

December 2025

A PROGRESSIVE FRAMEWORK PROGRAMME TO MEET EUROPE'S STRATEGIC AMBITIONS

**Neth-ER Reaction to the Proposals for the
Framework Programme 10 &
European Competitiveness Fund**



Introduction

The proposal for the next Framework Programme for Research and Innovation (FP10) is a right step towards a strong and competitive European economy and a more resilient and inclusive society. Unfortunately, the proposals lack detail on key provisions and require further clarification. Moreover, the budget falls short of the Draghi-Heitor recommendation to **double Horizon Europe's budget to at least €200 billion**.

Neth-ER calls on Parliament and Council to ensure that the final regulation reflects the ambition to strengthen Europe's research and innovation landscape. Research and innovation (R&I) are key enablers of the EU's competitiveness, its capacity to address societal challenges, and its ability to deliver public value, and only a truly ambitious and strong FP10 can help deliver that.

We must put research & innovation, science & technology, at the heart of our economy and society.

Neth-ER calls for:

1. A protected budget of at least €200 billion that secures the future of European research.
2. Excellence and impact as the core criteria.
3. Representation of the R&I sector in the advisory board of the ECF and good presence of social sciences & humanities and health in pillar II.
4. Simplification that truly benefits researchers and does not shift burdens downstream.
5. A primarily civil focus in FP10 and establishing a dual-use advisory platform to support applicants and beneficiaries.

¹ [The Draghi report on EU competitiveness](#)

² [Align, act, accelerate - Research, technology and innovation to boost European competitiveness](#)

³ [European Commission, 'For every euro invested Horizon Europe generates up to €11 in economic gains, Apr 20, 2025.](#)

List of Recommendations by Neth-ER

Articles

- **Article 6** should double the FP10 budget to €200 billion in 6(1) to reflect R&I's strategic importance for EU competitiveness and resilience.
- **Article 6** should include a safeguard clause ensuring that any reallocation of FP10 funds requires co-decision, an independent impact assessment, and may not reduce the overall budget or indicative allocations.
- **Article 6** should include a provision ensuring balanced and predictable funding across the full R&I chain to safeguard coherence and long-term stability.
- Article 6 should explicitly reference the Financial Regulation (2024/2509, Article 15(3)) so that decommitments from research projects are returned to the programme.
- **Article 9** should clarify that association with Pillar 2 of Horizon Europe allows full participation in Pillar 2 and is wholly independent from association with the ECF.
- **Article 10(1)** should be amended to ensure that lump sum funding and personnel unit costs are optional, not mandatory nor the default.
- **Article 10(5)** should be amended to state that "the evaluation committee shall be composed fully of independent external experts."
- **Article 14** should guarantee representation of the broad R&I sector in the Strategic Stakeholders Board of the ECF, including universities, UAS, RTOs, and research funders.
- **Article 18 and Article 83** should reinstate the obligation for the Commission to regularly inform programme committees of the implementation progress of FP10 and ECF respectively, in line with Article 14(7) of Council Decision (EU) 2021/764.
- **Article 25** should maintain excellence and impact as the core evaluation criteria.
- **Article 25(2)** should explicitly specify that only excellence applies to ERC frontier research actions and MSCA research & training actions.
- **Article 25** should confirm that geographical criteria may only be used within 'widening participation and spreading excellence'.
- **Article 32** should continue to guarantee adherence to Open Science and Open Access standards, consistent with the principle 'as open as possible, as closed as necessary.'

Recitals

- **The recitals** should include a dedicated statement that FP10 will have a primarily civil focus, allowing researchers full autonomy in deciding whether to pursue dual-use applications.
- **The recitals** should reaffirm that investment continuity and stability are essential for Europe's resilience, competitiveness and leadership in R&I.

General

- The FP10 Regulation should specify clearly which rules from the ECF single rulebook apply to FP10, and ensure all award-procedure documents are published before the end of 2026.
- FP10 should ensure a strong structural role for SSH and Health research across Pillar II.
- The FP10 & ECF proposals should establish a dual-use advisory platform accessible to all applicants and beneficiaries, offering guidance on compliance, dissemination, and risk management.
- FP10 should allow more public debate, clarification, and guidance on dual-use implications before and during implementation.

