



Response to the Public Consultation on Ex- Post Evaluation of the 7 Framework Programme

European University Association

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European University Association

With 850 members across 41 countries, the European University Association (EUA) is the largest and most comprehensive organisation representing universities in Europe. 17 million students are enrolled at EUA member universities. As the voice of Europe's universities EUA supports and takes forward the interests of individual institutions and the higher education sector as a whole.

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Introduction

This document sets out the response of the European University Association (EUA) to the public consultation on ex-post evaluation of the Seventh Framework Programme (FP7). EUA has prepared this response in consultation with its [Research Policy Working Group](#) (RPWG). The RPWG serves as an advisory body to the EUA Board and Council on European research and innovation policy matters.

Due to EUA's wide and diverse membership base, some questions included in the online survey were not deemed appropriate to be answered collectively by EUA. Consequently, EUA's response to the ex-post evaluation of FP7 is submitted in electronic paper form, rather than via the online survey.

Implementation of FP7

Based on your experience has the implementation of FP7 been effective?

Higher education institutions have been major beneficiaries of FP7, in terms of numbers of applicants and requested EU funding, and have effectively used FP7 funds to strengthen their research activities in basic research and collaborative research with external partners. As cited in recent monitoring reports "Higher and secondary education organisations (HES) – also the biggest beneficiary of FP7 funds – record higher growth than other types of organisations, which all show a similar trend of more than € 100 million increase in FP7 financial contribution per year"¹.

Importantly, FP7 has also been instrumental in supporting universities in consolidating their actions towards the ERA goals^{2,3}. Overall effectiveness could have been enhanced more with greater simplification of the procedures and regulations governing the grants and contracts.

Simplification

To what extend have the FP7 simplification measures been successful?

The points below are a compilation of key simplification issues, identified by EUA based on input from its large university membership, which were not successfully addressed in FP7. EUA's recent studies such as "Financially sustainable universities: towards full costing in European universities"⁴,

¹http://ec.europa.eu/research/evaluations/pdf/archive/fp7_monitoring_reports/7th_fp7_monitoring_report.pdf#view=fit&pagemode=none

²http://eua.be/Libraries/Publications_homepage_list/EUA ERA Publication 04_14_web.sflb.ashx

³http://eua.be/Libraries/Publication/2014_EUA_MoU_report.sflb.ashx

⁴ Financially sustainable universities II: European universities diversifying income streams (2011), EUA. [www.eua.be/Libraries/Publications_homepage_list/Financially_Sustainable_Universities_II_-_European_universities_diversifying_income_streams.sflb.ashx](http://eua.be/Libraries/Publications_homepage_list/Financially_Sustainable_Universities_II_-_European_universities_diversifying_income_streams.sflb.ashx);

and projects such as EUDIS - diversification of income streams (2009-2011)⁵, EUIMA Full-Costing (2010-2012)⁶ and EUA's Public Funding Observatory (e.g. 2012, 2013, 2014)⁷ provided unique evidence to the debate on the effectiveness of FP7 simplification measures. They emphasised the need for more flexibility in taking into account the diversity of Europe's universities and to reduce excessive administrative burdens.

Dialogue with EUA membership allowed EUA to issue a series of policy positions and recommendations which can be summarised as follows (references available at the end of this section):

I. Rules and regulations

From the experience of FP7, the following general recommendations are made. Firstly, it is desirable for applicants that all rules, regulations and model grant agreements are made available from the beginning of each framework programme. Secondly, it is important that all the rules and regulations are applied and interpreted consistently across all components of the programme. The European Commission needs therefore to take further steps to ensure that this is the case across all concerned services (including agencies). The establishment of a research clearing committee by the Commission Decision C(2011) 174⁸ although a valuable step in the right direction but has not achieved this desired outcome. Finally, the further guidelines for applicants issued during FP7 should have only been issued to clarify original rules and regulations, and not to introduce new or additional requirements.

For many universities, the acceptance of their usual accounting and management practices did not prove to be a reality in FP7. The preference would have been for a broader acceptance of different time allocation mechanisms rather than simply accepting timesheets as the single method. Also, full costing methodologies that were approved by the relevant authorities at national level could have been recognised as valid for the purposes of the European Commission's programmes which would have achieved a major simplification.

