European Research Area Act

EUA response to the European Commission's call for evidence

September 2025

The European University Association (EUA) looks forward to the future ERA Act, which should bring the EU closer to the achievement of a fully integrated ERA and the implementation of the 5th freedom, enabling the free movement of knowledge, research, innovation and education.

EUA supports its three objectives to reach the target of investing 3% of GDP in R&I, better align investments and improve researchers' framework conditions. In the past, unequal levels of engagement among member states in the implementation of the ERA Policy Agenda have led to contrasted results. This type of legislation could therefore help the EU to overcome this issue and further advance the ERA.

EUA's key recommendations for the design of the ERA Act are:

(1) To foster the attractiveness of research careers, the Act should enable multiple and more flexible career pathways and prioritise the improvement of researchers' working conditions and the reduction of barriers to their mobility, e.g. through the harmonisation of research positions and pension schemes.

(2) The 5th freedom should not be limited to mobility, but encompass the full circulation of knowledge in all its dimensions, including openness in education, research data and methodologies as a defining principle.

(3) The Act should support a harmonised framework for an equitable open science ecosystem with open infrastructures, reduced barriers to open access -through a European Secondary Publishing Right, backed by rights retention policies- and reform of research assessment.

(4) Including knowledge valorisation is welcome and should boost R&I impact, but the Act should provide legal clarity on how to rethink academic structures that currently favour research and teaching while giving little incentive to innovation.

(5) While a common conception and approach to the protection of the freedom of scientific research shared across the EU would be helpful, any regulatory and/or legislative action to protect and support it should be mindful of existing national and other (international) frameworks, and related implementation issues.

(6) The Act is a unique opportunity to foster cross-border collaboration and sustainable access to funding. To achieve this, member states must commit to reforms and make significant national investments to reach the 3% target, with close monitoring to guarantee successful implementation.

While these issues are important to address, EUA calls for a proportionate approach: the Act should focus on key objectives that cannot be achieved at national level in accordance with the subsidiarity principle.

Moreover, it is of utmost importance that the Act maintains a balance between reducing fragmentation and maintaining adequate levels of flexibility and autonomy for institutions. The Act should guarantee an assessment of new legislation to ensure it is 'fit for research', in line with the 'university check' advocated for by EUA.

While binding measures are welcome to make headway on parts of the ERA, the Commission should reflect on the risk of unintended consequences and assess the danger of overly restrictive measures. To ensure effective implementation, proposals should not create an additional burden for institutions, such as increased compliance checks. Moreover, member states' lack of compliance with the binding principles of the ERA Act should not put R&I actors at a disadvantage.

Finally, the ERA Act should complement related EU initiatives: the ERA and the Innovation Acts should reinforce one another. Closer alignment and coordination with the European Education Area and European Higher Education Area are also necessary.

Following these initial considerations on the ERA Act, EUA will continue to monitor the proposed legislation's progress and provide further input in the coming months as part of the upcoming consultations. EUA looks forward to further dialogue with the Commission to contribute to making the ERA Act a successful initiative that strengthens Europe's R&I ecosystem.

With more than 900 members and affiliates in 48 countries, the European University Association (EUA) is the largest representative organisation of universities and national rectors' conferences in Europe. By engaging with policy makers and stakeholders, EUA seeks to place research, education and innovation at the forefront of Europe's competitiveness and prosperity.