



APRE

Agenzia per la Promozione
della Ricerca Europea

NOVEMBER 2025

RECOMMENDATIONS ON THE EUROPEAN COMMISSION'S PROPOSAL FOR THE NEW HORIZON EUROPE (FP10)

VERS0 FP10

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If parts of this publication are extracted and used, please cite the source as follows:

“Recommendations on the European Commission’s proposal for the new Horizon Europe (FP10)”

Publication date: November 2025

The electronic version of this publication is available on the website www.apre.it

BACKGROUND

In the months preceding the publication of the European Commission's proposal for the Multiannual Financial Framework (MFF), a climate of concern emerged regarding the future of the Horizon programme. Despite multiple declarations of ambitious objectives, there was widespread apprehension that Research and Innovation (R&I) would not receive adequate attention and that its prospects might be sacrificed in favour of other priorities—legitimate and widely shared—such as short-term competitiveness recovery and strengthening European security.

In this context, following the European Commission's proposal for the next MFF 2028–2034, APRE expresses its strong appreciation for the architecture of the 10th EU Framework Programme for Research and Innovation (FP10) Horizon Europe 2028–2034 and for the newly established European Competitiveness Fund (ECF), recognising their strategic importance for the future of the European Union.

APRE calls on the European co-legislators—Parliament and Council—to preserve and further strengthen this ambitious framework. Any reduction of resources or objectives would represent a step backwards, inadequate and difficult to justify in light of the challenges Europe is facing.

This document presents, in the first section, the elements that APRE welcomes and expects to be fully preserved during the negotiation process; and, in the second section, aspects that require clarification and/or adjustments, to ensure that the overall structure fully meets the needs of the European research and innovation community.

WHAT WE WELCOME

1. Central Role of Research & Innovation

The central role of R&I in achieving the Union's strategic objectives, repeatedly stated in the past, is reaffirmed with unprecedented emphasis in the MFF proposal, which – consistent with the reports by Mario Draghi, Enrico Letta and Manuel Heitor – places R&I at the core of the European economic and social strategy, as an essential driver of competitiveness, sustainability and strategic autonomy, in line with the major ongoing transitions.

2. Financial ambition

The essential role of R&I is confirmed by the proposed budget. Several influential preparatory documents (Draghi and Heitor reports, as well as many position papers from institutional actors, national and European R&I organisations – including APRE's) advocated a financial envelope of €200-220 billion for the next Framework Programme. The proposed doubling of the Horizon budget comes close to this target, overcoming previously expressed doubts about the feasibility of such an ambitious funding allocation.

3. Autonomy and identity of the Framework Programme

Early indications of a major restructuring of the MFF and the prioritisation of competitiveness in research and innovation programmes raised concerns about the possible fragmentation or even loss of Horizon's identity. The proposal, however, confirms the importance of safeguarding Horizon's autonomy ("stand-alone") and ensuring a protected budget ("ringfenced"). This principle is crucial: it safeguards scientific and technological freedom, fosters researchers' creativity, and recognises Horizon as an excellence-based instrument aimed at generating knowledge and addressing medium- and long-term challenges. Governance mechanisms to guarantee full implementation still need clarification.

4. Structure and Instruments: Continuity and Enhancement

Despite the introduction of several important new elements, the structure of the Framework Programme remains largely consistent with the model that received widespread appreciation in previous cycles, notably by confirming and strengthening its most successful instruments (ERC, MSCA, EIC), and by reaffirming the role of collaborative research as a structural component of the Framework Programme and an essential mechanism for building and consolidating the European Research Area. The decision to place the instrument for Research and Technology Infrastructures within the fourth pillar is also welcome, as it is fully consistent with the overall logic of the Programme.

5. Breakthrough Innovation and New Paradigms

Europe's insufficient capacity to translate scientific excellence into innovation and corresponding market opportunities has long been identified as the weakest point of the European R&I system. The Commission's proposal addresses this challenge by placing renewed emphasis on breakthrough innovation, through updated instruments inspired in particular by the U.S. ARPA model (as also suggested in the Draghi report and other authoritative contributions), and by promoting the design and implementation of research and innovation programmes and projects explicitly oriented towards solving concrete problems.

6. International Cooperation and the Safeguarding of European Values

Recent geopolitical dynamics are challenging some of the fundamental principles of international cooperation and the multilateral framework that underpins it. The European Commission's focus on enhancing the potential contribution that scientific and technological collaboration with the Union's partners can make to global prosperity is therefore very welcome. In continuity with previous R&I programming cycles, and while confirming a strong commitment to openness in scientific and technological cooperation, the Commission's proposal places greater emphasis on the need to promote and safeguard, in this context, the fundamental values on which the Union is founded, giving priority to international cooperation programmes and projects with countries that share those values, and on topics where collaboration and complementarity are essential.

