

THE 10TH FRAMEWORK PROGRAMME FOR RESEARCH AND INNOVATION

ANALYSIS OF THE EC'S PROPOSAL
AND REACTION FROM THE ANRT-ERA
WORKING GROUP

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Introduction

The Association Nationale de la Recherche et de la Technologie (ANRT) is a French association that brings together key actors from the research and innovation ecosystem, including large companies, SMEs, research organisations, universities, and public authorities. ANRT promotes dialogue between the public and private sectors to strengthen the competitiveness of French and European R&I. To support this engagement at EU level, ANRT has established the ERA Working Group (GT ERA), which focuses on European research policy and the European Research Area. The group comprises a range of 50 organisations that are highly active in Horizon Europe and together account for 41% of the funding secured by France.

This position paper presents the collective views of the ANRT ERA working group on the European Commission's proposal for the 10th Framework Programme for Research and Innovation (the FP10). We identify the strengths of the proposal and areas for improvement, and provide concrete recommendations to ensure that FP10 effectively supports European research excellence, industrial competitiveness, and societal progress.

Vision and objectives for FP10

The EU stands at a turning point, and research and innovation have never been more important. In a context marked by global uncertainty, recurring crises, rapidly emerging technologies, and a fast-changing geopolitical landscape, sustained and well-structured R&I efforts are essential to understand current challenges, develop solutions, and master the technologies that will shape Europe's future.

In this context, the Framework Programme is a cornerstone of Europe's research and innovation ecosystem, driving knowledge exchange, technological progress, and innovation across the continent. The Framework Programme, and in particular its collaborative research dimension, has proven to be a powerful accelerator of innovation. When organisations collaborate across borders, the FP creates a genuine snowball effect, whose impacts include stronger partnerships and new funding opportunities. These in turn contribute to achieving Union policy objectives and enable work with third countries where appropriate, in a spirit of constructive and mutually beneficial cooperation.

FP10 must be ambitious in its objectives and resources. The programme must play a central role in building the European Research Area and strengthening EU competitiveness by supporting the full innovation chain, from fundamental research to market deployment. It should foster the creation of consortia around common themes, bringing together complementary skills, facilitating SMEs' integration, and supporting technology maturation and sovereignty through collective effort.

The societal impact of European research must remain central. Transdisciplinary collaborative projects foster mutual enrichment, multiply impact, and ensure innovations are both mature and socially acceptable.

The ERA Working Group considers that the key priorities for FP10 should focus on:

- strengthening collaborative research as the pillar of European R&I;
- ensuring adequate budget levels to reduce the current funding gap and maintain appropriate funding rates to encourage participation;
- supporting the full Technology Readiness Level scale to close the gap between research and industrialisation;
- simplifying programme implementation rules; and
- ensuring the strategic autonomy of the European Union.

Analysis of the European Commission's proposal

The ERA Working Group is broadly satisfied with the European Commission's proposal for FP10. Members welcome the overall direction, which corresponds to the group's priorities, particularly in recognising the Framework Programme's central role in EU strategy and the importance of maintaining its standalone status while some elements require further clarification or adjustment, we see the program as a solid foundation on which to build an ambitious and effective future framework programme.

1. Key strengths to retain

Programme architecture

The maintenance of the overall programme structure is a very positive element. Continuity is an essential factor that facilitates community mobilisation and strengthens the programme's visibility. This structural coherence should be preserved.

We also welcome the inclusion of technology infrastructure as it reinforces the programme's capacity to support high level RD&I and further addresses the urgent need for the EU to remain at the forefront of technological progress.

Budget ambition

The proposed budget of €175 billion represents a step forward and should be defended as an absolute minimum.

Simplification efforts

We highly approve of the focus on simplification measures, since it is a key priority for all types of applicants and beneficiaries. Positive steps include the introduction of a single rulebook for the European Competitiveness Fund (ECF) and Horizon Europe, as well as the use of lump-sum funding, applied in a limited and appropriate manner rather than by default. However, some aspects still require further clarification and improvement.

Continuum between research and innovation

The objective of ensuring a continuum between research and industrialisation is highly relevant. This approach is illustrated by the creation of a fourth pillar, including technology infrastructures, and the coordination between pillar 2 and the Policy Windows of the European Competitiveness Fund.

