

ANRT – ERA Working Group

Feedback on the Horizon Europe Programme for the mid-term evaluation

10th February 2023

The ERA Working Group at the [ANRT](#)¹, made up of **44 public and private French organisations** and active in Framework Programmes since 2000, welcomes the opportunity to participate in the Horizon Europe mid-term evaluation thanks to the consultation launched by the European Commission.

The members of the ANRT working group are pleased to present a set of key recommendations as a contribution to the Horizon Europe mid-term evaluation and the strategic orientations for the Horizon Europe strategic plan 2025-2027. The following reflections about Horizon Europe are related to five different topics:

- **Political aspects**
- **Calls for proposals**
- **Missions and partnerships**
- **Proposal preparation and proposal evaluation**
- **Project implementation**

1- POLITICAL ASPECTS

- **Budget:** The pandemic, the energy crisis and climate change have made it clear to the world that research and innovation play an essential role in shaping a green, digital, healthy future. As stated by Commissioner Mariya Gabriel during the [French Horizon Europe kick off](#), “Undeniably, innovation and research will be the engine of Europe's future. If we are to learn from the current pandemic, one of the most important lessons is the dynamism of research and innovation in Europe.”
For these reasons, the ERA Working Group **welcomed the increased budget allocated to Horizon Europe** to tackle global challenges, and the wealth of opportunities foreseen for all sectors to boost European competitiveness.
- **Synergies:** the ERA Working Group invites taking a **systemic approach** to research and innovation by proposing calls that allow for **greater synergies** between different Horizon Europe topics and EU programmes. In particular, the implementation of synergies between Horizon Europe and all other programmes should also be facilitated by **simplifying the rules**.
- **International cooperation:** in research and innovation, it is essential to address global challenges and to enable Europe to work together with researchers and innovators in other areas of the world. The ERA Working Group welcomes Horizon Europe's ambitions beyond Europe's borders. However, **delays in concluding association agreements** could affect the composition of consortia and create difficulties in preparing and implementing grant agreements. At present, uncertainties remain with regard to the United Kingdom.
- **Coverage of TRLs:** over the last two years, it has become clear that there is a need to **rebalance the coverage of TRLs** in order to plan R&I portfolios for the future of Horizon Europe and the next Framework Programme. Two aspects should be highlighted:

¹ Association Nationale de la Recherche et de la Technologie

- The coverage of collaborative excellence in **basic research in clusters is too limited**. Solutions need to be found quickly, but not only in applied research. For this reason, it is crucial to **increase the opportunities for low TRL projects** in the second pillar and to boost funding for projects of thematic excellence (ERC, MSCA). Furthermore, it might be interesting to provide for a number of bottom-up calls for proposals on some scientific topics (with a low TRL) with long innovation cycles.
- At the same time, **demonstration and industrialisation are not sufficiently covered** in the second pillar, and it is worth noting that Horizon Europe has launched a small number of high TRL calls (TRL higher than 7) in the last two years, often with budgets far too low to meet the projects' needs. It is therefore essential to **increase this type of call**.
- **Programme organisation:** in general, the **planning and political prioritisation** foreseen in Horizon Europe is highly appreciated, but a **simplification of the current framework** is desirable. It is currently difficult for researchers and innovators to understand the links between the different levels of programming (strategic plan, work programme, destinations, missions, etc.) and this can make it difficult to position themselves in calls for proposals.

2- CALLS FOR PROPOSALS

- **Type of instrument:** as explained above, in the second pillar it is important to ensure **TRL consistency** between clusters and destinations and to make sure that the **entire TRL scale is covered in each cluster with the appropriate instruments**.
- **Simplification of calls for proposals:** an **increased complexity of topics** has been observed. Horizon Europe calls for proposals are now broader in scope, which makes them more difficult for researchers, leads to a reluctance to coordinate projects, and may paradoxically reduce the ambition and impact of projects. Horizon Europe calls often require a new approach, involving more partners, leading to larger consortia that are more difficult to manage and coordinate. **Coordination, and even participation, are often discouraged**. Some factors have been identified: low success rates; multiplicity of instruments and work programmes; limited financial and human resources within organisations (Horizon Europe projects require very specific, scarce skills); setting up European projects is time-consuming and return on investment remains a major concern.
For these reasons, the ERA Working Group insists on: a **far-reaching simplification of instruments and calls**; facilitating coordination and participation; favouring smaller, more targeted projects; and even **reconsidering call deadlines** with better distribution over the year (the calendar is very challenging, with many calls opening in a very limited timeframe).

3- MISSIONS AND PARTNERSHIPS

- **Missions:** the ERA Working Group does not question the idea of **missions** as such, but rather **their implementation and consistency with other calls** under the second pillar. Unfortunately, few members are involved in missions projects and they find it difficult to access these calls. There are many reasons for this: topics are particularly complicated ; lack of visibility; it is difficult for researchers to find a place in a mission project; very few calls for missions; lack of understanding of how to participate in these actions.
In this context, it seems crucial to **clarify the scenario and to support participants** in order to **ensure the widest, easiest possible participation in these calls**.
- **Partnerships:** the Working Group greatly appreciated the efforts made to **rationalise the partnerships landscape** and reduce the number of tools and instruments, although difficulties

remain. For newcomers especially, these latter two instruments (missions and partnerships) can sometimes be a source of confusion.

