



Brussels, 21 May 2026
(OR. en)

9403/26

Interinstitutional Files:
2025/0543 (COD)
2025/0544 (CNS)

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CODEC 940

NOTE

From: General Secretariat of the Council
On: 26 January 2026
To: Delegations

No. prev. doc.: 11765/1/25 REV 1; 11749/25

Subject: Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing Horizon Europe, the Framework Programme for Research and Innovation, for the period 2028-2034 laying down its rules for participation and dissemination, and repealing Regulation (EU) 2021/695
Proposal for a Council Decision on establishing the Specific Programme implementing Horizon Europe – the Framework Programme for Research and Innovation for the period 2028-2034, laying down the rules for participation and dissemination under that Programme, and repealing Decision (EU) 2021/764
- Opinion of the European Economic and Social Committee

Delegations will find attached a copy of the above-mentioned opinion.

This opinion is be available in all language versions on the following website: [Horizon Europe | EESC](#)

OPINION

European Economic and Social Committee

Horizon Europe



- a) Proposal for a Regulation of the European Parliament and of the Council establishing Horizon Europe, the Framework Programme for Research and Innovation, for the period 2028-2034 laying down its rules for participation and dissemination, and repealing Regulation (EU) 2021/695
(COM(2025) 543 final – 2025/0543 (COD))

and

- b) Proposal for a Council Decision on establishing the Specific Programme implementing Horizon Europe – the Framework Programme for Research and Innovation for the period 2028-2034, laying down the rules for participation and dissemination under that Programme, and repealing Decision (EU) 2021/764
(COM(2025) 544 final — 2025/0544 (CNS))

INT/1102

Rapporteur: **Christophe LEFÈVRE**

Advisor	Véronique CHAPPELART (for the rapporteur)
Legislative procedure	a) EU Law Tracker
Referral	a) Council of the European Union, 25/9/2025 European Parliament, 12/11/2025 b) Council of the European Union, 25/9/2025
Legal basis	Articles 173(3), 182(1) and 188 (2) of the Treaty on the Functioning of the European Union
European Commission documents	a) COM(2025) 543 final — 2025/0543 (COD) b) COM(2025) 544 final — 2025/0544 (CNS) Summary of COM document
Relevant Sustainable Development Goals (SDGs)	SDG 3, 6, 7, 9
Commission responsible	Section for the Single Market, Production and Consumption
Adopted in section	8/1/2026
Adopted at plenary session	22/1/2026
Plenary session No	602
Outcome of vote (for/against/abstentions)	178/0/2

Recommendations

In the current context, characterised by increasingly complex global challenges (green and digital transitions, the global water crisis, strategic competition with global actors such as the US and China), the European Commission's proposals represent a strategic and radical change for the future of the EU, in line with the Draghi and Letta reports.

1. Recommendations

In the current context, characterised by increasingly complex global challenges (green and digital transitions, the global water crisis, strategic competition with global actors such as the US and China), the European Commission's proposals represent a strategic and radical change for the future of the EU, in line with the Draghi and Letta reports.

The European Economic and Social Committee (EESC)

1.1 urges the co-legislators to support the new approach to strengthening the EU's industrial competitiveness, as well as its technological leadership and civil, industrial and societal preparedness, and to direct financing for research and development (R&D) and innovation activities towards clear competitiveness targets;

1.2 considers the indicative budget of EUR 175 002 000 000 proposed for the period 2028-2034 to be encouraging and that it sends out a strong signal of support for scientific excellence and the aim of investing in research and innovation (R&I) and disruptive technologies. However, the EESC recommends that it be used only as a baseline figure for discussions between the Council and the European Parliament, and that particular attention be given to clean technologies where the EU can develop comparative advantages and reinforce its strategic autonomy;

1.3 believes that the budget should specify the alignment between resources and clearly defined results, and should also include measurable key performance indicators, including those used to assess success and impact against the specific objectives of the programmes; such objectives include the participation of SMEs and EU candidate countries, and shortening the time-frame for awarding grants to an average of 120 days (90 days for fast-track grants), thus guaranteeing accessibility, fairness, efficiency, administrative simplification and proportionality;

1.4 deems it imperative to improve monitoring the use of funds and to identify obstacles to their use or factors in underspending in certain countries: measures are needed to better steer the scheme, to support researchers and to encourage them to use EU funds for research;

1.5 recommends maintaining and correctly aligning Horizon Europe and the European Competitiveness Fund, particularly the fund's four policy components and the corresponding activities under Pillar II of Horizon Europe 'Competitiveness', while focusing on the need to cover the entire innovation cycle and all stages of the 'investment journey';

