

REACTION – FP10 AND ECF



Our recommendations in short

With fewer than eighteen months to go before the start of Horizon Europe 2028-2034, R&I stakeholders need clarity on the programme's governance and implementation and on its relation to the ECF. The European institutions should therefore reach a political agreement as soon as possible, so that the R&I sector can prepare and a false start in 2028 is avoided, at a moment when Europe can least afford to lose time on competitiveness, resilience and technological leadership.

The statements in this paper take into account the ITRE draft reports on the tenth Framework Programme for Research and Innovation (FP10) and on the Specific Programme implementing Horizon Europe, both published on 18 March 2026 and the ITRE draft report on the European Competitiveness Fund (ECF), published on 2 April 2026. They also consider the opinions submitted by other parliamentary committees on these initiatives and the Partial General Approaches (PGA) reached by the Council on the ECF and FP10 on 16 June 2026 and on 26 June 2026 respectively. Neth-ER looks forward to the compromise amendments in the ITRE committee and the subsequent negotiations between the co-legislators in trilogue.

Neth-ER asks the co-legislators to secure the following points:

- 📌 A budget of €220 billion for FP10, ringfenced and protected against reallocation following shifting political priorities;
- 📌 Clarity on which rules from the ECF single rulebook will apply to Horizon Europe 2028-2034 and the relationship between the framework programme and the fund;
- 📌 Simplification that serves research: lump sum funding limited and justified, reimbursement of actual eligible costs preserved, and no financing not linked to cost in FP10;
- 📌 Excellence and impact as the core evaluation criteria, with the autonomy of the ERC and the bottom-up character of Pillar 1 preserved;
- 📌 A diverse portfolio of partnership instruments that does not make Joint Undertakings or other institutionalised partnerships the default;
- 📌 Recognition of the critical need for the R&I sector to be adequately empowered to identify, mitigate and address research security risks;
- 📌 A primarily civil FP10, with defence R&I funded exclusively through the ECF;
- 📌 A substantive role for the R&I sector in both programmes' governance;
- 📌 Skills embedded as an objective across all policy windows of the ECF.

Budget. Neth-ER strongly supports the €220 billion budget for FP10 proposed by the rapporteur, in line with the Heitor report and the ‘Double Knowledge’ campaign. A budget of this size is necessary to ensure that research and innovation continue to be able to provide the foundation for increased European competitiveness and strategic autonomy, not only now but in decades to come. The budget must also be ringfenced and protected against reallocation following shifting political priorities, to ensure a separation between funding excellent research and supporting industrial policy. This is a concern Neth-ER has raised since 2023 and which the rapporteur rightly addresses.

Simplification. Applicants need clarity on which rules from the ECF single rulebook will apply to Horizon Europe 2028-2034. Furthermore, lump sum funding must not become the default. Neth-ER welcomes the ITRE draft report’s proposal to specify in Article 20 of the FP10 Regulation which rules from Section 2 of the ECF Regulation will apply. Potential applicants must be able to understand the implications of the new rulebook as early as possible to ensure that they are ready to submit proposals when the first calls are published in 2028, and auditors need that same clarity in time to adapt their protocols. Simplification is welcome where it reduces the administrative burdens for researchers and institutions and less so where it simply displaces them. On that basis, Neth-ER endorses the ITRE position that lump sum funding must be targeted and justified. Likewise, Neth-ER supports the Council’s proposal to remove the statement that lump sums should become the default from Recital 26 and to add that reimbursement of actual eligible costs remains possible. For the same reason, Neth-ER welcomes the removal of ‘financing not linked to cost’ from Article 10(4): that mechanism is entirely results-oriented and should never be applied to research, where results are, by definition, uncertain. Neth-ER also supports the Council’s proposal for simplified cost options for the Marie Skłodowska-Curie Actions (MSCA) and reiterates the need for an update of the country correction coefficients and living allowance every two years, on the basis of the latest available data from Eurostat, provided that the Eurostat data reflect our actual cost of living and do not lag behind. Updating the country correction coefficients and the living allowance levels every two years is essential to guarantee that MSCA funding remains appropriate for researchers’ salaries.

Excellence and impact. Excellence and impact must remain the core evaluation criteria for FP10 and Article 25 should confirm that geographical criteria may only be used within ‘widening participation and spreading excellence’. For this reason, Neth-ER welcomes the strong defence of ERC autonomy and of the bottom-up character of Pillar 1 by the rapporteurs for both FP10 and the Specific Programme. The proposed Fast Track to Excellence is an interesting articulation for strengthening collaboration at low technology readiness levels (TRLs) and bringing excellent research closer to impact. Whether it delivers depends on its positioning: it should bridge Pillar 1 and Pillar 2, not crowd out bottom-up collaboration.

The role of experts. Experts from the R&I sector should be involved in Pillar 2 in an advisory role. Interdisciplinary representation from public research organisations, universities, universities of applied sciences and research and technology organisations (RTOs) must be guaranteed. Neth-ER therefore supports the rapporteur’s recognition of the value that experts from the R&I sector bring to Pillar 2.