The rules on the "Certificate of Methodology" to calculate average personnel costs and indirect costs, and the way these rules were interpreted, did not allow sufficient take-up by universities. The procedures to obtain the certificate were not simple, and seemed to lack transparency on their equal accessibility to all potential beneficiaries.

Financially sustainable universities: towards full costing in European universities (2008), EUA. www.eua.be/Libraries/Publications_homepage_list/Financially_Sustainable_Universities.sflb.ashx

⁵ European Universities Diversifying Income Streams, EUDIS Project (2009-2011). More information available at: www.eua.be/eudis/

⁶ FP7 Project – European Universities Implementing their Modernisation Agenda (EUIMA; 2010-2012). More information available at: www.eua.be/euimafullcosting.aspx

⁷ EUA's Public Funding Observatory. More information available at: www.eua.be/eua-work-and-policy-area/governance-autonomy-and-funding/public-funding-observatory-tool.aspx

⁸ Decision of the European Commission C(2011) 174 final of 24 January 2011 on three measures for simplifying the implementation of Decision No 1982/2006/EC of the European Parliament and of the Council and Council Decision No 970/2006/Euratom and amending Decisions C(2007) 1509 and C(2007) 1625.

II. Procedures

From the experience of FP7, the two-step application process, as a simplification measure, needs to be examined carefully to ascertain whether desired goals were achieved. A sample of Grant applicants (both successful and unsuccessful), FP7 evaluators and the Commission-appointed independent observers of the evaluation process should be consulted on whether the first stage simplification goals were achieved and, if not, what improvements can be made.

Universities' experience does not show the reporting requirements appear to have been reduced or simplified in FP7 (in terms of numbers of reports required and reporting specifications/requirements to be met. Perceived heavy reporting requirements continue to act as a disincentive to apply. Further thought and reflection from FP7 experience is required also to ensure that an appropriate balance and weight is achieved with respect to ex-ante and ex-post controls.

It would be desirable for Europe's universities that for HORIZON 2020 the European Commission, the European Parliament, the Council of the European Union and the European Court of Auditors seek to agree upon a single document providing the basic principles of the simplification procedures with clear guidelines on how they should be interpreted and implemented.

III. Cost recovery

There should have been a broader acceptance of eligible costs, in particular for the possibility to recover VAT. The FP7 approaches of recovering indirect costs through a certified methodology (analytical accounting system or a simplified method) should preferably had allowed for a wider scope of methods to identify the indirect costs of projects. Different methods of identifying activities, cost objects, cost drivers, different cost bases and different ways of determination of staff time and its allocation needed to be recognised as eligible. The interpretation and further development of rules tended to be too restrictive. Universities that had the capacity to identify the full costs of their activities through an appropriate accounting methodology were not successful in obtaining a certification. The FP7 simplified method was set up to encourage universities to move towards full costing but unfortunately a rather restrictive interpretation of the rules and subsequent further regulations hindered that objective and generated the opposite effect. Universities often fell back to the flat rate option in spite of their capacity to identify costs through an appropriate methodology.

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Achievements and impact

Contribution of FP7 activities to the European Research Area (ERA)

As documented in EUA's ERA Progress Reports (2014a⁹, 2014b¹⁰), European universities have made substantial and concrete progress in working towards the ERA, particularly in removing barriers and implementing policies. FP7 was instrumental in supporting European universities' work towards achieving the ERA.

The following main messages emerged in the 2014 EUA ERA Progress Report concerning European universities' contributions to reaching ERA goals:

- 1. The importance of an adequate public funding mix for university activities.** National and regional authorities, as the main providers of funds to universities, have a special responsibility in ensuring that their higher education system is financially sustainable over the long term. For research activities in particular, this means ensuring a certain level of institutional funding to guarantee research capacity. Competitive funding mechanisms (both national and European) need to take account of the sustainability of universities' research facilities and fund the related costs to maintain a competitive research base. Therefore, EUA emphasises that achieving the ERA goal of more effective coordination of national systems will require greater complementarity and synergy with EU funding systems for improved efficiency and impact.
- 2. The role of universities in the design and implementation of successful Research and Innovation Strategies for Smart Specialisation (RIS3) needs to be fully recognised.** Universities are working towards strengthening partnerships with their regional authorities to draft and implement R&I strategies combining funds which include effective synergies with Structural Funds. A core [set of recommendations](#) on taking forward these partnerships,

⁹ EUA ERA Progress Report I (2014). Available at:

www.eua.be/Libraries/Publications_homepage_list/EUA ERA_Publication_04_14_web.sflb.ashx

¹⁰ EUA ERA Progress Report II (2014). Available at:

www.eua.be/Libraries/Publication/2014_EUA_MoU_report.sflb.ashx

developed jointly by EUA and the JRC/IPTS, remain highly relevant and require urgent take-up by the respective partners: the EU, regional partners and universities.

