ISE statement on the EC's proposals on the next Multiannual Financial Framework (MFF) including the Framework Programme 10 (FP10)

Brussels, 29.10.2025

The Initiative for Science in Europe (ISE) welcomes the European Commission's proposal of 16.7.2025 and commends the confirmation that Horizon Europe (FP10) will remain a self-standing Framework Programme for Research and Innovation.
ISE supports the decision that most of FP10 will not be absorbed in the European Competitiveness Fund (ECF) – ISE calls hereafter for the entire FP10 to remain outside the ECF, while maintaining links to it.
ISE welcomes the proposed increased budget of 175,3 billion Euros over 7 years as a strong and positive step in the right direction.

In the following, ISE outlines seven observations and recommendations on the EC proposals:

Changes to improve the EC's proposal:

1-Ensure a self-standing FP10: The entire FP10 should be linked to, but neither determined nor managed by the European Competitiveness Fund (**ECF**). This requires a fundamental change to the EC proposal: The four policy windows found in Pillar 2 "competitiveness" should be moved back into the FP and determined solely by the FP, independent of the ECF and only linked to it. These policy windows replace the six current Horizon Europe Clusters. This independent collaborative research, now research and innovation, part has been at the core of the EU Framework Programmes from their inception and remains essential to benefit researchers, innovators and society in Europe. To this end, a comprehensive approach of collaborative fundamental and applied research, demonstration, and innovation in each of the policy windows is crucial.
If these policy windows would only be found in the ECF, European research competitiveness and innovation are endangered as the FP is the only mechanism which funds research – fundamental / basic and applied.

2-Include "Fundamental research", "Bottom-up approaches" and "Programme Committees" in the "competitiveness part" of pillar 2:

- Add collaborative basic research (e.g. Research Actions) to strengthen lower Technology Readiness Levels (TRLs) and create an upwards Research and Innovation (R&I) spiral recognising that 'insight precedes application'.
- Include both bottom-up and top-down approaches to research, as rightly proposed by the EC for the European Innovation Council in pillar 3.
- Add Programme Committees and create a structured mechanism to receive input from European science associations and European industry associations. These are currently not foreseen in the EC proposal yet.

3-Use Lump sum for grants to individual entities (e.g. ERC), but not as default funding scheme for collaboration projects. Increase flexibility in current funding models. From the experience with lump sum pilots, these

- create a financial risk in multi-entity (collaboration) projects, as all partners involved in a work package lose the funding for their work if even one partner does not fulfil its obligations,
- shift the administrative workload from the project implementation stage (affecting only funded consortia) to the proposal stage (affecting all applying consortia),
- and complicate instead of simplifying the process, as the entire effort of a Work Package (WP) is only paid when all work has been finalised. This leads to artificial duplication of WPs to ensure that they start and end in a single reporting period.

Rather, ISE recommends that current funding schemes be made more flexible and the main administrative effort remains in the project stage – a step change in flexibility is needed to allow shifting of resources between WPs, cost categories, and partners to take into account new developments and needs and increase the impact of projects, allowing including a new path after the project has started to encourage innovation.

4-Cap dual use under FP10 to maximum 5-10 % of a policy window budget to ensure most of the resources are used for the challenges specified in the policy window title and description in FP10.

5-Consult European science associations and European industry associations to develop R&I strategies / policies and Work Programmes. These include European researchers' associations and SME associations.

6-Increase the overall budget from Horizon Europe to FP10 to 220 billion € as called for in the Heitor High-Level Group report. Such an increase would ensure that no part of FP10 faces a budget cut despite more content has been added. On the contrary, programme budgets should increase to reach a critical mass capable of supporting competitive, world class research and innovation in Europe, bringing investment levels closer to those of the USA and China.

Safeguard core components of the proposal:

7-The following elements of the EC proposal should be protected and maintained:

- **The ERC and MSCA** (in Pillar 1), ensuring entirely bottom-up calls without any directionality,
- **Global Societal Challenges** tackled by the social sciences and humanities (in pillar 2),
- and **Widening** Participation (in pillar 4).

These four components are well designed and are independent from the European Competitiveness Fund.

ISE is ready to collaborate with policy makers in the **Council**, the **European Parliament,** and the **European Commission** to discuss and further improve the EC's proposal in the coming months.

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About ISE: The Initiative for Science in Europe (ISE) is an independent platform of European Learned Societies and Research Organizations supporting all fields of science at a European level to engage in European science strategies and policies. http://initiative-se.eu

Links:

ISE main recommendations towards FP10, 27.2.2025
ISE first reaction to the EC's proposal on MFF including FP10, 18.7.2025
ISE Annex on Boost collaborative basic research in HE and FP10_V3, 15.1.2025
ISE Working Group FP10
EC Heitor HLG Report on HE 'Align, act, accelerate – Research, technology and innovation to boost European competitiveness', 16.10.2024