

The European University Association (EUA) welcomes the opportunity to contribute to the discussion on dual use and its future role in EU programmes. The European Commission's White Paper reflects the growing importance of this issue in a challenging geopolitical context and resonates with wider debates on security within the research and innovation sector. As key actors in this sector, universities play a leading role as both producers of knowledge and developers and adopters of solutions to major societal challenges, including security and resilience. Each of the three options outlined in the White Paper can facilitate this role in distinct ways, and EUA has closely examined their respective implications for universities. However, due to the lack of impact assessments to substantiate the options and their merits, EUA feels it would be premature to express a preference. The many unknowns surrounding the topic of dual use mean that the White Paper gives only a limited indication of what universities can expect from future EU programmes. As such, beyond the unclear definition of dual use, EUA would like to pinpoint some aspects for further elaboration by the Commission.

Firstly, there should be more clarity on the financial implications of dual use: if defence applications of research are included in a dual-use instrument within the Framework Programme for Research and Innovation, would this mean additional financing? Likewise, if a new, separate dual-use instrument is established, would this programme compete for financing with the Framework Programme? Additionally, the potential administrative burden for researchers and universities is yet to be determined, as is the difficulty of assessing international collaborations in line with academic values. For example, concerning Open Science, defence applications could require more stringent rules on Open Access to results and data from such projects. It is also not yet understood how research careers and their assessment would be affected by the explicit introduction of dual use. Moreover, the participation of associated and other third countries in specific calls might be heavily restricted, contradicting the openness principle of R&I programmes.

With these considerations in mind, the benefits and shortcomings of each option cannot be weighed conclusively. For instance, option 1 proposes more synergies across civilian and defence programmes, and there is indeed potential for better use of existing project results. But if maintaining an exclusive civilian focus means there will be no defence-related projects in the Framework Programme, would these be funded only through the European Defence Fund and thus lead to a smaller budget for FP10?

Option 2 would maintain key aspects of Horizon Europe in FP10, such as openness to third countries in specific areas of mutual interest. From an innovation perspective, it would open up more opportunities for universities that want to develop defence applications, and attract more defence industry stakeholders. But what is the precise range on the Technology Readiness Level scale where defence applications would be pursued? R&I actors do not have equal capacities to join high TRL projects, and there is a risk that industry may monopolise dual-use calls if this were the main focus. Also, the topics for dual-use R&I would need to be clarified from the outset in order to ringfence the budget for exclusive civilian applications. Otherwise, it would be left to the individual Work Programmes to define the topics and this would cause too much unpredictability.

Finally, as the Commission itself recognises, a new instrument for dual use as proposed in option 3 entails greater complexity for applicants through new eligibility criteria and rules for participation. Crucially, the budgetary consequences are hard to foresee. In conclusion, EUA would welcome more details on the options and remains committed to further discussion with the Commission.