1. Double the Budget

FP10 must be doubled to at least €200 billion to safeguard Europe's global leadership in research and innovation. This requires anchoring long-term, predictable investment across the full R&I chain in the legal text, reflecting its strategic role in resilience, competitiveness and autonomy.

Double the budget to meet strategic ambitions

FP10 must be backed by a budget of at least €200 billion. This is not merely a political aspiration, but a strategic necessity, supported by the Draghi¹ and Heitor² reports. Investing in research and innovation is not only an economic strategy, but a foundation for Europe's resilience and its ability to safeguard its strategic autonomy. Each euro invested in the FP generates up to eleven euros in economic gains.³ A world-leading knowledge economy requires sustained, world-class investment. The current increase falls short of the strategic ambitions outlined in the FP10 regulation. FP10 positions R&I as central to the Union's ability to anticipate challenges, develop key technologies, and respond to crises – from climate and health to security and geopolitics (Recital 1, Objectives).

Need to protect the budget

Without robust and predictable investments – meaning a clear, long-term commitment anchored in the regulation itself – Europe cannot deliver on its strategic ambitions or solve global challenges. FP10 must ensure a balanced and stable funding landscape across the full R&I chain, from frontier science to applied and practice-oriented research. Currently, it lacks concrete safeguards to guarantee continuity and coherence in funding across all stages. The budget must be protected to ensure predictability and stability. While FP10 refers to the programme as “independent and predictable,” it lacks concrete safeguards against reallocation of the proposed budget. The practice of diverting funds to new or shifting political priorities undermines trust in the programme and hinders long-term planning. Only a protected budget guarantees that European researchers and innovators can continue to deliver excellence and impact for society. Additionally, FP10 should include explicit safeguards against re-programming. Any redeployment of Horizon appropriations to new political priorities should only occur through co-decision and following an independent impact assessment. It shall not reduce the FP10 budget nor the minimum allocations across pillars and instruments. Contingency needs should be financed from dedicated MFF instruments rather than from appropriations. Any unused funds should be reallocated to the programme (decommitments), in line with the Financial Regulation.

Neth-ER recommends:

- **Doubling the FP10 budget to €200 billion in Article 6(1) to reflect the strategic importance of R&I for the EU's competitiveness and resilience.**
- **Adding a safeguard in Article 6 so that any reallocation of FP10 funds requires co-decision, an independent impact assessment, and may not reduce the budget or allocations.**
- **Inserting a provision in Article 6 ensuring balanced, predictable funding across the full R&I chain to safeguard coherence and long-term stability.**
- **Inserting an explicit reference to the Financial Regulation (2024/2509 article 15(3)) that “decommitments from research projects shall be made available again to the benefit of the research programme.”**

2. Preserve Excellence and Impact

Excellence and impact should be preserved as the key criteria of the FP. The FP10 proposal rightly reaffirms the importance of freedom of scientific research and bottom-up research.

Maintain excellence and impact as key criteria

Excellence, both scientific and applied, and impact must remain the key criteria for the evaluation of all proposals under the programme, as stated in Article 25.

Only excellence should apply to the evaluation of ERC frontier research actions and MSCA research & training actions. Excellence in FP10 should also recognise diverse forms of research and innovation, including practice-oriented and regionally anchored projects that address societal needs. Whereas FP10 lists excellent knowledge creation as a key objective, the role of impact is less clearly defined and should be strengthened in FP10's objectives. Impact must be explicitly added to Article 3 (Programme objectives) and reflected in the relevant recitals. Geographical criteria must not influence the evaluation of proposals outside 'widening participation and spreading excellence'. Promoting broad geographical coverage should never be an end in itself. Finally, peer review is a cornerstone of R&I practices. All proposals under FP10, including pillar 2, shall be evaluated by committees composed of independent external experts.

Balance bottom-up and disruptive research across FP10

FP10 should protect bottom-up research in Pillar 1. The strength of Pillar 1 lies in empowering researchers to pursue curiosity-driven ideas. It must continue to support bottom-up calls – such as ERC frontier research grants, MSCA mobility projects, and applied research pilots – and avoid shifting towards top-down calls. This is acknowledged in the proposal in the explanatory memorandum, but not yet firmly embedded in the legal provisions. The other pillars should continue to ensure support for R&I on disruptive and breakthrough research and innovation, where Pillar 2 supports all TRLs and also supports R&I on global societal challenges.

