

Feedback European Commission proposals for Horizon Europe (2028-2034) & the European Competitiveness Fund – Universities of the Netherlands

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Horizon Europe (2028-2034)

Introduction

Universities of the Netherlands (UNL) welcomes the proposal of the European Commission for the successor to Horizon Europe for the period 2028–2034. The proposed budget of €175 billion underlines the crucial importance of research and innovation (R&I) for Europe's future prosperity, resilience, and strategic autonomy. Maintaining Horizon Europe as a standalone programme with its own legal basis is a positive step that safeguards continuity and identity. We see this as a recognition of the achievements of past framework programmes and as an ambitious impetus to strengthen Europe's competitiveness in a rapidly changing world. At the same time, we call for an actual doubling of the budget, corrected for inflation, to fully deliver on the recommendations of the Draghi report on European competitiveness. While the proposed figure is impressive, in real terms it is less substantial than it appears, and a higher budget – moving towards €200 billion, as advocated by various stakeholders – is essential to fund excellent projects and address societal challenges.

Budget and Financial Ambition

UNL supports the proposed budget increase, which implies a doubling compared to the current programme. This responds to the urgent need to intensify investments in R&I, as highlighted in the reports by Draghi, Letta and Heitor. However, once corrected for inflation and other factors, the increase is less impressive than presented. During the European R&I Days 2025, Commissioner Zarahieva said that investing 3% of GDP into R&I is not enough, and that it “should be 4%”. We take note that Europe is still far from reaching just 3%, let alone 4%. This means that more ambition is required, and it is paramount that the EU take up its role in ensuring the future competitiveness of Europe. We therefore call for a budget of at least €200 billion.

UNL stresses that the independence of Horizon Europe from other funds must be protected during negotiations with the Parliament and member states, to avoid the diversion of R&I resources for short-term objectives. The focus on excellence and impact must remain paramount, with sufficient resources for bottom-up research to drive innovation. Finally, we note that the €7.6B allocated for society within Pillar II is low. To understand and tackle urgent sociopolitical challenges in Europe and beyond, it is vital to increase funding for this component.

Furthermore, UNL emphasizes that despite the combination of the Research and Innovation Actions (RIAs) and the Innovation Actions (IAs), the funding rate for non-profit entities must remain at 100%. If not, the accessibility of Horizon funding may be reduced for universities, especially those facing budget cuts.

Governance and the Relation with the European Competitiveness Fund (ECF)

Robust governance is essential for the success of FP10. UNL stresses that the ERC must retain its leading role, with the autonomy of the Scientific Council and its President safeguarded. The decision to shorten the term of the ERC presidency to 2+2 years requires clarification and clear reasoning. We are also concerned about potential interference through “corporate policies” or excessive steering by the Commission, which could undermine the independence of excellence-driven research. Reports that art. 25 of the FP10 proposal was bracketed by the Council of the EU are highly concerning, as this crucial article guarantees that excellence is the primary criterion on which research proposals are evaluated.

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For Pillar II (Competitiveness and Society), we advocate a governance structure that balances the roles of Member States and the Commission, with active involvement of scientists, universities and research support offices. The link with the ECF can create useful synergies, but it must not compromise the autonomy of FP10 or come at the cost of funding for low- to medium TRL research: FP10 funding should exclusively go to R&I. Regarding the connection with Pillar II, we note that this Pillar is not merely an instrument for industrial policy that is subject to shifting political priorities, but a long-term investment in key research areas that helps European science remain competitive. All budget for R&I, including the budgets for Pillar II, should therefore be ringfenced to ensure a separation between funding excellent research and supporting industrial policy.

Simplification and Efficiency

UNL welcomes the simplification measures, such as shorter work programmes, less prescriptive planning and a shift towards open topics. Reducing the time-to-grant from eight to seven months is a positive step that will enhance the programme's attractiveness.

We emphasize that simplification must be developed in dialogue with researchers and research support professionals to ensure it fits the realities of research, as we note two major issues with the proposed simplification measures.

First, we advise caution regarding the implementation of personnel unit cost, as this could seriously disadvantage countries with higher (variability in) salary levels, such as the Netherlands. In these cases, the personnel unit costs – calculated based on the total personnel cost of an organisation – are substantially lower than the actual cost of research personnel carrying out a Horizon-funded project. This could severely damage the accessibility and reputation of Horizon funding and disproportionately hurt smaller universities. It should therefore remain possible to use actual personnel costs.

Second, we are also concerned about the default application of lump sum funding in large collaborative projects: it shifts much of the administrative effort to the pre-award phase, often doubling the workload during proposal preparation, while in the post-award phase the same level of record-keeping remains required, as lump sum grants can still be subject to financial audits. As a result, the approach risks complicating rather than simplifying consortium projects and places disproportionate pressure on coordinators, without improving either success rates or overall outcomes.

