

Horizon Europe 2028-2034

EUA analysis of the European
Commission's proposal



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Introduction

The European University Association welcomes the European Commission's proposal for the next Horizon Europe programme, published on 16 July 2025.

The Association is pleased to note that many of its recommendations have been reflected in the proposal for what will be the European Union's tenth Framework Programme for Research & Innovation (FP10). Nevertheless, some areas still lack clarity and consistency, which will need to be addressed in collaboration with the programme beneficiaries and the broader R&I community.

In this context, EUA underlines that Horizon Europe must remain focused on excellent research, including collaborative research, rather than being repurposed as a tool to deliver industrial or short-term political objectives. Building on EUA's [initial reaction to the proposal](#) from July 2025, this document provides in-depth analysis of the legislative proposal for Horizon Europe (2028-2034) and its links to the newly proposed European Competitiveness Fund (ECF). It outlines the proposal's positive elements while also drawing attention to significant areas of concern for European universities.

The programme's fundamentals

Horizon Europe remains a stand-alone programme

The decision to maintain Horizon Europe as a stand-alone programme, with its own legal base, budget and branding, is a clear sign of the European Commission's commitment to research and innovation.

Indeed, [EUA has consistently advocated for the programme's autonomy](#), as this is crucial to advancing scientific excellence and ultimately strengthening Europe's long-term competitiveness, prosperity and resilience. While efforts to enhance synergies between EU funding instruments are welcome, integrating Horizon Europe into a broader structure would risk undermining its core mission.

Horizon Europe is not just a funding instrument, and the importance of it remaining a stand-alone programme is not just a matter of respecting the treaties. Horizon Europe stimulates research excellence, builds research capacity, fosters mobility, international and cross-sectoral cooperation and drives breakthrough innovation. These unique strengths make it an invaluable asset to Europe's competitiveness and prosperity, which is why the programme must retain its independent identity, with the new Competitiveness Fund serving to complement rather than absorb it. This cannot be taken for granted, as outlined in the next section.

Unclear boundaries with the European Competitiveness Fund threaten Horizon's independence and integrity

The Commission's proposal provides welcome reassurance that Horizon Europe will remain a stand-alone programme. However, the proposed 'tight connection' with the ECF raises serious concerns about whether the programme's autonomy and integrity, which are the very foundations of Horizon's ability to deliver on its unique mission, will be safeguarded in practice.

This concern is compounded by vague and inconsistent language across both the Horizon Europe and ECF proposals. In particular, the new competitiveness component of Horizon Europe, largely replacing today's Pillar II, at times seems to belong to Horizon Europe, while in many other instances it is presented as if already

integrated into the ECF. This ambiguity undermines the stated commitment to a truly independent programme. Greater clarity, consistency and alignment is needed.

The proposed links between Pillar II and the ECF, with joint work programmes, shared governance and the introduction of a single rulebook, are likely to create friction, delays and legal uncertainty as the new programme takes form, and very likely beyond. Given their magnitude, these issues could lead to even more substantial delays and additional legal uncertainties for beneficiaries than those caused by the late establishment of the corporate grant agreement under the current programme.

Moreover, the governance arrangements for how Horizon Europe and the ECF will work together remain unclear. While the Commission has briefly outlined how topics for collaborative research might be selected, it has not provided a clear framework. Nonetheless, the proposal to introduce an ECF Strategic Stakeholders Board is welcome. It is vital that researchers, particularly from universities, are included in this advisory board, given its role in shaping the direction of research opportunities in the Horizon Europe's competitiveness component, as well as in the European Innovation Council's 'Challenges' and 'Partnerships' initiatives.

Similarly, the different configurations of the ECF committee specified in the proposal of the ECF regulation should include research representatives from the member states, not solely industrial policy representatives. It is also essential that the governance of this connection ensures a strong role for the European Commission's Directorate-General for Research and Innovation (DG RTD), working in close coordination with other Commission services, so that research and innovation remain at the core of the programme.