3. **Research infrastructure development and fair access for doctoral candidates should be facilitated.** Universities own and/or host many research infrastructures which need strong investments for maintenance and update to remain scientifically competitive. A “Charter for Access to Research Infrastructures” which is currently being developed should aim at providing guidelines and recommendations while respecting the specific characteristics of each infrastructure and existing regulations. The charter should frame criteria for fair access for early-stage researchers to ensure the development of the next generation of researchers.
4. **The open labour market for researchers’ careers particularly with respect to university-business collaboration and mobility requires careful nurturing.** There is no “one-size fits all” model but a variety of successful models, emerging from both top-down and bottom-up approaches. The key factors are building trust and mutual understanding and, particularly, the support from top management levels, both in universities and in companies. Focused institutional leadership and the provision of appropriate support structures and services (from public and private sources) are crucial. These foster a research environment that encourages researchers to engage in collaborative research and which recognises and rewards its success in their future career development. These points have emerged in EUA’s FP6 DOC-CAREERS¹¹ and FP7 DOC-CAREERS II projects.
5. **On open access to research publications, it is crucial that the transition to open access does not increase overall publication costs.** International cooperation in the field of open access at the university level could be an important tool in raising awareness (in particular at the level of public authorities) to discuss the costs associated with open access, which could be more widely integrated into research grants in the future. High-level talks with major publishing houses to explore do-able business models that reflect the impact of digital technological developments on the process of producing scientific publications, as well as operational conditions for open access that meet universities’ needs, should be a priority and the European Commission should engage in this process with EUA and other stakeholders. The FP7 pilot projects (FOSTER, OpenAIRE) have acted as a valuable initial catalyst in this respect.
6. **Enhanced development and efficiency of knowledge and technology transfer activity** is crucially linked to: i) the internal university “research culture” and its ability to converse with companies; ii) the external technical innovation culture, and its level of confidence in research structures as well as its capacity to invest; and iii) the level of development of the regional knowledge exchange “ecosystem”. New measurement tools for the assessment of university-based research collaboration and knowledge transfer processes reflecting the diversity of university missions have emerged from EUA’s [EUIMA](#) project¹² work on collaborative research. The role of FP7 coordination actions have been crucial for European Stakeholders as an effective tool in making progress through promotion of good practice.

¹¹ Collaborative Doctoral Education: University-Industry Partnerships for Enhancing Knowledge Exchange. DOC-CAREERS project (2009). Available at:

www.eua.be/typo3conf/ext/bzb_securelink/pushFile.php?cuid=2729&file=fileadmin/user_upload/files/Publications/DOC-CAREERS.pdf. The outcomes of this report have contributed to the development of the Marie Curie European Industrial Doctorate Programme. The DOC-CAREERS II project report will be published in June 2015.

¹² University-Business Collaborative Research: Goals, outcomes and new assessment tools (2014). Available at: www.eua.be/Libraries/Publications_homepage_list/EUA_EUIMA_Publication_web.sflb.ashx

7. **EUA recognises the need to balance the protection of individual data and its availability for the purposes of scientific research.** The emergence of complex research issues, such as those requiring the use of large personal data sets, requires new interdisciplinary approaches and skills. EUA's view is that the future Data Protection Regulation must preserve the access to and use of data for scientific research, the ultimate purpose of which is to benefit both individuals and society at large.

European Added Value

EU added-value of FP7

In the view of EUA, the EU-added value of FP7 is illustrated around three main axes, namely the European Research Council (ERC), Marie Curie Actions and the European Institute of Innovation and Technology (EIT). The IDEAS and PEOPLE programmes referring, respectively, to ERC and Marie Curie, accounted for 12.37 billion euros of the total FP7 budget (€ 50.6 billion). EU added value has been its significant contribution to higher citation and impact of university research and collaboration through enhancing research excellence in Europe.

