



REPLIES OF THE EUROPEAN COMMISSION

TO THE EUROPEAN COURT OF
AUDITORS' SPECIAL REPORT

**Measures to widen participation in Horizon
2020** were well designed but sustainable change
will mostly depend on efforts by National
Authorities

Contents

EXECUTIVE SUMMARY (Paragraphs I-X).....	2
INTRODUCTION (Paragraphs 1-11).....	3
AUDIT SCOPE AND APPROACH (Paragraphs 12-16).....	4
OBSERVATIONS (Paragraphs 17-86).....	4
CONCLUSIONS AND RECOMMENDATIONS (Paragraphs 87-99).....	8
Recommendation 1 – Strengthen the use of the PSF.....	9
Recommendation 2 – Aim for a more balanced participation of widening countries in widening measures.....	9
Recommendation 3 – Facilitate the timely availability of complementary funding.....	9
Recommendation 4 – Enhance the capacity of project beneficiaries to exploit their research results.....	10
Recommendation 5 – Enhance monitoring of the widening measures.....	10

This document presents the replies of the European Commission to observations of a Special Report of the European Court of Auditors, in line with Article 259 of the [Financial Regulation](#) and to be published together with the special report.

EXECUTIVE SUMMARY (Paragraphs I-X)

Commission replies:

I. The pathway to economic growth and competitiveness is largely connected to research and innovation (R&I). Therefore, the Commission has paid special attention to R&I through the EU framework programmes (FPs) – through the current Horizon Europe programme (2021-2027) and the former Horizon 2020 programme (2014-2020).

II. Since 1984, nine framework programmes have been approved. Since the beginning, the Commission has followed up the participation of Member States in the FPs. In this respect, the Commission has identified differences in the participation among the Member States and has been working to address them since the Horizon 2020 FP.

The current FP, Horizon Europe, continues the endeavour initiated in Horizon 2020 to reinforce the participation of the less performing countries – Member States (MS) - in this field. As a result of the actions undertaken by the Commission -widening measures – these MS should strengthen their potential for successful participation in R&I processes, promote networking and access to excellence.

In addition, participants in the programme should be able to upgrade their R&I systems, making them stronger and allowing the EU as a whole to advance together, in line with the policy objectives of the European Research Area (ERA).

III. The Commission designed and implemented several actions under Horizon 2020. These are as follows:

Teaming: Support/create centres of excellences as role models to stimulate excellence, new investments and reforms of R&I systems.

Twinning: Develop excellence in chosen R&I domain, increase visibility of the research institutions and universities, and upskill its staff.

ERA Chairs: to support universities or research organisations from eligible countries to attract and maintain high quality human resources and help excellent scientists and their teams to become game changers in their field.

European Cooperation in Science and Technology (COST): cross-border scientific network helping excellent researchers and innovators get access to the European and international networks.

V. Widening measures under Horizon 2020 have triggered reforms and changes within national R&I systems, encouraged new partnerships and introduced new scientific curricula, extended networks, and encouraged more peer reviewed international publications.

In recent years, the widening countries have increased their participation under Horizon 2020. On average, it represented 7.2% of the total Horizon 2020 budget allocated so far (up from 5.5 % in the Seventh Framework programme, FP7).

The Commission continues to work on this endeavour. Nevertheless, the success of these measures relies on the systems in place at national or regional level.

In this respect, the Horizon Europe Regulation reflects that the Commission efforts “shall be mirrored by proportional measures by Member States... with the support of Union, national and regional funds.”¹

VI. Since 2015, the Policy Support Facility (PSF) gives Member States and countries associated to Horizon Europe practical support to design, implement and evaluate reforms that enhance the quality of their R&I investments, policies and systems.

This facility has provided recommendations to the countries which applied for it. The recommendations are important pieces of advice for the improvement of the national R&I systems. Their implementation relies on the national governments.

VII. The widening measures in place since Horizon 2020 are expected to produce a number of results in the future. Nevertheless, it is still premature to assess the effectiveness of the projects implemented or still ongoing.

VIII. The widening measures referred above are producing promising results. Nevertheless, the ECA’s report has pointed out some aspects of the implementation of these measures that the Commission will work on. The Commission’s own monitoring has also identified some issues for further improving the performance of these measures.

