

Kunnskapsdepartementet
Postboks 8119 Dep
0032 Oslo

Oslo, 15. april 2011

EU-kommisjonens grønnbok om framtidig europeisk forskningsprogram – Innspill til norske synspunkter

Det vises til Deres henvendelse pr e – post av 10.02.11.

FFA - Forskningsinstituttene fellesarena takker for at vi er invitert til å gi innspill til norske synspunkter på grønnboken. I stor grad støtter FFA det norske innspill som allerede er gitt. Vi vil imidlertid fremme noen konkrete synspunkter knyttet til grønnboken. Våre innspill er skrevet på engelsk.

1. Working together to deliver on Europe 2020

Further real progress in *administrative simplification* is critically important. The recent package of simplification measures is very welcome. Those measures must now be made to work in practice. The Commission should aim at clear information and a high degree of openness regarding accounting systems, routines etc that have been accepted according to new rules. This will help beneficiaries adapt to the new regime. Moreover, the forthcoming revision of the Financial Regulations should enable further improvement. Real-cost funding must be the basis.

In order to help ensure that invention becomes innovation, further *post-research co-funding* will be needed. There is now a need and opportunity to significantly ramp up this kind of support, which should be generalized and seamless across programs, themes and priorities.

The development of concerted actions by the Member States like Joint Programming initiatives (JPI) is supported. In order to avoid difficulties in synchronizing national funding and program procedures, *binding commitments from participating states* are needed.

Solving grand challenges require a *balance between smaller and larger* R&D projects. In practice grand challenges can only be tackled by breaking down the headline challenge into specific, traceable objectives and deliverables. Both targeted projects and a bottom-up approach will be needed, from case to case.

Smaller projects are also needed in order to support economic competitiveness and completing the European Research Area.

In general it is of high importance to *preserve and reinforce* the Framework Program's central place in the European R&D system, in terms of budget as well as key instruments such as collaborative research and smaller projects. Even though the Framework Program equates to only about 5 % of total public funding in EU, it is a major source of transnational public project-based research funding in Europe.

2. Tackling Societal Challenges

The Green Paper asks how a stronger focus on societal challenges should affect the balance between curiosity-driven research and agenda-driven research. The answer is that both should continue to receive support in future EU research and innovation programs. Curiosity-driven research should however to a high degree be targeted by including such research in the strategically focused programs.

3. Strengthening Competitiveness

Pre-commercial procurement can be a powerful tool for driving innovation. Therefore the Commission should develop measures that encourage the Member States to develop substantial pre-commercial procurement schemes. A useful approach could be to agree a target whereby Member States would spend a certain percentage of their procurement budgets on science-based and innovative procurement.

4. Strengthening Europe's Science Base and the European Research Area

The increased attention to research infrastructures is welcomed. The initiative should however be extended to medium-sized facilities as well as to shared infrastructures, e-infrastructures, collections and other infrastructural resources. This will broaden the relevance of the infrastructure initiatives.

5. A specific suggestion for simplification.

The Commission has accepted the use of average personnel cost. It is possible for a beneficiary to apply for a Certificate on Average Personnel Cost (CoMAv). We will ask the Commission to publish the methodology in the accepted CoMAv. The beneficiary should be kept anonymous. There are more than 10.000 different beneficiaries and most of these will not ask for a CoMAv. But there are only a small number of significantly different methodologies. Publication should be performed such that it is easy for a beneficiary to find a methodology that is close to its own. Then the beneficiary may consider to change to the accepted methodology and possible state with the cost statement that it has used this particular methodology. The publication of the methodology should ideally be so detailed that it is limited possibilities for subjective interpretations. A publication of the methodologies in the CoMAv will lead to transparent economic rules, equal treatment of different beneficiaries and a standardization of methodologies. We cannot see any valid argument against publication of the methodology in the CoMAv in such a manner that the beneficiary is anonymous. We also encourage publishing all audit procedures. Together will these changes give increased trust and make the audits more objective and predictable and reduce the work load and conflicts.

Innretning og faglig profil på 8. rammeprogram er av den største betydning for instituttsektoren. FFA vil gjerne delta aktivt i den videre diskusjon med tanke på å komme fram til konstruktive forslag som fremmer norske interesser.

Med vennlig hilsen

Gunnar Jordfald

Daglig leder

T: 952 46 343

E: gunnar.jordfald@abelia.no