2. Aspects requiring revision

Budget concerns

The proposed €175 billion budget remains below the ambitious proposals put forward by Mario Draghi and the expert group led by Manuel Heitor, which suggested €220 billion. Moreover, nearly 70% of high-quality projects remain unfunded with the current version of Horizon Europe, and the Commission estimates that an additional €81.7 billion would be needed to meet the real needs of European research and innovation.

Furthermore, we strongly believe that the FP10 budget should be ring-fenced, while ensuring close coordination with European Competitiveness Fund initiatives. Overall, budget stability is a key concern, which implies limiting periodic reductions or regular reallocations of funds to new priorities.

The planned increase for pillar 2 is very limited compared to the other pillars, despite the essential role this pillar plays in European competitiveness and the research continuum. Pillar 2 is strategically crucial for several actors. For example, it represents the main pathway to European collaboration for large companies, which are excluded from parts of pillar 3. Currently in FP9, pillar 2 accounts for 54% of the Framework Programme's budget. In the budget proposal presented by the European Commission on 16 July for FP10, this share would fall to 43.4%. This significant reduction risks undermining the strategic role of this pillar.

The budget dedicated to research and technology infrastructures appears severely underfunded in regard to its ambitions. A reassessment is required to ensure coherence between allocated resources, stated objectives, and leverage expected from sources other than EU funding.

Governance and coordination with the European Competitiveness Fund

The distribution of TRL levels between FP10 and the ECF must be clearly defined. FP10 should continue supporting projects up to advanced development stages. For higher TRLs covering pre-industrialisation and deployment up to TRL 9, ECF intervention is essential.

The roles and responsibilities in decision-making processes must be more clearly structured in order to ensure an effective continuum between research and innovation, in the framework of the ERA. Member States must remain fully involved in defining roadmaps, in close collaboration with the scientific and industrial community. The involvement of national programme agencies is essential to avoid duplication and ensure roadmap coherence.

Finally, it is important that R&I be properly represented within the ECF policy windows and work programmes, and that it can truly reflect the voice of scientists and industry from each Member State, including through the comitology process.

Pillar 2: Key challenges

The organisation of pillar 2 of FP10, structured around two components—compe-

titiveness and society—currently seems rather fragmented. Collaborative SSH research appears to be isolated from other pillar 2 actions, particularly the competitiveness component, which seems to run counter to the current objective of integrating SSH across all projects and promoting multidisciplinary. It is also unclear how instruments such as the Missions and the New European Bauhaus can contribute to the programme as a whole and strengthen its overall impact. Moreover, the link between these instruments and the ECF is not specified, even though it is essential to ensure the continued deployment of key R&I investments from the current MFF and the effective transfer of innovations to the market.

In conclusion, pillar 2, which must remain the keystone of the Framework Programme, requires greater coherence and clarity.

Strategic planning

The Commission's proposal does not currently provide for strategic planning. In FP9, this aspect required improvement, but its absence from FP10 could make the programme less clear. Establishing a clear strategic framework, including a long-term vision, would ensure that decisions are not driven solely by short-term timing, strengthen coordination between instruments, and improve overall programme coherence.

Moonshots

The introduction of moonshots is interesting but requires several clarifications. There is a risk of multiplying, replacing or weakening existing instruments rather than complementing them. Special attention should be paid to the potential impact on pillar 2, especially since some envisaged moonshots overlap with themes already addressed by institutionalised or co-programmed partnerships. In addition, the question of moonshot financing remains to be clarified: it is important to indicate whether a budget will be allocated to this instrument and, if so, the amount, as its funding could represent a risk for the existing budgets of pillars 2 and 4, in particular for the infrastructure component.

Moonshots should ideally be interpreted as an overarching tool for programming and coordination between different instruments and funding sources, jointly managed by scientists and industrialists, based on common strategic priorities at European level. They could also play a useful role in engaging the public with European research and innovation.

Funding rate

The generalised funding rate of 70% for all for-profit entities (except SMEs) is not appropriate in our opinion particularly for low-TRL actions. This measure risks discouraging large companies from participating in the Framework Programme and could undermine the establishment of public-private partnerships. Industrial involvement to secure market deployment, even for low-TRL projects, is now essential in a context of increasing competitiveness.