Balancing Priorities: Competitiveness, SSH and the SDGs

The proposal places strong emphasis on competitiveness, which is vital for Europe's future position on the world stage. However, this must not come at the expense of integrating the Social Sciences and Humanities (SSH), curiosity-driven research, and the Sustainable Development Goals (SDGs). Europe's strength in competitiveness lies not only in technological leadership but also in its excellence in SSH and its capacity to link the implementation and development of technical innovation with societal insights.

We strongly believe that EU's industrial competitiveness depends also on our societal competitiveness. Innovation is not purely technical – it is multidisciplinary by nature – and Europe stands out globally in this regard. Technological breakthroughs cannot truly serve society without deep social foundations. Social, governance, organizational and policy innovations, alongside technological ones, create public value through improved governance, citizen engagement, societal adoption, or institutional absorption and effectiveness, which are critical for starting or scaling up any innovation or technology. SSH research produces high-impact outputs including datasets, governance models, participation designs, behavioural insights, solution to complex societal challenges, and service innovations. These outputs rarely translate into patents but are vital for achieving the EU's strategic goals on democracy, strategic autonomy, resilience, sustainability, and social cohesion, and they are essential for addressing Europe's most pressing challenges: peace and democratic

resilience, trust in democratic institutions, inclusive prosperity, equitable healthcare, just climate transitions, and the responsible use of technologies.

Therefore, we call on the ECF and FP10 alike to explicitly recognize and support social innovation as a distinct and equally important category of innovation, alongside technical innovations. Moreover, we call for balanced distribution of the financial allocations in Pillar 2, with a substantial increase of the allocations for SSH research in the Society Window, to at least double what has already been proposed (15bn). This way EU innovation policies and funding programmes will safeguard a better balance between technological and social innovation in both the context of European industrial competitiveness and societal competitiveness. Next to this, clean technologies and other sustainable innovations are essential both for economic competitiveness and for global climate objectives and should feature prominently within Pillar II.

In a similar vein, the emphasis on high Technology Readiness Levels (TRLs) in competitiveness-driven calls must be complemented by support for low and mid-TRL research to enable real breakthroughs. This also applies to Pillar II: the four technology areas emphasized in Pillar II, corresponding to the ECF policy windows, are underpinned by curiosity-driven innovations that cannot be made immediately applicable by industrial partners. De-emphasizing the need for fundamental research is short-sighted and damages Europe's competitiveness in the longer term.

Finally, while we emphasize a broad and inclusive definition of competitiveness, we also caution that competitiveness is far from the sole objective of European research. It is crucial to recognize the broader value of science across all disciplines. Fields such as Social Sciences and Humanities (SSH) and curiosity-driven research are indispensable for understanding societal change, shaping governance, and bringing science forward in a broad sense. Europe's scientific strength relies on its diversity, where technological excellence is complemented by insights from SSH and other research areas. Sustained investment across all disciplines, including in low and mid-TRL research, is essential to secure both immediate innovation and the long-term foundations of knowledge.

Policy Directionality: MSCA, Moonshots & New European Bauhaus

UNL stresses that avoiding undue policy directionality is crucial to preserving the creativity and effectiveness of Europe's research programmes. Imposing detailed thematic steering risks constraining researchers and reducing the impact of bottom-up initiatives, which have consistently delivered excellent results while supporting broader societal and economic objectives.

With this in mind, UNL emphasizes the importance of carefully embedding specific programmes within FP10. The Marie Skłodowska-Curie Actions (MSCA) must retain their fully bottom-up character; introducing policy direction or thematic steering would undermine the programme's strength and limit researchers' freedom.

Additionally, Moonshot initiatives can play an important role in driving innovation and mobilizing broad coalitions, but they should not be funded through bottom-up instruments such as MSCA or ERC. The Moonshots should not be limited to technology-driven or high-TRL activities; they should also include low-TRL research and the integration of SSH to deliver long-term solutions.

Finally, the New European Bauhaus (NEB) Facility contains valuable elements for innovation in building design and urban planning, but its non-research components are more appropriately placed within instruments such as the European Competitiveness Fund (ECF), while the research elements fit naturally within FP10.

International Cooperation and Use of R&I Resources

UNL welcomes the explicit elevation of the European Research Area into FP10 as a dedicated pillar: a targeted ERA pillar can help reduce fragmentation, increase mobility, and align national research ecosystems

to boost Europe's long-term competitiveness and attractiveness for talent. At the same time, ERA-related instruments must preserve open competition where excellence is the primary selection criterion, while also supporting widening and capacity building across the Union.

International cooperation beyond the EU remains essential: association to the Framework Programme is the closest and most effective form of participation for non-EU partners and should continue to be promoted where mutual benefit, shared values and reciprocity exist. At the same time, clarity is needed on association conditions, on which parts of FP10 non-EU partners can participate, and on how collaborations in strategically sensitive areas will be signalled and managed. The experience of past and recent reactions from associated countries shows that uncertainty about scope and governance risks reducing trust and uptake. It must remain attractive for partner countries to remain associated to Horizon.

