EERA Position Paper on FP10

SECURE EUROPE'S INNOVATION CONTINUITY - FROM SCIENCE TO SOCIETY

The European Energy Research Alliance (EERA) is a membership-based, non-profit association, constituting **the largest low-carbon energy research community in Europe and the formal research pillar of the SET Plan.** It was established in 2008 by leading research institutes and universities to expand and optimise EU energy research capabilities. Today, it brings together more than **250 organisations from over 30 countries.** EERA coordinates its activities through 18 pan-European Joint Programmes that provide world-leading scientific expertise on three pillars: materials, low-carbon technologies, and systems' dimensions. Its vision is to put research and innovation at the heart of a sustainable and resilient European energy system, and its mission is to catalyse Europe's low-carbon energy research to shape science-based policies and advance world-class innovation.

EERA, as the **voice of the low-carbon energy research community in Europe,** is keen to contribute to the ongoing discussions on shaping the next Framework Programme for Research and Innovation (FP10), including its relationship with the European Competitiveness Fund (ECF). Following the European Commission's proposal of 16 July 2025, these instruments are expected to be closely connected, with discussions set to progress under the Cyprus and Irish Presidencies of the Council of the EU, with work on these files expected to be largely finalised by the end of 2026.

Supporting a budget commensurate with Europe's research, climate and competitiveness ambitions

EERA welcomes the European Commission's proposal to increase the FP10 budget to €175 billion. However, in line with the recommendations of the Draghi report and the expert group's interim evaluation of Horizon Europe (Heitor report), and as EERA has consistently advocated in the run-up to the proposal publication, we believe **that FP10's budget should be raised to €200-220 billion** to adequately reflect Europe's research, climate, and competitiveness ambitions. The **R&I budget should remain securely ring-fenced** in order to prevent reallocation during implementation and to **ensure transparency, stability, traceability, and strategic continuity** in research funding.

Such increased EU investment in research and innovation **must be matched by sustained and reinforced national and regional funding** if the long-standing EU target of investing 3% of GDP in R&D by 2030 is to be achieved. This requires a genuinely combined effort across governance levels to accelerate technological progress, strengthen Europe's global competitiveness and keep the Union on track to meet its climate objectives.

A key risk, however, is that higher EU funding—particularly if accompanied by increased co-funding requirements—could lead national and regional authorities to redirect existing R&I budgets towards EU programmes rather than increase overall investment. This crowding-out effect would weaken national and regional research programmes and risk deprioritising research areas that underpin local innovation ecosystems but fall outside the scope of EU calls. **EU funding should therefore be designed to complement and attract, but not replace, national and regional investment in research and innovation, supported by strong coherence and effective cooperation across EU, national and regional levels to ensure that increased EU ambition translates into additional, rather than redistributed, R&I investment.**

In this context, **the EU must efficiently use and replicate if necessary tools such as the Strategic Energy Technology (SET) Plan, which provides a well-established governance framework bringing together the European Commission, Member States, industry and the R&I community and contributes to defragment and better link national, private and EU R&I funding** for clean energy technologies.

Placing the clean energy transition and sustainable competitiveness at the core of FP10 and the European Competitiveness Fund

EERA welcomes the orientation of the European Competitiveness Fund (ECF) policy window on Clean Transition and Industrial Decarbonisation, as well as the continued allocation of FP10 resources to clean energy-related activities. However, **the share of FP10's budget devoted to climate, energy and mobility priorities — estimated at around 14.5 % of the total — would represent a decline compared with the 16 % allocated under Horizon Europe.**

This raises concerns that support for clean energy research and innovation could weaken at a time when Europe's climate objectives require sustained ambition. While the ECF can play a valuable role in supporting later-stage development and deployment, it cannot substitute for a strong, clearly defined FP10 commitment to upstream clean energy R&I. **FP10 should therefore maintain robust support for clean energy research and the transition to net zero,** with a clear articulation of roles and governance to ensure that the strategic linkage with the ECF does not blur the legal and functional distinction between research funding and deployment support.

