

# Research Council of Finland's position paper on Horizon Europe proposal

November 2025

## Our main messages

The European Commission's proposal for a new Framework Programme for Research and Innovation for 2028-2034 is a welcome initiative. The proposed €175 billion budget for the new Horizon Europe is ambitious and demonstrates the Commission's commitment to investing in knowledge, research and innovation.

When negotiating Horizon Europe 2028-2034, it must be ensured that quality and competition remain the primary criteria in the allocation of funds. Open science and responsible international cooperation should also remain fundamental principles. We also need clear rules for artificial intelligence and dual use.

The Research Council of Finland (RCF) supports the development of the European Research Area (ERA) to keep Europe globally competitive as a knowledge-based society that evolves on a sustainable basis. New research-based knowledge plays a key role in solving future challenges.

# We support the Commission's proposal particularly in the following areas:

- Research excellence and competition remain the main principles of funding.
- Strong roles of the ERC and the MSCA, increase in Pillar I
- Substantial budget for research infrastructures
- Promoting the core values of scientific freedom and openness
- Securing and continuing the pillar structure
- Simpler administration



## We highlight the following challenges in Horizon Europe Pillar II:

The European Competitiveness Fund, which brings together numerous separate programmes, and its link to Pillar II need further clarification.

Funding under Pillar II is currently heavily weighted towards competitiveness (90%), with the society component (10%) receiving significantly less attention.

Furthermore, the social sciences and humanities as well as ecology and the environment have not been given sufficient attention in the overall context. Their quantitative and financial weight in the framework programme should be increased. In addition, they must be incorporated as cross-cutting themes in all clusters.

## Pillar-specific views

#### Pillar I: Excellent science

The RCF underlines that research excellence must remain at the core of the framework programme. We must solidify the strong statuses of the ERC and the MSCA, and their funding must be based purely on open competition and research quality, without any political steering. A researcher-driven, bottom-up approach facilitates breakthroughs even in unpredictable fields. A versatile and high-quality scientific base is also the best way to reinforce society's resilience to unknown threats.

The ERC plays a critical role as the spearhead of cutting-edge research, and increasing its budget in relation to the overall programme is justified. The autonomy and independence of the ERC are key principles that must be preserved.

The MSCA programme is particularly important for training early-career researchers, supporting their career development and fostering new research ideas, which is why increased MSCA funding should be considered.

The global reach of both the ERC and the MSCA is extremely important for facilitating worldwide research collaboration and attracting talented researchers to Europe.

Placing the JRC under Pillar I is a new idea, and the reasons for this should be clarified.



#### **Pillar II: Competitiveness and society**

The RCF believes that the Horizon Europe programme should continue to enable the full participation of research organisations, and therefore, projects at lower Technology Readiness Levels (TRL) should also be funded, and Societal Readiness Level (SRL) assessments should be included in Pillar II calls. Funding must be allocated to the entire RDI chain, and there must be no gaps between different TRL levels.

In addition, it must be ensured that the 'society' component genuinely focuses on multidisciplinary research into societal issues and phenomena, emphasising the importance of the social sciences, humanities and the arts in analysing societal challenges and presenting solutions to these challenges.

Interdisciplinarity in research and innovation generates competitiveness and real societal impact. Understanding new research findings and innovation needs, and putting them to good use, requires in-depth expertise in human and social sciences.

Similarly, consideration of ecology and the environment in Pillar II needs further elaboration.

According to the proposal, co-funded partnerships will also be part of the new programme period. Unfortunately, the proposal does not sufficiently describe their forms, funding base or management model. The proposal also mentions that the Commission seeks to ensure appropriate voting rights for itself in the establishment of European Partnerships. This is a new approach, and it is not entirely clear why such a possibility should be included in future partnerships.

#### **Pillar III - Innovation**

The RCF notes that the EIC Pathfinder instrument has proven to be effective and efficient, and it should be allocated significant funding in the new framework programme.

The RCF is open to experimenting with new types of instruments (e.g. with ARPA-like elements) and assessing their potential as a funding scheme under the framework programme.

Assessments of new instruments must be transparent and the criteria clear. Overlaps between funding instruments should be avoided and the continuity between programmes ensured. The instruments on offer must be clearly defined from the applicants' perspective.



#### **Pillar IV: European Research Area**

Moving the infrastructure funding from the first pillar to the fourth pillar is a new initiative. Here, the RCF calls for comprehensive justifications from the Commission. In essence, European research infrastructures are versatile ecosystems of cutting-edge research and expertise and deserve even more substantial funding in the future.

In order to improve the impact of the widening components, their focus should be on cooperation in research and innovation, not just on capacity building. Linking widening instruments to the widening countries' own RDI investments from 2030 onwards is a positive step. Synergies with other EU programmes should be exploited more effectively.

## Views on general principles of Horizon Europe

#### Scientific freedom makes innovations possible

- The research and innovation path begins with fundamental research, which is why its funding base must be solid.
- The freedom to choose research topics and address bold research questions are the cornerstones of a civilised society and scientific innovation.
- Investing in research is playing the long game: the impact of the investments cannot be evaluated solely based on shortterm economic indicators.

# **Europe's competitive advantage is in international cooperation**

The nature of cutting-edge research is essentially international, and the programme should remain as open as possible.

The RCF is keen to emphasise the importance of secure international research cooperation and is concerned about possible restrictions between Horizon Europe and the European Competitiveness Fund.

Association agreements with third countries are a practical and effective way of expanding European scientific cooperation.



## **Excellence requirement also applies to funding for dual-use research**

The funding for dual-use research must be based on the same quality criteria as other funding. Dual use should be seen as an outcome of high-quality science, not as a strategic choice that may restrict scientific freedom and international cooperation. Instead of strategic selection, cutting-edge expertise itself generates solutions that enhance security.

# Administrative considerations and simplification of implementation

The administrative burden of participating in the framework programme must be reduced. Applicants need clear and consistent standards for project management. The administrative work involved in running the projects must also be reduced. Among other things, the current rules lead to a lot of work in the administration of partnerships and international research infrastructures.

There are ambiguities in the use of lump sum funding that require more detailed guidance. According to feedback from research actors, the lump sum system does not solve the problem of applicants finding the application process laborious and complicated, but in practice it only facilitates and simplifies the administration of funded projects. The lump-sum practices should also be developed to simplify the application process.

The full cost model as a key condition for research organisations must be maintained in Horizon Europe funding.

The use of artificial intelligence in the preparation of funding calls and application review requires clear guidelines in the future.

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