CSC- IT Center for Science Ltd.

**EU Call for Feedback on "Proposal for a Decision of the European Parliament and of the Council on establishing the specific programme implementing Horizon Europe – the Framework Programme for Research and Innovation"**
06.08.2018

CSC welcomes the principles and practices of Open Science as the modus operandi of the programme. It is very positive that Horizon Europe aims to foster open access to research data, supports FAIR principles and the further development of EOSC. More emphasis could however be put on data interoperability and the training and skills development aspect of Open Science.

**The three-pillar structure**
It remains unclear how the promised coherence between and within the three pillars emerges and how it helps to achieve the program objectives. Especially, the linkage between pillar 1 "Open Science" and pillar 3 "Open Innovation" needs to be described more concretely, since innovations are ultimately based on achievements of basic research. CSC recognizes that the mission-oriented approach is one way to strengthen the link between the pillars, but more interconnection is needed.

**Pillar 1 "Open Science": Research Infrastructures**
It is crucial that more funding is allocated to Pillar 1 "Open Science", especially to Research Infrastructures (RIs). Pillar 1 has previously shown great European added value, yet compared to H2020, the RI budget decreases 3% (from 2,480 billion to 2,4 billion). Access to RIs has become even more important for both research and innovation, and securing enough funding for RIs is crucial for all science and innovation activities, thus affecting the results within the other pillars as well. RIs are also becoming increasingly advanced and more expensive to develop, which has to be reflected in the funding.

It is encouraging to note that the need to reinforce the international dimension of EU RIs is recognized, and that the international collaboration will be based on excellent science/technology/innovation capacities. Research Infrastructures and e-Infrastructures in particular are global efforts and even more so in the future. What is done in Europe has to comply with other efforts elsewhere. Hence the interoperability aspect and the possibility for Research Infrastructures to become more engaged in addressing multi-layer interoperability issues should be better addressed.

**Background information on budget allocation**
There is no information either in the proposal or in the annexes why the budget is structured the way it is. For transparency, at least the main arguments for the reasoning behind the division of the budget needs to be clearly stated.

**The European Innovation Council (EIC)**
CSC recognizes the ambition of the European Innovation Council to enhance the effectiveness of the programme by bridging the gap between research and commercialization, and the implementation of the EIC itself is very well described. Nevertheless, CSC is concerned about the implementation of EIC´s

instruments. "Bottom-up activities" seem to be a crucial element both in the workings of Accelerator and Pathfinder, but the meaning of "bottom-up" in this context needs a more precise definition. The idea of EIC being a "one-stop-shop" to high-potential innovators also needs a more concrete explanation.

**The mission-oriented approach**
Excellence should remain the key criterion for the selection and evaluation of missions. It is important to include competences and capacities from a variety of fields, and to involve different actors and stakeholders in the planning of missions. However, the focus of citizen involvement should not be to involve citizens in the choice of missions, but rather on dissemination of the results as well as enhancing citizen science. Since there is no separate budget for the missions, it needs to be more transparent how the funding of the missions actually will be allocated.

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