

Comments on the Rules of Participation and Design
of the 7th EU Research Framework Programme
from Private Non-Profit Research Organisations
in Germany

Introduction

In view of the present, predominantly unsustainable trends, research for sustainable development has to focus on the transformation of society, its patterns of production and consumption, its technological foundations, and the capacities and capabilities of different actor groups. Research cannot limit itself to the scientific exploration of the natural environment and changes in it. Research should prepare and support social and political change, without prejudicing decision processes. Research of this kind has to criticise and be able to take criticism, as well as being constructive and able to identify new approaches. Researchers have to work with those affected, and make the results – also preliminary ones – openly available for discussion; research has to be results-oriented and not stick too close to theory. The promotion of socio-economic and social-ecological research constitutes a beginning in this respect.

In the preparation of the 7th Framework Programme (FP7), DG Research requested suggestions and experiences regarding research policy. These are compiled spontaneously in the following. This paper focuses on two aspects:

- The general need for more Trans-disciplinary Research (TdR)
- The improvement of the Rules of Participation

Trans-disciplinary Research to solve today's major problems

One of the main objectives of the FP7 is given by the Commission's statement "The Lisbon strategy" is, in effect, the EU's programme to solve the equation between economic growth, competitiveness and employment on the one hand, and social and environmental sustainability on the other hand" (COM (2005) 118). In order to meet this objective, Trans-disciplinary Research (TdR) becomes increasingly important as a new mode of knowledge

production in heterogeneous research cooperation with industry and societal groups as partners. TdR is strongly related to Sustainable Development Research, Technology Assessment, and Global Change Research, and it generates a new integrated knowledge base for solving today's major problems. It addresses the twofold integration problems of integrating societal problem understanding in R&D agenda-setting and research practice as well as integrating scientific knowledge of the natural, social and engineering science, and the humanities. Therefore, TdR should be considered in the 7th FP more explicitly as the most appropriate approach for cross-cutting research from the very beginning. Additionally, cross-cutting research should be implemented in all nine themes and knowledge integration should be understood as a crucial scientific competence and potential for innovation and better problem solutions.

Concrete suggestions for improvement of the Rules of Participation

- **Improving funding for training and dissemination in STREPs**

Regarding the projects funded by the European Commission, work-packages which are not strictly speaking research should receive 100% funding in STREPs; as in the case of SSAs and CAs. In addition to management – which can be fully financed in theory, but is strongly capped in practice due to the 7 %-rule – this kind of work includes training, dissemination of results (including their placement in political processes), consultations with interest groups, event management and project-based political consultancy. We appreciate the corresponding changes in this area proposed by the Commission for the rules of participation in actions under the FP7 (COM (2005) 705).

- **Raising financial contribution for private non-profit research organisations**

An improved funding is needed for private non-profit research organisations without substantial institutional funding, which are particularly important for the implementation of inter- and trans-disciplinary projects. The current possibility of financing 50% of the full costs ("FC model") is not sufficient, because providing the remaining own-contributions to the total costs is often not realistic: Being non-for-profit organisations without institutional funding there are very limited possibilities under German legislation to gain the necessary co-funding via profits from our other project activities. Therefore, a funding with a rate lower than 100% exceeds the economic capacity of our kind of organisation and would lead in general to the exclusion of an important component of expert knowledge and competences in the European Research Area (ERA). In fact, this exclusion is already obvious. In principle, we strongly support the Commission proposal for the rules of participation in actions under the FP7 (COM (2005) 705). In the case of a private non-profit research organisation the proposal envisages a financial contribution of a maximum of 75 % of the direct and indirect eligible costs. This proposal leads in the right direction. Nevertheless, the equalisation of funding schemes of universities and private non-profit research organisations fails to provide equal funding opportunities in order to prevent exclusion from the ERA. These research organisations without substantial

institutional funding should be given the possibility of receiving a higher funding rate. In this case – considering applied basic research carried out by non-profit institutions, and assuming marginal marketability – a funding rate of 90% would be adequate (on the lines of the 95% cost-recovery of eligible direct and indirect costs from government grants possible in Germany). A similar suggestion can be found in the “Simplification Paper” of the DG Research for the FP7 which was also the result of a German and French initiative. A further development of the initiative for strengthening the participation of PNP-SME in European research would be extremely desirable.

