

EUA input to the public consultation on the next Multiannual Financial Framework

Performance of the EU budget

May 2025

In 2025, the European Commission will present its proposal for the next Multiannual Financial Framework, which will set the priorities for 2028-2034 and define the future architecture of EU funding programmes that are crucial for universities, such as Erasmus+ and Horizon Europe. The European University Association (EUA) outlines the following recommendations as its contribution to the European Commission's public consultation on the next MFF focusing on the performance of the EU budget.

Below are EUA's comments on selected topics addressed in the survey.

General EU priorities and principles supported by the EU budget

EUA takes note of the list of general EU priorities and principles outlined in the survey. In addition to the responses provided in the survey, the Association would like to comment specifically on gender equality and the 'Do No Significant Harm' principle.

Gender equality

While attention to gender equality has significantly increased in iterations of the Framework Programme over the years, it was Horizon 2020 (2014-2020) that first set gender equality as a horizontal issue. The final evaluation of Horizon 2020 found that, although the programme enhanced gender equality, women remained significantly underrepresented. Specifically, women comprised only 37% of research teams and 23% of project coordination roles. The measures introduced in the successor programme, Horizon Europe, notably **Gender Equality Plans (GEPs), forged a pivotal pathway towards the implementation and improvement of gender equality policies at an institutional level**. While the introduction of GEPs represents a positive development, there is room for improvement in the next MFF.

One of the key challenges is that, in some cases, GEPs are perceived as a box-ticking exercise, lacking substantial impact. For example, some projects may demonstrate gender balance within the research team at the proposal stage, yet the actual implementation team may differ in composition.

Moreover, there is an emerging need for the programme to promote a more inclusive and diverse R&I environment. **Currently, the focus is predominantly on gender equality, overlooking a broader, more holistic approach to equality, diversity, inclusion and belonging (EDIB)**. Addressing this gap would ensure a richer and more varied contribution to R&I.

Do No Significant Harm principle

EUA fully supports the environmental objectives outlined in the EU's sustainable finance taxonomy regulation. However, broadening the application of the Do No Significant Harm

principle (DNSH) to all projects under European R&I framework programmes (i.e. Horizon Europe and any eventual successor programme), should be carefully considered.

The introduction of the DNSH principle creates an additional administrative burden, complicating project proposals and evaluations. EUA has long advocated for the simplification of these programmes, and any broader application of the principle must not add further burdens on researchers.

Furthermore, there are no clear guidelines on how the principle should be practically implemented. If the DNSH principle becomes mandatory for all framework programme projects – particularly in Horizon Europe’s Pillar I or for projects with lower technology readiness levels (TRLs) in Pillar II – researchers may face significant challenges in undertaking certain types of (fundamental) research.

Given these concerns, **the broader application of the DNSH principle should be preceded by a thorough assessment of its implementation within the current Horizon Europe programme.**

Performance framework including monitoring and reporting tools

To fully assess the effectiveness of EU-funded programmes, impact indicators should be prioritised and complemented with qualitative assessments and long-term tracking mechanisms to ensure a more accurate reflection of real benefits for society and the economy.

While the EU’s performance indicators provide a structured way to evaluate programme effectiveness, input and output indicators may lack meaningful insight into actual success, as they focus only on financial allocation or participation numbers rather than real impact. Result indicators, while somewhat useful, do not always capture whether funded research translates into broader societal benefits.

Impact indicators are the most meaningful and effective tools in this regard, particularly for R&I funding, as they aim to capture the long-term transformative effects of EU-funded programmes on society and competitiveness. Unlike input, output and result indicators, which offer only a moderate reflection of a programme’s success, impact indicators better capture the true value of EU investments.

However, a key challenge in assessing the impact of R&I and higher education funding is that many effects take years or even decades to materialise. This is particularly true for fundamental research, where discoveries made today may not translate into tangible applications, economic benefits, or societal advancements until much later. Measuring success too soon risks undervaluing breakthrough innovations that require time to develop.

In this context, EUA also highlights the importance of robust evaluation mechanisms, particularly for pilot initiatives or major changes to funding models, before wider adoption. The example of the lump sum funding model introduced in the R&I framework programme underscores the need for thorough impact assessments to understand both benefits and unintended consequences. There is often a tendency to rapidly scale new approaches without

sufficient evidence of their long-term effects or suitability across diverse institutional contexts. Sound, evidence-based evaluation should be a prerequisite to scaling up any new policy instrument to ensure that pilot initiatives or major changes to funding models do not undermine programmes' objectives.

EUA remains committed to contributing to the design of the next MFF and future priorities for EU financial programmes on behalf of universities in Europe and to safeguarding stand-alone programmes with stable funding.

List of relevant publications

- [Paving the way for impactful European R&I – EUA's vision for FP10, April 2024](#)
- [Building on the success of Erasmus+, November 2023](#)
- [Impactful Simplification of the EU Framework Programme for Research and Innovation, 2018](#)
- [Accepting university accounting practices under Horizon Europe: Strategic and practical recommendations, September 2018](#)
- [Taking simplification of EU Funding to the next level - The university perspective, February 2018](#)

With more than 900 members and affiliates, the European University Association (EUA) is the largest representative organisation of universities and national rectors' conferences in 49 European countries. EUA is a recognised stakeholder in the development of EU programmes for research, education and innovation. The Association actively contributes to all major European-level dialogues as the next MFF takes shape. By engaging with policy makers and stakeholders, EUA seeks to place research, education and innovation at the forefront of Europe's competitiveness and prosperity.