EARTO Response to EC Public Consultation on the European Research Area (ERA) Act

1. Strengthen R&D investment and bring it up to the 3% GDP target to address the current lack of investment

Current situation

To what extent do you agree with the following statements?

	Strongly agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Strongly disagree	No opinion
The EU's innovation gap with other major economies is largely caused by underinvestment in R&D.	◉	○	○	○	○	○
We should reduce disparities in R&D intensity between Member States, which create innovation gaps inside the EU.	◉	○	○	○	○	○
Increasing R&D intensity should be a priority at EU level to boost socio-economic progress and competitiveness in the EU.	◉	○	○	○	○	○

Possible way forward

To what extent are the following suggestions appropriate for EU-level legislation to increase R&D intensity?

	Very appropriate	Somewhat appropriate	Neither appropriate nor inappropriate	Somewhat inappropriate	Very inappropriate	No opinion
Define national R&D intensity targets, where public investments are solid obligations.	◉	○	○	○	○	○
Ask Member States to write multiannual national plans or roadmaps for implementation and monitoring of progress towards R&D intensity targets.	◉	○	○	○	○	○
Ensure the better use of public R&D investments to further mobilise private R&D investments.	◉	○	○	○	○	○

Please provide the reasoning behind your responses and/or additional suggestions. Are there any other key challenges regarding the need to increase R&D intensity or possible ways to address this challenge that you think should be considered?

2000 character(s) maximum

EARTO strongly supports the European Commission (EC)'s renewed ambition to achieve the 3% of GDP target for R&D investment. The next Multiannual Financial Framework (MFF) for 2028–2034 must be designed to make this goal achievable. The proposed €175 billion budget for FP10/Horizon Europe is a positive step, in line with the Draghi and Heitor reports. Strong EU RD&I investment is essential to ensure Europe's technological sovereignty, competitiveness, and resilience, while also encouraging greater private sector investment.

Reaching the 3% target will require the smart mobilisation of all EU funds under the next MFF, with a significant focus on applied, industry-driven RD&I. Such investments are crucial to leveraging private funding, which must complement public spending. EARTO therefore calls for the upcoming ERA Act to include a roadmap with concrete R&D investment commitments from Member States and EEA EFTA countries. These commitments should be embedded in national and regional reform plans and monitored through a new EU RD&I Semester, as proposed in the Draghi report.

Finland is highlighted as a best-practice example. The R&D Funding Act, effective since January 2023, legally mandates annual increases in public R&D spending through 2030, aiming for 4% of GDP. Importantly, it links public investment to private leverage, targeting €2 of private R&D investment for every public euro invested.

Finally, EARTO underlines the need to better demonstrate the economic impact of RD&I investments. It recommends that the ERA Act support the development of an EU-level methodology to measure these impacts. Research Performing Organisations (RPOs), which already collect extensive data on collaborative RD&I, could play a key role in developing econometric models to assess returns on public R&D spending. This would help refine public policies and maximise the impact of publicly funded research.

2. **Greater alignment of R&I investments, policies and programmes between the EU and Member States, and between Member States**

Current situation

To what extent do you agree with the following statements?

	Strongly agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Strongly disagree	No opinion
The lack of mechanisms to coordinate and prioritise research and innovation policies at EU level reduce the effectiveness of R&D investments.	○	◉	○	○	○	○
The existing institutional structures and instruments are insufficient to align policies and R&D investments across Member States, and between Member States and the EU, and to set out strategic priorities.	○	○	○	○	○	○
EU spending on R&D is not well-aligned with key EU-wide policy priorities, e.g. industrial policy.	◉	○	○	○	○	○
Existing mechanisms that support R&D initiatives co-funded by different actors (notably European Partnerships [1]) are not sufficient to address the current needs for coordination and alignment.	○	○	○	○	◉	○
The system of European Partnerships is too complex and fragmented in terms of its implementation modalities.	○	◉	○	○	○	○
There are too many European Partnerships to ensure critical mass and strategic orientation.	○	○	○	○	○	○

Possible way forward

To what extent are the following suggestions appropriate for EU-level legislation to better align R&D investments, programmes and policies?