Budget proposal points in the right direction, but falls short of what is really needed

The European Commission's proposal of €175 billion for Horizon Europe is an ambitious step forward. This sends a strong signal that R&I is recognised as a cornerstone of Europe's future competitiveness, prosperity and resilience. The university community values this commitment, which underlines the essential role of R&I in addressing Europe's challenges and strengthening its long-term strategic capacity.

While this proposal is encouraging, a budget of €200 billion would ensure that the programme achieves the greatest possible impact. Anything below this will inevitably reduce Horizon Europe's effectiveness and limit its ability to drive Europe's competitiveness.

It is also important to recognise that the budget increase proposed by the Commission will not translate directly into a proportional increase in R&I activity. Due to exceptionally high inflation and rising costs across Europe in recent years, its impact will be significantly less pronounced in practice. Although the proposed budget is nearly double that of Horizon Europe from 2021 to 2027, the number of researchers and innovators that can realistically be supported will be far fewer than double.

Therefore, the Commission's proposal must serve as a baseline in the upcoming negotiations. Any reduction below €175 billion would be a missed opportunity at a time when sustained and increased investment in R&I is more crucial than ever for Europe's competitiveness, resilience and prosperity.

Assessing how the proposed budget increase will translate into meaningful allocations across the programme remains challenging. With the exception of Pillar II, the proposal does not provide a detailed breakdown, which means that other key components such as the European Research Council (ERC), Marie Skłodowska-Curie Actions (MSCA) and the European Innovation Council (EIC) are presented only as part of a broader package, making it impossible to assess the extent to which they will be able to deliver on the programme's ambitions.

Where a breakdown is provided, as for Pillar II, it already reveals a striking imbalance between its two strands, with over €68 billion for 'Competitiveness' and only €7.6 billion for 'Society'. The upcoming political negotiations on the programme's budget breakdown must significantly strengthen its support for highly successful components such as the ERC, MSCA, early-stage, precompetitive collaborative projects in Pillar II and the EIC's Pathfinder and Transition schemes, as these are the exact components that most often lead to the breakthrough innovation needed for long-term competitiveness and prosperity.

Approach to dual-use research remains unclear

Unlike the current programme and its predecessors, the draft FP10 regulation no longer includes a civilian clause – the rule that restricted EU research funding to non-military purposes. This diverges from [the preference of many universities](#) to maintain it, as expressed in the Commission's consultation last year.

This sudden shift from a longstanding consensus could seriously impact the use of Horizon Europe. Nevertheless, the implications of this shift are not clarified throughout the proposal, as presently only the European Innovation Council (EIC) is expected to support innovation in critical technologies with a focus on defence applications. While FP10 may support dual-use actions according to an explanatory memorandum to the regulation, this does not provide the legal basis to understand which parts of the programme will fund projects with military use.

Additionally, enabling dual-use research on technologies with potential military applications may lead to more calls whereby access for third countries is restricted. This would hence limit international scientific collaboration, a key strength of Horizon Europe.

Such calls are also more likely to focus on high technology readiness levels (TRLs). This will be to the detriment of fundamental research, while possibly requiring more security and background checks within universities and research groups. Given these potential downsides, it is important to restate the value of academic freedom and open knowledge exchange and to translate this into a clear demarcation between civilian, dual and military uses of research. Such uses and their respective requirements must therefore be explicitly flagged in calls.

The programme's structure and breakdown by pillar

EUA welcomes the continuation of Horizon Europe on the basis of its established pillar structure, with no major changes to its core components. The Commission's proposal preserves the key elements and principles that underpin the programme's success. Maintaining its integrity will ensure continuity and reinforce its identity as a comprehensive European R&I initiative that promotes scientific excellence and collaboration.

