



**Committee of the Regions**

**EDUC-V-006**

**6th Commission meeting  
18 November 2010**

**DRAFT OPINION  
of the  
Commission for Education, Youth, Culture and Research  
on  
SIMPLIFYING THE IMPLEMENTATION OF THE RESEARCH  
FRAMEWORK PROGRAMMES**

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This document will be discussed at the meeting of the **Commission for Education, Youth, Culture and Research** to be held **from 11 a.m. to 3.30 p.m. on 18 November 2010**. To allow time for translation, any amendments must be submitted by email to the commission secretariat **no later than 8 November 2010** (email address: [educ@cor.europa.eu](mailto:educ@cor.europa.eu))

Reference document

Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions - Simplifying the implementation of the research framework programmes  
COM(2010) 187 final

## **I. POLICY RECOMMENDATIONS**

### THE COMMITTEE OF THE REGIONS

1. welcomes the intention, expressed by the European Commission in the communication on "simplifying the implementation of the research framework programmes", to facilitate the interinstitutional debate on the administrative and financial simplification of the programme rules;
2. acknowledges that a number of simplifications have already been introduced that have resulted in improvements to the Seventh Framework Programme (FP7) and accepts that some of these measures need time to have a real impact but nonetheless highlights that FP7 is still a complex programme whose management is characterised by excessive bureaucracy, low risk tolerance, poor efficiency and undue delays;
3. highlights the direct link between the rules and procedures that apply to the FP7, its attractiveness to prospective participants and the quality of the research performed. In this regard, stresses that simplification must be achieved with the end-user/beneficiary in mind and must outweigh the costs of its implementation;
4. considers that the timing and sequencing of changes/simplifications is important, as project promoters require certainty and stability in the rules and their application. Also, believes that continuity is essential to a seamless transition from FP7 to FP8 and ensuring that Framework Programmes' goals are attained;
5. understands that the FP7 and its associated instruments is seen by many as disjointed; recognises at the same time, a need to address the myriad of R&D policy structures at EU, national and sub-national levels through a more holistic governance approach;
6. considers that the role of the National Contact Points (NCPs) needs to be assessed, to deliver a more effective service for potential participants in the Framework Programme; furthermore considers that despite improvements some negative perceptions remain which the NCPs could help dispel;
7. recognises that in tandem with the simplification of the FP7 a number of other related measures are also under consideration, or need to be, such as the triennial revision of the Financial Regulation.

#### *Management of the FP7 and simplification within existing rules*

#### *Guidance and Support*

8. notes that complexity is itself a major source of error and irregularity; calls for simplification in the documentation and amount of information required to participate in projects, and also reduction in the number and size of official documents;

9. calls for a narrowing or harmonisation of the "constellation" of intervention rules and streamlining of grant conditions, to be sought with uniform guidance and on-line supports available;
10. emphasises the importance of consistent and unambiguous interpretation and communication of the meaning of rules, regulations and definitions for all stakeholders;
11. stresses the need for uniform application of rules and coordination of controls and audits from the different services;
12. is concerned about: the length of time in receiving clarification and guidance; the discretionary interpretation of the mandate of project officers to negotiate; the retrospective application of new 'rules' or interpretations;
13. suggests the introduction of new mechanisms for both the efficient provision of constructive feedback to unsuccessful applicants and the dissemination of the results of FP7-funded projects;

#### *Structure and Timing of Calls for Proposals*

14. supports the introduction of a two stage assessment process to avoid the enormous wasted effort and cost incurred in preparing detailed proposals which are subsequently not approved. This is a high but hidden cost of the current appraisal system;
15. suggests introducing fixed deadlines (e.g. 60 days) for evaluation of applications and also a fixed deadline for completion of contract negotiations (another 60 days); notes that this could help to lower participation barriers for smaller local and regional actors;
16. supports the proposal to allow smaller consortia, which could significantly help secure greater flexibility and, thanks to simpler management, lead to greater efficiency;
17. welcomes efforts to simplify the combinations of funding rates, organisation types and activity types but cautions against the introduction of a single reimbursement rate for all categories of organisation;
18. is concerned, that in an effort to shorten "time-to-grant" periods, the proposal to dispense with the input of Member State experts in project selection would have the effect of losing valuable understanding of the research context prevailing in the Member States and regions from the process. Therefore, suggests that instead a more efficient mechanism for channelling such input into the selection process should be considered.

