

COCIR Contribution to the EC proposal for Horizon Europe¹

1. Introduction

We welcome the European Commission proposal for Horizon Europe published on 7 June. Following on its predecessor Horizon 2020, Horizon Europe is supposed to be the most ambitious Research and Innovation programme of the European Union yet. As Commissioner Moedas said when announcing the new programme, Europe has built a "global reputation as a world leader in research and innovation programming"².

As the most innovative sector in terms of patents in Europe, the medical technology and digital health industry highlights the need to support research, development and innovation at the European level. COCIR members have a long-standing engagement in EU-funded research and innovation and look forward to the development of the new programme.

2. Executive Summary

COCIR supports the European Commission's efforts to maintain a vibrant research, development & innovation ecosystem in the European Union. We offer the following recommendations to ensure that Horizon Europe helps our members conducting R&D&I in Europe and bringing the most innovative medical and digital health innovation to the European patient:

1. We call on the European institutions to **increase the budget** for Horizon Europe to €120 billion, if not the €160 billion suggested by Pascal Lamy in his report.
2. **Pillar 2 should be allocated 60% of the overall budget** of Horizon Europe to acknowledge the strategic importance of collaborative R&D&I for European competitiveness.
3. Clarify the different types of public-private partnerships suggested and support the **creation of a dedicated healthcare partnership**.
4. Retain the possibility from the European Commission proposal to **access funding from other programmes** through the Seal of Excellence.
5. The **Rules for Participation should remain in the continuity from Horizon 2020**, including funding rates, selection criteria and IPR provisions.
6. We propose to **clarify the open access obligation** to ensure that an opt-out due to legitimate commercial interests remains possible.
7. As proposed by the European Commission, keep **dedicated funding for health research & innovation** within pillar 2, especially for the digital transformation of health and care.
8. **Involve all relevant stakeholders**, including industry, early in the formulation and selection of the missions.

¹ [European Commission Proposal for Horizon Europe – legal texts and factsheets](#)

² [Commissioner Moedas, From Horizon 2020 to Horizon Europe, 2 May 2018](#)

3. Detailed Briefing

3.1. Regulation and Rules for Participation³

3.1.1. Overall budget for Horizon Europe

In their proposal (*Article 9*), the European Commission has recognised the strategic importance of research & innovation. Horizon Europe has been allocated €97.9 billion, a welcome increase from its predecessor Horizon 2020 (€80 billion). However, in view of the expanding scope and needs of the research community, this sum can only be a minimum for the upcoming negotiations.

We call on the European institutions to increase the budget for Horizon Europe to €120 billion, if not the €160 billion suggested by Pascal Lamy in his report⁴.

3.1.2. Structure of the Programme

We welcome that the Programme will be structured (*Article 4*) around three pillars – (1) Open Science, (2) Global Challenges and Industrial Competitiveness, and (3) Open Innovation. Especially the second pillar will be crucial as it combines Horizon 2020's Societal Challenges and large parts of the former Industrial Leadership pillar. The medical technology and digital health industry is in the unique position to develop technologies with clear societal benefits. The large majority of our membership will thus focus on this pillar.

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3.1.3. European Partnerships

We very much appreciate the partnership instruments in Horizon 2020 that bring indispensable private capital to finance far-reaching research and innovation projects. We believe the success of Horizon Europe will depend on the close partnership of all actors from public authorities to industry, research, academia and citizens and would welcome the creation of a dedicated partnership in the healthcare field.

The European Commission proposes to streamline the number of partnerships that the EU co-programmes or co-funds with partners like industry, civil society and funding foundations. Three types are laid out in *Article 8*, however the distinction between the so-called co-programmed and co-funded European Partnerships is not yet entirely clear to us. Industry especially needs to clearly understand the required commitment and obligations for the private side of the partnership.

³ [Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing Horizon Europe – the Framework Programme for Research and Innovation, laying down its rules for participation and dissemination](#)

⁴ [LAB – FAB – APP, Report of the independent High Level Group on maximising the impact of EU Research & Innovation Programmes, July 2017](#)

Clarify the different types of public-private partnerships suggested and support the creation of a dedicated healthcare partnership.

3.1.4. Synergies with other programmes

We welcome the European Commission's proposal to make the Seal of Excellence (*Article 11*) more effective by foregoing the second evaluation by the other fund currently still necessary. Together with the possibility that member states can allocate up to 5% of their Cohesion Funds to other EU programmes, such as Horizon Europe, this is certainly a step in the right direction.

Retain the possibility from the European Commission proposal to access funding from other programmes through the Seal of Excellence.

3.1.5. Rules for Participation

We are glad that both the award criteria (*Article 25*) and the funding rates (*Article 30*) have been taken over from Horizon 2020. No changes should be made here to provide continuity to beneficiaries.

The Rules for Participation should remain in the continuity from Horizon 2020, including funding rates, selection criteria and IPR provisions.

3.1.6. Open Science

The proposed Open Science provisions (*Article 35.3*) seem to go beyond the open access policy of Horizon 2020 and require open access to publications, data, and to research data management plans. We are worried that open access requirements that could be misunderstood or be unsuitable for businesses prevent industry from participating in Horizon Europe.

We propose to clarify the open access obligation to ensure that an opt-out due to legitimate commercial interests remains possible.

3.2. Specific Programme⁵

3.2.1. Clusters

The European Commission proposal (*Article 3*) allocates €7.7 billion to research & innovation in the health area. It is extremely important that health research and innovation have their place in Horizon Europe, considering the enormous challenges European health systems are facing. All the proposed areas of intervention in the health cluster are crucial to focus on the best value for the patient and support the development of integrated care in the EU. We especially welcome the area of intervention on tools, technologies and digital solutions for health and care. The challenges posed by the different clusters cannot be addressed in silos. As we recommended in our mission proposal for Horizon Europe⁶, dedicated funding is necessary to jointly address the "health" and "digital" challenges.

⁵ [Proposal for a DECISION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on establishing the specific programme implementing Horizon Europe – the Framework Programme for Research and Innovation](#)

⁶ [COCIR mission proposal "Live longer, Feel better: a European mission for the digitisation of healthcare"](#)



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3.2.2. Global Missions

The European Commission proposes a process to select a limited number of inspiring and ambitious missions on topics that affect the lives of European citizens. We strongly support the development of a mission to address UN Sustainable Development Goal 3: Ensure healthy lives and promote well-being for all at all ages. *Article 5* of the Specific Programme lays out the process for the selection of missions. Here especially the involvement of industry is crucial to fully realise the benefits for European citizens, societies and economies and make the link to relevant public-private partnerships.

Involve all relevant stakeholders, including industry, early in the formulation and selection of the missions.