

Joint Statement by the German Research Foundation (DFG), the German Rectors' Conference (HRK) and the Leibniz Association on the Commission Proposal for a new Horizon Europe (FP10, 2028–2034) and related proposals

On 16 July 2025, the European Commission presented its proposals for a regulation establishing a new Framework Programme for Research and Innovation for the period 2028–2034 (2025/543), a Council Decision establishing the Specific Programme implementing Horizon Europe (2025/544) and a regulation establishing the European Competitiveness Fund (2025/555).

The German Research Foundation (DFG), the German Rectors' Conference (HRK) and the Leibniz Association, representing the voice of researchers, universities and independent research institutions in Germany, welcome the opportunity to comment on the proposals and to contribute actively to shaping a strong and robust FP10 that drives Europe's competitiveness on the global stage while fostering the foundations of excellent research.

While the European Commission's effort to simplify procedures and streamline the Horizon Europe Regulation and its specific programme should be acknowledged, many of the provisions need to be articulated more precisely as they remain vague and do not sufficiently address the specific needs of research. The same applies to the new regulation for the European Competitiveness Fund (ECF).

The DFG, HRK and Leibniz Association call on the EU institutions to take the following points into consideration:

(1) Ensure a connection between Horizon Europe and the ECF that benefits research

The DFG, HRK and Leibniz Association welcome the European Commission's decision to propose a standalone framework programme for research and innovation. The framework programmes have been fundamental to advancing excellent research, as they provide funding mechanisms and rulebooks that are specifically dedicated to researchers' needs. At the same time, the Commission intends to connect Horizon Europe tightly to the new ECF with the aim of creating a seamless investment journey from basic research to market deployment. This new governance structure offers an opportunity for Europe to move faster and be more agile with regard to future technological developments. However, the proposed ECF Regulation does not specify how exactly this goal is to be achieved.

- The European institutions should agree on an **effective governance structure which defines the complementary functions of FP10 and the ECF** through appropriate coordination instruments and promotes their synergistic alignment. This includes clear pathways for the involvement of the research community in the agenda-setting of the Competitiveness part in Pillar II and in the ECF policy windows in the regulations, including the proposed Competitiveness Coordination Tool and the Observatory of Emerging Technologies.

- Achieving the programme-specific objectives requires a **clear demarcation of funds between FP10 and the ECF** in order to ensure that the relevant funding is used for its intended purpose and remains available for the respective programme.
- The Horizon Europe Regulation should continue to specify **different rulebooks for all funding instruments** in accordance with the current Horizon Europe Regulation (2021/695) and Specific Programme (2021/764). A general application of the ECF's rulebook to research and innovation projects funded under FP10 needs to be avoided, as it is too rigid to accommodate the diverse types, sizes, and risk profiles of projects. Rather than simplifying administration, a single rulebook would create friction, legal uncertainty and red tape. Research needs rules tailored to its needs, not a one-size-fits all approach.
- **Association to the ECF must not become a prerequisite for association to the Competitiveness part of Pillar II in FP10.** The ECF's strategic orientation towards European technological sovereignty and associated research security imperatives could present substantial hurdles for countries seeking to associate with it. Such hurdles should not result in distinguished partners from associated countries being excluded from collaborative research endeavours. Their absence would significantly weaken the European Research Area.

(2) Strengthen the budget to make research and innovation the motor of a strong EU economy

The DFG, HRK and Leibniz Association welcome the European Commission's decision to increase the FP10 budget to €175.3 billion, not least to address the staggering oversubscription rates. Particularly in times of global challenges, it is essential to reinforce Europe's commitment to excellent research and innovation as drivers of competitiveness. If the EU wants to remain a global player and put research and innovation at the centre of its economy, FP10 will require an even higher budget – as outlined in the expert reports by Mario Draghi¹ and Manuel Heitor².

- The DFG, HRK and Leibniz Association reiterate the call of the Alliance of German Science Organisations to **raise the budget for FP10 to €200 billion**. This budget should be safeguarded throughout the MFR negotiations and be ring-fenced exclusively for research and innovation for the full duration of the programme.
- Each instrument mentioned in Article 4 of the Horizon Europe draft regulation should receive a **separate budget line** in Article 6 so as to ensure their attractiveness and reliability for all researchers throughout the funding period.