Simplification concerns

All simplifications must be genuinely effective for beneficiaries and designed as reciprocal advantages, while maintaining coherence with existing European instruments. Legal texts should be clearer, as certain elements (such as evaluation provisions) are currently insufficiently addressed in the Commission's proposal, which risks making calls for proposals even harder to understand.

Lump-sum funding is generally welcome but requires adaptations and improvements to reduce uncertainties and increase flexibility. This type of funding should not be the default model, but should be applied when relevant and coherent. We are not in favour of generalising of Personnel Unit Costs (PUC) as this simplistic yet rigid tool does not reflect current standard internal practices. The proposed reduction of the Time-to-Grant also needs clarification: Shortening the contractualization period by one month is not meaningful as it concerns an important exchange phase. Priority should instead be given to reducing the evaluation phases.

International cooperation

The Commission proposal appears to maintain openness, while addressing necessary security considerations. However, it does not sufficiently address international cooperation, and further clarification is required, particularly concerning the association of third countries and their connection with the ECF. International cooperation should remain a key dimension and be preserved, while taking into account the EU's strategic autonomy, its role in global strategic issues, and the need for increased research security.

Dual use

Additional clarifications are needed regarding the interconnection between dual use and the collaboration of third countries. The measure should be neither mandatory nor binding. The Commission should clarify how this aspect will be considered in project evaluations, including implications for project setup and management, to avoid additional complexity for applicants.

Key recommendations

Based on this analysis, the ANRT ERA Working Group puts forward the following recommendations:

1. Budget

- **Defend the €175 billion budget as an absolute minimum** and advocate for higher amounts closer to the €220 billion recommended by expert groups.
- **Ring-fence the FP10 budget** to ensure it is non-fungible with the ECF and protected from annual reduction proposals or constant reallocation to new priorities.
- **Retain a small budgetary reserve (up to 3% of the total) to address emerging priorities and urgent situations** during programme implementation, with any unused funds redistributed across the programme's calls for proposals.
- **Strengthen the pillar 2 budget** to reflect its essential role in European competitiveness and as the primary collaborative framework.
- **Clarify the moonshot instrument** to prevent negative impacts on the existing budgets of pillars 2 and 4.

2. Collaborative research and programme structure

- **Maintain collaborative research as the programme's core**, recognising its role as an accelerator of innovation where teams and innovation progress faster and more effectively together.
- **Preserve the RIA/IA distinction** to ensure clarity in calls for proposals and programming continuity.
- **Better integrate SSH** in pillar 2 to promote multidisciplinary and avoid isolation from competitiveness actions, with a view to ensuring that collaborative R&I results can help solve the challenges facing the EU.

3. TRL coverage and funding rates

- **Ensure that funding covers the entire TRL scale** to guarantee continuity from research to market deployment, with FP10 supporting projects up to TRL 7 (or TRL 8 if needed) and ECF addressing TRL 8-9, while promoting effective synergies between instruments and preventing overlap.
- **Preserve current Horizon Europe funding rates at 100% for all participants in low-TRL projects**, including large for-profit entities, to ensure the public-private partnerships essential for innovation maturation. Any change to this framework

could not only discourage the participation of private actors, it could also penalise the public sector. The latter would have to bear an increased share of risk and funding within consortia, and would not receive recommendations on the future industrial potential of emerging solutions.

- **Create dedicated measures and funding** for bridging research results to innovation and industrialisation, including pathways between different actions.
- **Ensure that grants remain the primary form of funding**, particularly for actions in the «competitiveness» component of pillar 2. Direct funding constitutes a major asset of the European R&I model.

4. Governance and priority setting

- **Ensure Member States remain central in FP10 programming**, especially for pillar 2, and fully involved in defining roadmaps and research programmes in collaboration with scientific and industrial communities.
- **Establish clear criteria** for expert selection in committees and boards, ensuring balance between scientists and industry stakeholders.
- **Ensure that R&I is properly taken into consideration, which is essential given the close link between pillar 2, the competitiveness area, and ECF activities.** Comitology should be structured around specific themes or policy windows, ensuring that R&I is adequately represented. Thematic priorities for both programmes should be interdependent along the innovation lifecycle to guarantee that public investments have the greatest possible impact. This approach will help coordinate research priorities, support strategic investments, and strengthen Europe's industrial and technological leadership.
- **Involve national programme agencies** to avoid duplication and ensure roadmap coherence.