EERA also supports the requirement that 35% of the overall budget contribute to climate action and environmental objectives. However, while this equates to roughly €700 billion, it marks a **decrease compared with previous combined allocations for climate and biodiversity under the current Horizon Europe,** and the absorption of the LIFE Programme into the ECF risks diluting these priorities further.

In this regard, **EERA warns against narrowing the role of R&I to a purely economic view of competitiveness,** as framing it solely in terms of productivity and growth risks overlooking the broader benefits it brings to the environment and society. In line with EERA's recent policy recommendations on boosting the EU's competitiveness and strategic autonomy, we call for the **adoption of a wider, more inclusive concept of sustainable competitiveness** to inform the ambitions of the Framework Programme, the European Competitiveness Fund, as well as the broader EU political agenda.

Placing the clean energy transition and sustainable competitiveness at the core of FP10 and the European Competitiveness Fund

FP10 must maintain a balanced approach across technology readiness levels (TRLs), which is essential to preserving the integrity of the EU's research and innovation ecosystem, **from frontier research to close-to-market activities.**

This balance is necessary to ensure continuity across the research continuum and to avoid distortions in the knowledge value chain, at a time when political attention is increasingly drawn towards higher TRLs. While later-stage activities are important, **sustained investment in both basic and collaborative research remains indispensable to Europe's long-term competitiveness,** with frontier research in particular playing a critical role in enabling new ideas, concepts and breakthrough trajectories to emerge.

As regards collaborative research specifically, the current proposal allocates €75.876 billion to FP10's **Pillar II.** Although this represents a nominal increase compared to Horizon Europe (€53.516 billion), its **relative share of the overall budget would decline from 56% to 43.4%.** EERA considers that collaborative research under Pillar II has consistently demonstrated its value in addressing global challenges while strengthening Europe's industrial competitiveness and innovation capacity. **It should therefore remain a cornerstone of FP10, representing at least 60% of the programme's total budget.** A stronger emphasis on scaling up technologies must not come at the expense of the collaborative research base that feeds the innovation pipeline and underpins Europe's ability to deliver future breakthroughs.

At the same time, **FP10 should ensure that the results of higher-TRL research are effectively valorised and taken forward by strengthening pathways for the utilisation, dissemination and further development of project outcomes.** This includes reinforcing cooperation with industrial stakeholders and supporting project formats that integrate different TRL stages, from breakthrough to validation and demonstration, within a coherent framework. Such approaches can help **address the "valley of death"** while remaining firmly anchored in FP10's research-driven mandate. **Clear articulation with other EU funding instruments, alongside impact-oriented governance,** can leverage additional funding, reduce fragmentation and maximise impact. The **Flagship Wind Call** introduced under the Horizon Europe 2026-2027 Work Programme provides a structured and FP10-ready model in this respect, which could be replicated for other key technologies across the SET Plan, where industrial maturity, critical mass and speed are decisive.

Beyond balance across TRL levels, EERA also underlines the importance of **balance across disciplines.** FP10 should continue to **promote interdisciplinary approaches that bring together technological and industrial perspectives with their economic, social and societal dimensions,** and should further **strengthen the integration of social sciences and humanities (SSH) expertise** in both programme design and evaluation processes.

Addressing unclear FP10–ECF governance through SET Plan alignment and excellence

EERA welcomes the creation of the **European Competitiveness Fund (ECF), insofar as it has the potential to streamline and defragment support for later-stage, close-to-market, and deployment activities.** A more coherent and simplified ecosystem is urgently needed by researchers and is essential to reinforce EU competitiveness, which continues to be constrained by the **persistent "valley of death" in innovation** and by fragmented support instruments.

At the same time, **it is essential to clarify how the ECF and FP10 will interact in practice,** a concern recently raised by several stakeholders, including the European Parliament and the European Court of Auditors. While smoother governance and stronger coordination are necessary, **a careful balance must be struck to safeguard researcher autonomy and the long-term value of curiosity-driven research. An overly top-down or politically driven approach could undermine stable investment pathways and lead to short-term shifts in funding priorities. Excellence must remain a core principle in all governance arrangements.** Selection and prioritisation processes should continue to be based on proven expertise, scientific and technological impact, and the capacity to deliver at scale, rather than relying predominantly on excellence in proposal writing. Preserving these principles as FP10 interacts with new instruments is essential for maintaining the credibility and effectiveness of EU R&I funding.

