitions. LERU has made concrete suggestions on how this could be done in its [note on precompetitive, collaborative R&I](#) and a [recent statement on the topic with other R&I stakeholder organisations](#). We warmly encourage the EC to look at our suggestions when further developing the linkages between the competitiveness part of pillar II of FP10 and the ECF.

Partnerships

The radical simplification and streamlining of partnerships and the increased control of the European Commission on partnerships if Union funding is involved, are fully in line with LERU's position⁷. We hope this will indeed reduce the number of partnerships and increase

⁷ See LERU [FP10 paper](#), p.13-14

accessibility and transparency of the partnerships as well as the co-financing by other partners involved.

Moonshots

“Moonshots” are a surprising novelty in the communication around FP10. The notion is a bit confusing; when missions surfaced in the run up to FP9, they were often referred to as ‘moonshots’. Now they are only mentioned and illustrated in the Explanatory Memorandum to the FP10 regulation, not in the FP10 regulation as such, nor in the ECF regulation. So there is presently no legal basis for these moonshots, while they feature prominently on the EC FP10 website⁸ and a separate factsheet on moonshots⁹ has been published. In addition, it is not clear how these moonshots will be financed. The EC website mentions that funding from FP10 and the ECF, national and regional funding, as well as private funding could be pooled. While it is sensible that R&I activities could be financed through the competitiveness part of pillar II in FP10, the scaling and upscaling of these moonshots should certainly not be funded by FP10. The notion that all parts of FP10, including bottom-up programmes like ERC and MSCA, could contribute to the financing of the moonshots, is unacceptable. Clarification on these moonshots and, in particular their financing, would be very welcome!

Society

LERU warmly welcomes the inclusion of a ‘society’ window in the future pillar II that is independent from the EFC and that will address bottom-up research, in particular in the areas of global societal challenges. It is very important that collaborative R&I funding, with a specific emphasis on global societal challenges, including those that are not directly linked to economic output, are continued in FP10. As indicated above, this part of pillar II is very important and should be strengthened budget wise in the final text.

LERU is pleased with the approach proposed for the missions in FP10, namely that FP10 will only fund the R&I activities of the missions and that these will not be continued beyond 2030.

LERU does question the funding of the R&I activities of the New European Bauhaus facility, by this part of pillar II and by Horizon Europe in general. We do not believe this belongs in the FP since, until now, there were hardly any R&I activities related to the Bauhaus initiative.

⁸ https://research-and-innovation.ec.europa.eu/news/all-research-and-innovation-news/horizon-europe-2028-2034-twice-bigger-simpler-faster-and-more-impactful-2025-07-16_en

⁹ https://research-and-innovation.ec.europa.eu/document/download/a64d902e-c508-4694-a0da-60504d071f82_en?filename=ec_rtd_mff-moonshots.pdf

e) Pillar III “Innovation”

We welcome better linkages between pillar II and pillar III. While in the current programme there are good connections between pillar I and pillar III, especially between ERC and EIC, these connections are currently missing between pillar II and pillar III.

We are pleased with the strengthening of the **European Innovation Council (EIC)** and the confirmation of EIC Pathfinder with both the Open and Challenges part and EIC Transition. We stress that these parts of the EIC are also very important to researchers and universities, not only to startups and SMEs. We also welcome the move to an even more ARPA-like approach for the EIC.

The draft FP10 regulation states that the EIC may support innovation in critical technologies with focus on defence applications. This is a clear move away from the civil character that FPs have had until now. Understanding the balance between funding non-defence applications and defence applications will be important to assess the impact of this double approach in EIC.

We notice that the EIT is not included in FP10. As universities which have been significantly involved in the EIT’s KICs over the past years, we would like to get clarity as soon as possible whether the EIT is to become independent from the ECF or FP10, or will be discontinued, and/or if the EIT KIC activities will continue to receive funding under the Innovation Ecosystems in FP10.

f) Pillar IV “European Research Area”

In general, LERU is pleased that there is a real fourth pillar bringing together different aspects of strengthening R&I and the ERA, including research and technology infrastructures, since this is in line with what LERU suggested in its FP10 paper¹⁰. However, the FP10 regulation and Specific Programme are so short that it is difficult to assess the proposed changes. For instance, what widening instruments will be accessible to which category of countries is not clear.