	Very appropriate	Somewhat appropriate	Neither appropriate nor inappropriate	Somewhat inappropriate	Very inappropriate	No opinion
Create a coordination instrument to allow the EU and the Member States to set out their strategic R&D priorities together.	◉	○	○	○	○	○
The competencies of the ERA governance bodies (i.e. the ERA Forum and the European Research and Innovation Committee - ERAC) could be expanded and applied to the definition of strategic priorities and to the alignment of R&D investments and policies.	○	○	○	○	◉	○
The European Partnerships should concentrate a critical mass of funding in key strategic areas, which are aligned with the EU's priorities.	◉	○	○	○	○	○
The system of European Partnerships should be constructed in such a way that it is flexible enough to adapt to evolving EU policy priorities, for instance by re-orienting existing European Partnerships, possibly ending existing Partnerships or creating new ones.	○	◉	○	○	○	○
The system of European Partnerships should become more transparent and easier to use by creating and running partnerships in a harmonised way.	○	◉	○	○	○	○
Key provisions for implementing European Partnerships should be included in the ERA Act.	○	○	○	○	◉	○
The respective roles of public and private actors should be taken into account in creating and running European Partnerships	◉	○	○	○	○	○

Please provide the reasoning behind your responses and/or additional suggestions. Are there any other key challenges regarding policy and investments alignment or possible ways to address them that you think should be considered?

2000 character(s) maximum

EARTO members welcome the focus on enhancing coordination between EU strategic priorities and national funding agendas, as EARTO underscored the need for strong alignment of public and private investments as well as of RD&I policies at both EU and national levels in its recommendations to Draghi's report. Such an alignment is essential to avoid fragmentation, leverage synergies, and maximise the societal and economic impact of RD&I across Europe.

In response to the questions raised, EARTO would like to underline that provisions on the implementation of European Partnerships should not be included in the ERA Act, as they are already addressed in the proposed regulatory framework of FP10/Horizon Europe and its Specific Programme. The ERA Act should therefore avoid duplicating provisions that are covered under forthcoming legislation. EARTO strongly supports the continuation and reinforcement of European Partnerships in FP10/Horizon Europe, as they have proven to be effective instruments to strengthen Europe's industrial competitiveness and accelerate innovation from research to market. Public-Private Partnerships are particularly valuable in mobilising industry, reducing risks, leveraging private investment, and aligning RD&I efforts with EU strategic priorities. EARTO therefore calls for a more strategic, coherent, and impact-oriented Partnerships landscape in FP10/Horizon Europe, with reduced fragmentation and a stronger role in supporting EU policy objectives and long-term competitiveness.

The European partnerships should be further utilised for further alignments for RD&I investments, public and private, and alignment of RD&I and industrial policies at the EU level. In this context, we do not see the interest in expanding the ERA Forum, which has not proven its capabilities for such a coordination to date. Good examples of EU and MS investments' alignment can be found in the Joint Undertakings, as well as in initiatives like the EU Chips Act.

3.2 Ensuring the free circulation of researchers and scientific knowledge

Please provide the reasoning behind your responses and/or additional suggestions. Are there any other key challenges regarding enhanced research careers and mobility that you think should be considered, including national-level obstacles preventing seamless mobility across Member States?

2000 character(s) maximum

EARTO welcomes the European Commission's focus on improving framework conditions for researchers, but notes that current initiatives often remain too strongly centred on academia, insufficiently reflecting the contribution of Research Performing Organisations (RPOs), including Research and Technology Organisations (RTOs). Intersectoral mobility should be supported not only between academia and industry, but also across RPOs, where many PhD holders work on applied research, technology development and innovation.

EARTO further notes that most questions in the consultation primarily address academia. Representing more than 228,000 researchers, EARTO calls for a dedicated set of measures to address mobility barriers faced by RPOs, including RTOs.

