

# Statement

on the EU-Green Paper “From Challenges to Opportunities: Towards a Common Strategic Framework for EU Research and Innovation funding”



Verband | Biologie, Biowissenschaften  
& Biomedizin in Deutschland

## ***I. Occasion***

In spring 2010 the EU-Commission presented the Green Paper on a Common Strategic Framework for future EU Research and Innovation Funding and invited individuals and organisations to provide their comments and views on this paper (available under: [http://ec.europa.eu/research/csfr/index\\_en.cfm](http://ec.europa.eu/research/csfr/index_en.cfm)).

VBIO gladly accepts this invitation and will, in the following, contribute the views of biological and life sciences researchers in Germany regarding this important subject.

## ***II: General assessment***

### **Science first!**

According to VBIO, the only aspect that should govern the development of the European Research Area and the funding strategy is excellence. Non-scientific criteria, e.g. the representation of regions or countries should be disregarded. This should also apply to cross-border policies that are not influenced by general political considerations.

### **Do not undervalue basic research!**

The Green Paper emphasises applied, strategic research including the participation of SMEs. While these aspects are important for the development of a thriving European Research Area, the importance of basic research should not be undervalued. VBIO asks the EU-Commission to explicitly endorse free, curiosity-driven basic research. Only basic research can provide the foundation for applied research and industrial development. This commitment has to be visible at all strategic levels and in all political and financial instruments.

### **Strengthen the ERC!**

The establishment of the ERC was an important milestone in the development of the European Research Area. The Council allows for the funding of excellent, curiosity-driven basic research which will continue to be necessary in the future. The independence of the ERC should not be restricted by the intended strategic orientation of the funding policy or any other direct or indirect requirements. On the contrary, the ERC should be consolidated financially.

### **Simplify funding processes!**

VBIO welcomes the EU-Commission's attempt to reduce bureaucracy in the funding process. All measures that point in that direction are greatly appreciated. However, we would like to remark that the two objectives 'simplification and standardization' and 'transition to more flexible processes' are in potential conflict with each other.

### **Ensure coherence!**

VBIO acknowledges the intentions of the EU-Commission to ensure coherence in research strategy and funding measures (regional funds, programs to support SMEs etc.). But this will require substantial effort.

### **III. Selected questions of the questionnaire for the Green Paper**

#### **Question 2:**

**How should EU funding best cover the full innovation cycle from research to market uptake?**

>>> In general, VBIO embraces the fact that the EU intends to fund the full innovation cycle in the future. However, we do not believe that the exemplary funding of one single full innovation cycle (and respective funding programs) is financially sensible. Additionally, in the light of the many different innovative funding areas we consider it to be highly problematic.

The objective can only be met, if specific, reasonably financed programs for all stages of the innovation cycle are in place. From experience we know that during the course of development und marketing several originally promising innovations turn out to be ineffective or economically unviable and end up being dropped. On the contrary, the financial risk of innovations which have already been successfully developed is low. Therefore VBIO advocates that more financial support is granted to the early stages of the innovation cycle, including explicitly curiosity-driven basic research.

\*\*\*

#### **Question 3:**

**What are the characteristics of EU funding that maximise the benefit of acting at the EU level? Should there be a strong emphasis on leveraging other sources of funding?**

>>> The leveraging of other funding sources by the EU could be realized through announcements with other non-EU countries. VBIO supports this idea in general, as long as the announcements are motivated by research and development and not by politics.

>>> Within an EU-call the leveraging of other funding resources should be of little importance. This is based on the realisation that „other sources of funding“ follow their own agenda and provide different criteria for funding. This is of course legitimate. But in practice, this would create conflicts of objectives. Additionally, this would further increase the complexity of EU-projects and create an even bigger need for coordination. This in turn does not further the goal to promote transparency and simplification (wherever possible).

VBIO welcomes explicitly the approach of „focussing on instruments with proven European added value, becoming more results-driven and leveraging other public and private sources of funding (page 2)“. However, this is admittedly “wishful thinking” and should not be overrated in the scientific arena. Excellent basic research has to be guaranteed by all means, even if possibilities for subsidiary funding from other sources are scarce.