The **European Research Council (ERC)** has critically helped to promote basic research in universities (although also creating, at least momentarily, concentration in certain areas of Europe), and supported young researchers to develop independent careers through the ERC Starting Grants. Importantly, the ERC has been instrumental in showing the way forward in enhancing excellence criteria in EU programmes. In EUA's perspective, excellence criteria should determine the use and allocation of instruments and funding across the range of research and innovation activities based upon assessments and indicators of best practice in the various research domains.

The ERC has achieved both high visibility and legitimacy, amongst researchers and the institutions in which they are based, as a mark of research excellence in Europe. ERC's "hallmark" has also been its leadership in the simplification of the application and evaluation processes and importantly the operational, financial and reporting procedures concerning its grants. The implementation mechanisms of the ERC grant schemes have shown a commendable degree of flexibility and "user-friendliness" towards the ERC applicants and grant holders.

The **Marie Curie Programme** has had a structuring effect in Europe through promoting mobility of researchers and intersectoral mobility via the industrial doctorates programme. It has promoted best practices in doctoral education, researchers' skills and career development, as well as in mobility mechanisms that link both research and teaching capacity building all levels in the university including intersectoral exchange and cooperation. Indeed, the Marie Curie Actions have benefited approximately 50 000 researchers of 140 nationalities, of which 24% were from third countries, and has provided structured doctoral education to more than 10 000 doctoral candidates in Europe¹.

The **EIT KICs** are developing to cluster major consortia of education, research and innovation organisations in all grand challenges areas, to reduce the gap between research-generated ideas and product/service development to the market.

It is also important to mention the FP7 COOPERATION Programme, which has been instrumental to foster collaborative research among consortia of universities and industry. This has been a key

programme to support universities in working together with external partners to advance the state of the art in critical societal areas, such as energy, health or ICT, among others.

Final questions

What are the key achievements/strengths of FP7 in particular?

- It has been a key driver of enhanced European university research and innovation development and cooperation.
- It has facilitated scientific and technological cooperation across European universities which will have a lasting effect with respect to academic research staff and young researchers exchange and career development.
- It has fostered scientific and technological cooperation within EU, Associated Countries and Third countries.
- It has contributed to the creation and expansion of a critical mass of researchers across European countries.
- It has fostered the development of good practices in Human Resources (e.g. European Charter and Code for Researchers, HR “Excellence in Research” logo).
- It has contributed to shape Horizon 2020 and its focus on excellence, which is crucial to boost top research in Europe through competitive funds. It has therefore supported the competitiveness of Europe through research and innovation.
- It has contributed to review the ‘Innovation Union’ as an important catalyst for action at EU level, stimulating policy development and implementation measures in the member states (regional and national levels to complement the EU initiatives).
- It has facilitated university-business cooperation through the creation of valuable new instruments within, for example, Marie Curie Actions.
- It has facilitated the development of, and access to, physical and e-infrastructure for research and innovation.

Are there shortcomings in FP7 that you think should be corrected? According to your experience have these already been addressed to in the Horizon 2020 Programme?

It is important to consider the current broad economic context, which is still characterised by an under-investment of the EU in R&D in relation to other areas in the world, which affects Europe's competitiveness and its overall attractiveness for researchers. For instance, R&D spending in Europe is still lower than in the US and Japan, mainly as a result of lower levels of private investment according to available data. Moreover, according to Eurostat data (2013), R&D expenditure as a percentage of GDP remained relatively stable in the EU-27 at around 2% of GDP during the period 2000 to 2011. In addition, the economic crisis has had a clear impact on universities' budgets, and has increased the differences between member states in terms of R&D performance (e.g. R&D expenditure, tertiary education, business R&D investment, etc.).

A. EUA's Public Funding Observatory report published in 2014 highlighted an ever-increasing disparity between the highest and lowest funded higher education systems in Europe. The **evolving geographical divide between European systems** in terms of investment in research and higher education has also been confirmed: whilst there are notable exceptions, countries in eastern and southern Europe still appear to be more affected by the crisis than countries in northern and western Europe (Figure 1). This situation represents a "challenge for Europe as a whole, whose global competitiveness is harmed by such imbalances and weaknesses in the European Higher Education and Research Areas" (EUA Public Funding Observatory report, 2014¹³). EU, together with Member States, will need to consider how to address this imbalance during the lifetime of Horizon 2020, namely how to ensure that the opportunities that EU funding offer are fully taken up, keeping excellence as the main criterion to allocate EU funds.