As the representative of European RTOs, EARTO is strongly committed to improving international researcher mobility within the European Single Market. Already in 2019, EARTO highlighted excessive administrative burdens linked to EU Regulation 883/2004, the Enforcement Directive 2014/67/EU and the revised Posting of Workers Directive 2018/957/EU, and proposed improvements. However, these burdens have increased rather than diminished. If not addressed, they risk undermining mobility, weakening the European Research Area, and limiting the effectiveness of Horizon Europe mobility instruments.

EARTO therefore recommends addressing key obstacles, including A1 forms for business trips and secondments, EU notification requirements, remote work from abroad, and the mutual recognition of residence permits for researchers. EARTO also underlines the value of strengthening international exchanges between RTOs, including with Horizon Europe-associated countries.

EARTO calls for a comprehensive EU framework supporting research careers beyond academia, reducing administrative burdens, and promoting mobility across all RD&I sectors.

3.2.2 Free circulation of scientific knowledge

Possible way forward

To what extent are the following suggestions appropriate for EU-level legislation to achieve the free circulation of scientific knowledge?

	Very appropriate	Somewhat appropriate	Neither appropriate nor inappropriate	Somewhat inappropriate	Very inappropriate	No opinion
Research-funding organisations (RFOs) responsible for managing public research-funding and research-performing organisations (RPOs) that receive public funding should include in funding agreements requirements for immediate open access to and reuse of publicly funded scientific publications in public open access repositories as a condition to providing public funding for research.	○	○	○	○	◉	○
Public RFOs and RPOs receiving public funding shall foresee requirements for researchers and/or their organisations to retain the necessary intellectual property rights to provide immediate open access and reuse of their research outputs.	○	○	○	○	○	○
Public RFOs and RPOs receiving public funding shall foresee, where relevant, requirements for data management plans and open access to research data and other research outputs under the principle '*as open as possible, as closed as necessary*'.	◉	○	○	○	○	○
Member States should ensure the findability, accessibility, interoperability and reusability (FAIR) of publicly funded research data and other research outputs, and their availability through secure and trusted digital environments.	◉	○	○	○	○	○
Member States should ensure that research data is standardised and interoperable within and between different scientific disciplines and across borders.	○	○	○	○	○	○
Member States should ensure the further development of secure and trusted infrastructures for access to, sharing, reuse and preservation of scientific information and data.	◉	○	○	○	○	○
The applicable legal frameworks should be reviewed to improve legal certainty and facilitate open access, sharing and reuse of data for scientific purposes in a secure way that ensures privacy.	◉	○	○	○	○	○
Publicly funded researchers should have facilitated access (e.g. in terms of technical requirements, available platforms or administrative procedures) to data under the common European data spaces.	◉	○	○	○	○	○
Non-legislative measures should be implemented to improve the awareness and use of existing legal and market-based solutions that make it possible to share, access and reuse protected content for scientific purposes.	○	○	○	○	○	○
Public RFOs and RPOs that receive public funding should create mechanisms to ensure that assessments of research, researchers and research organisations recognise the diverse outputs, practices and activities that help maximise the quality and impact of research.	○	○	○	○	○	○

3.2.4 Knowledge valorisation

Current situation

To what extent do you agree that the following problems currently prevent R&I in the EU from achieving optimum levels of knowledge valorisation?

	Strongly agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Strongly disagree	No opinion
There are limited financial and non-financial incentives for researchers, higher education and research-performing organisations to valorise knowledge.	○	◉	○	○	○	○
Academic reward systems are predominantly focused on publications and citations, with limited recognition for activities that create socio-economic impacts.	○	○	○	○	○	○
Higher education and research-performing organisations, and their researchers lack the capacity to collaborate with the private sector, public authorities and citizens, and to engage in standardisation activities.	○	○	○	◉	○	○
Dedicated support services in universities (e.g. knowledge and technology transfer offices, public engagement units and innovation offices) to facilitate effective knowledge valorisation are under-resourced.	○	○	○	○	○	○
Many researchers lack the training and skills necessary to engage successfully with non-academic collaborators (industry, citizens, public authorities) as part of knowledge transfer and valorisation.	○	○	○	○	○	○
Researchers' employment conditions lack flexibility for two-way mobility between academia and industry (e.g. short-term secondments) and to engage with external stakeholders (e.g. consulting, collaboration with societal actors and public authorities).	○	○	○	○	○	○

Please provide the reasoning behind your responses and/or additional suggestions. Are there any other key challenges regarding knowledge valorisation and possible ways to address them that you think should be considered?