It is not easy to express a single opinion on partnerships, it depends very much on the type of partnership.

In any case, **greater involvement of the private sector in certain clusters** should be facilitated through the establishment of co-programmed partnerships or a better balance between the types of partnership. Indeed, when the vast majority of partnerships are co-financed, interactions with the private sector are limited. Overall, **public-private partnerships are powerful instruments** for excellent collaborative research and innovation in Europe.

4- PROJECT PREPARATION AND PROJECT EVALUATION

- **EU competitiveness:** as a general reflection, **the timing of the evaluation process and the grant agreement preparation phase (8 months) could be too long and inadequate for some specific innovative ideas** in the current context of global competitiveness. The European Union could risk losing promising opportunities for its competitiveness and strategic autonomy.
- **Proposal template:** the ERA Working Group welcomes the efforts made by the EC to further simplify the **proposal preparation** phase. Two aspects of the **new proposal template** are particularly appreciated: the removal of the governance description and the avoidance of repetition. At the same time, however, **the consistent reduction of the page limit is in contradiction** with the increasing number of topics to be covered by a proposal and the required interdisciplinary and cross-sectoral approach. **A reconciliation of these requirements seems desirable.**
Another difficulty highlighted in the framework of the new template is the current version of the **impact section** (especially the pathway to impact), which is more complex to address for researchers and innovators.
- **Blind evaluation:** concerning the evaluation phase, in view of the forthcoming introduction of the **blind evaluation pilot**, the Working Group would like to emphasise the **need for information and support** to explain how to write an admissible proposal to avoid the risk of exclusion. So far, this new mechanism is not clear and all **applicants need to be fully aware of the main changes** in order to meet this new challenge.
- **Right to react:** furthermore, another pilot was launched during the two first years of Horizon Europe: **the right to react**. The ERA Working Group appreciated the new methodology proposed, although **some improvements still seem necessary**. It would be interesting to **have information on the data relating to this pilot and its evaluation** and to understand the potential future of this mechanism.

5- PROJECT IMPLEMENTATION

- **Annotated Model Grant Agreement (AMGA):** firstly, the members of the ERA Working Group call on the European Commission **to finalise and publish the AMGA**. This is an important issue for beneficiaries two years after the entry into force of the Framework Programme. At present, there are still several uncertainties due to the lack of annotations clarifying the financial and administrative rules.
- **Simplification of the implementing rules:** the ANRT Working Group appreciates the **continuity and stability of the rules**, which are the real strength of the EU Framework Programme, supports the European Commission's **willingness to simplify administration**, and has welcomed some specific new initiatives (e.g. corporate rules, the data sheet section in the grant agreement, etc.). Nevertheless, some efforts are still needed. More specifically:
 - **Personnel costs:** the new **productive time** provision (215 days) **is not suitable** for French organisations because it is not adapted to the national system and there is a

risk of economic loss. **A new alternative option should be introduced** to take account of the specific characteristics of the beneficiary organisation. In addition, **the obligation to calculate personnel costs several times a year**, for each project reporting, significantly **increases the administrative burden**. This rule is not adapted to current accounting practices, as it was under Horizon 2020.

- **Internally invoiced goods and services:** despite the simplification, further clarifications are needed to better understand the new method.
- **Clinical trials:** the **unit cost** for reporting the costs of clinical trials is **no longer foreseen** by Horizon Europe and this is **contradictory to the announced simplification efforts**. In any case, it seems useful **to explain how to report these costs and to add some examples** in the Annotated Model Grant Agreement.
- **Project management:** there is a need to **simplify processes and activities**. This task is currently concentrated in the hands of the coordinator, whose workload is enormous, which can be a disincentive to fulfilling this role.
- **Audit:** detailed **rules on auditing are still lacking**. The **publication** of both the **Indicative Audit Programme and the Grant Agreement annotations** is increasingly urgent. Beneficiaries need to know from the very beginning how to manage their project correctly.

In general, the Working Group is convinced that one of the keys to simplification is to ensure **coherence between the Horizon Europe implementing rules and the general internal practices** of beneficiaries.

- **Lump sum:** finally, the use of **lump sums** will be extended as of 2023. The tools and guidance provided by the European Commission are highly appreciated, **but there are still open questions** as to whether the European R&I community is ready for this big change:
 - The need to know the structure and level of detail of **technical reporting**.
 - **Compliance with internal financial and accounting practices:** what kind of **checks** can be made during an audit.
 - Clarification about **technical evaluation and technical checks**.
 - **Amendment** management.

Furthermore, the Working Group fears that greater use of lump sums could affect **partner selection**. In order to reduce the risk of defaulting partners, which could ultimately lead to reduced payments, the choice could be directed towards trustworthy organisations (like regular partners). This could be an **obstacle to the inclusion of newcomers** (especially small organisations) in Horizon Europe projects.

ANRT and the members of the ERA Working Group remain ready to provide additional input on the topics mentioned above and are available for further discussion with representatives from European institutions.