# **Presentation to ITRE Hearing**

"Implementing the Research Framework Programme
How to Reduce Red Tape and Increase Effectiveness"

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# **Brief Words about EARTO and RTOs**

### **EARTO** represents 350 RTOs

- mission-oriented research organisations
- generally government owned, government sponsored, government sanctioned
- 150,000 employees, €15 billion annual turnover
- Some of our larger members: VTT, SINTEF, Swedish industrial institutes, Teknologisk, TNO, VITO, Fraunhofer, Technology Partners, Bay Zoltan, Instituts CARNOT, FEDIT Technological Centres...
- Major players in Framework programme
  - e.g. Fraunhofer 2<sup>nd</sup> largest single player in FP6: >500 project participations,
  - e.g. 5 largest RTOs above: >1,400 project participations, >€520 million EU funding

# **Promised Simplifications in FP7 - I**

#### **Guarantee Fund**

- Too early to say
- Original intention was to protect participants as much as the public purse
- Evidence suggests has not facilitated smaller companies or smaller research organisations as project coordinators

### **Single Registration Facility**

Valuable, teething problems, slow validation

### Flat rates, lump sums

- Simplification for Commission, complication for most players (who use real-cost accounting)
  - Absurd that participants are required to produce (real-cost) accounts showing that they
    spent at least the value of the fixed amounts received (Marie Curie)

# **Promised Simplifications in FP7 - II**

### **Methodology Certification**

- Average personnel costs, overall financial reporting
- Average personnel cost certification in its present form will be an almost complete failure
  - Criteria too restrictive (notably 25% deviation criterion)
  - Does not correspond to common practice in industry (cost centre averaging)
  - Does not correspond to common practice in research organisations
  - Probably many universities using full cost will find themselves disqualified
- Evidence collected from 30 of the largest RTOs in Europe (several '000 project participations in FP6):
  - Almost all normally use average personnel costs ("usual accounting and management principles and practices")
  - 24 of 30 (80%) definitely cannot meet the Commission's criteria (most of the others uncertain – partly a problem of cross-time stability of remuneration profiles)
  - 2 will anyway switch to direct costs for reasons of legal certainty (distrust of the Commission), despite the additional administrative cost

# **Promised Simplifications in FP7 - III**

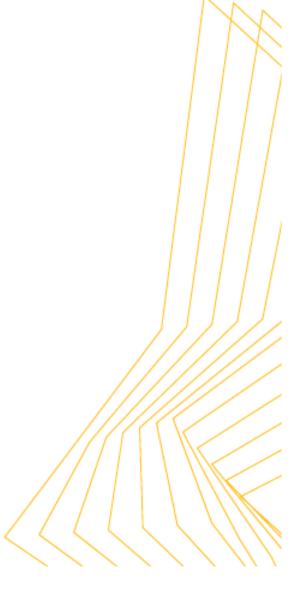
#### **Audit Certificates**

- In principle, a major advance
- In practice, probably redundant in view of Commission's auditing campaign
  - Ex-post FP6 audits
  - "real-time" FP7 audits

# **Climate of Mistrust**

## **Ex-post FP6 Audits**

- Successive tightening of definitions
- Multiple audits by COM and ECA
- Retrospective, unilateral redefinition of eligible costs



# **Background to Climate of Mistrust**

## **Financial Regulation**

### **Auditing Approach of the ECA**

## **Rules of Participation**

- Principles rather than precise definitions
- Interpreted in the past with intelligent discretion in order to accommodate real differences between countries and categories of FP participant

## What to Do?

#### **The Past**

- Stop trying to fix the past (cf. EP 2007 budget discharge amendment)
- Focus on fixing the future

#### The Future

- Put clear, uniformly agreed rules (definitions, control framework) in place for FP8
- EP (ITRE, COCOBU) could take lead in establishing an inter-institutional "Round Table" to achieve this?
- Associate stakeholders to ensure rules and definitions that correspond to real-world practice

#### The Present

• In the meantime, manage FP7 projects with intelligent discretion, notably by respecting the principle of "in accordance with the usual accounting and management principles and practices of the participant" RoP, Art. 31(3)c