1.6 recommends that, in order to support the entire innovation cycle from fundamental research to placing on the market, project assessment and selection procedures must not only be based on scientific excellence, but also on additional assessment criteria designed to better understand commercial relevance, industrial impact and the contribution to European strategic autonomy and competitiveness of European industry;

1.7 considers that, in addition to the close coordination and connection that is needed between Pillar II of Horizon Europe and the European Competitiveness Fund, stronger synergies are essential, even between the different pillars of Horizon Europe, and including between these pillars and the European Competitiveness Fund;

1.8 recommends that the budget for funding R&I relating to global societal challenges, including strengthening democratic values and foundations, citizen participation, promoting social inclusion and social acceptance of technologies under Pillar II ‘Competitiveness and Society’, be increased in order to remedy the significant imbalance in the proposal that favours the ‘Competitiveness’ component;

1.9 recommends maintaining a four-year term of office, renewable once for the President of the European Research Council (ERC), instead of reducing it to two years, extendable once for up to two years, as set out in Article 6(4) of the proposal for a Council Decision on Horizon Europe;

1.10 considers that Pillar I relating to research and excellent science in the Marie Skłodowska Curie Actions (MSCA) (Article 9 of the proposal for a Council Decision on Horizon Europe and Article 13 of the proposal for a regulation) should not be guided by any particular policy stance, and recommends maintaining a bottom-up focus (‘directionality’) instead of the top-down focus proposed by the Commission. In particular, the new Horizon Europe programme places too little emphasis on basic research, to the benefit of applied research and technological innovation. In the long term this could undermine Europe’s ability to produce disruptive knowledge;
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(* TRAD AM1 - EESC-2025-02760-01-00-AMP-TRA *)

1.11 calls for the intention of ‘Making the Moon accessible to Europeans’, as envisaged in the preamble to the proposed regulation, through ambitious ‘moonshots’ projects with a strong scientific component, boosting EU-wide value creation and strategic autonomy, to also be incorporated into and spelt out in the regulation, if only in subsequent implementing acts;

1.12 recommends that the key role of European universities should not be neglected for the sole benefit of start-ups and SMEs in the European innovation ecosystem, as this could reduce the scope of the European Innovation Council’s action. At the same time, industry involvement in the European Innovation Council’s Pathfinder, Transition and Accelerator instruments will be important for increasing the impact of research activities. Synergies between public research and the private sector should be increased;

1.13 recommends the utmost caution regarding the condition of 3% of GDP, provided for in Pillar IV ‘European Research Area’ in the proposed regulation, for the financing of capacity building measures from 2030 onwards, as it is in danger of affecting beneficiaries in countries with lower R&I capacities;

1.14 recommends that the flat-rate model not be the only research programme funding model, but rather that such funding be flexible and adapted to the diversity of research activities;

1.15 recommends that the 20% ceiling laid down in Article 18(2) of the proposed Horizon Europe regulation on the funding of research and technology infrastructure be strictly respected: the Horizon Europe programme must not be used to cover the costs of constructing the buildings needed to install this infrastructure, otherwise there is a risk that Horizon Europe would be deflected from its objective of funding research;

1.16 recommends that audit and control mechanisms be adapted and based on risks, in order to reduce the administrative burden for low-risk or micro beneficiaries, while maintaining sound financial management and the responsibility resulting from this;

1.17 notes that the proposed regulation provides for Horizon Europe to be able to support research in the field of dual-use and defence applications. On 8 October 2025 the Council agreed that the budget should follow this approach. The EESC recommends that the legal basis for determining which parts of Horizon Europe will be allocated to these areas should be explicitly laid down in the proposal for a regulation;

1.18 considers that the European Commission should set up mechanisms for the recovery of funds in the event of the transfer of patents, shares or capital to non-European entities that have indirectly benefited from EU funding as a result of such transfers;

1.19 urges the Commission and Member States to integrate an inclusive dimension in all entrepreneurship policies, with particular attention paid to the role of the social economy;

1.20 reiterates its call to include sustainable use of water as a criterion in all EU funds, including Horizon Europe. Funding should support research into and uptake of water-efficient technologies, as well as the jobs and skills needed to support the twin transitions and water resilience in industrial sectors;

1.21 recommends that the Commission examine the flexibility of procedures and requirements for applying for funds to identify potential obstacles and ensure that they are accessible to applicants representing social minorities or at-risk or vulnerable groups.

2. Explanatory notes

Arguments in support of recommendation 1.2

2.1 Any cut in the budget to below EUR 175 billion would be to waste an opportunity at a time when sustained, increased investment in R&I is more crucial than ever for the EU's competitiveness, resilience and prosperity. In fact, exceptionally high inflation and rising costs across Europe are likely to reduce the impact of the aims set out in the proposals for a Council decision and regulation.