7. Simplification

The path towards simplifying the Work Programme – aimed at facilitating access and use, and reducing participation burdens for all actors – was already initiated in previous editions. However, we welcome with satisfaction the intention behind the

proposal to introduce radical and substantial reforms, in particular the announcement of a single “rulebook” applicable to the entire Competitiveness Fund and all components of the Work Programme, the generalization of the lump-sum model, and the reduction of the time-to-grant to seven months. The lump-sum model, in particular, besides reducing administrative burdens, has the merit of shifting the focus from formal process control (such as timesheets) to evaluating the quality of the results achieved (the deliverables). For the proposed reforms to effectively deliver the expected outcomes, it is obviously essential that the operational details of the implementing mechanisms are developed and made available well in advance.

PROPOSALS FOR AMENDMENT AND INTEGRATION

8. Overall framework and coordination with ECF

The establishment of the ECF strongly addresses the widely shared strategic priority of a decisive shift that allows Europe to regain competitiveness on the international stage. We are therefore convinced that the new structure (ECF plus FP10) can foster coherence, synergies, simplification, and the reduction of redundancies. However, we do not consider acceptable the proposal for integrated Work Programmes across the two instruments, given that Pillar II “Competitiveness and Society” must indeed respond to competitiveness imperatives, but must also serve the objectives of other Union policies and contribute to expanding knowledge and enhancing excellence through collaborative research and innovation. We therefore believe that the autonomy of HE Work Programmes relative to those of the ECF should be maintained, entrusting the “single rulebook,” the so-called “coordination tool,” the systematic and shared use of foresight to identify priorities, possible coordinated calls, and more generally a broad consultation process, with the task of ensuring the necessary complementarity between HE and ECF – while maintaining that, in a knowledge-based economy, it is knowledge that drives industry, not the other way around.

9. Budget breakdown

While welcoming the significant increase in the overall budget proposed for R&I, we must note that the level of detail provided so far is insufficient and does not allow for the identification of potential imbalances between the various components. We are aware that a detailed breakdown will be subject to discussions throughout the whole negotiation process; nevertheless, we consider it essential to have a budget articulation available promptly, at least at the same level of breakdown used to present the structure of the programme. This will enable Member States to participate in the negotiations with sufficient information to promote their respective priorities, while also supporting the objective of safeguarding the Work Programme’s budget from reallocations to other headings of the MFF.

10. Industrial R&I

The four thematic windows proposed for the “Competitiveness” part of the second Pillar effectively cover, by regrouping and partially expanding them, the thematic priorities of previous programmes. However, we believe that this framework does not sufficiently highlight the objective of European re-industrialisation, which is an essential pathway for restoring competitiveness. We consider it necessary to introduce an additional cross-cutting component within the four windows,

both in Horizon Europe and in the ECF, to ensure support for industrial R&I – starting from the sectors currently covered by the “Industry” part of Cluster 4 of the current Horizon Europe – in order to guarantee full complementarity between the two instruments and transversal support for industrial technologies.

11. Transdisciplinarity

It is not clear if and how the new framework, and in particular the close coordination with the ECF, will be able to effectively promote inter- and transdisciplinary research. We believe that the competitiveness objective is not limited to the recovery of industrial productivity but aims at increasing the quality and performance of the entire socio-economic system, addressing major societal challenges with a systemic, transdisciplinary, and participatory approach. Particular attention should therefore be paid to the risk that the ECF's window-based system may recreate thematic silos. In light of the declared emphasis on the impact of R&I on society (and the encouragement to incorporate the social dimension comprehensively into projects), it appears inconsistent to consider R&I on “Society” (within the second Pillar) only as a distinct and separate element – including in terms of governance – with limited thematic coverage and insufficient funding, rather than also as a cross-cutting component

12. Missions and moonshots

From the Commission's proposal, it appears that the currently ongoing Missions will be phased out and that no new ones are foreseen, whereas particular emphasis is instead placed on the so-called “moonshots,” broad-ranging initiatives spanning from research to application, co-financed by HE, the ECF, Member States, and other national public and private sources. The concept is interesting, but it is essential that their objectives, implementation terms, and governance are specified in greater detail, also to avoid introducing additional elements of complexity into the already highly articulated European R&I landscape. Above all, it is surprising that such a potentially significant component of the programme is not reflected in the legally binding part of the legislative text.

13. Widening su base regionale Regional-based Widening

“Capacity building” measures aim to reduce excessive disparities within the Union by promoting the development of R&I systems in less advanced areas. The distinction between “widening countries” and “transition countries” introduced in the Commission's proposal may contribute to a fairer allocation of resources in this field, but it does not take into account the significant disparities between regions within individual Member States. Defining access criteria for “Widening” measures on a regional rather than national basis, and promoting their integration with already existing regional-level funding lines, would better correspond to the intended objectives, would undoubtedly be fairer, and more consistent with the European tradition of development and cohesion policies.

