

EERA REACTION TO THE EUROPEAN PARLIAMENT'S DRAFT REPORT ON FRAMEWORK PROGRAMME 10 (EHLER REPORT)

The [European Energy Research Alliance \(EERA\)](#), as the largest low-carbon energy research community in Europe and beyond, representing over 250 leading organisations across more than 30 countries, warmly welcomes MEP Christian Ehler's [draft report](#) on Framework Programme 10, recently presented to the European Parliament's ITRE Committee.

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

EERA supports the overall direction of the report, and notably the **increased budget proposal**. Allocating **€220 billion to Framework Programme 10** aligns with the recommendations issued in the [Heitor report](#), as well as with the demands of the research community, and appropriately recognises the importance of research and innovation (R&I) in fostering competitiveness, resilience, and technological independence.

EERA also welcomes the ensuing increase to Pillar II's budget, from **€75.8 billion to €95.3 billion**. However, EERA notices that its share of the total budget still falls from 56% to 43.4%, compared to the current iteration of the programme. EERA believes that **collaborative research under Pillar II has proven crucial** in addressing global challenges and strengthening Europe's industrial competitiveness and must therefore remain a central pillar of FP10, calling for it to **represent at least 60% of the FP10 budget**. The growing emphasis on scaling up technologies and market deployment must in fact by no means undermine the need to keep the innovation funnel well-nourished to safeguard Europe's long-term competitiveness and capacity for breakthrough innovation.

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

EERA stresses that **both the European Competitiveness Fund (ECF) and FP10 must be key instruments for advancing the clean energy transition**. In that regard, **renaming Horizon Europe's Chapter on 'Clean Transition and Industrial Decarbonisation', and the corresponding ECF policy window into "Energy Infrastructure; Decarbonisation & Clean Technology" appears concerning**. Infrastructure should not be the main focus of energy research and innovation activities. The "Clean Transition and Industrial Decarbonisation" phrasing is broad and allows to encompass the whole spectrum of clean transition technologies. **Renaming the window into "Energy Infrastructure; Decarbonisation & Clean Technology" risks limiting the energy R&I priorities to be funded**.

It is essential that the Policy Window is rooted in the principle of technological agnosticism, ensuring eligibility for Horizon research funding to all net-zero technologies as defined under the [Net-Zero Industry Act \(NZIA\)](#). This would not only advance the EU's climate neutrality objectives but also strengthen European industrial competitiveness in strategic clean technology sectors where leadership in research and innovation is a decisive geopolitical competitive advantage.

In addition, EERA warns against opposing climate action and competitiveness, as implied in **proposed Amendment 14**. It contributes to **diminishing the importance of climate action** by focusing exclusively on its potential impact



on “the cost of doing business in Europe”, which introduces a narrow understanding of competitiveness. In line with [EERA’s recent policy recommendations on boosting the EU’s competitiveness and strategic autonomy](#), EERA advocates for a **larger and more inclusive definition of competitiveness, beyond purely economic considerations**, which encompasses climate and social considerations. Framing competitiveness solely in terms of productivity and growth risks overlooking the broader benefits it brings to the environment and society.

Clarifying governance and ensuring coherence between FP10 and the ECF

EERA has long called for **clarifying how the European Competitiveness Fund and FP10 will interact**, advocating for a **governance structure which would allow to streamline and defragment the research and innovation funnel**, while recognising the **importance of excellence and the expertise of researchers**. In this regard, EERA appreciates the European Parliament’s rapporteur’s **efforts to increase agility, coherence, and strategic direction** throughout the Framework Programme.

However, EERA expresses concern regarding the **full decoupling of Horizon Europe and the ECF, which would mean losing the opportunity to efficiently scale up technologies**. EERA recommends the ECF and FP10 to **operate through a single Work Programme, with a separate, ring-fenced budget allocated to FP10 activities**. Quality decisions will not be jeopardised in any way but will follow a coherent pathway from successful R&I under FP10 through to appropriate market uptake.

Moreover, while calling for the governance of both the ECF and FP10 to rely on researchers and innovators’ expertise, **EERA does not recommend the creation of the two Councils on Competitiveness and Society** to achieve this. EERA instead advises **focusing on simplifying procedures and ensuring transparency in decision-making through a bottom-up, participatory system** – as in the current Framework Programme and the initial European Commission’s FP10 proposal – rather than a top-down, centralised governance model. Indeed, **a system based on such Councils would shift responsibility for drafting topics to dedicated expert teams**, representing a move away from the current co-creation model and risking:

- bypassing existing research ecosystems while favouring duplication;
- providing too little time for programme committees to react;
- reducing transparency in the drafting of calls and the programming process;
- reducing stakeholder influence, potentially leading to a loss of legitimacy within the R&I ecosystem.

To ensure expertise and strengthen the involvement of researchers and innovators, EERA therefore calls for bodies such as the **ECF Strategic Stakeholder Board, the Observatory on Emerging Technologies, and the Investment Committee** to **systematically include representatives from the R&I community**.

Embedding alignment between FP10’s Clean Transition activities and the SET Plan

More specifically, in the case of low-carbon energy R&I, set to fall under the “Clean Transition & Industrial Decarbonisation” policy window of the ECF, and FP10’s Pillar II Chapter IV of the same name, strong alignment with the [Strategic Energy Technology Plan’s \(SET Plan\) Governance](#), which already gathers key stakeholders from the EU, Member States, industry and R&I would be highly beneficial. Indeed, **the SET Plan and the Clean Transition & Industrial Decarbonisation activities pursue similar, closely aligned objectives across the clean energy transition, making stronger coordination essential to avoid fragmentation and maximise impact**.

The SET Plan is supported by operational structures – including its **Steering Group**, anchored in the [Net-Zero Industry Act](#), **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. Under the current FP, these actors, as well as Partnerships **play a central role in shaping research priorities and topics**. However, under the new approach, ETIPs and Partnerships would no longer act as co-creators but rather as stakeholders to be consulted by the expert teams, leading to redundancy, overlap and loss of efficiency.

In this context, **EERA remains committed to providing support and expertise to the European Parliament with this important process as discussions on Framework Programme 10 continue.**