2.2 The EESC considers that, as things stand, it is difficult to assess the proposed budget increase and translate it into allocations to the various research programmes.

2.3 With the exception of Pillar II 'Competitiveness and Society', the proposed regulation does not provide a detailed breakdown, meaning that other key components such as the European Research Council (ERC), the Marie Skłodowska-Curie Actions (MSCA) and the European Innovation Council (EIC) were presented only as part of a broader package, making it impossible to assess the extent to which the Horizon Europe aims would be achieved.

Arguments in support of recommendation 1.3

2.4 The effectiveness of the budget must be seen as more important than the volume announced. Proposing impressive figures without ensuring their impact serves no purpose because the size of the budget is less relevant than its actual composition.

Arguments in support of recommendation 1.4

2.5 This would also avoid a brain drain to other continents. In the same vein, it is necessary to examine the reasons why some structures manage to be granted these funds while others do not. In a number of previous opinions, the EESC has pointed to the lack of support structures for putting together co-financing dossiers, red tape and difficulty in accessing information relating to funding programmes. In addition, the lack of stable and continuous support from Member States for research reduces the opportunities to participate in funding programmes. Precarious employment in research, which leads to brain drain, and a lack of skills, particularly language skills, are limiting factors.

Arguments in support of recommendation 1.5

2.6 The governance of both programmes must be effective and transparent, and based on clear implementation mechanisms. The Competitiveness Coordination Tool that was announced must guarantee and maximise the complementarities and synergies between both programmes and the financing instruments. At the same time, the Strategic Stakeholders Board of the European Competitiveness Fund should play a key role in defining priorities and ensuring alignment.

2.7 However, the EESC welcomes the focus placed on collaborative research and partnerships, which are essential tools for pursuing competitiveness targets and stimulating innovation, as well as on the effective use of resources, sustainability, achieving significant results and economic growth. Financing instruments and forms of funding that are designed according to industrial logic and developed adopting a bottom-up approach must also be provided for.

2.8 Besides large companies, innovative SMEs, start-ups, scale-ups and small mid-caps must be recognised as drivers for research and innovation, job creation and competitiveness in the European economy and therefore be empowered to take on leading roles in collaborative projects and to access simpler, more direct and more specific financing mechanisms.

Arguments in support of recommendation 1.7

2.9 This is essential for covering the entire investment journey, for translating the results of the ERC and the EIC into marketable services and products and creating a continuous innovation pipeline starting from fundamental research (Pillar I) through to market deployment (Pillar III), while passing through applied research and technological development to address major societal challenges (Pillar II), with the support of the ‘enabling’ activities under Pillar IV.

Arguments in support of recommendation 1.8

2.10 This concern stems from the vagueness, not to say inconsistent use of language in Article 11 Collaborative research of the proposal for a decision on Horizon Europe, which refers to the Horizon Europe programme, and Article 15 Collaborative research of the proposal for a regulation establishing Horizon Europe, the Framework Programme for Research and Innovation, for the period 2028-2034, which refers to the European Competitiveness Fund. The new Competitiveness component of Horizon Europe in Pillar II seems to be part of Horizon Europe, but it is presented as if it has already been integrated into the European Competitiveness Fund. This ambiguity undermines the stated commitment to a truly independent Horizon Europe programme. Greater precision and consistency are needed.

2.11 Moreover, the budget breakdown provided for Pillar II shows that there is a striking imbalance between the two components, with more than EUR 68 billion for the ‘Competitiveness’ component and only EUR 7.6 billion for the ‘Society’ component.

Arguments in support of recommendation 1.9

2.12 Founded in 2007, the ERC was created to support high-risk and high-gain innovative research through a bottom-up and research-led approach. The proposal to shorten the term of office of the ERC President is worrying, as this would inevitably weaken a key guarantee of ERC autonomy and its mission to support excellent basic research, especially as it is long term research. The EESC sees no valid reason to shorten the term of office of the President and considers the argument that the duration of the ERC presidency should be aligned with that of the EIC to be irrelevant.

Arguments in support of recommendation 1.10

2.13 Fostering sustainable careers – an expression which has yet to be defined and clarified – supporting research careers worldwide at all stages thereof and encouraging research excellence: all these measures do not seem to fit with strategic and policy synergies decided by the ERC, because of the risk of a top-down focus ('directionality'), which would allow policymakers to impose research topics. This would reduce the resources available for bottom-up projects which provide researchers with the freedom to define their own research topics, as an inherent, distinguishing feature of MSCA is the bottom-up nature of the research.