SSH and European Universities alliances. Neth-ER welcomes the CULT committee's call to embed social sciences and humanities (SSH) structurally across the whole programme, which is essential to address the societal and ethical implications of technologies such as Artificial Intelligence (AI) and biotechnology, as well as the stronger role for SSH in Recital 4b of the PGA. Indeed, excellence requires a broad view of what counts as relevant knowledge. In the same spirit, Neth-ER supports the committee's proposal to define the European Universities alliances in the Regulation and to recognise their contribution to both the European Research Area and the European Education Area, together with structured synergies between FP10 and Erasmus+. Neth-ER encourages the rapporteur to include both proposals in the consolidated ITRE report.

Civil character of FP10. Civil research and innovation should remain the primary focus of Horizon Europe (2028–2034). The boundaries of the programme matter as much as its content. Neth-ER welcomes the rapporteur's view and the Council's proposal that all defence research must be funded under the ECF and calls for an amendment to the recitals stating explicitly that FP10 will have a primarily civil focus. Regarding dual-use R&I in FP10,¹ the Commission should publish clear criteria for this designation as soon as possible and clarify how these relate to the Dual-Use Export Regulation ((EU) 2021/821). On the proposal to rename the 'Resilience and Security, Defence Industry and Space' policy window in Pillar 2 to 'Space, Critical Raw Materials, Security', Neth-ER welcomes the removal of the reference to the defence industry. Resilience should, however, be retained as an objective of FP10: replacing it with 'critical raw materials' is too narrow and risks excluding R&I efforts that contribute to the resilience of the Union. Neth-ER therefore suggests 'Space, Critical Raw Materials, Resilience and Security'.

Partnerships. Neth-ER supports a diverse portfolio of partnership instruments and does not agree that Joint Undertakings or other institutionalised partnerships should become the default. Co-funded and co-programmed partnerships should remain available as they offer a flexible and effective framework for cooperation without creating unnecessary administrative and governance structures. Indeed, the current partnership landscape is overly complex and requires simplification. The appropriate model should therefore follow from the objectives, scale and financing needs of the initiative concerned. At the same time, Neth-ER recognises that Joint Undertakings can strengthen the link between Horizon Europe and the ECF, provided there is a clear division of labour and of TRL focus between the framework programme and the fund. Neth-ER also supports the Council's call for explicit requirements on phasing-out strategies for partnerships, including a continuity plan, provided these remain proportionate and do not add administrative complexity.

Research security. Neth-ER welcomes the Council's emphasis in Recital 22 on the critical importance of research security and on the need for the R&I sector to be adequately empowered to identify, mitigate and address risks and supports the rapporteur's proposal in Recital 29b and Article 9a to embed the Council Recommendation on enhancing research security (23 May 2024, C/2024/3510) into the programme.

¹ Neth-ER recommendations for dual-use R&I in Horizon Europe 2028–2034.

Connection with FP10. The R&I sector requires further clarity on the relationship between the ECF and FP10. For the ECF, the central question is how it connects to the Framework Programme, particularly Pillar 2, without absorbing it. The proposal by the rapporteurs to establish a clear pathway from research to industry via 'Horizon Europe Pathway Actions', which support the deployment and scaling of FP10 results under the ECF, is an interesting proposal. Indeed, it may reduce the risk that the ECF's policy window structure fully steers the research agenda of Pillar 2. However, further clarity is needed on the precise conditions of this instrument, including on the conditions for participation, financing and the award criteria. The Council's proposal that the programme committee of Horizon Europe and the 'ECF General Committee' hold joint sessions to discuss areas of overlap and possibilities for synergies provides a clearer articulation of how the two instruments may be joined.

R&I stakeholder representation. The Strategic Stakeholders Board of the ECF must guarantee space for representatives from the R&I sector, including from public research organisations, universities, universities of applied sciences and RTOs, as well as representation from Member States. The pathway from FP10 to the ECF only works if the sector that produces those results has a say in how the fund is designed. Neth-ER therefore shares the rapporteurs' view that experts from the R&I sector should advise on the design and implementation of the ECF. The ITRE draft report gives the sector a more prominent place in ECF governance.

Budgetary predictability and defence R&I. Neth-ER calls for protected, predictable R&I funding that allows researchers and institutions to plan with confidence. As such, Neth-ER welcomes the rapporteurs' measures to increase budgetary predictability across the ECF, including ceilings on internal reallocations, clearly differentiated budget lines and the anchoring of funding stability in the Regulation. Neth-ER also welcomes the proposals by both the rapporteurs and the Council to fund defence R&I exclusively through the ECF, which will preserve the primarily civil character of FP10, while keeping room for dual-use R&I.

Skills and synergies with other Union programmes. Neth-ER calls for skills to be embedded as an objective across the policy windows of the ECF and welcomes the rapporteurs' proposal to do so. Investment in facilities and in industry will not deliver without people. As such, this focus on skills is needed to bring about the industrial transformation and technological change on which the competitiveness of the Union depends. For the same reason, Neth-ER welcomes the Council's proposal to stipulate in the Regulation that the ECF must be implemented in synergy and complementarity with Erasmus+.