14. Partnerships

While confirming the validity of European partnerships and their considerable leverage potential, the proposal effectively responds to the numerous calls for rationalisation and simplification that have emerged in recent times. The reduction of

partnership types from three to two, along with the radical simplification of management rules, would represent a significant step forward, streamlining procedures and reducing administrative burdens. However, concrete details on the new operational mechanisms are still lacking. It is also necessary to clarify if and how the Competitiveness Fund should contribute to the partnerships, and how the reform can ensure the safeguarding of investments already made by the European R&I community in the establishment and implementation of partnerships, particularly those launched in the 2025–27 period.

15. EIC

We strongly welcome the significant strengthening of the EIC and the declared intention to simplify its access and governance rules – simplification that, however, requires further operational clarifications. In particular, the coordination with the ECF for activities related to defence and dual-use technologies needs to be defined, in order to avoid overlaps and ambiguities in interactions with the EDF. Similarly, the relationship between the EIC Fund and the Scaleup Europe Fund integrated within the ECF must be clarified, ensuring flexibility, complementarity, and continuity without weakening support for innovators. APRE also reiterates the crucial importance of the Programme Managers' role, who must possess high-level expertise and full operational autonomy, while also being subject to transparent accountability mechanisms.

16. SME Participation

The set-up of consortia in collaborative research projects is often led by large companies and research centres, and the introduction of “moonshot” projects, with their large scale and complexity, risks reinforcing this tendency. We believe it is necessary to develop additional mechanisms to promote SME participation in projects – not as an obligation but as an opportunity – by, for example, including it as an evaluation criterion and, more generally, streamlining the currently fragmented support services for SMEs, also to facilitate their access to research and technological infrastructures and Innovation Test Beds.

17. Success Rate and Seals of Excellence

The Heitor report repeatedly highlights the potential – but so far underutilized – role of the Seals of Excellence (SoE). It is well known that many proposals, although positively evaluated under the Work Programme, are not funded due to a lack of resources, and SoEs could trigger a leverage mechanism that would allow a broader range of projects to be financed. The Commission's proposal introduces, with a similar intention, the Competitiveness Seal. Whether SoEs or SoCs, for the leverage mechanism to work, it is essential that, alongside Member States, regions, and their managing authorities, other third parties (foundations or other investors) are encouraged to co-finance, and that the awarding of the Seals is sufficiently selective to enhance their value. One possible additional option would be to provide marginal funding from the Commission (e.g., 20%). Furthermore, to increase the success rate to at least 25%, we consider it appropriate to extend two-stage calls (except for MSCA), reducing the first stage to a “concept note” and ensuring continuity in the evaluation from the first to the second stage, so as to avoid the mechanism generating additional administrative burden rather than reducing the overall participation effort.

18. Dual use

According to the Commission's proposal, R&I projects with potential civil and military applications (dual use) are eligible across all parts of the programme. Given the extreme sensitivity of this issue, we consider it first and foremost necessary to formulate and agree on a rigorous and sufficiently detailed definition of the concept of dual use, allowing consortia – and the researchers involved – to fully understand the potential scope, both civil and military, of the innovations pursued. In any case, it is necessary to exclude the first Pillar and the "Society" part of the second Pillar, and to establish strict rules that clearly define the acceptable boundaries, both in terms of thematic coverage and regarding the participation of entities from third countries.

19. Association of Third Countries

The possibility for third countries to associate to the Framework Programme is confirmed, without modifying the requirements already in place. Considering that these countries can also associate to the ECF, it is necessary to clarify whether and to what extent association to Horizon is conditional on association to the ECF. It is also essential to ensure that countries already associated to the current FP can automatically renew their association agreement to the new Horizon or complete it through a simplified procedure, thus avoiding the need to repeat the entire bureaucratic process. Such an approach would promote continuity, legal certainty, and greater attractiveness of the programme for international partners, while reducing the need to rely on transitional rules, which often create complications in consortium set-up during the proposal submission phase.

20. Evaluation

The limitations of the current project evaluation mechanism (ex ante, in itinere, and ex post) have been repeatedly highlighted by various stakeholders, yet the issue is not addressed in the Commission's proposal. We consider a substantial revision of the existing mechanisms absolutely essential, especially in light of the significant changes introduced by the new framework: emphasis on competitiveness and impact, the portfolio approach of the ECF windows, the generalisation of lump-sum funding, and the adoption of a single rulebook. A renewed system, consistent with these changes, as well as greater attention to the selection of both internal and external evaluators, would not only improve effectiveness and transparency but also fully enhance the scientific quality, innovation, and socio-economic potential of the projects supported.

21. National Contact Point (NCPs)

The significant innovations introduced by the Commission's proposal will inevitably require updating and, in many cases, radically redesigning the participation modalities in HE at all stages. The role of NCPs, and the financial support provided to them under HE, is therefore even more fundamental, and it is unexpected that this mechanism is not mentioned in the 2028–2034 Programme proposals – neither in the Regulation nor in the HE Decision, nor in the ECF proposal. We therefore consider it absolutely essential that the final legislative text explicitly provides for the role of NCPs and their financial support.



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