

Simplification in the 7th Framework Programme

The Royal Society of Edinburgh (RSE) is pleased to comment on the EU Commission consultation on simplification in the 7th Framework Programme (FP7). The RSE is Scotland's premier Learned Society, comprising Fellows elected on the basis of their distinction, from the full range of academic disciplines, and from industry, commerce and the professions. These comments have been compiled by the General Secretary, Professor Andrew Miller and the Policy Officer, Dr Marc Rands, with the assistance of a number of Fellows with considerable experience in this area.

We welcome the broad thrust of the proposals for simplification of FP7. Investment in research and development (R&D) is a key driver of innovation and the competitiveness of economies. However, the initial implementation of the Framework 6 programme was both too complex and too onerous for many former participants, meaning that it was not as successful as it could have been in providing a stimulus to European science and innovation. In this context, the Commission inter-services working group is a valuable step forward and could be used as an opportunity to move towards standardisation of both rules and procedures for research funding from all areas of the Commission.

The specific details identified in the working document are addressed below:

A simple set of funding schemes allowing continuity with the instruments of FP6 and providing a broad flexibility of use

Increasing flexibility is a positive change. However, this has to be combined with rights and obligations that can be understood easily by all participants and flexibility can sometimes lead to further problems when there is confusion over these issues. Participants, therefore, should be given as much notice as possible relating to the actual rules themselves, upcoming calls, and types of instruments that will be applicable.

Consistent, high-quality communication

We strongly agree with the rationalising of information. This information should be easy to interpret and therefore useful on a practical level.

Setting up a single clearing house is also a useful development. In the past, the internal pressures and deadlines placed on EC Desk Officers were sometimes passed on to participants, so that the apparent flexibility was lost. Commission staff were also often unable to give straightforward answers to simple queries. Desk Officers should therefore have a clear and consistent understanding of the rules and rights of participants and enforce these consistently.

Rationalisation of the requests for information addressed to the participants

We support a two stage process for FP7 applications.

Guaranteeing the protection of the Community's financial interest without imposing an undue burden on participants by reducing a-priori controls to a bare minimum

In connection with the three main measures proposed:

- Both an organisation's history and their track record with EC funding should be considered when looking at their suitability to perform a project. An organisation should not need to repeatedly evidence that they have the required resources.
- The list of requirements that all Directorate General's (DGs) will use should only include what is strictly necessary for the purpose. This list should not just be a combination of the wishes of each individual DG.

- When dealing with collective financial responsibility, it can be extremely difficult to resolve disputes between partners. The one body that is in a position to mediate and resolve these conflicts amicably is the Commission, as all parties would generally adhere to a decision by the EC. However, the Commission often refuse to get involved on these disputes, as they are not going to suffer the loss, and so leave some participants to carry the cost. It would be helpful, therefore, if the Commission would at least informally mediate in some disputes.

The proposals with regard to Intellectual Property management are also extremely important, and it is clearly the intent to simplify further the provisions, especially on background IP. This is a critical issue for universities as very substantial investment may be made in particular scientific or technical areas, and the protection of this investment would be a major objective for universities when they enter discussions with other European partners.

In connection with the Marie-Curie outgoing Fellowship schemes, there are currently problems in the level of financial risk being born by universities. An outgoing Marie-Curie Fellow who refuses to return incurs no penalty for renegeing on their contract, whereas a penalty of over 100,000 Euros is borne by the university from which they came.

Full operational autonomy entrusted to consortia

With regard to the grant agreement, although the rules are based on reasonable principles, in the past it has often been difficult to get practical guidance on what was actually acceptable within these rules. The only time interpretation of the rules was confirmed or rejected was during an audit, with expenditure often disallowed for not meeting the exact rules of the grant agreement, despite the funding being spent on the project. These misunderstandings can be expensive and organisations have been put off going for EC funding due to bad experiences with these audits. Hopefully the planned help desks will assist with preventing these issues from arising.

Audit certificates are also expensive due to the cost of employing external auditors and because of the level of guarantee they are required to give. It is difficult to see in what way this will change.

Streamlining the selection process

We welcome any change that leads to a reduction in the delays during the contract negotiation and awarding process and that also increase the time available to Commission staff.

A more extended use of flat-rate financing within a simplified framework of forms taken by Community financial contributions

We have concerns about how both the flat-rate and the lump-sum models can be reconciled with the full economic costing models with which UK universities must work, and how such models will be able to cover the full costs of research carried out under their auspices. There is widespread recognition that all research in universities in the UK has been historically under funded, which has limited their ability to reinvest effectively in research infrastructure and facilities. The current level of overheads provided on European projects is unlikely to cover these full costs, and the net effect will be to make FP7 a relatively unattractive source of research funding, unless the Framework Programme can be changed to provide a higher proportion of projects' full economic costs.

In this context, the proposed simplification of FP7 will only be beneficial to UK universities if the Commission accepts the Transparent Approach to Costing (TRAC) model used within the UK as being an acceptable method of measuring full direct cost. Without this, UK universities will still only be able to claim their additional cost (as they are easy to demonstrate and measure) and so will be no better off than they are in FP6.

To achieve the goal of a sustainable research base all funders need to recognise the need for institutions to invest in the future of the research base and meet more of the costs of the activities they fund. If the sustainability agenda is not supported the Lisbon goals will be achieved at the expense of the infrastructure in universities.

Additional Information

In responding to this consultation the Society would like to draw attention to the following Royal Society of Edinburgh responses which are of relevance to this subject: *The Role of the Universities in the Europe of knowledge* (May 2003).

Copies of this response and of the above publication are available from the Policy Officer, Dr Marc Rands (email: mrand@royalsoced.org.uk) and from the RSE web site (www.royalsoced.org.uk).

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