

EUROPEAN RESEARCH AREA BOARD

ERAB views on the communication “Simplifying the implementation of the Research Framework Programmes” COM(2010) 187.

1. Some General comments on the communication

Probably the focus of most criticism of the Framework programme by both individual researchers and industry is the excessive bureaucracy that is counter to the culture of research and innovation. It is the most frequently cited reason that industry (especially SMEs) do not apply for FP funding. At the recent ERAB conference held in Seville on 5-7th May it was top of the issues raised by young researchers in receipt of ERC grants. It is vital that this issue is addressed if the future innovation agenda is to be successful in supporting high risk research and innovation..

ERAB fully endorses the ambition of the EC to reduce this burden

ERAB recognises that there is a desirable, unavoidable and necessary need to have a reasonable level of accountability to ensure that the funding from the EU is spent in a correct manner. If the EC can get the balance right between monitoring for the correct use of the funds without excessive intrusion in the *modus operandi* of the research groups, then multiple benefits will follow including a greater engagement of industry and a greater devotion of effort to the inventive side of research rather than the bureaucratic aspects.

ERAB recommends simplification ex ante the introduction of the research and support programmes focussed via the flagship project "Innovation Union"

ERAB recognises that the pressure to have a reasonable level of specific monitoring comes from other actors in the EU including the member states and the Members of the European Parliament. However the tendency to apply rules from one sector of EU support (e.g. Agriculture) to another (e.g. Research) ignores some crucial cultural and functional differences that underpin quite unrelated activities.

Notwithstanding the fact that some of the procedures are imposed on the Commission, those engaged in R&D funded through the FP'ss have the EC and its services as their interlocutor and hence the message in the communication from the Commission will attract very significant attention, not least because the Commissioner has identified simplification as one of her major goals.

The document is also an opportunity for DG Research to state the specificities of the actions that are delivered by its programmes and hence the need for administrative processes that are apt for its mission. Above all, research inherently carries an element of risk and in general the exact timing of delivery of steps towards a research goal cannot be predetermined accurately.

Although the general ideas behind a research programme are known at the outset, if the results are so predictable then there is little value in undertaking the research. Researchers explore the unknown and need to be fleet footed to take advantage of whatever unexpected results are found. In general, most researchers are driven by curiosity and not by financial reward in the first place and work in Institutes that are in turn heavily monitored in the national systems..

It should be noted also that those that receive an FP grant are frequent applicants for further support for related or new research activities. This means that their performance is examined not only ex post an award but again when a new application is made. With such a captive community, the negative consequences of inappropriate behaviour or failure to deliver on a grant are multiplied and would militate against that individual having a successful career.

ERAB has already urged in its first annual report that that these actions would include recognition of the inherent risk in research programmes. Also ERAB proposed that a code of ethics be drawn up for researchers which among other elements would take into account financial responsibility,

2. ERAB's Specific Proposals

Much in the document is very positive especially many aspects in strand 2 and we do not comment on them further. Our suggestions are focussed on the factors that arise from the particularities of the research domain and are informed by the discussions at the ERAB conference and by our collective and diverse experiences.

(1) Bring an immediate halt to the requirements for timesheets that monitor the time commitment of researchers to the project and sub themes within it.

The need to maintain timesheets for those employed to deliver a research project has become the symbol of "EC Bureaucracy ".It was the point made most frequently at the Sevilla ERAB Conference by researchers and heads of research institutes. Research is not a "nine to five" activity and even when away from the laboratory researchers invest considerable time reflecting on the problems they are working on, the data that they have produced and the new information they have read from other groups that has to be integrated into their work. Timesheets are not appropriate for this group or culture. Anecdotal information points to a low factual collaboration between the time sheet and the actual time spent. This is not because of a desire to act in a fraudulent manner but rather because of a mis-match between the reality of the practice and the presumptions, based on an industrial and manufacturing environment, that underpin the use of time-sheets. ERAB is convinced that the benefits of the timesheet process are minimal and the reputational damage to the EC is disproportionately high by the continued use of this tool.

ERAB believes that an immediate announcement of the discontinuation of the use of timesheets would attract very significant positive publicity for the Commissioner and the EC.

(2) Set targets for the time from application to time of grant and from decision to award to time to pay.

The Communication recognises (eg in section 3.1) the need to improve these parameters. It also anticipates reductions of several months in these times if some of the proposals are introduced. However a more powerful indication of the seriousness of intent would come from the publication of specific targets for each of these steps. By showing data for the current situation and monitoring the reductions in time achieved by the changes introduced, the EC would show that the impact of the measure introduced match the goals for simplification that are announced.

In addition, this move would introduce predictability into the system and this would be very important, especially for SME's that have to be very sensitive about cash-flow.

(3) Expand the use of prizes to minimise bureaucracy for the ERC.

The aims of the ERC are different from those of other parts of the FP. The Communication helpfully points out that prizes have been provided for in the financial regulations. These seem to be particularly appropriate for the awardees of funds through the ERC programme. It is recalled that the ERC was established and justified on the basis that competition between the best researchers in Europe would stimulate even higher quality research and hence those that are awardees are in effect 'winners' in a competition. Prizes are very appropriate given this construction of events. The fact that the applicants are individuals, adds to the appropriateness. And the research that is performed in the ERC funded laboratories is, by definition, at the frontiers of knowledge where there is and should be a high level of unpredictability and hence a greater difficulty of matching the research to the usual milestones and pre-defined deliverables associated with other parts of the FP.

Prizes therefore would address many problems, would receive very high visible appreciation from the awardees, would provide an opportunity for a Prize winning ceremony with attendant positive PR consequences and are very suited to this subset of the FP.

(4) Do not implement Strand 3 of the communication

Whereas there is an implicit benefit in terms of simplification if the focus moved to results based rather than cost based funding, it is a suggestion that does not match the reality of those involved in research activities. Put simply, an SME could not afford to take the risk that, despite performing all the research that had been proposed and accepted at the time of application, the results would be 100% in line with those anticipated.

It has been pointed out above that there is an inherent risk and uncertainty in research and hence this proposal would inevitably lead to a complete exclusion of many researchers, would result in research that was very predictable and incremental and often that is not research that has a high impact.