In this context, **researchers, as de facto experts, are well placed to contribute to steering the ECF effectively, provided that governance arrangements allow for meaningful and structured input from the research and innovation (R&I) community.** As such, governance and advisory bodies, as currently envisaged, including stakeholder and expert-based fora as well as investment-oriented structures, should systematically include representatives from the R&I community to ensure continuity with FP10 principles and to anchor the ECF in sound scientific and technological expertise. **EERA experts, as unbiased and trusted advisors to the European institutions, would, in that regard, be particularly well placed to contribute to the ECF's governance.**

More specifically, **FP10 Pillar II and relevant ECF policy windows** — notably the ECF window on Clean Transition and Industrial Decarbonisation — **would benefit from stronger and more structured alignment with the SET Plan.** The SET Plan already provides a well-established governance framework bringing together the European Commission, Member States, industry, and the R&I community around shared strategic objectives that largely converge with those pursued under FP10 Pillar II and the ECF's clean transition-related activities.

Crucially, **the SET Plan is supported by operational structures** — including **Implementation Working Groups (IWGs), European Technology and Innovation Platforms (ETIPs), and EERA as the formal research pillar of the Plan — which translate strategic priorities into coordinated action. These structures can be effectively leveraged to articulate and align FP10 and ECF priorities,** providing a defragmentation engine and a coordinated interface across the EU research and innovation landscape.

As new instruments are developed to respond to legitimate needs, **avoiding redundancy, addressing potential overlaps, and fostering efficiency across the EU R&I landscape must remain central objectives.** Finally, the implementation of the ECF, in coherence with FP10, should align with other relevant regulatory frameworks, including public procurement rules that support sustainable, "made in Europe" solutions, which are essential to reinforcing EU competitiveness while sustaining a strong and innovative industrial base.

Creating a simplified, inclusive and attractive European research and innovation ecosystem

FP10 and the ECF should also address administrative hurdles. Today, major burdens continue to hinder EU R&I progress. From a legal perspective, the Framework Programme remains overly complex, and **the legal status of participants** (beneficiaries, affiliated entities, etc.) **should be clarified and made more straightforward.**

Moreover, **complicated and sometimes contradictory cost reporting requirements can create confusion and significantly increase the time that must be devoted to administrative tasks. EERA therefore urges FP10 to simplify grant processes and increase transparency,** in order to better support researchers across the EU and create an environment that enables excellent research. One concrete measure to enhance transparency would be to **provide applicants with the full evaluation summary report of the winning proposal,** which would promote learning across the research community.

In addition, the **quality and relevance of evaluators' expertise** should be recognised as a key element in ensuring fair and robust proposal assessment. Ensuring that evaluation panels include appropriately qualified experts, with up-to-date scientific and technological knowledge and a sound understanding of the relevant industrial, policy and systemic context, is essential to guarantee the credibility of evaluation outcomes and to strengthen trust in FP10 procedures.

Furthermore, **reinforcing and systematically adopting the clustering of projects addressing similar objectives** — even when not funded under the same topic — **would ensure that relevant results are discussed and disseminated among peers, and that common actions** (e.g. contributions to standards) **are streamlined. It also remains crucial to facilitate the funding of outstanding yet unsuccessful proposals through other instruments,** for instance by making systematic use of tools such as the **Seal of Competitiveness and the Seal of Excellence,** which are awarded to high-quality proposals that fail to obtain funding, in order to support access to alternative and complementary funding sources.

EERA also recommends embedding the principles of equality of opportunity and access, inclusion, diversity, and fairness across FP10 and all its actions, while aligning FP10 with efforts to enhance the attractiveness of research careers. Moreover, safeguarding freedom of scientific research and ensuring open access to research data, in line with the FAIR (findable, accessible, interoperable, and reusable) principles, is also essential to creating an attractive and competitive European research ecosystem.

Strengthening and streamlining European Partnerships while preserving research balance

Partnerships are an important tool within the EU's research programme and should be further strengthened and better aligned with relevant EU policies under FP10. These instruments have indeed proven key to fostering collaborative work and overcoming the "valley of death" in innovation.