¹ https://commission.europa.eu/document/download/ec1409c1-d4b4-4882-8bdd-3519f86bbb92_en?file-name=The%20future%20of%20European%20competitiveness_%20In-depth%20analysis%20and%20recommendations_0.pdf (16.12.2025).

² <https://op.europa.eu/en/publication-detail/-/publication/2f9fc221-86bb-11ef-a67d-01aa75ed71a1/language-en> (16.12.2025).

The **European Research Council (ERC)** is the flagship of the EU Framework Programmes. Its funding programmes have made a decisive contribution to raising Europe's profile as a global research leader. The DFG, HRK and Leibniz Association therefore welcome the increased budget for Pillar I – including the ERC – in absolute terms. The ERC's individual grants are overdue for adjustment to reflect real costs, as they have not been adjusted for inflation for more than a decade.

The situation is worse for the **Marie Skłodowska-Curie Actions (MSCA)**, which foster Europe's future research talent across the board. Their share of the overall programme budget has been halved from 10% in FP6 (2002-2006) to only 5% in the Horizon Europe proposals despite their recognised success and significance for researcher mobility and career development. As a result, the MSCA suffer from high oversubscription. The "expansion of the ERC" as announced by Commission President von der Leyen cannot be implemented with the current proposals, as the budget for Pillar I would remain relatively unchanged. The MSCA's share of the budget would actually decrease further.

Furthermore, the strategic alignment of most collaborative research funded under Pillar II with the competitiveness agenda contradicts the demands of the vast majority of researchers, who called for more opportunities for **early-stage and pre-competitive collaborative research** in their statements prior to the Commission's proposals.

- **ERC and MSCA need a substantial budget increase, as does early-stage and pre-competitive collaborative research in Pillar II**, in order to account for their indispensable contribution to strengthening Europe as a research location, supporting the recruitment of excellent talent and deepening scientific cooperation between researchers and institutions within Europe and with international partners.

(3) Uphold the commitment to excellent research

In the European Commission proposal, the DFG, HRK and Leibniz Association recognize a clear intent to strengthen the contribution of research and innovation to competitiveness. As excellent research is the fundamental condition for innovation and competitiveness, it is worrying that the Horizon Europe draft regulation no longer foresees scientific excellence as a specific programme objective under Art. 3 (2). The ERC programme evaluations have shown that the ERC's funding of open-topic and bottom-up research does create new knowledge and consequently has a measurable impact in terms of patents and start-ups: while the ERC budget currently only accounts for 17% of all Horizon Europe funding, 40% of ERC projects were subsequently cited in patent applications.

- **The aim of "developing, promoting and advancing scientific excellence" should be reintroduced as programme objective** under Art. 3 (2) of the Horizon Europe Regulation.

Moreover, the draft proposal for the specific programme implementing FP10 includes measures that threaten Europe's research excellence by weakening the autonomy and bottom-up nature of both the ERC and the MSCA. Among them are the suggestion to reduce the mandate of the ERC President from 4+4 to 2+2 years (Art. 6 (4)), the removal of the terms for the mandate of the ERC president as currently included in Annex I of the Specific Programme

(2021/764), the new consultation requirements for the ERC Scientific Council (Art. 7 (6)) and an explicit call for the MSCA to also target specific EU priorities (Art. 9 (2)).

- **The proposed changes to the mandates and obligations of the ERC President and the ERC Scientific Council should be reversed** in order to fully safeguard their autonomy. They are the foundation for the programme's success in funding excellent basic research with the highest levels of international recognition.
- **MSCA should remain a bottom-up programme.** Any thematic steering and alignment with political priorities should be introduced only with additional funding sources, as currently provided for under Annex I of the Specific Programme.

(4) Expand opportunities for collaborative research

The European research community has consistently identified collaborative research as the primary vehicle for scientific integration across Europe. This collaborative foundation has proven instrumental in realising a truly integrated European Research Area and fostering sustainable transnational scientific partnerships that strengthen Europe's research ecosystem. While recognizing the strategic alignment between the ECF and the four policy windows in the Competitiveness part of Pillar II of FP10, it is essential that collaborative research funding continues to transcend narrow competitiveness objectives. An overemphasis on immediate economic returns risks constraining fundamental research endeavours that generate transformative insights and drive long-term innovation capacity. Funding exploratory research must not be limited solely to the Society part of Pillar II.