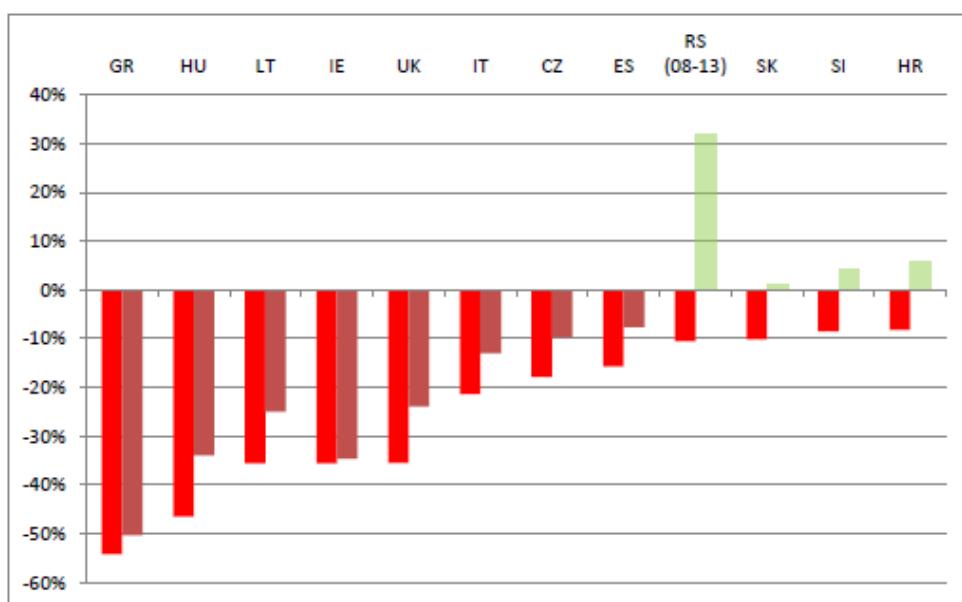


Figure 1. Countries with declining public funding over 2008-2014 (real and nominal change)

Source: EUA Public Funding Observatory (2014)

Note: The first column for each system shows the inflation-adjusted evolution of public funding; the second column represents nominal change.

B. The **European Research Council (ERC)** has had a critical role in building scientific excellence across the EU. The ERC has helped universities to strengthen excellence in basic research, as well as to help young researchers develop independent careers through the ERC Starting Grants. However, in the short-term, ERC grants are also creating a concentration of research resources in certain areas of Europe, as illustrated in Figure 2. This situation reflects to some extent the degree to which some national research systems are adapted to benefit more from the possibilities within the EU competitive research funding schemes. This can be remedied by Member States through more tailored realignment of national efforts to better suit the EU funding instruments, and also through their investment of EU Structural Funds being prioritised to build greater capacities in research and innovation.

¹³ www.eua.be/Libraries/Governance_Autonomy_Funding/PFO_analysis_2014_final.sflb.ashx