EERA supports the implementation of a portfolio approach to European Partnerships to reduce duplication and fragmentation, foster cooperation, and achieve clearly defined common objectives in a more targeted and timely manner. Member States and their funding agencies should align national R&I budgets with EU funding to maximise impact.

EERA also recommends maintaining a balanced share of the research budget allocated to European Partnerships, as is currently the case under Horizon Europe, to ensure that sufficient funding remains available for a broad range of research topics, including those not covered by partnerships, which tend to be more industry-led.

In addition, **EERA welcomes recent developments pointing towards the simplification of partnership processes. Today, co-funded partnerships lead to very cumbersome project selection and approval procedures,** due to the fact that funding comes from a combination of European, national and regional sources. **The "Euratom Co-Funded Partnership model" notably provides an interesting example that could be further replicated,** as it de facto delegates the management of funds and strategic decisions to the scientific, technical and industrial community involved, avoids parallel filters for the approval of project proposals, and enables automatic bottom-up alignment among participants.

Improving access to and alignment of European research infrastructures

To ensure the success of FP10, **improving access to research and technology infrastructure** will also be essential. Today, **significant barriers remain, from administrative burdens to high costs,** especially for small and medium enterprises. EERA recommends establishing **single access points, or one-stop shops,** allowing to streamline procedures and reduce fragmentation. Experience shows that these one-stop shops can be very effective, especially when benefitting from public funding. In addition, ensuring **targeted funding and easily accessible information** is also very important. In that regard, it is crucial to efficiently align Horizon Europe and the **upcoming EU Innovation Act.** In parallel, **creating an integrated European Research Area (ERA)** is central to the objective of furthering collaboration between research organisations and infrastructure, and has the potential to address fragmentation and administrative barriers. **Strong alignment with the upcoming EU Research Area Act** would thus be highly beneficial to these goals.

Reinforcing Widening as a cornerstone of a more balanced European R&I ecosystem

EERA calls for the **continuation of the Widening programme,** which is a key instrument to close the research and innovation gap between the EU Member States and ensure their more balanced participation in EU R&I activities. As such, Widening should continue being considered a **horizontal sub-programme of Framework Programme 10, with a specific budget and specific calls.** In addition, building on the widening gap's learning curve, **additional funds from enlargement and DG NEAR budgets** could be considered in order to promote a greater integration of candidate countries in the EU's R&I ecosystem.

Safeguarding civilian research in the context of increased attention to dual-use activities

EERA calls on policymakers to **safeguard civilian research priorities,** ensuring that funding for the clean energy transition, decarbonisation, clean technologies, and climate-related research is neither diverted nor diluted. **Any framework for dual-use research should also preserve scientific openness and academic freedom.**

At the same time, it is necessary to **clearly define dual-use activities and establish robust governance arrangements to prevent ambiguity, loopholes, or the misuse of funding instruments. Research and technology infrastructures should be able to serve multiple purposes where appropriate, without compromising their primary civilian R&I mission,** in line with evolving geopolitical and energy security considerations. Integrating defence-related research within academic institutions raises several critical issues that must be addressed in advance, including access for external personnel, information and data sharing, research and data security, cybersecurity, and scientific publication policies. Well-defined frameworks and specific agreements can ensure the coexistence of civilian and defence-related research within the same institution, while respecting confidentiality and defence classification requirements where necessary.

Maintaining openness while safeguarding strategic autonomy through international cooperation

Firmly attached to the principles of multilateralism, and recognising international cooperation's positive contribution to global prosperity, EERA welcomes the possibility for long-standing, like-minded international partners to associate to FP10, and encourages **removing barriers to association.**

Still, it is necessary to ensure that **association pathways do not contradict the EU's objectives of strategic autonomy,** are aligned with the European Commission's Communication on the Global Approach to Research and Innovation, and safeguard knowledge security. Besides, association should also be **conditional to a general alignment with the** EU's fundamental values.

In parallel, the EU must continue to foster the **international mobility of students and researchers** through other existing programmes by simplifying their implementation, through smaller and more targeted projects as it is currently the case.