IX. The regulation setting up Horizon Europe (Article 50, Horizon Europe Regulation referred above) has established a set of rules for monitoring. In this respect, the Commission will establish a system to monitor the implementation of the widening measures accordingly.

X. The Commission accepts all recommendations.

INTRODUCTION (Paragraphs 1-11)

Common reply to paragraphs 01-05:

Disparities in R&I performance amongst Member States is a complex and multi-faceted issue of shared responsibility with a European, national and regional dimension. In Horizon 2020 a set of targeted actions were introduced under the 'Spreading Excellence and Widening Participation' (SEWP) – commonly known as “Widening” and devoting EUR 900 million to activities such as Teaming, Twinning, ERA Chairs and COST to help less performing countries increase their R&I performance in general, and, in time, facilitate their wider participation in the Framework Programmes.

For Horizon Europe, the co-legislators have agreed to increase the share for this area of intervention to 3.3% of the budget as compared with about 1% in Horizon 2020. Such an increase in budget will enable a stronger impact of planned measures and better contribute to fostering excellence across the EU.

Widening Participation and Spreading Excellence actions contribute to building R&I capacity for countries lagging behind. They strengthen their potential for successful participation in transnational R&I processes and promote networking and access to excellence.

¹ Regulation (EU) 2021/695 of the European Parliament and of the Council of 28 April 2021 establishing Horizon Europe – the Framework Programme for Research and Innovation, laying down its rules for participation and dissemination, and repealing Regulations (EU) No 1290(2013 and (EU) No 1291/2013, Article 7.5.

Participants in the programme are expected to be able to upgrade their R&I systems, making them stronger and allowing the EU as a whole to advance together, in line with the policy objectives of the ERA.

Under Horizon Europe, measures such as Teaming, Twinning, ERA-Chairs as well as brain circulation and excellence initiatives have as their objective to help spreading excellence, improving R&I managerial skills and building stable foundations for cooperation with partners across Europe. The Commission expects that through a well-functioning National Contact Points' system potential beneficiaries will have an opportunity for a pre-proposal check. It will be complemented by a match-making service which should help in finding entities which could work together. A new special measure (the so called "hop on") will allow new partners from widening countries to join ongoing collaborative research and innovation projects and will contribute to building collaborative links.

Both Horizon 2020 and Horizon Europe are excellence-based competitive programmes.

AUDIT SCOPE AND APPROACH (Paragraphs 12-16)

No Commission replies.

OBSERVATIONS (Paragraphs 17-86)

Commission replies:

28. Since 2015, during Horizon 2020, the Horizon PSF gives MS and countries associated to Horizon 2020 practical support to design, implement and evaluate reforms to enhance the quality of their R&I investments, policies and systems.

The Horizon Europe PSF, launched in February 2021, keeps the above-mentioned action and should provide good practice, independent high-level expertise and guidance at the request of MS and associated countries. PSF activities are regularly presented and discussed in the European Research Area and Innovation Committee (ERAC).

32. The Policy Support Facility (PSF) is an analytical tool that proposes recommendations. Implementing these recommendations can face push back from relevant stakeholders that may be wary of a changing status quo and thus requires political leadership at national level.

The Commission takes note of the point raised by the ECA and is working on it. Nevertheless, the Commission's 2019 evaluation of the PSF concluded that the advice from independent experts and mutual learning helped policymakers understand their own R&I systems and develop a more outward looking perspective. In addition, it acknowledged that there was a genuine need from countries for this type of support, and that this need will continue in the coming years.

33. While agreeing with ECA's observation, the Commission analysed PSF reports provided by the experts after their screening of the R&I system in the country concerned.

The report is then extensively discussed bilaterally with the MS concerned in order to contextualise their recommendations and observations.

MS are therefore encouraged to tackle the report's recommendations for improving their own R&I system.

35. MS are fully responsible for the implementation of the set of the recommendations issued by the experts in their reports.

The PSF expert report is subject to discussions with the relevant Member States for them to provide their own views and to assess how to best implement the proposed recommendations.

39. The report on the Commission's 2019 evaluation of the PSF was issued prior to, and in preparation for, the design of the instrument under Horizon Europe. Once the revamped Policy Support Facility was adopted under Horizon Europe in February 2021, the implementation of the recommendations of the PSF evaluation was taken into account in process.

