

Position of the Helmholtz Association to the European Commission's Proposal for a Regulation establishing Horizon Europe 2028-2034

In collaboration with the Helmholtz centres this paper was developed by the Helmholtz Brussels Office as input to the negotiations of the future framework programme Horizon Europe 2028-34 and certain aspects of the draft Regulation establishing the European Competitiveness Fund. Accompanying [Helmholtz Policy considerations](#) & [Helmholtz Technical considerations](#).

Horizon Europe 2028-2034 budget

Efforts should be made to fully meet the Heitor report's recommendations regarding the budget needed. The European Union must invest heavily into research comprising the whole spectrum from low to higher TRLs to stimulate growth and ensure future prosperity. Therefore, the budget for HE 2028-2034 should be ring-fenced and should not be indicative to rule out cuts and safeguarded it against reallocations to other programmes during annual budget negotiations. Within the distribution of the HE 2028-2034 budget, low TRL research activities should be prioritized and thus receive the main share as financing of high TRL projects will be sufficiently provided by the European Competitiveness Fund (ECF). At the same time, a coherent value chain perspective is required also for the Competitiveness Fund, including an identifiable budget to bridge the gap between frontier research and innovation via mid-range TRL research and development activities.

The budget for fundamental research channelled into "moonshot" projects is not indicated in the proposed distribution of the budget for HE 2028 - 2034. If parts of their budget are to stem from HE 2028-2034, research needs to be a key element of them. Additionally, existing Missions should be completed and supported to avoid fragmentation as well as enable transformation and ensure long-term impact.

Objectives

Collaborative research across borders in Europe reduces national disparities and fosters European competitiveness as well as the development of know-how and is therefore at the very heart of a framework programme for research and innovation. Horizon Europe 2028-2034 needs to retain its distinctive research-driven identity alongside industrial policy focused instruments. Non-profit research organisations and universities are key to the programme's success. Being tightly connected to the objectives of the Competitiveness Fund with a focus on industry, it is of paramount importance that this framework programme is open to bottom-up ideas and continues to address urgent societal challenges (e.g. circular economy, waste reduction, climate change and biodiversity loss). These are currently less prominently reflected in the ECF framework and addressing them is essential for achieving the necessary global transformative change. Moreover, European researchers and innovators should have access to the research infrastructures needed for world class science.

Addressing societal challenges is one of the core components of Europe's economic resilience. Funding and investments in those areas does not only respond to the needs, but also strengthen the capacity to withstand crises, reduce strategic dependencies, and maintain global leadership in knowledge-intensive sectors.

Funding and cost coverage

We welcome the continuity of funding via grants for research and innovation projects with a funding rate of 100% for non-profit legal entities. However, we are concerned that the proposed “financing not linked to costs” as default for the Competitiveness Fund and as instrument for grants of HE 2028-2034 is not suitable for research and innovation projects. Non-profit legal entities depend on EU-funding for their participation in projects and need coverage of their actual costs. But neither financing not linked to costs nor current simplified cost options such as lump sums meet this demand. Financing not linked to costs is even decoupled from the underlying costs. With financing not linked to costs, as described by the Financial Regulation, funding depends on the fulfilment of certain conditions *ex ante* or on the achievement of results. Therefore, it is either meeting predefined conditions or the achievement of certain results that trigger the payment. If results are pre-defined the flexibility required for exploratory and frontier research is missing. In addition, each research project would entail a risk of non-funding if a pre-defined target or pre-set milestone is not archived even though the research activity was carried out. This is particularly relevant for non-profit research organisations, because they depend upon coverage of their researchers’ salaries, material and equipment costs.

Simplification

Currently, personnel unit costs are lacking uptake by the stakeholder community. This is due to their present methodology, which takes into account the past remuneration of the entire beneficiary workforce and does not mirror beneficiaries’ reality in which the majority of staff working for EU-projects are highly educated researchers with above average personnel costs. If simplification is the EU Commission’s aim, personnel costs eligibility should reflect the beneficiaries’ needs and usual accounting practices while making personnel cost reimbursement as simple as possible. To this end, we propose a new approach that accepts full personnel costs, as long as they are paid in accordance with collective labour agreements and are recorded in the beneficiary’s accounts. Personnel cost should be eligible as they are recorded in the accounts if staff worked 100% for the EU-project and pro-rata according to percentages in other cases. This approach should be used throughout for personnel cost remuneration and also as basis for lump sum budget calculations comprising the predictable salary increase during the project implementation. Furthermore, fewer and simplified periodic financial reports that do not require justification for each item, as well as reduced audits could embed a trust-based approach, while maintaining appropriate safeguards and financial oversight. For additional considerations for effective simplification please take note of the Helmholtz position paper “[Simplifying European Research Funding](#)” (January 2025).

Single set of rules

The proposed regulation mentions a single set of rules as an option for combined funding by different EU-programmes or in case of cumulative funding with EU Member States. As an option, it falls short of the idea to simplify the rules for all funding programmes. Moreover, certain aspects currently covered by the Regulation establishing Horizon Europe 2021-2027, such as the evaluation of proposals and evaluation review possibilities, transfer of ownership of results and licencing, as well as access rights and audits, are not regulated in this proposal, thereby potentially causing lack of transparency and legal clarity. The single set of rules should harmonise rules and procedures and provide simplification measures as well as ease applicants’ and beneficiaries’ understanding of terms, conditions, core cross-cutting principles and standards of European research and innovation funding in the Multiannual Financial Framework 2028-2034. An Annotated Grant

Agreement for research and innovation within the first 3 months of the new MFF and templates such as a subgrant template with standard terms and conditions for subgrants of cascade funding calls would ease the process.