Crucially, maintaining the investment journey across the three pillars from fundamental research to innovation, complemented by a fourth on strengthening capacities, safeguards the programme's coherence and ensures the necessary continuity.

In addition, it is especially welcome that, despite some earlier speculation, support for collaborative research has been preserved within Horizon Europe. This is one of the programme's major strengths.

Pillar I 'Excellent Science'

EUA welcomes the protection of the bottom-up nature of flagship components of Horizon Europe – the ERC and MSCA – which are essential for advancing frontier science, nurturing talent and fostering high-risk, high-reward innovation.

The Commission's proposal to expand the **European Research Council** is especially welcome. However, certain proposed changes that risk undermining this body's independence are deeply concerning. Preserving the ERC's independence is a prerequisite for it to continue driving excellent research that delivers crucial advances across scientific fields. Safeguarding the ERC from political steering or subordination to political agendas, and maintaining its fully bottom-up character, are therefore of utmost importance.

Equally, the ERC must remain governed by an independent body, free from political interference. The proposed reduction of the ERC President's term is especially worrying, as it would inevitably weaken a key safeguard of the Council's autonomy and its mission to support excellent fundamental research.

Regarding the **Marie Skłodowska-Curie Actions**, EUA strongly opposes the proposed introduction of a top-down thematic focus, often referred to as 'directionality', which would allow policy makers to impose certain research topics. In addition, these topics directed from the top down would come without any additional budget. Such a shift would inevitably reduce the resources available for bottom-up projects, limiting beneficiaries' freedom to define their own research questions and undermining their ability to pursue curiosity-driven ideas. The bottom-up nature of MSCA is a defining feature of the instrument and a cornerstone of its success. It needs to be preserved.

It is particularly concerning that the Commission has already considered applying a liberal interpretation of the Horizon Europe legal base to introduce new top-down thematic focus to MSCA. This underlines the urgent need for clarity in the FP10 legal

base, in line with the joint statement of stakeholder organisations ('[No directionality in MSCA](#)'), to ensure that this approach is not further expanded or enshrined in law. Any increase in directionality would risk diminishing the unique value of MSCA within Horizon Europe.

The Commission's proposal also notably states that 'MSCA shall support the career at all stages'. While it is indeed important to provide career support throughout researchers' professional paths, further clarity is needed here. Compared to the current legal base, this shift could alter the identity of MSCA, which has been Europe's predominant instrument to support early-career researchers (ECRs). Safeguarding this role is crucial to maintaining MSCA's distinctive contribution to nurturing Europe's next generation of researchers.

Pillar II 'Competitiveness and Society'

EUA welcomes the continued support for collaborative research in Pillar II, having consistently called for this unique feature to be preserved. Collaboration across borders, disciplines and sectors is a hallmark of Horizon Europe and one of its greatest strengths and sources of added value.

At the same time, ensuring stronger support for collaborative early-stage, precompetitive and interdisciplinary projects is essential to achieving the programme's long-term goals. In light of the envisaged tight connection with the European Competitiveness Fund, it is vital that collaborative research at lower TRLs is not sidelined in favour of near-market activities.

A balanced approach must guide the design of Pillar II as a whole, as well as its new 'Competitiveness' and 'Society' strands. In particular, researcher-driven, early-stage projects must have sufficient space within the competitiveness strand and its four policy windows. While the proposal contains provisions to balance activities across lower and higher TRLs, similarly to the current programme, [experience shows that higher-TRL projects have received greater support in practice](#). Stronger safeguards are therefore needed to ensure that this balance is upheld.

When it comes to the investment logic between Horizon Europe and the new European Competitiveness Fund, TRLs in Horizon Europe should remain at low and medium levels. Meanwhile, the European Competitiveness Fund should take responsibility for supporting high-TRL projects that bring ideas, products and services to market, thereby ensuring continuity with the research supported by Horizon Europe.