- **Ensure common interpretation of financial guidelines**

Beyond these issues, a simplification of the financial regulations is necessary; these changes should above all minimise the differences in interpretation between Commission, auditors and project officials. At present, differing interpretations of all sides involved occur again and again, which, particularly in contract negotiation, repeatedly result in the loss of large amounts of time. Helpdesks and “clearing houses” would be a great improvement. In addition, the timely completion of the FP7 guidelines should be guaranteed.

- **Common database for proposer related informations and official documents**

When presenting a proposal, research organisations have to provide a wide range of organisation related informations and official documents (financial statements, bank enquiries, etc.). Separate submission is required for every single proposal. This leads to excessive administrative burdens particularly in the case of small research organisations and SMEs. A common database with access for all Commission services should provide a major simplification.

- **Improving funding instruments for dissemination**

In general, funding requests for dissemination of results, through events, scientific publications, preparation for policy advice and articles in the popular press are not approved or budgets are strongly reduced. Dissemination measures are frequently required by contract to be implemented after project conclusion, and thus occur after the project period for which costs can be recovered. A performance-related funding is needed here, which in the case of institutions without core funding should also cover the human resources deployed. In this way, the relevance and visibility of research and science within society and politics can be increased.

- **Bridging financial gaps between projects**

In institutions which are not mainly state-financed, the question arises of how to keep research teams employed when gaps occur, e.g. between the periods of various projects for which costs can be charged to grants. Without bridging financing, teams must be quickly dissolved and the individual scientists integrated into new ones. Once this happens, the original teams cannot be simply brought together again. A solution could take the form of funding devices with quick and uncomplicated application and approval mechanisms, or in the recognition of the share of (overhead) costs required for generating reserves for transition costs, which provide funds to scientists after a project’s conclusion.

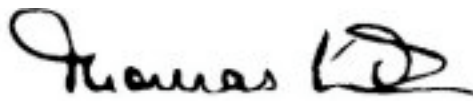
- **Ensuring neutrality of the programme management**

Attention should be paid to the fact that institutions that act as programme-management organisations should not be permitted to apply for project funding. Otherwise a highly questionable situation results: that the recipient of suggestions, applications and proposals ends up competing with the organisations proposing or applying to it.

- **Promoting European integration**

Lastly, with regard to the European integration process we consider it of major importance that this process should be anchored in all DGs of the European Commission with respect to all fields of actions and knowledge. The actual simplification process in the FP7 and the involvement of the so-called third research sector (non-commercial, non-profit, non-state) with its specific expertises and knowledge networks but also administrative constraints are crucial in order to achieve that objective.

Signatories



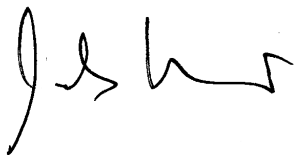
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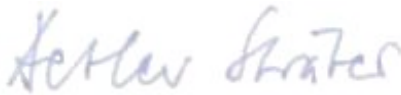


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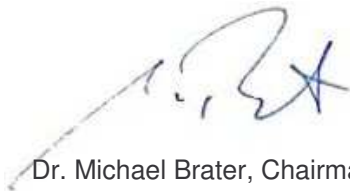
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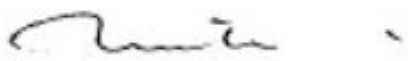


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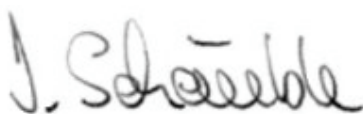


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