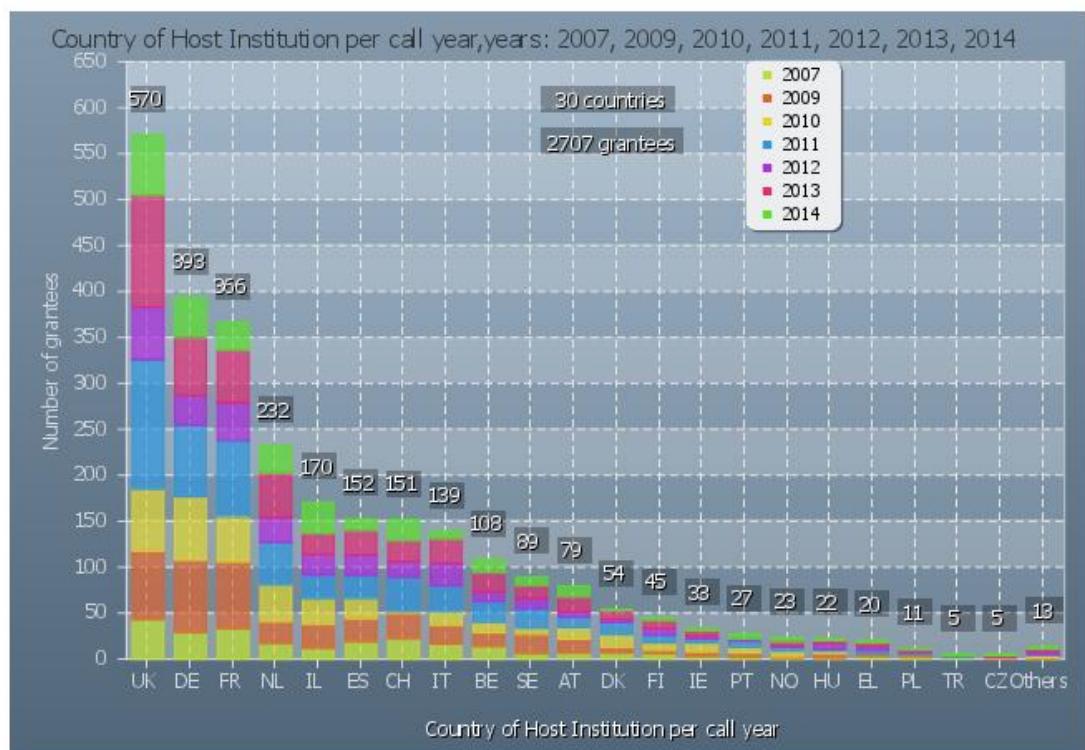


Figure 2. Country of host institution for ERC grants (2007-2014)

Source: Basic statistics for ERC funding activity, available at: <http://erc.europa.eu/projects-and-results/statistics>. Data retrieved on 21 May 2015.

C. EUA has highlighted the need for **greater complementarity and synergy between Horizon 2020 and EU Structural Funds** for improved efficiency and impact. Clear and timely information on how to combine funds is essential to allow efficient planning and pooling of resources to maximise achievements and impact. In this respect, EUA welcomes the efforts of the European Commission in providing guidelines on the complementarity of different funding instruments¹⁴. EUA also welcomes the work of DG Regio and, specifically, of the Joint Research Centre/Institute for Prospective Technological Studies (JRC/IPTS) in supporting the role of universities in the development and implementation of Smart Specialisation Strategies^{15,16}.

In short, EUA considers that European institutions and Member States should commit to providing mechanisms to support universities in their long-term missions as they are educating tomorrow's leaders, researchers and informed citizens and hence furthering Europe's research, innovation and competitiveness. In particular, public authorities, as the main source of funding for universities, have a special responsibility in providing a stable regulatory and financial framework for universities to

¹⁴ Enabling synergies between European Structural and Investment Funds, Horizon 2020 and other research, innovation and competitiveness-related Union programmes (2014). Available at: http://ec.europa.eu/regional_policy/sources/docgener/guides/synergy/synergies_en.pdf

¹⁵ Joint Statement of the European Commission's S3 Platform and the European University Association: "Mobilising Universities for Smart Specialisation" (2014). Available at: <http://s3platform.jrc.ec.europa.eu/documents/10157/412938/Joint%20Statement%20S3%20Universities.pdf>

¹⁶ Report on Joint EUA-Regio/JRC Smart Specialisation Platform expert workshop: The role of universities in Smart Specialisation Strategies (2014). Available at: http://eua.be/Libraries/Publication/EUA_Seville_Report_web.sflb.ashx

fulfil their missions. For research activities, this means ensuring a certain level of institutional funding to guarantee research capacity.

From the perspective of European universities, the following points are particularly important to foster Europe's competitiveness in research and innovation. These are not understood as shortcomings, but rather as important areas that need to be addressed during the period of Horizon 2020.