*Better Usage of ICT*

19. welcomes the intention of the European Commission to provide more unique IT tools for the EU research, education and innovation programmes; calls for wider application of E-administration – on-line system for proposals, negotiation and reporting – and; better harmonisation within DG RTD and between DGs;
20. calls for the Research Participant Portal to provide an open, transparent system for making guidance, interpretations and such information available to all (beneficiaries and Commission staff). This would help in terms of consistency in the application of the rules and ensure management efficiencies;

*Extended Usage of Prizes*

21. cautions against possible side-effects of prizes in terms of concentrating funds on a select few bigger entities; notes that prizes should not substitute structured funding but could instead be used to encourage the discovery of new talent and promising ideas;

*Adopting a trust-based approach*

22. considers that the current system and practice of FP7 management are excessively control-oriented and endorses moves to a high-trust and risk tolerant approach to funding research and for that reason welcomes a number of the proposals set out in the communication, in this regard;
23. underlines that financial management and control takes-up a disproportionate amount of project promoters/researchers' time and diverts resources away from the effective implementation of the project and the research effort;
24. welcomes the Commission Communication of 26 May 2010 entitled "More or less controls? Striking the right balance between the administrative costs of control and the risk of error"<sup>1</sup> which proposes specific tolerable rates of error (TRE) for research funding;
25. supports the adoption of a higher TRE for research, ensuring a proper balance between sound financial management and appropriate controls;
26. calls for a broader acceptance of usual accounting rules and practices (as compliant with national accounting and auditing standards), especially for average personnel cost methodologies;

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<sup>1</sup> COM(2010) 261

27. recommends that the Commission analyse the cost-benefit ratio of audits and to present more precise, consistent and transparent rules for audit procedures; cautions that targeted risk-based audits could give rise to higher detected error rates than random samples of expenditure.
28. acknowledges the importance of distinguishing between error and fraud, and of fostering a culture of integrity and trust;
29. suggests that in addressing the risk adverse approach to the FP7 that the EU Staff Regulations needs to be re-considered on the issue of personal liability. Furthermore, suggests a programme of continuous training (especially on contract management) for European Commission project officers and auditors; also recommends the provision of common guidance for all staff on the implementation of the Framework Programme (FP), with a view to improve consistency.

*A shift to a results-based approach*

30. acknowledges that a proposed move to a results-based funding mechanism is well intended but suggests that it could have a number of unintended consequences, such as leading to a risk-adverse (at least less-risky) approach to research, less likely to push the boundaries and thus undermining the emphasis on excellence but also placing increased burden on the potential beneficiary in the proposal stage and lead to longer "time-to-grant" periods;
31. has therefore yet to be convinced by a move to results-based research but welcomes the proposed pilot action to test this approach, as the CoR considers that a combination of directed and non-directed research may be more appropriate in addressing future research challenges;
32. supports the approach suggested by the European Parliament for a "science and technology" or "science and innovation" based approach<sup>2</sup>, rooted in sound scientific/technical quality criteria; relying on realistic management practices; acknowledging the commonalities and differences between science, technology development and market diffusion.

*Achieving a better balance between excellence and cohesion*

33. considers that complexity of the current FP7 heavily favours existing beneficiaries and thus reinforces the research and innovation gap between research-successful and lagging regions;
34. stresses that effectiveness should be judged not just on the achievement of excellence in research activities, but also on the building of research capacities and absorption potential across all territories of the EU in line with the principle of territorial cohesion. European

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<sup>2</sup> 2010/2079(INI), adapted from paragraph 26.

research should not only be about global flagships or consolidation of research leadership of a small number of regions; it should also be about achieving balanced participation without compromising excellence;