- **The Competitiveness part in Pillar II of FP10 must encompass both exploratory and application-focused research.** This requires distinct functional boundaries to initiatives in the ECF and the European Innovation Council (EIC), ensuring optimal synergies while avoiding programmatic overlap. Technologies that the EU is strategically advancing in the market should remain open to new ideas and breakthroughs from lower TRLs at all stages.

Furthermore, the current version of the Horizon Europe draft regulation does not make it clear whether interdisciplinary approaches will receive adequate funding within the four policy windows associated with the ECF. Social change and adaptation to this change are crucial to Europe's competitiveness and must therefore always be considered in the context of competitiveness.

- **The Competitiveness part of Pillar II of FP10 should earmark funding for the social sciences and humanities (SSH)** to address the societal implications of the competitiveness-related transformations required, such as the unintended use and adoption of new technologies, the societal disruption caused by new technologies, and public backlash to new regulations. SSH research can help anticipate impacts, design frameworks, and secure the public acceptance on which Europe's competitiveness ultimately depends.

Since FP7 (2007–2013), EU research policy in technological fields has favoured a top-down approach with large, mission-oriented consortia, substantial coordination and rigorous programme steering to align stakeholders and objectives. Examples include the FET Flagships, the missions and the Knowledge and Innovation Communities (KICs). In the explanatory memorandum of the Horizon Europe draft regulation, the Commission mentions 11 'moonshot' projects but does not allocate any funding to them. While the Commission's intention in including these initiatives is unclear, this approach risks concentrating funding on a few large-scale projects once again, leaving less room for smaller, more diverse, bottom-up research activities. Also, their complex governance structures can slow decision-making and reduce flexibility.

- The European institutions should **exercise caution when allocating funding within Horizon Europe (and its Competitiveness part)** to one or more of the moonshot projects mentioned in the explanatory memorandum of the programme's draft regulation.
- Future FP10 funding instruments for higher TRL projects should encourage European companies and their research partners to compete with each other to develop the best ideas.

(5) Maintain the European Innovation Council (EIC) ecosystem and end the European Institute of Innovation and Technology (EIT)

The European Commission proposes maintaining the EIC as the EU's instrument for deep tech and breakthrough innovation and introduces ARPA-style challenge pathways overseen by programme managers. EIC support focuses on innovative start-ups and SMEs, rather than universities. Scale-up finance is to move to the ECF, with the EIC coordinating shared challenges.

- **The EIC Pathfinder and Transition instruments should remain open, bottom-up funding schemes for early-stage, high-risk, low-TRL projects**, with protected resources and regular cut-offs. This enables outstanding research discoveries to progress swiftly from exploration to validation.
- **It is imperative that universities and research organisations are kept explicitly within the scope of the European Innovation Council (EIC) in order to unlock Europe's full innovation potential.** They have played a pivotal role in EIC Pathfinder and Transition, particularly in promoting early-stage, high-risk concepts. The EIC should also encompass more than technology, recognising social innovation as a key driver of societal benefit and resilience.
- Regarding the introduction of an ARPA-style instrument, the Commission should focus on **creating efficient pathways for promising new technologies from the ERC and Pillar II to the EIC.**

The Horizon Europe proposals do not explicitly name the European Institute of Innovation and Technology (EIT). Part III only refers to "innovation ecosystems" and activities to foster the integration of the "knowledge triangle" (education-research-business) across the Union — functions traditionally associated with the EIT. Under the current EIT Regulation, the

Commission is to review the EIT by the end of 2026. After more than 15 years, the EIT has not really proven its effectiveness and is not an attractive model for German universities and research organisations.

- **The Commission should phase out EIT funding and instead redirect it to new knowledge-triangle formats** that bring together universities, non-university research organisations and companies. These new formats should be organised in smaller, more efficient and competitive formats. Furthermore, it is important to acknowledge that universities are active on all three sides of the knowledge triangle, not only in training talent.