41. The PSF is a tool to help MS in their reform processes, but it can be complemented by other support actions.

COMMON REPLY TO PARAGRAPHS 42 TO 49: Since the adoption of the widening measures, the Commission monitors the progress of the participation of the eligible MS.

Although these countries have not yet reached the hoped-for level of participation, there are expectations for the success of these actions. Most of Horizon 2020 projects are ongoing and new measures are being implemented under Horizon Europe.

As regards Horizon Europe, article 7.5 of the Regulation sets the principle that:

“the Programme shall assist widening countries to increase their participation in it and to promote a broad geographical coverage in collaborative projects, including through spreading scientific excellence, boosting new collaborative links, stimulating brain circulation as well as through the implementation of Article 24(2) and Article 50(5).

Those efforts shall be mirrored by proportional measures by Member States, including through setting attractive salaries for researchers, with the support of Union, national and regional funds.

Without undermining the excellence criteria, particular attention shall be paid to geographical balance, subject to the situation in the field of R&I concerned, in evaluation panels and bodies such as boards and expert groups.”

50. Horizon 2020 and Horizon Europe are competitive programmes, and no country quotas can be set. However, they assist widening countries to increase their participation in these programmes and promote a broad geographical coverage (see reply to paragraph 42, article 7.5 of the Regulation setting Horizon Europe and the rules for participation). With an increasing portfolio of projects, more diversified actions and targeted communication activities including a strengthened National Contact Points network, it is expected that the disparities in participation amongst widening countries will further equalise throughout Horizon Europe.

52. The ECA refers to some aspects of the implementation of the widening measures that stem from their analysis of the ongoing projects.

These are mostly related to the capacity of building up a system that supports the further development of research and innovation at national level in the widening countries.

The first strategic plan for Horizon Europe (2021-2024) aims at underpinning geographical diversity, building the necessary capacity to allow successful participation in the R&I process and promoting networking and access to excellence.

In this respect, the Horizon Europe Work Programme 2023-2024 related to “Widening participation and strengthening the European Research Area”, in the process of being drafted, envisages addressing these aspects.

Therefore, a portfolio of complementary actions (the Horizon Europe Work Programme 2023-2024) that aim to build up R&I capacities in widening countries, also through national and regional R&I

reforms and investments, will enable them to advance to the competitive edge at European and international level.

Capacity building will go beyond purely scientific capacities since it includes the development of management and administrative capacities for the benefit of institutions that are eager to take over consortium leadership roles.

Teaming actions will create new, or modernise existing, centres of excellence by means of a very close and strategic partnership with leading institutions abroad. The impact will be amplified by the ex-ante conditionality of securing complementary investment (especially for infrastructure, building, hardware) from the structural funds or other sources.

Further, they will demonstrate the success of modern governance and management and hence stimulate generalised reforms in the national R&I environment.

57, SECOND INDENT. Under the 2014-2020 regulatory framework for ERDF funds, the final date of eligibility is 31 December 2023. However, the closure guidelines provide two possibilities for operations co-financed by ERDF funds, which cannot be finished at the date of submission of the closure documents (15 February 2025):

- non-functioning projects (i.e., projects that have not been physically completed or fully implemented) with a total cost exceeding EUR 2 million, can be finalised one year later (15 February 2026) under certain conditions, with other funding.
- projects with a total cost exceeding EUR 5 million can be phased into the 2021-2027 programming period under certain conditions, in particular the operation needs to consist of two identifiable phases and phase 2 needs to be eligible under the 2021-2027 period (i.e. the second phase needs to be compliant with all applicable rules of the 2021-2027 period (Article 118 of Regulation (EU) 2021/1060) and may be financed therefore with 2021-2027 funds).

Reply to Box 3 - Example of difficulties faced by a Teaming project with ERDF complementary funding:

Managing authorities (MA) are obliged to show due diligence during the selection of operations for ERDF support. Delays were caused by the complexity of the procedure required by the managing authority and the struggling of the beneficiary to compile and submit the necessary documentation.

59. Under Horizon Europe the Commission has established the rules for the monitoring and reporting of the programme. (Article 50). In this respect, the Commission will monitor continuously the management and implementation of the programme. The performance reporting system will ensure that data for monitoring the implementation and the results of the programme are collected efficiently, effectively and in a timely manner.