5. Simplification

- **Ensure all simplifications deliver effective benefits to beneficiaries** and remain coherent with existing European instruments.
- **Implement a single set of rules** across different FP instruments (e.g. partnerships) and the ECF.
- **Maintain lump-sum funding on a case-by-case basis** rather than applying it by default, so that it is applicable only when relevant to a project, based on clearly defined criteria.
- **Maintain Personnel Unit Costs (PUC) as an alternative to established methodologies**, as their generalisation is not considered favourable. This simplified tool does not reflect current standard internal practices, nor does it recognise the value of diverse expertise, and its limited uptake to date does not justify extending its use.
- **Time to grant: prioritise reducing the evaluation period rather than the contractualisation phase** in time-to-grant improvements, as contractualisation remains an important exchange period between the coordinator and the granting authority.

- **Establish that two-stage calls should be used only when necessary and relevant, and simplify the first stage.** This approach should be seen as a way to reduce the resources needed to prepare a proposal by enabling an initial pre-screening of applications.
- **Discontinue blind evaluation,** as it does not necessarily improve transparency, and project quality also depends on the composition of the consortium.
- **Maintain terminology continuity** with Horizon Europe (e.g., associated partners, affiliated entities) to avoid reinventing definitions.
- **Maintain the NCP** role at thematic, legal and financial levels as a support structure and interface with the European Commission.
- **Generalise the use of the F&T Portal and integrate all calls for proposals,** including all partnerships, to improve readability.
- **Ensure early availability of documents and provide rules that are clear and understandable from the outset** to support project planning and preparation while reducing administrative complexity and uncertainty for beneficiaries.
- **Improve call deadline management** to avoid concentration during peak periods and spread deadlines throughout the year.

6. Partnerships

- **Rationalise the partnership framework** to avoid overlap with other programme instruments and simplify rules through harmonisation.
- **Preserve co-funded partnerships** as structuring governance instruments while improving readability and simplifying rules, particularly the diversity of funding rules between EU and national levels.
- **Ensure that institutionalised partnerships improve their inclusivity,** where this is not already the case, actively involving actors beyond large industrial players.
- **Strengthen co-programmed partnerships,** which are generally very attractive due to funding conditions and smoother implementation, while providing participants with greater strategic influence in governance and project orientations.

7. International cooperation and dual use

- **Maintain an openness principle** for international cooperation while taking necessary security precautions, with cooperation adapted and proportionate to each theme, in order to address increasing research security risks without undermining the core R&I principles of the ERA.
- **Ensure coherence with Global Europe** in the new European funding context. Research programmes' results funded by FP10 should guide Global Gateway investments, while the Global Gateway could amplify their reach, impact, and political visibility. **Appropriate processes, mechanisms and tools should be developed.**
- **Ensure that European investment results, particularly the most sensitive and strategic, are not exploited outside the EU** while preserving the collaborative spirit. This approach aims to maintain excellence in Europe and strengthen competitive European industrialisation. The European Commission should also regular-

ly monitor the exploitation of intellectual property resulting from the Framework Programme, both inside and outside the EU.

- **Clarify dual-use provisions** to ensure that they are neither mandatory nor binding (both at the call level and during project execution) with clear implications for project setup and management, compatible with Open Access principles. The dual-use approach should be limited to very specific topics and maturity levels, and the specific requirements of defence technologies and systems should be considered from the earliest stage of development.

Conclusion

The ANRT ERA Working Group welcomes the Commission's proposal for FP10 as an ambitious foundation for the next Framework Programme. The preservation of the overall programme structure and the focus on simplification represent positive developments.

We strongly believe that significant improvements are needed to ensure that FP10 effectively supports European research excellence and competitiveness. The budget must be defended and strengthened, collaborative research must remain central, the full TRL scale must be covered, adequate funding rates must be maintained, and genuine simplification must be delivered to beneficiaries.

The Working Group stands ready to engage constructively with the Commission, Member States, the European Parliament and all stakeholders to shape a Framework Programme that truly accelerates European innovation and delivers scientific, economic, and societal impacts for all citizens.

ANRT and the members of its ERA Working Group
remain ready to provide additional input
on the topics mentioned above and are available
for further discussions.



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