(6) Define clear rules for dual use

With its Horizon Europe draft regulation, the European Commission is proposing to move away from exclusively civil European R&I funding. The explanatory memorandum states that “the programme may support dual-use actions”, while the EIC will actively support start-ups in the field of defence and dual-use activities in the future. Neither provision is included in the legal part of the regulation. While separate programmes for civil and military research would be preferable for some universities, the DFG, HRK and Leibniz Association recognise that the European Commission favours an integrated approach for FP10. However, the integration of dual-use research requires greater transparency, particularly for universities with civil clauses and for associated third countries, and therefore clarification of the relevant provisions in the draft regulation.

- The Horizon Europe Regulation and the specific programme should explicitly specify which instruments are eligible for dual use and under what conditions. Clear guidelines are essential in this sensitive area in order to avoid uncertainties, e.g. regarding the possible composition of consortia, and to clarify legal aspects at an early stage.

(7) Establish a clear strategy for funding research infrastructures

The European Commission proposes in Art. 18 of the Horizon Europe draft regulation and Art. 16 of the draft specific programme that Horizon Europe should cover up to 20% of the construction costs for “critical new world-class capacities of European research and technology infrastructures”. The DFG, HRK and Leibniz Association welcome the fact that the European Commission recognises the need for investment in excellent infrastructure in principle. However, the lack of details and justification for this new provision raises several concerns.

First, the Horizon Europe draft regulation and the draft specific programme contradict each other as to whether both research and technology infrastructures or only research infrastructures should be funded. Second, there is no clear reference to a mechanism by which an infrastructure should be classified as a “new and world-class capacity”. Third, such a mechanism would be even more important given that the total budget available for infrastructures (although not specified in the regulation and specific programme) could amount to around €10–11 billion. This might be just enough to provide, for example, 20% of the funding for three larger infrastructures of the scale of CERN’s Future Circular Collider, the feasibility of which is currently being explored. Fourth, it is unclear why research funds from FP10 should generally be converted into construction funds, when other funds, such as the European Regional

Development Fund and the Cohesion Fund, have been suitable for this purpose in the past. Lastly, funding construction costs in Horizon Europe might create false incentives for national governments, making EU co-funding mandatory for the implementation of an infrastructure project.

- **A clear strategy should be developed for financing construction costs of research and technology infrastructures at EU level.** This could either lead to a higher budget and clear selection mechanisms for financing the construction of research and technology infrastructures under FP10, or to this proposed option being removed altogether.

(8) Improve the design of the widening programme

The programme objectives under Art. 3 (2) of the Horizon Europe draft regulation no longer base widening measures on the need to foster research excellence, but on the need for inclusion. However, the aim of reducing national and regional disparities in research and innovation capacity will continue to be best achieved by fostering research excellence everywhere rather than by scaling back ambition.

The aim of “fostering excellence-based participation of all Member States, including low R&I performing countries” should be reintroduced as a programme objective under Art. 3 (2) of the proposed Horizon Europe Regulation.

The proposals also foresee a new categorisation of widening countries into transition countries (Cyprus, Estonia, Greece, Malta, Portugal, Slovenia) on the one hand and widening countries (Bulgaria, Croatia, Czechia, Hungary, Latvia, Lithuania, Poland, Romania, Slovakia) on the other hand, based on their positions on the Innovation Scoreboard. Only the latter are to receive funding for capacity-building in the future and – from 2030 onwards – only if they have increased their national R&D funding. The attractiveness of a transition country status is questionable if it only comes with exclusion from capacity-building measures. It is also doubtful whether sanctioning low R&D investment in widening countries is the most effective way to raise national R&D spending.

- **The status of a transition country should come with specific benefits and include a dynamic factor** so that widening countries can qualify for it if their performance on the Innovation Scoreboard improves during the timespan of the FP10.
- Rather than sanctioning stagnating or reduced national R&D funding, **the Commission should reward increased national R&D funding** with specific benefits within the widening programme.

Shape FP10 as a strong programme for Europe's future

FP10 will set the course for European research and innovation for the coming decade. The DFG, HRK and Leibniz Association are committed to contributing constructively to the negotiations to help FP10 become a strong and robust programme for research and innovation that drives Europe's competitiveness on the global stage while protecting and fostering the base for excellent research that forms the foundation of European society.

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