The Commission will therefore arrange the aspects to be taken into account for monitoring the widening measures implemented, as noted by the ECA in paragraph 61.

COMMON REPLY TO PARAGRAPHS 60 AND 61:

Since April 2021, complementary funding is within the scope of the monitoring process in addition to its ex ante assessment, in the sense that the Commission started asking for a Report on the use of Complementary Funding at project review stage thus placing more emphasis on the need to report on it and to be transparent in its use.

63. The design of the widening measures is challenging. They are aimed at significantly improving research performance of beneficiaries in a chosen scientific domain as well as at facilitating their success in obtaining competitive funding. The recruitment of international staff is an important factor to achieve these objectives. In this respect, the Commission requires that high-level

researchers recruited for the implementation of this programme be excellent researchers and research managers in the given field of research, with a proven record of effective leadership.

Article 7.5 of the Horizon Europe (2021-2027) Regulation states that: “Those efforts shall be mirrored by proportional measures by Member States, including through setting attractive salaries for researchers, with the support of Union, national and regional funds.”

64. Under Horizon Europe the Commission requires, as it is laid down in the Work Programmes, that widening countries clearly describe the intended remuneration package of the high-level researchers and the criteria on which the level of remuneration has been established, as well as his/her roles, level of responsibility and obligations.

65. Under Horizon Europe (2021-2027) the Commission Work Programmes also pay special attention to sustainability of the widening actions.

In this respect, the Commission demands the applicant to present an investment plan including the letter(s) of commitment for complementary funding from the competent national/regional authorities or private sources to commit financial resources (e.g. resources coming from programmes co-financed by the ERDF or other sources) for implementing the future Centre, in particular regarding investment in infrastructure and equipment. The letter(s) of commitment for complementary funding of the project will be an integral part of the evaluation of the proposal.

The generation of additional income from the exploitation of their research results requires an adequate level of maturity of the institution benefitting from the widening funds.

68. The issue of becoming self-sustainable after the EU grant termination is broadly discussed during the projects’ review meetings. It is to be noted that being sustainable does not mean staying outside of any system. It is normal for the centres of excellence to continue operating within a certain framework of a university or a research institution. The fact that, even now, most centres are succeeding in getting competitive funding from various sources, although projects are not yet finished, means a good progress towards their sustainability.

69. Seals of Excellence were only granted to Teaming2 project proposals under Horizon 2020 first call, that were evaluated above quality threshold, but were not funded due to the limited budget for the call.

It is foreseen that under Horizon Europe Teaming will be one of the actions that will be given the Seal of Excellence.

72. Community Research and Development Information Service (CORDIS) has a rich and structured public repository with project information such as project factsheets, participants, reports, deliverables, and links to open-access publications.

The information is provided by the project beneficiaries via the e-grants data warehouse and is transferred on a monthly basis to CORDIS. Moreover, all widening instruments, according to their legal typology, are coordination and support actions, not actual research or innovation actions, which means that research results only occur as a follow-up activity not necessarily registered in project reports.

76. Teaming actions are designed to create new or modernise existing centres of excellence by means of a very close and strategic partnership with leading institutions from abroad. Once established, the centres should function as lighthouses with far reaching impact and role models for attracting the best talents. Further, they should demonstrate the success of modern governance and management, and hence stimulate generalised reforms in the national R&I environment.

In this context, the ongoing actions are expected to have a considerable impact at the level of the widening countries.

77. ERA Chairs are designed to support universities or research organisations from eligible countries to attract and maintain high-quality human resources under the direction of an outstanding researcher and research manager (the 'ERA Chair holder'), and to implement structural changes to achieve excellence on a sustainable basis.

In this context, the ongoing actions are expected to have a considerable impact at the level of the widening countries.

COMMON REPLY TO PARAGRAPH 81 TO 83:

In December 2021, the Research Executive Agency published the Spreading Excellence and Widening Participation Impact Report, including some H2020 results and an outlook to Horizon Europe.

This report provides some insights into the impact of the Widening projects throughout Horizon 2020 emerging from Teaming, Twinning and ERA Chair Actions.

This Widening Impact Report includes a reflection upon and analysis of economic, social and scientific impacts. The study of impacts is illustrated following the corporate Horizon Europe Framework structure on impact pathways. Key impacts detected for Teaming, Twinning and ERA Chair Actions, supported with data obtained from surveys are presented in the report and main messages are captured in the conclusions and final recommendations.