35. appreciates the Research Potential of Convergence Regions programme in the Capacities Programme, as an important step in developing regional capacities and facilitating participation by these regions in R&D activity; and considers that the Regions of Knowledge measure has had some success as a stimulus for regional and local authorities to work with universities and research centres in developing projects as well as local and regional R&D strategies;
36. suggests that the next Framework Programme further expands such programmes and incorporates a scheme for mainstreaming the participation of competent partners from research-lagging regions in projects and programmes led by their better known, excellent peers, through mentoring schemes or other means; notes, in this regard, the potential of local and regional actors to nurture 'hubs of competence' linked to 'poles of excellence';
37. suggests more frequent calls under such programmes than the current one per year;
38. supports on-going efforts at coordination between Structural Funds (SF) and Framework Programmes (FP)<sup>3</sup>; but notes, in this regard, the need to better develop consistent rules, procedures and practices, and to coordinate calls for proposals;
39. emphasises, however, that EU Regional Policy must be used for the purpose as defined in the Treaty, which is to support cohesion and stresses the need to avoid creating the perception that second-class projects, that do not make the cut under the research programme, can find a route to financing through the Structural Funds;
40. appreciates the potential to create pathways between the FP and other EU programmes, whereby Structural Funding could be used to support projects that have met all excellence criteria in the FP evaluations and suggests that these pathways could be two-way, with projects developed under the Territorial Co-operation programme, for example, having easier access to FP programmes;
41. suggests that in the coordination of research programmes, the ERA-NET scheme needs to be simplified, as regions have found it to be too restrictive; believes that regions need to be enabled to develop similar initiatives to those offered to central governments in the framework of Joint Programming.

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<sup>3</sup> (2009/2243(INI))

## II. PROCEDURE

<b>Title</b>	Simplifying the implementation of the research framework programmes
<b>Reference(s)</b>	COM(2010) 187 final
<b>Legal basis</b>	No explicit reference to TFEU. Possibly relevant: TFEU Title XIX (research) and article 322 (financial regulation review)
<b>Procedural basis</b>	-
<b>Date of Council referral/Date of Commission letter</b>	30 April 2010
<b>Date of Bureau/President's decision</b>	
<b>Commission responsible</b>	Commission for Education, Youth, Culture and Research (EDUC)
<b>Rapporteur</b>	Fiona O'Loughlin (IE/ALDE)
<b>Analysis</b>	24 July 2010
<b>Discussed in commission</b>	Working document discussed on 27 September 2010
<b>Date adopted by commission</b>	
<b>Result of the vote in commission</b>	
<b>Date adopted in plenary</b>	
<b>Previous Committee opinions</b>	<p>CdR 155/2005: Seventh framework programme of the European Community for research, technological development and demonstration activities (OJ C 115, 16.5.2006, p. 20-26)</p> <p>CdR 283/2008: European research infrastructure and joint programming in research (OJ C 76, 31.3.2009, p. 6-13)</p> <p>CdR 118/2006: The leverage effect of the structural funds (OJ C 156, 7.7.2007, p. 1-7)</p> <p>CdR 442/2001: The Regional Dimension of the European Research Area (OJ C 278, 14.11.2002, p. 1-5)</p> <p>CdR 263/2007: More efficient support to research and innovation: Coordinating the use of the Research Framework Programme and the Structural Funds (OJ C 105, 25.4.2008, p. 1-6)</p> <p>CdR 83/2007: Green Paper on the European Research Area – New Perspectives (OJ C 305, 15.12.2007, p. 25-29)</p>



	<p>CdR 174/2007: Mid-term review of the strategy on life sciences and biotechnology (OJ C 105, 25.4.2008, p. 7-10)</p> <p>CdR 56/2008: Single market, social vision and services of general interest (OJ C 120, 28.5.2009, p. 6-11)</p> <p>CdR 339/2006: The future of the single market and stocktaking of European society (OJ C 156, 7.7.2007, p. 14-17)</p> <p>CdR 40/2006: Modern SME policy for growth and employment (OJ C 229, 22.9.2006, p. 53-56)</p> <p>CdR 258/2004: Proposal for a decision of the European Parliament and of the Council establishing an integrated action programme in the field of lifelong learning (OJ C 164, 5.7.2005, p. 59-64)</p> <p>CdR 307/2003: Proposal for a Decision of the European Parliament and of the Council on a single framework for the transparency of qualifications and competences (OJ C 121, 30.4.2004, p. 10-14)</p>
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