In addition, we wonder how the substantial increase of funding will be spent. While LERU would welcome FP10 to cover more expenses related to equipment for research, the actual building of large research and technology infrastructures (“bricks and mortar”) should not be financed by the FP. That type of funding should come from the ECF or from the national and regional partnership plans. We would also welcome more insights into how the ERA part will

¹⁰See LERU [FP10 paper](#), p. 23-24

link to the ERA Act. Too many questions remain on this pillar. In general, also for this pillar, more details are needed.

g) Other

We miss the mentioning of “strengthening excellent basic and frontier research” in the specific objectives of the programme. We hope this is not an indication of a decrease in importance of the **excellence principle** that has guided the FPs for many years and that is key to its success.

LERU is pleased that the EC is taking **simplification** seriously and aims at less prescriptive programming and open topics as default, with more freedom to applicants for different pathways towards expected outcomes (see also the comment above on the importance of guaranteeing this across pillar II, also in the competitiveness part). However, LERU remains cautious about lump sums, especially for large collaborative projects with many partners. We are therefore not in favour of setting lump sums as the default form of union contribution in the FP10 regulation. We hope the EC will develop other simplified forms of cost reporting and any other simplification measures, in dialogue with stakeholders, including research-intensive universities.

We take note of the missing of a civil clause in the FP10 regulation. Based on the proposals published, it is unclear what is the distinctive position of **civil, dual use and/or military R&I** in FP10. Only for the EIC there is clear picture included in the FP10 regulation: the EIC will be able to fund dual use and defence activities. For the rest of the programme this is not clear, although Commissioner Zaharieva has stated¹¹ that dual use would be the default for FP10. For LERU, this is impossible for FP10 without a clear legal basis, which is presently lacking. A short, unclear, sentence on dual use in the Explanatory Memorandum to the FP10 regulation has no legal value.

Next to a legal basis for dual use, we also want an indication which parts/calls of FP10 can fund dual use research. A flagging system like we know it for SSH can be considered. This is also important for third countries wanting to associate to the programme and for universities and possibly other beneficiaries that have a civil clause or that are in an officially neutral country.

Last, we would welcome clarity on the defence research programme developed under the ECF, and the possible alignment with DIANA, the NATO Defence Innovation Accelerator that also

¹¹ Commissioner Zaharieva made this statement in the press conference presenting FP10 at the informal competitiveness council on 17 July, see for instance <https://sciencebusiness.net/news/dual-use/horizon-europe-will-be-dual-use-default-zaharieva-says>

funds a lot of defence research. Any overlap between what the EU will fund and what is covered by DIANA needs to be avoided.

Clarification is also needed regarding the ECF **single rulebook** that would also apply to Horizon Europe. As stated previously, R&I activities should be implemented through different rules than those for market-oriented activities such as deployment.

The FP10 regulation mentions that there will be no distinction anymore between funding rates of **RIA and IA**. We are concerned that this may discourage participation from for-profit entities other than SMEs to participate in RIA, what would be very concerning. Also, we underline the need to still clearly distinguish RIA and IA when it comes to the activities that can be funded with these instruments.

LERU notes that the proposed article on **association** for FP10 is completely the same as in FP9. While we in general welcome continuity, we stress that swift association of close partners like the UK and Switzerland, that now fall in the 'third countries' category, should be a priority. These countries are not third countries like Canada, New Zealand or South Korea to name only those already associated to FP9. They are strong, close and reliable partners that have been involved in setting and implementing EU R&I policy for decades and hence should get a different, fast-track, treatment.