The Commission is taking into account the conclusions that stem from this report for further policy design and monitoring of the programme.

84. The Commission is working to identify the best KPIs for widening actions for the near future, as well as to find more diversified ways for showcasing the project's successes.

Nevertheless, as the ECA reflects, the Commission has carried out surveys on the beneficiaries to assess the progress of the projects and to reach conclusions on the progress of the programme.

86. The Commission envisages putting in place a new measure within the Widening portfolio introduced in the Work Programme 2023-2024 to help beneficiaries with the dissemination and exploitation of results. Follow up after the end of funding will be ensured by systematic impact evaluation of closed projects after an appropriate elapse of time.

CONCLUSIONS AND RECOMMENDATIONS **(Paragraphs 87-99)**

Commission replies:

87. Research and Innovation (R&I) policy can only strive towards more excellence if everyone progresses. The EU's R&I system needs to promote a more inclusive approach in which all can participate and from which all can benefit. Existing disparities between R&I leading and lagging countries can be tackled by R&I investments and introducing structural policy reforms.

Closer links between research and innovation and institutional cooperation to produce high-quality knowledge are also paramount in helping bridge these disparities.

Furthermore, less R&I advanced countries will be able to upgrade their R&I systems, making them stronger and allowing the EU as a whole to advance together by building upon existing excellence and connecting them to broader networks. All possible means need to be mobilised and coordinated towards this end.

88. The success of the actions undertaken by the Commission require the engagement of national and regional systems through progress in institutional reforms and transformation processes of the R&I system, also with the help of mobilising national investments in R&I capacity and raising the bar for excellence of R&I actors in widening countries in partnership with outstanding European and international institutions.

Recommendation 1 – Strengthen the use of the PSF

1.A. The Commission accepts the recommendation.

1.B. The Commission accepts the proposed recommendation to put in place mechanisms (such as PSF open) to ensure the implementation of the recommendations elaborated in the context of previous PSF country exercises and in line with Semester and Recovery and Resilience Plans related reforms.

91. Horizon Europe, as a continuation of Horizon 2020, aims to increase the participation in the Framework Programme of the beneficiaries from the Widening measures.

The Commission is aware of the observations reported by the ECA and will act accordingly.

Recommendation 2 – Aim for a more balanced participation of widening countries in widening measures

The Commission accepts the recommendation and will examine possible measures considering the evolution of the participation of widening countries.

94. Although the Commission has continuously paid attention to the complementary funding for the widening projects (i.e. ex-ante controls), the scope of the Commission monitoring has been now enhanced during the lifetime of the project. In this respect, the Commission started asking for a report on the use of complementary funding at project review stage, thus placing more emphasis on the need to report on it and to be transparent in its use.

Recommendation 3 – Facilitate the timely availability of complementary funding

The Commission accepts the recommendation.

Article 73 of the Common Provisions Regulation for Union Funds implemented under shared management in the 2021-2027 programming period sets out rules that apply to the selection of operations by the managing authorities. Paragraph 4 of this article contains specific provisions for operations co-funded by Horizon Europe or which have been attributed a Seal of Excellence. These provisions can facilitate and accelerate the selection of such operations by managing authorities. The Commission is currently preparing guidance on synergies between Horizon Europe and ERDF (including on the use of the Seal of Excellence and teaming).

95. The measures adopted during the former Horizon 2020 are mostly still being implemented.

The Commission's new Framework programme Horizon Europe keeps this endeavour and takes the lessons learnt from the previous programme and the reports and monitoring related to the ongoing projects.

96. See the Commission's reply to paragraph 72.

Recommendation 4 – Enhance the capacity of project beneficiaries to exploit their research results

4.A. The Commission accepts the recommendation.

4.B. The Commission accepts the recommendation.

4.C. The Commission accepts the recommendation.

98. See the Commission's reply to paragraph 59.

99. The Commission will elaborate a coherent framework of KPIs for the entire portfolio of widening actions taking into account the specific requirements of the individual actions. This will include a guidance document to beneficiaries for mandatory implementation.

Recommendation 5 – Enhance monitoring of the widening measures

5.A. The Commission accepts the recommendation.

5.B. The Commission accepts the recommendation.