2.14 The existing trend of reducing the number of calls for projects that cover lower technology readiness levels (TRLs) is worrying in this respect. Indeed, in the first two years of Horizon 2020, 20% of calls were for projects with a lower TRL compared to only 14% of calls in the first two years of Horizon Europe.

2.15 This trend stands in the way of the transformations necessary to address local and global societal challenges and deliver on key commitments such as the European Green Deal and the digital transition. The European Union depends on scientific and technological developments that cover all TRLs, as well as on a sound scientific basis and frontier research, as set out in the Lund Declaration.

2.16 Given the trend that has been observed, the EESC has every reason to believe that this will continue.

Arguments in support of recommendation 1.9

2.17 It is essential that beneficiaries are properly consulted on the approach taken in Pillar II, especially given the break in the strategic planning process. Although the proposals for a decision and a regulation for Horizon Europe and the European Competitiveness Fund indicate that some consultations will take place on the envisaged policy guidelines, how stakeholders and beneficiaries are to be involved in other important aspects of the pillar is as yet unclear.

Arguments in support of recommendation 1.12

2.18 The selection of projects under Pillar IV 'European Research Area', the sources of funding and their link to existing missions and partnerships must be specified.

Arguments in support of recommendation 1.13

2.19 In its proposals, the Commission only refers to support for innovative start-ups and SMEs in the context of EIC action, to the detriment of academic researchers and universities, which is

contrary to the current situation. Explicit recognition of the role of universities in early and high-risk innovation is essential to harness the full potential of European innovation.

Arguments in support of recommendation 1.14

2.20 Countries that have not increased their real public investment in R&I compared to the previous year would no longer be eligible for funding for capacity building. A criterion of performance in R&I would make more sense. It should be noted that the EU has not met the Lisbon strategy target of 3% of GDP being devoted to R&D. The 2024 Draghi report highlights the risk of Europe falling behind the US and China.

Arguments in support of recommendation 1.15

2.21 This form of financing could be well suited to short term projects, but complicates the planning and execution of long term and high risk research, as well as large scale collaborative initiatives. Creating a single set of rules for all programmes could be very complex and undermine the added value of the specific activities of each sector. The restructuring of Horizon Europe should focus on improving efficiency and simplification for beneficiaries instead of creating additional administrative barriers.

Arguments in support of recommendation 1.15

2.22 The Structural and Investment Funds seem better suited to the financing of buildings for research and for technological infrastructure.

Arguments in support of recommendation 1.17

2.23 The flat-rate payment method could be considered a positive move towards a more agile and simplified financing environment as it reduces red tape and the complexity of financial reports, thus allowing beneficiaries to focus more on the results and impact of projects rather than compliance with procedures.

Arguments in support of recommendation 1.18

2.24 Only the European Innovation Council explicitly provides for supporting innovation in critical defence-related technologies. This area is included only in the explanatory memorandum of the proposed regulation and has no specific legal basis. Moreover, some third countries will be further excluded from tendering. In addition, this expansion of the scope of Horizon Europe means that beneficiaries will have to adapt their rules on security and controlling access to research sites. This should be clearly reflected in the calls for tender, which should also explicitly state that research will be applied to dual-use and military items.

Arguments in support of recommendation 1.19

2.25 There are currently no safeguards that prevent founders, particularly founders of start-ups, from increasing the value of their personal investment through the sale of patents or shares to non-EU partners, even where EU funds have extensively financed research and innovation. While it is difficult to prevent such divestments, it should be possible to recover part of the financing that has given rise to capital gains.

Arguments in support of recommendation 1.20

2.26 A comprehensive EU water policy must be accompanied by an equally ambitious financing plan. The EESC considers that EU funds are vital for closing the existing investment gap and reiterates its call for a strategic, dedicated multiannual investment plan and an adapted funding framework for water infrastructure, skills, technologies and research.

2.27 Europe should seize the opportunities of its global leadership in water technologies (the EU owns 40% of all water-related patents) to trigger a paradigm shift in the way we use water by investing in resilient water infrastructures, circular water loops, cascading use, digital management and inclusive water governance.

Arguments in support of recommendation 1.21

2.28 In particular, the funds should be accessible to applicants that represent persons with disabilities, people in precarious situations and people and communities that face discrimination on the basis of their ethnic or racial origin or sexual orientation.

2.29 101 million people in the European Union have a disability (Eurostat, 2023) – they come up against strict requirements and procedures for accessing funding, and care must be taken to ensure that they are not excluded from it.

Brussels, 22 January 2026.

The President of the European Economic and Social Committee
Séamus Boland