It is equally important to ensure less prescriptive planning that allows for more open topics, especially within the Competitiveness strand. Although the Commission proposal commits to this, the planned political steering of the strand and its dependence on the mirrored policy windows in the European Competitiveness Fund risk leading to even greater over-prescription than before. Appropriate safeguards will therefore be necessary to eliminate this risk.

Finally, it is essential that beneficiaries are properly consulted on the direction of Pillar II, particularly given the discontinuation of the strategic planning process. Although the FP10 and ECF proposals indicate that some consultations will take place on the direction of the policy windows, it remains unclear how stakeholders and beneficiaries will be involved in other important aspects of the pillar.

Regarding the **EU Missions**, the emphasis placed on Horizon Europe only funding the R&I activities of the missions, while deployment and scaling up should be supported through other programmes, is welcome. EUA has raised this issue on many occasions and hopes that this principle will be duly respected in the future multiannual financial framework. As funding for the missions is currently foreseen only until 2030, clarity is also needed on what will happen thereafter.

Similarly, more clarity is needed regarding the newly proposed **moonshots**, in particular how they will be selected, what funding sources will support them and how they will relate to the existing missions and partnerships.

Finally, regarding the **European Partnerships**, the proposal to simplify the partnerships' landscape and streamline their operational and organisational processes is welcome. However, the simplification measures should be further detailed, and EUA looks forward to seeing how they will be implemented in practice. On the budget side, the programme's legal act should include a provision similar to the current programme's rule that 'the majority of the budget in Pillar II shall be allocated to actions outside European Partnerships'.

Pillar III 'Innovation'

Regarding support for innovation, EUA welcomes the expansion of Pillar III and the preservation of its successful schemes, in particular the **European Innovation Council's** 'Pathfinder' and 'Transition', as well as their bottom-up approach through open calls. Rather than shifting its focus to scale-up activities, it is crucial that the EIC continues to back projects at low TRLs, i.e. at the pre-commercial stage, by further reinforcing these schemes.

The proposal to introduce more 'ARPA' elements into EIC operations to stimulate breakthrough innovation is also welcome. The ARPA model, which refers to bodies like the Advanced Research Projects Agencies in the United States, will have an especially valuable role in creating clear pathways from the ERC and Pillar II.

At the same time, it is concerning that the Commission's proposal refers only to support for innovative start-ups and SMEs under the EIC, without mentioning researchers or universities, as is currently the case. This risks narrowing the scope of the EIC and overlooking the key role that universities play in Europe's innovation ecosystem.

Universities have been important contributors to EIC Pathfinder and Transition projects, particularly in advancing early-stage, high-risk innovation. Their continued inclusion and explicit recognition within this pillar is essential to unlocking Europe's full innovation potential. Similarly, it is important that the EIC supports diverse types of innovation, not only technological innovation. Social innovation is also essential, as it contributes to Europe's competitiveness while addressing societal needs and strengthening resilience.

Clarity is needed on the future of the **European Institute of Innovation & Technology** (EIT), which has provided a crucial link between research, education and innovation, particularly on how the EIT's Knowledge and Innovation Communities (KICs) will continue to be supported, especially those that have not yet reached full financial sustainability.

Policy makers should also address the future of horizontal activities coordinated by the EIT, such as the Higher Education Initiative (HEI), which has played an important role in helping universities to build their innovation capacity and fostering collaboration between academia, industry, research institutions, public authorities and governmental organisations. Such support is important in strengthening regional and European innovation ecosystems and was not yet fully addressed by the existing European Innovation Ecosystem component in Pillar III.

Pillar IV 'European Research Area'

The strengthening of support for the **European Research Area** (ERA) and the continuation of widening measures under a dedicated fourth pillar is a positive development. This reflects the EU's commitment to reducing disparities in R&I capacity across Europe and to advancing ERA-related reforms at national level.