Neth-ER recommends:

- **Maintaining excellence and impact as the key evaluation criteria in Article 25, and only excellence for ERC and MSCA in 25(2).**
- **Limiting geographical criteria to 'widening participation and spreading excellence' only.**
- **Amending article 10(5) to read "the evaluation committee shall be composed fully of independent external experts."**
- **Embedding the protection of bottom-up, curiosity-driven research directly in Chapter 2 of the proposal, rather than only referencing it in the explanatory memorandum.**

3. Ensure Interdisciplinary Representation of Scientific Domains and Institutions in Pillar II

The broad R&I sector should get a place in the Advisory Board for the ECF –universities, universities of applied sciences, RTOs and research funders. The importance of social science, humanities and health research should also not be further reduced during the further drafting and negotiation process.

Guarantee R&I representation in advisory board and committees

The Strategic Stakeholders Board of the ECF must guarantee space for representatives from the R&I sector – such as universities, universities of applied sciences and research performing organisations – and representation from Member States. With the tight connection between the ECF and Pillar II, the governance of FP10 risks slipping away from the research and innovation sector. In that regard, the role of the programme committees should also be strengthened. Just as in the Regulation of the current programme, the Commission should regularly inform the Committee of the implementation of the Specific Programme. This has been completely left out in the proposal for FP10.

Strengthen the presence of SSH and Health

The European Parliament and Council should ensure a stronger presence of key research areas such as Social Sciences and Humanities (SSH) and Health in the FP. Although the initial balance and structure of the FP is welcomed, giving priority to areas that are crucial for the EU's competitiveness, the strong connection to the ECF and the current structure of the Policy Windows risks severely diluting the share of SSH and health research. SSH has been put in a separate box within Pillar II, making it seem like an afterthought. Health has gone from its own cluster to being squished together with agriculture and biotechnology. FP10 should embed their role more clearly in the programme architecture, ensuring that excellence across the full R&I spectrum – technological and societal – is structurally supported.

Neth-ER recommends:

- **Ensuring representation of the R&I sector in the Strategic Stakeholders Board of the ECF established in Article 14 of the ECF proposal.**
- **Include again the obligation (Article 14(7) Council Decision (EU) 2021/764) for the Commission to regularly inform the programme committees of the overall progress of the implementation of FP10 and the ECF in Article 18 and Article 83 in both proposals, respectively.**
- **Maintaining a strong place for SSH and Health research, next to the priorities of the ECF, in the further drafting and negotiation process of the FP.**

4. Ensure Simplification for Participants

The FP10 regulation should clearly state which ‘rules’ from the ECF single rulebook will apply to the FP. All participants must understand the implications of the new rulebook as soon as possible. Lump sum funding and personnel unit costs should not become the default. Simplification should first and foremost be for all beneficiaries and applicants, including new participants to the programme.

Specify which rules in the ECF single rulebook apply to the FP

The FP10 regulation should clearly specify which rules from the ECF regulation will apply to the implementation of FP10 projects. FP10 and the ECF are separate and equal regulations, and there can be no confusion on the “single rulebook”. Beneficiaries, research managers and administrators must understand the implications of the new rulebook as soon as possible. Secondary documents related to the award procedure should be published before the end of 2026.

Lump sum funding and personnel unit costs should not be the default

Lump sum funding cannot become the default form of funding in FP10. The lump sum approach makes budget planning more complicated, forcing beneficiaries to not only provide more details pre-award, but also shifting key tasks to the post-award stage. Within certain types of research, such as clinical trials, it is very complex to introduce lump sum funding because they are subject to change during their duration. While lump sum simplifies financial reporting post-award stage, it still places a larger burden on the coordinator and, thus, fails to simplify the grant administration process. Lump sum also adds complexities and risks regarding the implementation of personnel unit cost. For Member States such as the Netherlands, with a high variety in salary levels, personnel unit costs will be substantially lower than the actual cost of research personnel carrying out a Horizon-funded project. This discrepancy in funding could severely damage the accessibility and reputation of Horizon funding and disproportionately hurt smaller and more practice-oriented institutions.⁴

Neth-ER recommends:

- **Specifying in the FP10 regulation which rules of the ‘single rulebook’ in Section 2 of the ECF proposal apply to FP10, so applicants can anticipate any changes, and ensuring documents related to the award procedure are published before the end of 2026.**
- **Amending recital 26 and article 10(1) so that lump sum funding and personnel unit costs are optional, but not the default and never mandatory.**

⁴ EARTO, ‘EARTO Recommendations regarding the Evaluation & Pre-contractual Negotiations of Lump-sums EU Funded RD&I Projects’, Jan 8, 2024.

