

The Council's Partial General Approach: much to be welcomed, but key concerns remain

We welcome the adoption of the Council's Partial General Approach (PGA) for the next Horizon Europe programme (FP10). This is a major milestone towards the finalisation of the FP10 regulation and specific programme. We call on the European Parliament to timely complete its position and allow the trialogue to begin in fall 2026 at the latest.

The Council introduced positive changes to the European Commission's proposal, which reflects [our sector's amendments proposals published in December 2025](#). The PGA explicitly asserts FP10's objective of supporting the development of excellent research and innovation (R&I) in Europe. It also strictly limits FP10's actions up to TRL 8. We welcome the removal of references to possibly eligible activities that are more relevant for the European Competitiveness Fund (ECF), notably "large-scale product validation and market replication."

Because our sector has relentlessly called for enabling international R&I collaboration through FP10, we welcome the Council's amendment to explicitly make all legal entities, regardless of their location, eligible by default. This openness to the world is critical to Europe's scientific leadership in addressing our pressing global challenges, and it significantly enhances our science diplomacy. The final FP10 regulation must go further than recognising the importance of associating countries, especially "trusted like-minded" countries, to Horizon Europe: these countries, in particular those already associated to FP9, including Switzerland and the United Kingdom, should have a fast-track association process and be invited to participate in the meetings of programme committees.

We take note that research security features prominently in the PGA and acknowledge the Council's efforts to design research security rules instead of simply applying economic security rules to research activities. We still believe that a more adequate, proportionate and simple approach would be to [remove the provisions that make the EU preference rules from the ECF applicable to FP10](#) and to replace them with fit-for-purpose research security rules. For instance, such a tailored approach would explicitly balance the risks of collaboration with [the risks of non-collaboration](#). Likewise, the ECF's accelerated and targeted actions for competitiveness are inadequate for FP10 and risk undermining its necessary focus on research excellence. We urge the Council to include in its negotiating box the revision of Article 20 in the FP10 regulation to ensure that the ECF rules applicable to FP10 are coherent with its objectives. Otherwise, FP10's contribution to the long-term competitiveness of Europe will be diminished.

We very warmly welcome the Council's strong support for the autonomy of the Scientific Council of the European Research Council (ERC) and for its president. In line with our proposals, the PGA removed the obligation for the Scientific Council to follow the European Commission's corporate policies and reintroduced the four-year term, renewable once, of the ERC President.

The Council's PGA introduced a major improvement that could fill a gap in the Horizon Europe framework programme, for which [we have also repeatedly asked for a solution](#): bottom-up and collaborative research

and innovation beyond the ERC synergy grants and Marie Skłodowska-Curie Actions (MSCA). Despite the legal provisions set up at the time, the design of FP9 has insufficiently allowed for bottom-up collaborative R&I activities in Pillar 2, even though they could have a significant impact on the capacities of Europe to develop new promising technologies and other innovative solutions to identified societal challenges. We urge the European Commission and the Parliament to maintain the Council's call for "a balanced approach between bottom-up actions and predefined topics from strategic areas" and to engage with R&I stakeholders to further specify the instruments that will follow this purpose.

We welcome the Council's proposals for widening instruments. In line with [The Guild's recommendations published in May 2026](#), the PGA introduces measures to enhance the participation of widening and transition countries in ERC calls. Building upon the ERA fellowship for higher participation in MSCA, these measures must not undermine the excellence principle in ERC. We reiterate our recommendation for a similar instrument aimed at higher participation in the European Innovation Council (EIC). We also regard the Council's proposal to encourage transition countries to share their experience and good practices with widening countries as highly relevant.

We also strongly support the Council's nuanced provisions on lump sum: instead of being the default form of funding, it is an option among others. This recognises that lump sum funding can induce simplification only in certain circumstances (e.g., mono-beneficiary or small consortium projects).

In alignment with our sector's joint proposals, other amendments reintroduced the Seal of Excellence, in-kind contribution to European Partnerships, and the cap on their budget (which must be lower than 50%). The Council is taking crucial steps to strengthen the excellence of the programme, and thus we welcome that evaluation panels will be composed of external experts only, by default, and that the eligibility and award criteria will be defined in the regulation (and not in the work programmes).

However, some of the amendments in the Council's PGA fail to address the concerns that The Guild, alone and jointly with other university and research institute networks, has repeatedly raised since July 2025. No nuance has been provided to the "tight connections" of FP10 to the ECF proposed by the Commission. The Council proposed a joint priority-setting for the ECF and FP10's Pillar 2 (Competitiveness) with a prominent role for the Member States. The proposal falls short of providing a role to individuals with recognised expertise and knowledge of the state-of-the-art and emerging technologies. The contribution of such individual experts would be critical to ensure that the EU's competitiveness model is driven by knowledge and towards new technologies, instead of being protective of incumbent industries with the strongest influence on policy orientation at the national and EU levels.

This joint priority-setting and the maintained presence of FP10 Pillar 2 (Competitiveness) calls within the ECF work programme do not provide any guarantee that what FP10 will fund, through its Pillar 2, is scientifically relevant and supports the development of emerging and potentially disruptive technologies even when these are still overlooked by policymakers and companies. We call on the EU institutions to agree on [connections between the ECF and FP10 that are more fit for purpose](#), so that both instruments have clearly distinct but complementary intervention logics to contribute together to an innovation-driven competitiveness model for Europe.

Another important concern regards defence R&I. We reassert the crucial importance of preserving FP10 as a civilian programme by default. We welcome the dual-use-by-design approach and call for the European

Commission to consult universities on the further specification of how calls for research with potential dual use should be designed. According to the Council's PGA, the EIC can still support the development of defence technologies, as proposed by the European Commission. We find the cap on the EIC's budget that could be used for defence technologies to be an insufficient guarantee for a fundamental principle of framework programmes: their civilian nature. If relevant, the development of defence technologies must be funded by the ECF instead.

Finally, we reiterate our call for not using FP10 to fund the construction of world-class and strategic research and technology infrastructures (RTIs), as more fit-for-purpose EU funding instruments exist, such as the ECF. The Council has not amended the Commission's proposal accordingly. It proposed introducing a cap – to be defined – on the share of Pillar 4's budget that could be used for partly funding RTIs construction. To be agreeable, this cap would need to be low. Otherwise, a disproportionate share of Pillar 4 budget will be used for building such infrastructures instead of funding the development, upgrade and accessibility of smaller infrastructures that researchers use regularly.

The Guild remains committed to engaging with the EU institutions, including the Council, to ensure that an ambitious FP10 geared towards strengthening Europe's scientific leadership, competitiveness, resilience and prosperity kicks off on 1st January 2028.