One of the key arguments for having an FP10 that is independent from the ECF was to enable and continue association and collaboration with third countries: after all, it is unclear why non-EU countries would support an ECF that is only aiming at the strategic autonomy and prosperity of the EU, and why would the EU let third countries be involved in, or benefit from, that autonomy and prosperity? Although FP10 is now independent, the very close connection to the EU's competitiveness and strategic autonomy agenda could put association of strong R&I partners still at risk. The UK's and Switzerland's participation (but also other countries now associated to Horizon Europe or parts of it) across the full spectrum of FP10 opportunities could increasingly depend on aligning with the EU's strategic autonomy and competitiveness agendas. Specific areas where the alignment questions arise are defence and dual-use funding in EIC (partial DARPA-sation), the 'Competitiveness' (and to some extent 'Society') segment of Pillar 2, as well as the anticipated linkages between the two (EIC and Pillar 2 'Competitiveness' in particular). Some specific conversations are needed regarding how alignment of these agendas will work for Associated Countries as well as Member States.

Nonetheless we are pleased to see that association to the ECF is at least possible. It is organised according to the same country categories as FP10, but with additional requirements. We wonder how the association to the ECF will be organised and call on the EC to start discussions on this with important partners, like the UK and Switzerland, as soon as possible, so they can be on board from the onset. One of the key issues will be the financial

contribution to be made by associating countries: will they need to pay twice (for FP and ECF association) or only once (meaning that the FP contribution will also cover the ECF contribution and vice versa)?

3. Comments on the proposed regulation establishing the European Competitiveness Fund

In general, LERU finds the ECF regulation difficult to assess because of the many ambiguities and inconsistencies across the text. The tight connection between the ECF and FP10 is unclear when it comes to work programmes, funding and governance, at least on the basis of the official proposals.

As indicated above, also the moonshots are strangely absent from the ECF Regulation. However, on other points, the ECF regulation is too detailed and overly complex.

The EC wants both predictability and agility for the allocation of budget to the various activities in the ECF. They want to achieve this by having a minimum budget for the 2028-2034 period, and work with indicative budget distribution across the four policy windows. We wonder if this will have an impact on the R&I activities funded for these policy windows in pillar II of FP10 and would welcome some clarification (see above).

Similarly, we would like to know to what extent the proposed 'competitiveness coordination tool' will also decide on the FP10 competitiveness-related funding. In general, the governance mechanisms of the ECF, including the Strategic Stakeholder Board, raises many questions. As mentioned above, LERU underlines that experts, including a considerable number of researchers, should be included in the agenda setting for the four ECF policy windows. Also on this point, clarification would be welcome.

LERU finds the proposed "Accelerated Competitiveness Actions" interesting, as this instrument can fund projects that received a positive evaluation but could not be funded, if deemed of significant importance; likewise, already funded projects can be extended beyond the original timeframe and budget. We wonder if this will extend to FP10 and could result in proposals on the reserve list having an extra chance for funding if deemed of great public interest.

LERU welcomes the inclusion of a 'competitiveness seal' similar to the FP's seal of excellence but for projects that have been submitted to the ECF but cannot get ECF funding. It could be a good stimulus for Member States or other funding programmes to fund the project, knowing that the action or project has reached the minimum quality requirements of the ECF award procedure.



On the award criteria, we consider the first point “As specified in the work programmes, proposals for actions shall be assessed in accordance with excellence-oriented award criteria” too weak. We would welcome a stronger application of excellence as an award criterion as well as more predictability for potential applicants. Having such an important award criterion set out in the work programmes and hence possibly differing from one work programme to the other, creates more red tape and less simplification for beneficiaries. Evaluating on the basis of excellence is still an important guarantee for spending EU funding wisely.

Conclusion

As indicated in the introduction, this note is LERU’s first response to the proposals. We look forward to the positions of Parliament and Council on the MFF, FP10 and ECF proposals and hope this initial input will already be useful for their work. Our goal is clear: we need the best possible FP ever, with an ambitious budget as proposed by the EC, to be approved by the summer of 2027. We will do our utmost to help the EU institutions achieve this goal.