5. Focus Primarily on Civil-focused R&I and Provide Adequate Support for Dual-use R&I

FP10 should primarily focus on civil R&I, and be open to dual-use. Researchers shall be free to decide for themselves as much as possible whether they wish to exploit the potential dual-use applications of their research. To help applicants and beneficiaries navigate dual-use potential, the ECF and FP10 proposals should establish a dual-use advisory platform.

Urgency for more information and debate

More information and discussion on the implications of dual-use R&I in the FP must be ensured. For most organisations from the R&I sector, dual-use is a new and complex topic. Given the current geopolitical environment, it is understandable that the Commission wishes to allow FP10 to support dual-use R&I. However, with a lack of information on the exact implications of the implementation of dual-use R&I in the FP, it is difficult for the R&I sector to have a well-informed and precise opinion on the topic. A more specific position on dual-use R&I cannot be formed without this information.

Maintain primary focus on civil application of R&I

Civil-focused research should remain the primary focus of the new Framework Programme. The FP should continue to follow the principle ‘as open as possible, as closed as necessary’, and adhere to open science practices as mentioned in Article 32. All defence research should be funded exclusively through the specific programme on defence R&I in the ECF, including all ‘DARPA’ activities in the EIC. For the FP, calls should identify whether there is ‘low’ to ‘high’ dual-use potential, to help researchers manage the risks and implications of performing said research. Researchers must be able to decide for themselves the civil or dual-use focus of their research and whom to collaborate with, to the greatest extent possible, as they have the moral responsibility to consider the potential unintended and unwanted implications of their research. Consortia shall remain free to explore dual-use potential where relevant, provided transparency, ethical review and compliance measures are in place.

Guarantee enough support through the research journey

The establishment of a dual-use advisory platform – composed of experts from industry, defence, the R&I sector, intelligence and customs – must be included in both the ECF and FP10 proposals. Recent studies from the Commission have shown that dual-use potential can be identified during several phases of the research process – notably during proposal drafting, project execution, result dissemination and exploitation.⁵ The platform must also offer advice to the Commission on the calls of the programme. All applicants and beneficiaries – from Pillar I to Pillar IV – should be able to consult this platform. The expert platform should offer clear guidance on matters such as risk assessment, openness and dissemination choices, ethical review, sanctions and export-control compliance. It can also offer advice on how to exploit the dual-use dimension. The Commission must coordinate this platform and establish it through a call for experts. Both the Commission and the platform should continuously engage in discussion with the R&I sector to address new developments and questions regarding dual-use R&I.

⁵ European Commission, ‘New publications on dual use provide strategic input for future EU R&I policies’, June 25, 2025.

Neth-ER recommends:

- Offering more information and allowing for more debate on the topic of dual-use R&I and its implications before the start of and during the implementation of the FP.
- Following the principle 'as open as possible, as closed as necessary' and maintaining existing open science and open access standards, as stated in Articles 5(c) and 32.
- Clarifying in Article 9 that association with Pillar 2 of Horizon Europe allows full participation in Pillar 2 and is wholly independent from association with the ECF.
- Including a recital stating the FP will have a primary focus on the civil application, giving researchers the autonomy to decide for themselves whether to exploit the dual-use dimension of their project.
- Including the establishment of a dual-use advisory platform that is accessible to all applicants and beneficiaries of the FP and ECF to offer guidance on dual-use R&I.

KNAW - Royal Netherlands Academy of Arts and Sciences

MBO Raad - Netherlands Association of Vocational Education Colleges

Nuffic - Netherlands organisation for the internationalisation of education

NWO - Dutch Research Council

TNO - Netherlands Organisation for Applied Scientific Research

UMCNL - UMCNL

UNL - Universities of the Netherlands

VH - Netherlands Association of Universities of Applied Sciences

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