

Contribution from Denmark to the public consultation on the European Research & Innovation Framework programme 2021-2027

With Horizon Europe, EU has achieved the largest and most ambitious framework programme for research and innovation (R&I) ever. The programme is essential to tackle the challenges facing the EU and to maintain the EU's competitiveness. It is crucial that we stick to the ambitions and the leading principles of the programme. At the same time, we must be aware of our responsibility to look critically at the areas where implementation of the programme should be improved to fulfil our shared ambitions.

This contribution aims to contribute actively to the continued development of the Framework Programme. Therefore, it focuses on Horizon Europe (HEU) and on the Strategic Plan 2025-2027 respectively. Denmark (DK) finds it of utmost importance to safeguard the leading principles of the Framework Programme and to ensure well-balanced and streamlined instruments, as well as simplified administration and procedures.

1. Excellence, impact, stability and openness should remain leading principles

Strengthening the principle of excellence

Excellence is key and should remain the leading principle of R&I policy in order for Europe to retain a leading role and to be able to compete internationally. The success and attractiveness of the EU Framework Programmes depend on strictly preserving the evaluation criterion of excellence. While DK supports the goal of widening HEU-participation to include more partners from widening-countries and more female participants, derogating from excellence will be detrimental to the programmes' attractiveness, its impact and EU competitiveness.

Ensuring budget stability to make an impact

The success of the Framework Programme depends on a predictable and stable budget. Ad-hoc redirection of funding to other EU-initiatives should only be done under exceptional circumstances, based on a well-coordinated procedures involving Member States and thorough impact analyses, and only for R&I-activities.

Staying as open as possible and closed when necessary

International cooperation beyond European borders is crucial. In order to tackle global societal challenges together with trusted partners, we need to access the worlds' best talents, expertise and resources. Staying "as open as possible and closed when necessary" as well as focusing on the EU's open strategic autonomy should continue for the duration of the programme and in the future. The geopolitical situation and the agenda of strategic autonomy should not result in closing off HEU to international R&I cooperation, which remains a prerequisite for solving global challenges. DK supports the current approach of considering on a topic-by-topic basis in the relevant programme committees - c.f. article 22.5 of the HEU regulation - whether partners from certain third countries should be ineligible, while also considering whether optimal project results are preconditioned on participation of such partners.

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2. Ensure well-balanced and streamlined instruments as well as simplifying administration and procedures

TRL balance

The trend of the thematic cluster-specific work programme for pillar 2 towards fewer Research and Innovation Actions (RIA) and more Innovation Actions (IA) must be reversed to reclaim an appropriate balance, including RIAs at low TRL-levels. While DK warmly supports actions aimed at including an array of participant types, the expected impacts of pillar 2 can only be realised if knowledge institutions continue to participate at current levels.

Retaining “bottom up” instruments

Excellent science and smart innovation reinforce and feed into each other. A major contributor to HEU as a world known brand is the European Research Council (ERC) and, hopefully in time, the European Innovation Council (EIC) Accelerator. It is vital to retain the truly “bottom up” nature of these instruments.

EIC Accelerator as an agile instrument

Successful applicants have suffered serious delays in obtaining their blended or equity-only finance due to legal questions within the Commission. While DK fully respects the need to design an appropriate implementation mode, we must make sure the ambitions behind this new instrument are not jeopardised, i.e. the need for agile and fast support for high-risk and long-term investment. Otherwise, an alternative instrument should be considered.

Innovative Europe: Streamlining for more added value

DK is of the opinion that the new third pillar of HEU dedicated to innovation would benefit from holistic streamlining and enhanced, systemic coordination across the three different but complementary instruments (EIC, the EU Innovation Ecosystems (EIE) and the EU Institute of Innovation & Technology (EIT)). Also, DK finds that the ever-increasing number of EU-funding innovation schemes have made it unnecessarily confusing for applicants – and difficult for National Contact Points to provide adequate guidance. Streamlining the EU-innovation landscape would allow the deployment of and scale up innovations faster and with greater impact, and provide increased added value of the EU budget as such.

Missions: Clearer governance

The majority of contributing Danish stakeholders point to challenges in relation to HEU missions, in particular, that the R&I-content of the missions is limited and that mission governance is unclear. DK believes that the missions cannot be achieved unless sectoral EU policies and -programmes contribute, based on a clear mandate, elevating the missions to be EU missions, not merely HEU missions, while using the HEU-budget only for R&I-activities.

Simplifying partnerships

- A number of fundamental issues related to the co-funded HEU-partnerships have not yet been solved, which constitutes a risk to the continued support from and participation of stakeholders. These issues must be solved and communicated to participants, including clear guidelines to partners on how to manage conflict of interest, in order to avoid further delay.

- DK believes the partnership instruments remain more complicated than necessary and that we have not yet achieved the HEU-objective: To simplify partnerships, avoid ad hoc derogations from common rules, give easier access for newcomers and deliver data-based, comparative measurement of impact.
- Work programmes should specify when topics are in fact aimed at existing partnership consortia and are not open for competition.
- Potential new partnerships must be focused, limited in number and only for areas where there is a current gap that cannot be filled by regular HEU-calls.

Administrative simplification and evaluation procedures

- Stakeholders continue to perceive HEU as a cumbersome programme compared to national schemes. DK fully supports efforts to reduce administrative burdens but we must be patient and fully evaluate consequences of pilots, e.g. for lump sum funding, before wider implementation.
- While DK fully supports the intention behind the decision to apply one “corporate approach” for grant agreements across 30+ EU-programmes, we are highly concerned that this has proven counter-productive and may prove detrimental to attracting participants and to a continued too high level of error. We note that several issues remain unresolved due to the need for coordinating across several DGs and that this means that participants suffer delays and uncertainty - and has also thwarted the hitherto productive cooperation with Member State experts.
- DK urges the Commission to work to ensure that evaluation feedback is always clear and in full accordance with the specified criteria.
- Finally, we suggest providing stakeholders with easily accessible comparative participation statistics across EU-programmes, including Digital Europe, to help promote synergies among these.

Lessons learned: The link between the Strategic Plan and HEU-calls

The Strategic Plan is a new element in the Framework Programme and it has taken great effort to communicate to applicants and stakeholders how to make use of it. DK warmly recommends ensuring that the next Strategic Plan is structured similarly to the current plan, if possible with fewer dimensions, and includes a short “guide to readers”. Also, DK would like to propose including clear, specific references in each work programme call/ topic to relevant descriptions in the plan.

3. Looking ahead: Europe as a global R&I powerhouse

The points above are important to ensure the success of the remainder of Horizon Europe. Looking ahead, we need a robust and stable programme with a budget that is in line with the ambitions for Europe to be among the world leaders in excellent R&I. In order to ensure the impact of EU R&I, we need an ambitious successor programme that builds on the successful principles of Horizon Europe.