2000 character(s) maximum

RTOs play a central role in Europe's knowledge valorisation, connecting academia, industry, and public authorities. They transform research into market-ready products, services, and processes through applied RD&I, IP licensing, start-ups, spin-offs, and reinvestment into new innovation cycles.

See EARTO Papers:

- Unlocking Innovation: The Role of RTOs as Intermediaries in Knowledge Valorisation
- EARTO Answer to EC Survey Industry Academia
- EARTO Response to EC Consultation on ERA
- EARTO Recommendations No EU Tech No EU Competitiveness

For more information on the topic please see below the latest EARTO publication on the subject.

EARTO Response to the EC Consultation on ERA Act

10 September 2025

EARTO, representing over 350 Research and Technology Organisations (RTOs) across Europe and beyond, welcomes the European Commission's initiative to establish a European Research Area (ERA) Act. To respond to the European Commission's call for evidence, EARTO would like to welcome the recognition of the three key objectives and policy options of this initiative, as well as raise some key issues and offer recommendations for the further development of the proposed ERA Act. Accordingly, this paper aims to complement the three main blocks of policy measures suggested by the European Commission (EC) for an ERA Act.

Policy Measures Block 1 - The 3% R&D Investments' Target

EARTO strongly supports the EC's renewed ambition to render the target of 3% of GDP investments in R&D a reality. The next Multiannual Financial Framework (MFF) for 2028-2034 must be designed to reach such a target: The proposed budget of €175 billion for FP10/Horizon Europe 2.0 recently put forward by the EC (See proposed regulation) is a step in the right direction following the Draghi and Heitor reports' recommendations. Strong EU RD&I investments will provide the scale and ambition needed to secure Europe's technological sovereignty and long-term competitiveness, as well as send a strong signal to industry, aiming to further attract private RD&I funding in Europe. **Ensuring that RD&I efforts directly contribute to the EU's competitiveness and resilience by smartly mobilising all EU funds available under the next MFF will be crucial. To do so, ensuring that a significant share of EU investments target applied industry-driven RD&I will be key to leveraging private investments, an indispensable complement to public spending to achieve the 3% target.**

Accordingly, the upcoming ERA Act should introduce a roadmap with concrete national commitments from Member States and EEA EFTA countries regarding their R&D investments to reach this 3% target. Building on existing best practices, these commitments should be anchored in national and regional reform plans proposed to the EC under the new MFF. They should be monitored under a new EU RD&I Semester as put forward in the Draghi report.

In this regard, **Finland** provides a best practice with its robust framework for long-term RD&I investments and may serve as a model for other Member States**: The Finnish Act on R&D funding**, effective since January 2023, legally mandates that the central Finnish government's R&D expenditures are increased each year through 2030 to meet an RD&I target of 4% GDP. **In addition to a more ambitious target, it includes a very important conditionality of private investments to its public investments**: public RD&I investments should raise private RD&I investments, so for every public euro invested in RD&I, it should bring €2 of private investment in RD&I[1].