Dual-use

UNL recognizes that research with potential dual-use applications is increasingly relevant in today's geopolitical context, but its inclusion in FP10 requires clear governance and legal certainty. The current proposal leaves open important questions about the status of civil, dual-use and defence-related research. At present, only the European Innovation Council (EIC) is explicitly mandated to fund dual-use and defence activities as part of pillar III, while for the rest of the programme the scope and legal foundation remain unclear. UNL therefore calls for a more explicit framework that defines the role of dual-use research within FP10 and clarifies in which parts of the programme it may be supported.

UNL also emphasizes that dual-use research is distinct from research with dual-use potential, which is present in almost every type of research. Implementing dual-use into FP10 should be accompanied by mechanisms that guarantee transparency – for example through clear signalling of dual-use calls and introducing a flag mechanism – and by safeguards to ensure the programme maintains its primarily civil orientation. Clarification is also required about the potential impact of dual-use objectives on open science principles and on the primacy of the excellence criterion when evaluating calls. Providing this clarity will be essential not only for universities and researchers, but also for associated third countries and institutions bound by neutrality or civil clauses. Only under such conditions can dual-use research be responsibly integrated into FP10 without compromising the openness, inclusiveness and attractiveness of the Framework Programme.

Conclusion

UNL considers the Commission's proposal a solid basis for an ambitious FP10, but calls for adjustments to safeguard excellence, autonomy and balance. We look forward to the negotiations in the Council and the European Parliament and are ready to contribute our expertise to shape a programme that strengthens Europe's knowledge base. Only with a strong, independent and inclusive FP10 can Europe rise to the challenges of the future.

European Competitiveness Fund

Universities of the Netherlands (UNL) welcomes the ambition of the European Commission to strengthen the Union's long-term competitiveness and resilience through the creation of the European Competitiveness Fund (ECF). We note that the proposal requires further clarification, and concerns around the inclusion of key actors and disciplines must be addressed. Universities play a crucial role in the knowledge ecosystem that underpins Europe's economic and societal strength, and we therefore value the opportunity to provide input on this important proposal.

The proposal stresses synergies between the ECF and Horizon Europe. From the perspective of the research and innovation community, it is essential that the relationship is carefully designed. Horizon Europe should remain the leading program for excellent research and collaborative innovation. The ECF must complement

this role, focusing on industrial policy and providing additional support for research, ideally by transferring funds to the pillars within FP10.

Strong and transparent governance is indispensable. Clear responsibilities between the European Commission and the Member States are necessary to ensure legitimacy and efficiency. The Commission should work in close partnership with the Member States and partners from the knowledge sector and industry. All these actors should have a meaningful role in shaping the priorities, implementation and continued development of the ECF.

The four proposed windows of the ECF address key areas, but competitiveness cannot be limited to technology and industry. It equally depends on social sciences, effective public policy, and societal resilience. Social and technological innovation reinforce one another: progress in governance, participation, and behaviour is essential for innovation to deliver public value. SSH research underpins democracy, sustainability, and social cohesion – core elements of Europe's competitiveness. We therefore call on the ECF and FP10 to recognize and fund social innovation as an equal counterpart to technological innovation, ensuring a balanced and comprehensive approach to Europe's industrial and societal competitiveness.

The proposal must provide greater clarity on how resources will be distributed, what the eligibility criteria are, and how different actors – universities, SMEs, large firms, and public institutions – can access support. While these topics will gain greater clarity as the program is implemented, transparent rules for allocation and evaluation at the earliest stage will be key to ensuring that the ECF enjoys broad support and that funding goes to projects with the highest added value.

Competitiveness starts with people. Europe's capacity to innovate depends on the quality of its education, the strength of its universities, and the vitality of its research base. Fundamental, curiosity-driven research is the foundation for long-term competitiveness. While high-TRL research is crucial for its ability to deliver immediate societal results, many of the greatest breakthroughs of the past decades have originated in fundamental science. Sufficient financing for the entire innovation pipeline is essential to enable long-term competitiveness: from training and upskilling students and researchers, financing all types of research, and supporting knowledge transfer and spin-offs.

UNL appreciates the ambition of the Commission to create a coherent framework for competitiveness. To succeed, the ECF must clearly distinguish its role from Horizon Europe, establish transparent and streamlined governance, adopt a broad and inclusive view of competitiveness, and invest in the entire talent and innovation pipeline. Crucially, sufficient funds should be available to invest in cutting-edge research that ensures Europe's long-term competitiveness. By embedding these principles, the ECF can become a powerful instrument to reinforce Europe's knowledge base, industrial strength, and societal resilience.