

Amendment Package for Members of the European Parliament (FP10 & ECF)

Following suggested amendments have been prepared by UASNL in liaison with our partners UAS4EUROPE, EURASHE, SwissCore, BayFOR, Central Denmark EU Office

The Dutch Universities of Applied Science (UASNL)'s reaction on the Ehler draft report for the European Commission's proposal for FP10

We **compliment Ehler's direction** and the ambition to secure EU with a world class and excellence driven FP10 with an increased budget of **€220 billion**.

We **welcome the support for a strong Pillar II** supporting collaborative research projects and welcome the proposed introduction of new instruments 'Fast-track to Innovation' allowing to fund projects through cut-off dates and with smaller budgets; 'Fast track to Excellence and European Demonstrator Scheme.

Furthermore, **UASNL's** key positions are:

- Smart Specialisation (S3) as a core principle across all pillars
- Impact Excellence alongside Scientific Excellence
- Strong linkage between Research & Innovation
- Clear FP10–ECF separation with operational synergies
- Applied research and UAS roles embedded in governance
- Place-based innovation as a structural element of FP10

General note:

- **Bold italics** are the new text that Christian Ehler also proposes it.
- **Green bold italics** are the text proposed by Universities of Applied Sciences. ~~Strikethrough~~ for deletions.

Text proposed by the Commission	Proposed amendment from Universities of Applied Sciences NL	Amendment rationale from Universities of Applied Sciences NL
Amendment – Article 3 (Objectives)	<p><i>The Programme shall strengthen the Union’s competitiveness by supporting excellent research and innovation as an integrated continuum, ensuring that knowledge creation, application, demonstration and deployment reinforce each other across all pillars. This integrated approach enables Europe to translate scientific advances into societal and industrial impact while preserving the distinct missions of FP10 and the European Competitiveness Fund.</i></p>	
Amendment – Recital (3)	<p><i>The Framework Programme and the European Competitiveness Fund shall have separate work programmes and governance structures. Synergies shall be ensured through transparent, operational mechanisms that allow research results to progress toward demonstration, deployment and market uptake without diverting research funding away from FP10.</i></p>	Protecting FP10 budget from industrial ‘pull’ we claim “two programmes, two work programmes”
Amendment – Article 5 (Partnerships) & Article 14 (ECF Governance)	<p><i>Proposal for a regulation Recital 7 a (new) (7a) The governance of the Programme’s collaborative research and innovation activities should be guided by Councils composed of prominent experts from fundamental and applied sciences, innovation, industry and civil society, and implemented by these expert teams empowered to design calls for proposals</i></p>	We support Ehler’s point on setting up an expert-driven Framework Programme. Regional and local authorities, as well as Universities of Applied Sciences and other applied research organisations, shall be represented in governance structures, including Stakeholder Boards, Programming Committees and advisory bodies. Their involvement is essential to ensure that FP10