Furthermore, to support the promotion of a renewed ambition in terms of RD&I investments, continuously proving the case of such RD&I investments is key. Accordingly, **EARTO hereby suggests that the ERA Act defines further work aiming at developing a broadly recognised EU-level method to measure the economic impact of RD&I**. A key objective of public support for R&D, including through the EU Framework Programmes, is to stimulate economic growth. However, quantifying the long-term effects of research on, for example, GDP is complex. This is due in part to limitations in available data and the methodological challenges that come with it. One possible solution is to focus on the role and relevance of Research Performing Organisations (RPOs). RPOs, including RTOs, play a key role in innovation processes: 1) they contribute to the development of knowledge, which forms an essential foundation for business-oriented R&D, and 2) they provide specialised research and technology facilities for companies that lack their own R&D infrastructure or only engage in innovation sporadically. In this context, RPOs systematically monitor the input, activities, and output of collaborative RD&I, many having a large reporting duty to their national ministries. These data collected by RPOs can serve as a basis for new methods to better map the economic impact of publicly funded research. This could, for example, be achieved through econometric models that estimate the returns on R&D investments and integrate these into broader macroeconomic analyses. Such analysis also provides valuable insights into the role and effectiveness of RPOs themselves. This, in turn, enables public

[1] See the full Finnish plan to raise R&D funding, State Treasury Republic of Finland, 2022.

policies to be refined and optimised to maximise the impact of publicly funded research. We therefore encourage the EC to include within the ERA Act the development of a methodological framework that contributes to a better understanding of the economic effects of RD&I in the EU. EARTO WG Impact Experts are at the disposal of the EC to further elaborate such a framework.

Policy Measure Block 2 - Enhancing the Alignment of Investments and Research Policies to Strengthen EU and National Strategic Priorities

EARTO members welcome the focus on enhancing coordination between EU strategic priorities and national funding agendas, as EARTO underscored the need for strong alignment of public and private investments as well as of RD&I policies at both EU and national levels in its recommendations to Draghi's report. Such alignment is essential to avoid fragmentation, leverage synergies, and maximise the societal and economic impact of RD&I across Europe.

To ensure that policies work better together, supporting Europe's capacity to develop and scale critical technologies, EARTO recommended that the EU places a stronger emphasis on planning and coordinating investments in Technology Infrastructures (TIs) across Europe. Technology Infrastructures are essential to bridge the gap between research and market uptake: they support both the scaling-up and commercialisation of innovations. Looking ahead, **EARTO emphasises its support for the establishment of the forthcoming pan-EU strategy on Technology Infrastructures (TIs)**, which are indispensable in bridging research and industrial deployment (See EARTO papers).

In addition, EARTO calls for the creation of a **dedicated instrument in the next Multiannual Financial Framework** (2028-2034) with a budget of €13-16 billion as proposed in the forthcoming European Investment Bank (EIB) study on the funding needs of Technology Infrastructures, to finance TIs' development, helping Europe close capability gaps with global competitors and reinforce its technological leadership (See JRC-EARTO report).

Policy Measure Block 3 - Improved Framework Conditions for Researchers and Research Organisations

While EARTO appreciates the EC's attention to enhancing framework conditions for researchers across Europe. In an earlier response to the EC Consultations on ERA, EARTO stressed the following:

- **Knowledge Valorisation:** The efforts up to now have been soft measures and guidance to RD&I actors with less capabilities and knowledge on valorisation. As such, these measures have not had a great impact on supporting the efforts of the RTO sector in scaling up technologies. EARTO recommends active reinforcement of RTOs in transferring technology and valorising knowledge: there is an underexploited potential that should be mobilised/ leveraged. Networks like the TTO Circle, coordinated by the JRC, offer valuable capabilities that should be further utilised to discuss what further efforts could be developed at EU level to effectively support RTOs.
- **Intersectoral Mobility of Researchers, facilitated through cooperation between academia with RPOs (including RTOs) and industry:** Discussions so far tended to mainly focus on academia-industry, missing the reality that many of the academic PhDs are hosted by RPOs, and especially RTOs on key technology developments[2]. This means that a more comprehensive framework is required to support research careers beyond academia and across industries and RPOs.
- **International Mobility of Researchers:** Current EU initiatives, by being largely centred on academic pathways again, fail to address the practical challenges faced by RTOs regarding their researchers' international mobility. Despite our past efforts to identify and address these issues[3], appropriate measures to adequately target those issues are still missing. Some of the administrative hurdles of international researcher mobility – including recognition of residence permits – have been addressed in the Council Recommendation on a European Research Framework (C/2023/1640) with a reviewed European Charter for Researchers. However, researchers are not recognised as a specific group with mobility taking place in EU or national publicly funded or industrial RD&I projects. Thus, in some EU countries, a Posted Worker Notification is required even for short mobility/business trips, even though the RD&I activities performed are not the equivalent of a service provision requiring such notification. As researcher mobility takes mainly place within EU or national publicly funded or industrial RD&I projects, this leads to further administrative burden and costs for researchers' international mobility, hindering Pan-EU collaboration between European RPOs, academia and industry.