In addition, this consolidation of the ERA objectives signals clear willingness towards the achievement of **the fifth freedom** to ensure the free movement of research, innovation, scientific knowledge and education within the EU's Single Market. Going forward, a clearer link with the future ERA Act will be needed, including how it can be supported by Horizon Europe.

Concerning **widening participation**, the Commission proposes renewing support for capacity building in countries with lower R&I capacity through the planned implementation of concrete measures to strengthen research and innovation capacity across Europe. This is very positive news. The introduction of the category of 'Transition' countries in the 'Widening participation and spreading excellence' component is a noteworthy development. This demonstrates the progress made by countries with lower R&I capacity in reinforcing their ability to engage in excellent research and to access competitive calls and is in line with the reasoning behind the initial introduction of widening measures as a way to increase the potential of these countries.

However, EUA advises caution regarding the proposed conditionality of funding for capacity-building measures to be implemented from 2030 onwards. Under this provision, countries that have not increased their real public investment in R&I compared to the previous year would no longer be eligible for such measures. EUA has repeatedly called for increased national investment in R&I to reach the 3% of GDP target. However, such a conditionality measure must be very carefully considered, as it may negatively affect beneficiaries in countries with lower R&I capacity, based on criteria unrelated to their own performance.

Finally, the 'Research Infrastructures' component, previously part of Pillar I in Horizon Europe, has been shifted to Pillar IV and expanded into the **Research and Technology Infrastructures**. Continued investment will contribute to reinforcing the role of these infrastructures as enablers of scientific excellence and as drivers of European collaboration.

Nonetheless, the Commission's plan to fund the construction of research and technology infrastructures through Horizon Europe is misguided. Horizon Europe is, above all, a research programme, and its funding should not be used to cover the building costs of new infrastructures. The Structural and Investment Funds are better

placed to continue fulfilling that role. Similarly, the expansion of the component to include technology infrastructures must not come at the expense of sustained support for research infrastructures.

Simplification

EUA welcomes the Commission's ongoing efforts to simplify participation in the programme, which is a longstanding priority for the Association. The reduced length of the work programme, combined with less prescriptive planning and a shift toward open topics by default, is a particularly positive development and is strongly welcomed by the university sector.

That being said, making lump sum funding the default model remains a matter of concern. While the introduction of lump sum funding under the current programme has brought improvements for some beneficiaries, it has also created new challenges for others. This model may be well suited to short-term, task-specific projects, but it complicates the planning and execution of long-term, high-risk research and large-scale collaborative initiatives.

The Commission should therefore reconsider this approach and propose a more flexible funding model that better accommodates the diversity of research activities and institutional contexts across Europe.

Similarly, attempts to create a single set of rules for all programmes could be highly complex and compromise the added value of specificities related to each sector. Any restructuring should focus on enhancing efficiency and simplification for beneficiaries, rather than creating additional administrative barriers.

Horizontal topics

The proposal's commitment to continuing to promote the values and principles of the European Research Area, notably research ethics and integrity, freedom of scientific research, gender equality and equal opportunities, Open Science and the promotion of attractive research careers and mobility, is highly welcome. However, as the

proposals provide limited detail on how these priorities will be implemented, further clarification is needed on how they will be translated into practice.

EUA also underlines the importance of maintaining a strong focus on **multidisciplinarity** and the **Social Sciences, Humanities and the Arts** (SSHA). The proposal to integrate SSHA across all components of the programme, including specific calls, is welcome. It is of particular importance that the multidisciplinary approach, including the integration of SSHA is also featured in collaborative projects of the Competitiveness strand of Pillar II.

The proposal's declaration that **international cooperation** will be further reinforced is a very positive sign, especially as it maintains the essence of the initial provisions included in the ongoing Horizon Europe regulation on the association of third countries to the programme.

However, the European Commission should reflect on the possibility of a simpler or faster association process for long-standing partner countries. As stated above, the shift towards funding for dual use research could limit participation from associated countries to specific calls and restrict international cooperation. To maintain the programme's openness, calls should clearly specify whether research is for civilian, dual or military use, along with corresponding requirements.