	<p><i>within the general thematic priorities; the general thematic priorities, including the budget available to each priority, will be set out in the Work Programmes adopted by Commission under examination procedure. The Work Programmes will cover three years, with each last year overlapping with the first year of the next Work Programme. This gives the expert teams enough time to work and offers predictability to applicants, while maintaining the needed flexibility over time. The observatory on emerging technologies established under the European Competitiveness Fund should play an important role in preparing the Work Programmes together with experts that have a proven track record at the frontier of innovation and societal application. This approach reflects the recommendation from the Draghi report to leave the management of the Programme to people with a proven track record at the frontier of innovation and is in line with the recommendation from the Report of Commission Expert Group on the interim evaluation of Horizon Europe of 6 December 2024 (the 'Heitor report') to establish dedicated Councils to guide collaborative research and innovation.</i></p>	<p>and the ECF reflect territorial needs, mobilise regional innovation ecosystems, and strengthen the link between research, application and deployment. This diversified representation serves regional integration.</p>
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<p>Amendment – Article 17 (ERA / Widening / Ecosystems)</p>	<p><i>Support under Pillar IV shall explicitly build on Smart Specialisation Strategies (S3) to strengthen territorial innovation ecosystems, enhance interregional cooperation, and reduce fragmentation across the European Research Area.</i></p>	<p>Completes the ERA architecture.</p>
<p>Proposal for a regulation Recital 26</p> <p>(26) Simplification in the Programme’s implementation is essential to ensure its accessibility and efficiency, particularly by reducing the administrative burden on beneficiaries and minimising the risk of errors. To this end, the Programme should primarily rely on lump sums as the default form of Union funding. Advancing efforts over the previous Framework Programmes to streamline funding rules and minimise errors, the reimbursement of personnel costs should also be further simplified by using personnel unit costs, which reduces complexity for participants and facilitates reporting.</p>	<p>Amendment 15 Proposal for a regulation Recital 26</p> <p>(26) Simplification is essential to ensure its accessibility and efficiency, and should be designed with a view to reducing the administrative burden for beneficiaries related to the application for and management of projects. Simplified applications ensure that the Programme remains open, including for newcomers. Therefore, information which is not absolutely necessary for a good qualitative evaluation of the scientific or innovative quality of a proposal should not be required in proposals nor included as an optional element in the proposal templates or calls. Lump sum based funding has proven to simplify participation for some beneficiaries while complexities remain for others. Further development of this system, and of the use of other simplified cost options, to ensure it leads to genuine simplification for beneficiaries will be required. Application of these options will be targeted and justified. Simplification for</p>	<p>Universities of Applied Sciences supports Ehler’s amendment 15, why the amendment here is a copy of the amendment by Ehler.</p>

	<p><i>beneficiaries also requires legal certainty for applicants. This requires that the Commission makes all relevant information related to the implementation of the Programme, including its rules for participation, available to applicants at the latest when calls for proposals open. The Model Grant Agreement as well as the Annotated Model Grant Agreement, in which the Commission specifies its detailed interpretation of the rules for participation set out in this Regulation, are two documents that provide essential information to applicants and which should therefore be available from the start of the Programme.'</i></p>	
<p>Amendment 29 Proposal for a regulation Article 2 – paragraph 1 – point 12</p> <p>8(12) 'valorisation' means the use of results in further activities other than those covered by the action concerned, including commercial deployment;</p>	<p>Amendment</p> <p>(12) 'valorisation' means the process of creating social and economic value from results, including through standardisation, by transforming data, know-how and results into new products, services, solutions and science-informed public policies, and fostering commercial deployment;</p>	<p>We support Ehler's amendment. It defines the multifaceted value of knowledge valorisation.</p>
<p>Proposal for a regulation Article 2 – paragraph 1 – point 20 a (new)</p>	<p>(20a) 'research action' means a collaborative action primarily</p>	<p>Universities of Applied Sciences Denmark propose to delete adding a new action as it</p>

	<p>consisting of basic research activities aiming to push the frontier of science and technology;</p>	<p>will counteract the ambitions to simplify the programme. Basic research is already included in amendment 20b establishing a research and innovation action.</p>
	<p><i>(20b) 'research and innovation action' means a collaborative action primarily consisting of activities aiming to establish new knowledge and, where applicable, to explore the feasibility of a new or improved technology, product, process, service or solution. Aimed mainly at early stages of the research and innovation continuum. This may include basic and applied research, technology development and integration, testing, demonstration and validation on a small-scale prototype in a laboratory or simulated environment;</i></p>	<p>We welcome that the definition of this research and innovation action includes activities on all TRL levels.</p>