- **“Bottom-up” funding instruments must be continued and enhanced.** The FP7 IDEAS and PEOPLE programmes proved to be effective and provided high added value to universities' research and innovation activities in terms of excellence and impact.
- **Funding instruments should cover the whole value chain of innovation, particularly aiming at closing the gap of research and innovation performance in different areas in Europe.** For example, specific programmes supporting the creation of university spin-offs would contribute to more geographically balanced research and innovation activities in Europe. Also, the creation of instruments able to support collaborations in strategic areas would be welcomed.
- **Europe's universities have a crucial and essential role to play in EU research and innovation funding instruments contributing to tackling societal “grand challenges”.** Europe's universities are already making scientific progress on major societal challenges such as energy, climate change, food security, health and ageing through creating innovative research and training environments involving inter-disciplinary cooperation. To tackle these challenges effectively Europe's universities require medium- to long-term commitment of funding instruments that support both basic research and collaboration with industry and other external partners. Europe's universities need a balanced and appropriate combination of instruments and funding at the European, national and regional level to assist their efforts.
- **The integral role of the social sciences, arts and humanities should be enhanced.** Interdisciplinary research perspectives involving the social sciences, arts and humanities will be essential to tackle effectively societal “grand challenges” in the areas of energy, climate change, health, sustainable cities etc.
- **Strengthen the International Dimension of EU research and innovation funding.** EUA believes strongly that Europe's future as a dynamic competitive global region will depend largely on its ability to increase substantially the number of highly trained people within EU Member States and to attract others from abroad in project collaboration and training environments and exchanges. EU research and innovation funding instruments should be used to further support and strengthen the European and international profile of university-based research through project collaboration and the enhanced mobility of their academic and research staff, post-doctoral and doctoral researchers and their career development.
- **Innovation requires wider interpretation and understanding than simply seeing it as the last step to commercial application: the importance of basic research and the use of innovative interdisciplinary approaches should continue to be recognised and supported.** The breadth of university-based research has its impact at many levels in the economy and society. Moreover, there is an inherent danger that an over-emphasis on strategic short-term priorities in applied research funding can undermine the fundamental research base in

Europe's universities, limiting their ability to maintain and/or strengthen their institutional research capacity and to address societal challenges through interdisciplinary approaches.

- **There is a clear need to promote knowledge partnerships and strengthen links between education, research and business**, including collaborations with industry to strengthen the intersectoral mobility of professionals. Collaborative research activities are an important asset for adapting education to the evolving needs of the job market, contributing to maximise the employability of graduates and creating and sustaining academic, technical and support staff positions.
- **Coordination of regional/national/European R&D and innovation programmes must be fostered, coupled with a necessary reduction of the complexity and range of different administrative procedures.** Simplification and reduction of heavy administrative and accounting procedures should be the driving forces for future developments of regional/national/European R&D and innovation programmes.

For example, input from the Informal Group of RTD Liaison Offices¹⁷, suggests that some of the changes from FP7 to Horizon 2020 have actually created more barriers and difficulties for universities: “on the reporting of personnel costs, the fact that the cost calculation is based on the last closed financial year is a complication, not a simplification, in many EU countries as it does not take into account automatic annual salary raises. This leads to mistakes in institutions as they need to use the manual calculation and may cause financial losses. This provision is also contradictory to the principle of actual costs (...) Declaration and calculation of personnel costs should be simplified taking better into account the real costs and usual working and accounting practices occurring at the institutions.”

Additional input

EUA, on behalf of the university sector in Europe, has been a key stakeholder throughout the policy debate on the implementation of the Seventh Framework Programme procedures and particularly the need for greater simplification in evaluation, funding and reporting requirements. EUA has also advocated on behalf of the university sector for a more flexible reimbursement model taking account of the real full costs of research activities at universities.

EUA has taken part in many formal and informal processes to simplify the procedural rules of the 7th Framework Programme (e.g. Contribution from the EUA to the Second Triennial Review, expert input at relevant meetings of the European Commission, European Council and European Parliament, like the Budgetary Control committee and the ITRE committee – EUA contribution on Key Issues for Simplification of EU Funding).

EUA has also developed relevant policy positions on behalf of the sector (Working together towards financial sustainability for European universities) and provided evidence and input to the stakeholder platform on common principles for external funding in ERA (Common principles governing external funding of research).

¹⁷www.iglortd.org/sites/default/files/public/users/public/ERA_in_Autumn_2014/20141120_iglo_views_on_firs_t_experiences_with_horizon_2020_final.pdf

Many of the views provided as EUA Input to the Debate on the Rules for Participation in Horizon 2020 are also valid for the evaluation of FP7 simplification procedures.

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