\*\*\*

#### **Question 4:**

**How should EU research and innovation funding best be used to pool Member States resources? How should Joint Programming Initiatives between groups of Member States be supported?**

>>> Generally, VBIO considers national funding programs to be legitimate and very important. Momentarily, more than 90% of funding is provided by national programs. Funding programs of the EU should by no means come at the expense of national programs. Diverse research projects and results can only be ensured by a large variety of funding programs.

The statement “Despite some progress, national and regional governments still largely work according to their separate strategies. This leads to costly duplication and fragmentation” is not necessarily accurate. Particularly, we think that at the time being the conclusion that “EU level

actions provide the opportunity to generate greater efficiencies and impact“ should be treated with caution.

Since the EU-funding process is still tedious and comes with a lot of coordination effort and bureaucracy, it cannot be considered exemplary for efficiency and effectiveness. Generally, VBIO thinks that plurality in funding of research and innovation works better, because predictability is not inherent in research and flexibility remains necessary.

Therefore we think the EU would do best to support common program initiatives among the Member States by ensuring transparency and participation. This could be realized with the provision of IT-tools or financial funds for respective meetings.

\*\*\*

#### **Question 5:**

**What should be the balance between smaller, targeted projects and larger, strategic ones?**

>>> Large strategic approaches struggle with legitimation, if they fail to produce results in an appropriate time frame. Smaller project which focus on single aspects often are problematic simply because they do not see the “Big picture”. Therefore we think that both smaller more focused and larger strategic projects are necessary. It should be avoided that one type is played against the other, even should it occur unintentionally. Both types of projects have to be designed in a way that makes it possible to transfer results from concrete to strategic levels (top-down and bottom-up, respectively).

\*\*\*

#### **Question 7:**

**What should be the measures of success for EU research and innovation funding? Which performance indicators could be used?**

>>> The criteria for the assessment of EU funding should be based on the purposes given in the Green Paper:

- Facilitation of cooperative and industrial research  
Criteria: number of applications, number of project partners, number of first time applicants
- Streamlining of funding instruments and facilitation of access  
Criteria: number of lines of funding, number of applications, number of project partners, number of first time applicants and volume of applications (also taking into account the supplements)
- Reduction of the time to market (marketing)  
Criteria: time in months
- Promotion of excellence  
Regarding single funding measures VBIO asks that excellence is used as the assessment standard. Several established instruments exist that allow for this kind of assessment. Since the instruments vary depending on the subject area, we recommend the use of differentiated measures, based on the experiences of other successful funding agencies (e.g. the DFG in Germany).

Further purposes such as

- European added value
- contribution to tackling societal challenges  
cannot be assessed by measurable criteria. The same applies to the not listed criterion ‘knowledge and acceptance of the general public’. In order to improve the latter VBIO recommends the installation of exemplary communication projects that accompany research areas that are particularly debated by the public (e.g. stem cell research, gene technology, synthetic biology). The accompanying projects should be dedicated to science

communication and develop instruments that allow for the measurement of success in this area.

\*\*\*

**Question 8:**

**How should EU research and innovation funding relate to regional and national funding? How should this funding complement funds from the future Cohesion policy, designed to help the less developed regions of the EU, and the rural development programmes?**

>>> VBIO appreciates that, in the future, the distribution of the listed funds will be guided more by criteria of research and innovation. – The distribution of funds of the future budget could be guided by economic criteria in certain phases of the innovation cycle. However, VBIO strongly recommends that the varying funding instruments for “research” and “industry/SMEs”, respectively, are clearly kept separate, precisely because the primary funding goals and approaches are not identical.

\*\*\*

**Question 9:**

**How should a stronger focus on societal challenges affect the balance between curiosity-driven research and agenda-driven activities?**

>>> (Also compare to question 5) VBIO considers both approaches to be indispensable. We are concerned that in various contexts basic research (i.e. curiosity-driven research) is considered to be less important. Therefore, we strongly emphasize that curiosity-driven basic research is the indispensable basis to applied research which focuses on the solution of problems of the future. Applied R&D greatly benefits from the pool of innovative ideas that basic research provides. Without further broad funding of basic research this pool will eventually dry up. Based on this, we view the expansion of industry participation, as apparently intended in question 16, with scepticism.