<p>Amendment 64 Proposal for a regulation Article 5 – paragraph 1 – point a</p> <p>(a) ensure a multidisciplinary approach, where appropriate, and provide for the integration of social sciences and humanities (SSH) across all components under the Programme, including specific calls for proposals on SSH related topics.</p>	<p><i>(a) ensure a multidisciplinary approach, where appropriate, and provide for the integration of social sciences, humanities and the arts (SSHA) across all components under of the Programme, including specific calls for proposals on SSHA related topics, topics dedicated to the cultural and creative industries:</i></p>	<p>We strongly welcome Ehler’s amendment 64 and the explicit inclusion of arts to social science and humanities. However, specific inclusion of disciplines should be discouraged at regulation level. Sector and other thematic priorities should be identified in the priority setting process that should guide implementation.</p>
<p>Amendment 133 Proposal for a regulation Article 15 c (new)</p>	<p>Amendment Article15c Fast Track to Innovation</p> <p><i>1. The Fast Track to Innovation scheme shall support small-scale, bottom-up collaborative applied research and innovation activities to foster excellent innovation in Europe. It shall support researchers and innovators exploring new avenues of collaboration or’ routes to result’s across borders, disciplines and sectors ensuring rapid uptake and strengthening Europe’s capacity to translate knowledge into solutions.</i></p> <p><i>2. The Fast Track to Innovation scheme shall be implemented through a continuously open call for proposals and it shall support applied research and excellent innovation research projects with a budget of up to EUR 2 000 000 with a duration of up to 2 years. It shall have a</i></p>	<p>We support the amendment by Ehler focusing on collaborative and bottom-up research and innovation activities. However, we stress the importance of including applied to the amendment text as seen in Ehler’s justification text. The application of research is essential to ensure the pathway from research to innovation.</p> <p>We welcome an instrument that addresses the risks of the Matthew effect. The proposed characteristics of the instrument (with four cut-offs per year, small budgets and two-year duration) will allow access to the Framework Programme for newcomers.</p> <p>We are very pleased to see an instrument that is truly bottom-up and supports collaboration into all disciplines and sectors thereby working with a broad definition of innovation, allowing for UAS relevant TRL levels’ eligibility.</p>

	<p><i>cut-off date at least once every four months and shall have at least four cutoff dates per year. By way of derogation from Article 26(1) all applicants shall be informed of the outcome of the evaluation of their application by 10 weeks from the cut-off date at the latest.</i></p>	
<p>Amendment (8c) – Recital (new)</p>	<p><i>(8c) Excellence shall not be understood solely as scientific breakthrough. ‘Impact Excellence’ — the capacity of research to generate technological, industrial and societal value through the uptake of knowledge in products, process or society’ — shall be recognised as an integral dimension of excellence across the Programme. This ensures that FP10 rewards research that delivers concrete solutions, accelerates uptake, and strengthens Europe’s competitiveness, while maintaining the highest standards of scientific quality.</i></p>	<p>Adding “impact” to excellence modernises FP10: Europe cannot afford excellence that does not translate into societal and industrial value.</p>

<p>New recital – Smart Specialisation as a Foundational Principle Across FP10</p>	<p><i>(29a) Industrial and technological capabilities essential to Europe’s competitiveness are territorially embedded. Smart Specialisation Strategies (S3) constitute the only EU-wide, evidence-based methodology capable of aligning regional strengths with Union strategic priorities, supporting diversification into related technologies, and enabling structured interregional cooperation based on complementarity rather than duplication. To ensure coherence across EU instruments and to strengthen Europe’s industrial value chains, S3 priorities shall be systematically recognised and used across all pillars of the Framework Programme — including Pillars II, III and IV — thereby bridging top-down EU objectives with bottom-up regional innovation and ensuring that research and innovation investments deliver territorial impact.</i></p>	<p>Adding S3 to FP10 is not symbolic — it is the mechanism that makes FP10 territorially intelligent, strategically aligned, and capable of delivering competitiveness at scale.</p> <p>Smart Specialisation should be treated as a core delivery engine for innovation. S3 can ensure that place-based innovation remains central to Europe’s twin transitions and strategic autonomy. The proposed multi-level approach would bridge top-down EU strategic goals with bottom-up regional innovation, integrating local strengths into Europe’s competitiveness</p>
<p>Amendment – Recital (new)</p>	<p><i>The Programme shall recognise place-based innovation ecosystems as essential drivers of European competitiveness. Support shall be directed toward strengthening regional innovation capacities, interregional collaboration, and the translation of research results into territorial impact.</i></p>	<p>Reinforces the political narrative of “competitiveness through ecosystems”.</p>

Amendment – Recital (new)

The Programme shall remain a civilian research and innovation programme. Dual-use technologies may be supported only where civilian applications are primary and where ethical, security and fundamental rights safeguards are ensured.