[2] See for istance EARTO Member Eurecat Industrial PhD Programme.
[3] See EARTO Position Papers from 2019 and 2023.

- **International Collaboration between RTOs and International Mobility of Researchers between RTOs:** Since 2019, EARTO, with its international members, has been managing the RTOs International Network **RIN**. In our international network, there is a willingness to exchange researchers between RTOs, but there is no EU programme supporting such international activities: current programmes are again focused on academia. EARTO itself has helped its members to develop a standard contract to support international exchanges of researchers to remove some of the barriers. It would be a great asset, especially in current geopolitics, to have some supporting actions from the EU to support exchange between RTOs at global level on critical technologies. In addition, the EC could develop further support actions to promote further research collaboration between RTOs using current association agreements. EARTO/RIN members located in one of the countries associated with Horizon Europe, such as Canada, South Korea, and Japan, are just at the early stage of learning/understanding what an FP programme represents and what opportunities it offers. As we very well know, our FP is a complex instrument; there could be some specific support action to target the most capable organisations in those countries, some of which are our international members, to effectively leverage this opportunity. The time to build and render effective NCPs to support those will take the remaining time left of the programme; some specific support could be offered in the meantime by the EC by using networks like RIN.
- **Third Countries and Research Security: EARTO calls for the ERA Act to include clear safeguards against foreign interference, IP leakage, and security risks—while preserving openness**. Prior EARTO recommendations highlighted the need for harmonised protocols, stronger due diligence, and closer coordination with national authorities to protect Europe's research integrity and competitiveness. EARTO is happy to contribute to further discussions and is glad to support the organisation of the upcoming EU conference on this topic this autumn.

EARTO fully supports the EC's ambition to reinforce the ERA through a dedicated legislative framework. We stand ready to continue collaborating with European institutions and Member States to shape an ERA Act that delivers excellence, impact, and resilience.

Latest EARTO papers on ERA:

- EARTO Position Paper on the Next EU Multiannual Financial Framework: How to Focus EU RD&I Investments to Boost our Technology Leadership, Productivity & Industrial Competitiveness?
- EARTO Response to EC Consultation on ERA
- EARTO Policy Recommendations 2024-2029: No EU Tech, No EU Competitiveness
- EARTO Inputs to the New ERA Policy Agenda
- EARTO Inputs for a European Framework for Research Careers (Comments to Technical Document)
- EARTO Paper Position Paper on Current Hurdles to Mobility of Researchers
- EARTO Position Paper on Research Security - Inputs to the EC Call for Evidence for EC proposal for a Council Recommendation

---

EARTO - European Association of Research and Technology Organisations
Founded in 1999, EARTO promotes RTOs and represents their interest in Europe. EARTO network counts over 350 RTOs in more than 31 countries. EARTO members represent 228,000 highly-skilled researchers and engineers managing a wide range of innovation infrastructures.
RTOs - Research and Technology Organisations
From the lab to your everyday life. RTOs innovate to improve your health and well-being, your safety and security, your mobility and connectivity. RTOs' technologies cover all scientific fields. Their work ranges from basic research to new products and services' development. RTOs are non-profit organisations whose core mission is to produce, combine and bridge various types of knowledge, skills and infrastructures to deliver a range of research and development activities in collaboration with public and industrial partners of all sizes. These activities aim to result in technological and social innovations and system solutions that contribute to and mutually reinforce their economic, societal and policy impacts.
EARTO Contact: *www.earto.eu*