Calls and proposals

In order to reduce over-subscription and ease the burden on applicants and evaluators, especially in bottom-up calls, a two-step submission process should apply.

If randomised award procedures are deployed, they should only apply to proposals which were evaluated throughout, reached the threshold and were assessed as equally excellent.

Regarding the evaluation of a proposal in Horizon Europe 2028-2034 potential dual-use applications should not increase the likelihood of receiving funding. Moreover, calls should entail a clear flagging (civil/dual-use) after assessment of possible outcomes and its intended use by the Granting Authority.

European Partnerships

The European Research Area needs sufficient Union support for cross-border research collaboration beyond Partnerships. EU Partnerships should be streamlined to such extent that via a reduced number the most important receive an increased budget allocation. However, EU Partnerships remain a key instrument for collaboration of non-profit research organisations and universities with industry. Joint implementation via grants between the Commission and a consortium of partners, generally composed of research and innovation funders and other public authorities (COFUND) should be continued as a component of EU Partnerships based on MoU (Art. 11.2). As non-profit research organisations and universities receive public financing, they are barred from participation in Partnerships with mandatory cash contributions. Therefore, in-kind contributions provided by non-profit research organisations, e.g. their scientific staff or provision of access to research infrastructures, should be accountable in all EU Partnerships and especially those based on MoUs. Some EU Partnerships such as the European Open Science Cloud include a fit-for-purpose governance, to represent the Union Member States and research data generators, and play a crucial role for the sustainability and development of data infrastructures. Generally, stable partnership-based funding is required to maintain large-scale, long-term EU initiatives as strategic European assets.

European Innovation Council (EIC)

The implementation of a (D)ARPA approach needs to be carefully evaluated in relation to the particular topics. The majority of EIC calls and funding should be dedicated to bottom-up blue-sky civil research whereas a top-down (D)ARPA approach should be applied selectively and only where duly justified by the nature of the topic.

Appropriate mechanisms ought to sustain success rates to prevent demotivating effects on researchers. The EIC projects should not be limited to incremental technological developments but aim for disruptive innovations for societal challenges, for example healthy life on land and below water as well as medicines.

Research Infrastructures

World-class infrastructures form the backbone of Europe's research and innovation ecosystem, providing the shared tools and platforms required for breakthrough science,

industrial innovation, and talent development. Ensuring adequate scale, long-term planning, and coordinated governance at European level will be decisive in enabling Europe's innovators and future Nobel Prize winners to compete globally. Enrico Letta's report "Much more than a single market" emphasizes that investment in research and technology infrastructures is an essential pre-requisite on the way forward to reach the fifth freedom. This is corroborated by Mario Draghi's report on "The future of European Competitiveness", in which he indicates that the lack of decision-taking for pan-European research and technology infrastructures is a key barrier for innovation in Europe.

Open Science

Open access should still be defined as online access to scholarly publications, provided free of charge and, as far as possible, free of technical and legal barriers - thereby permitting reuse and derivative works, subject to proper attribution. Open Science is wider in its scope and refers to the practice of making research processes, data, methods and other outcomes available through transparent, collaborative and inclusive approaches and in line with the FAIR principles. Scientists should be able to share their work and findings on platforms that adhere to research community standards based on the principle of openness. To ensure broad uptake of Open Science practices, concrete incentives for data sharing ought to complement principles. Dissemination and data management plans should pre-assess which research outcomes might need protection due to economic, privacy or security interests and which can be circulated freely considering the principle "as open as possible and as closed as necessary".

Research Security

Horizon Europe 2028-2034 should promote international collaboration with partners around the world to fully leverage complementary expertise and know-how and advance in sectors where other nations have invested heavily and achieved tangible progress, while Europe is falling behind. At the same time, international collaboration has its limits where beneficiaries' intellectual property, safety, or research integrity standards may be at risk. We therefore welcome the idea of a risk assessments at European level, which may, where necessary and proportionate, lead to restrictions regarding the association of non-EU countries to certain parts of the programme or the participation of specific entities. In this process, the experience and expertise of large research organizations should be taken into account in order to ensure a balanced and well-informed approach. Moreover, the EU, together with national authorities, should provide appropriate tools and support structures to enable research-performing organizations to carry out standardized, case-by-case risk assessments for their international research collaborations beyond Horizon Europe 2028-2034. In this regard, we also welcome the plans that were announced during the first European Flagship Conference by Commissioner Zaharieva ([* Commission announces new measures to strengthen research security - Research and innovation](#)).

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We are Germany's largest research organization. At Helmholtz, more than 47 000 people work together in 18 centres and develop solutions and technologies for the world of tomorrow. With an annual budget of six billion euros and long-term, interdisciplinary research programs and unique research infrastructures we address global challenges - in our six thematic fields: Earth & Environment; Energy; Aeronautics, Space & Transport; Health; Information and Matter.