\*\*\*

**Question 10:**

**Should there be more room for bottom-up activities?**

>>> The Green Paper correctly states “Experience has shown, however, the limitations of this approach in achieving the necessary flexibility, creativity and cross-disciplinary research needed“. For this reason, bottom-up activities should be given more emphasis. In order to implement this, participation-tools have to be developed which support innovative ideas independent of provenance or genesis. This applies both to scientific research and to society. The future research strategy has to provide several tools (participatory and expert-driven) which ensure that strategic challenges and problems regarding acceptance by the general public are recognized early on.

\*\*\*

**Question 11:**

**How should EU research and innovation funding best support policy making and forward-looking activities?**

>>> EU-financing of research and investment should not be solely focused on research and development. Outreach activities should become part of funded projects. Much to our regret these aspects are only marginally represented in the Green Paper. Particularly when it comes

to the development of new technologies the acceptance in the general public has to be considered. This can only be realised by providing dedicated funds.

\*\*\*

**Question 14:**

**How should EU funding best take account of the broad nature of innovation, including non technological innovation, eco-innovation and social innovation?**

>>> The funding of non technological, ecological and social innovation should not be designed as a separate, stand-alone instrument, but as an integral part of broader funding measures. This is the only way that a truly trans-disciplinary approach can be put into place.

\*\*\*

**Question 16:**

**How and what types of Small and Medium-sized Enterprises (SME) should be supported at EU level; how should this complement national and regional level schemes? What kind of measures should be taken to decisively facilitate the participation of SMEs in EU research and innovation programmes?**

>>> We would like to refer here to our comments in response to question 8: The funding of SMEs follows priorities different from the funding of research. Therefore we need different instruments for SMEs. All interested parties will benefit from the simplification of access procedures, particularly those from small institutions including SMEs.

\*\*\*

**Question 21:**

**How should the role of the European Research Council be strengthened in supporting world class excellence?**

>>> The European Research Council has greatly improved the support of excellence. As pointed out in our comments on question 2, 3 and 9, VBIO attaches much importance to curiosity-driven research and therefore deems the considerable increase of funds available to the ERC as absolutely necessary. At the same time it has to be guaranteed that the ERC will always stay free of tactical or strategic considerations – in regards to political, societal or economic aspects – in its funding decisions for excellent basic research.

\*\*\*

**Question 22:**

**How should EU support assist Member States in building up excellence?**

>>> Several ways to support the building of excellence are imaginable. VBIO thinks that the primary support should not be of financial nature, but focused on promoting the idea of excellence among Member States. However, the idea of excellence will only be authentic, if the EU strictly applies the criterion of excellence in its own funding programs.

\*\*\*

**Question 24:**

**What actions should be taken at EU level to further strengthen the role of women in science and innovation?**

>>> Basic research should follow the criterion of excellence. Therefore fixed quotas (e.g. for female junior researchers) are not feasible. Whether a female scientist succeeds in the research arena often is determined by individual factors such as for example availability of child care. It will be difficult to tackle these issues at the level of EU-funding. However, at the level of EU regional funding, possibilities exist to improve general conditions and to facilitate the re-entry of female scientists into research.

\*\*\*

**Question 25:**

**How should research infrastructures (including EU-wide e-Infrastructures) be supported at EU level?**

>>> VBIO holds the view that research infrastructure needs to be supported by the EU. It is precisely the connected infrastructure that generates the European added value which is what the new positioning of the European Research Area is aiming for. Determining factors should be excellence and societal necessities, but not regional considerations.

\*\*\*

**Question 27:**

**Which key issues and obstacles concerning the ERA should EU funding instruments seek to overcome, and which should be addressed by other (e.g. legislative) measures?**

>>> According to VBIO, the growing decrease of basic research support poses one of the biggest problems. Here, financial support by the EU could serve as a beacon. The aim should be to improve the understanding and appreciation of excellence. The funding of public-outreach activities could help to deal with the insecurities that new technologies and innovations often generate for the general public.

A substantial problem, particularly for biological and life sciences, are national rules and regulations that increase bureaucracy and inhibit innovation. This can interfere with the successful cooperation among research institutions of Member States.

Therefore, VBIO expects that the creation of the European Research Area will reduce bureaucracy and harmonise standards and regulations. This would grant comparable working conditions to all researchers. The resulting new standards should be comprehensible and make innovation easier. Unfortunately, we observe a substantial deficit in transparency when it comes to the process of setting standards which also complicates research at a regional level.

Berlin, May 2011