To this end, it is notable that the proposal mentions protecting the Union's 'public order and security in relevant policy areas, including economic and research security'. In light of this, Horizon Europe must strike the right balance between openness and adopting a risk-aware approach to international cooperation. This responsible and open approach to international collaboration is of utmost importance to tackling global challenges in areas such as health and climate.

Another important point relates to the practical implementation for third country participation in light of the close linkage between Horizon Europe and the European Competitiveness Fund, as it will be possible for third countries to also associate to the ECF. The connection between the two funds nonetheless raises questions about the participation of associated countries, which will need to be addressed in the final legislative proposal. EUA therefore reiterates that responsible openness should remain the default option for third-country participation, including in the 'Competitiveness' component of Pillar 2 that is supposed to be executed in complementarity with the European Competitiveness Fund.

Conclusion

As this analysis shows, the European Commission's proposal for Horizon Europe contains both encouraging steps forward and areas that raise concern for the university sector.

On the positive side, the decision to safeguard Horizon Europe as a stand-alone programme reinforces its role as the EU's flagship for scientific excellence and collaboration. The budget proposal of €175 billion, though still short of what is really needed, sends a positive signal that R&I is recognised as a cornerstone of Europe's competitiveness. The protection of bottom-up excellence schemes such as the ERC, MSCA and EIC Pathfinder and Transition schemes is equally welcome, as are the efforts to simplify participation through shorter work programmes, less prescriptive planning and more open topics by default.

At the same time, important concerns remain. The blurred boundaries and governance arrangements between Horizon Europe and the European Competitiveness Fund threaten the programme's autonomy, risking confusion and the dilution of Horizon Europe's research-driven mission. The envisaged use of joint work programmes, a single rulebook and shared governance may slow implementation, but also divert Horizon Europe towards industrial or short-term political objectives. Further risks to the success of the programme arise from the potential for political interference in the ERC's independence and the introduction of top-down direction in the MSCA, as well as likely over-prescription in Pillar II and the removal of the civilian clause, which creates ambiguity around dual-use research.

Taken together, these elements underline the need for constructive dialogue between European policy makers and stakeholders in the months ahead. EUA remains committed to contributing to these discussions so that the final programme strengthens Europe's capacity for excellent, collaborative and world-leading research and innovation, thereby enhancing European competitiveness, prosperity and resilience.

List of supporting EUA publications

- ❖ [The EU's next long-term budget must support ambitious and independent programmes for education, research and innovation, May 2025](#)
- ❖ [EUA response to the call for evidence on the implementation of the Strategic Technologies for Europe Platform \(STEP\), April 2025](#)
- ❖ [A research, education and innovation partnership for Europe's competitiveness, March 2025](#)
- ❖ [Universities welcome member states' and European Parliament's united call for a stand-alone FP10, March 2025](#)
- ❖ [Paving the way for impactful European R&I – EUA's vision for FP10, April 2024](#)

Joint statements and letters

- ❖ [Research Matters statement Future EU Budget: Research Matters welcomes increased investment in R&I, July 2025](#)
- ❖ [Research organisations call for EU to preserve early-stage collaborative R&I in the next framework programme, July 2025](#)
- ❖ [Research community urges the EU to preserve MSCA's bottom-up approach, June 2025](#)
- ❖ [Research and innovation sector calls for key actions to strengthen Europe's R&I leadership, February 2025](#)
- ❖ [Investing more in RD&I as a strategic move for Europe's future prosperity, January 2024](#)
- ❖ [Universities welcome European framework to attract and retain research, innovation and entrepreneurial talents, November 2023](#)

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The Association provides unique expertise in higher education and research as well as a forum for exchange of ideas and good practice among universities. The results of EUA's work are made available to members and stakeholders through conferences, seminars, websites and publications.

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