

**EUROHORCs comments on
European Commission decision of 24 January 2011
on three measures for simplifying the implementation of FP7**

Introduction

EUROHORCs members welcome the European Commission decision of 24 January 2011 on *three measures for simplifying the implementation of Decision No 1982/2006/EC of the European Parliament and of the Council and Council Decision No 970/2006/Euratom and amending Decisions C(2007) 1509 and C(2007) 1625*, as part of its efforts to simplify the implementation of FP7.

However, this decision can only be considered as a first step. Indeed, EUROHORCs members believe that further improvements are still possible without changing the legal framework, whilst drastic changes will be necessary for the success of a competitive future Common Strategic Framework for Research and Innovation.

Additional measures of simplification

EUROHORCs members welcome the three measures for simplifying the implementation of FP7. Nevertheless, for Public Research Performing and Funding Organisations, which constitute a large proportion of the beneficiaries of FP7, this decision has little or no impact on the administrative burden they have to face:

- The acceptance of average costs is still subject to criteria that prevent full use of institutions' own accounting systems and practices;
- Measures aimed at simplification for SME are welcomed, but by definition do not directly benefit EUROHORCs members or many of the organisations funded by them;
- The 'Clearing committee' is welcomed, but the nature of this is such that it might not necessarily help resolve disputes between the Commission and beneficiaries over diverging interpretation of rules in a timely manner. This seems neither to be a mediation service, nor an appeal or arbitration service that both Commission and beneficiaries can easily use.

EUROHORCs members would like to reiterate that other simplification measures are still possible within FP7 that would benefit both the Commission and beneficiaries. Therefore, they encourage the Commission to:

- revoke its interpretation of the Financial regulation that obliges coordinators to open Interest Bearing Bank Accounts;
- clarify and shorten guidelines and use well-defined, unambiguous terminology (there may be a need for a 'dictionary' to ensure common understanding of key terms);

- implement measures to ensure the traceability of decisions taken between Project Officers and coordinators, in order to insure legal certainty over time;
- further improve the *Participant Portal* which brings already significant facilities for participants.

As additional, concrete measures of simplification, EUROHORCs members would like to put forward two ideas:

Increased understanding of beneficiaries by the Commission

Research organisations know that they have to understand the European Commission procedures and have therefore established EU specialised units in their organisations. EUROHORCs members suggest that the Commission could do likewise, organising units ('mirror services') that are specialists in understanding the different Member State research landscapes and national regulatory frameworks and better knowing the specific beneficiaries. They would become the main interlocutors when dealing with implementation in respect of a given research entity. This could restore trust between the Commission and stakeholders.

Plug into the current scientific evaluation a financial check in order to anticipate a science-based approach

In the EUROHORCs *Key Elements* document, there was the suggestion of introducing a science-based approach composed of three major elements:

- a strong scientific *ex ante* evaluation made by independent peer reviewers seconded by an financial check on the top ranked proposals made by independent financial experts;
- a new project-specific lump sum based on a full cost budget breakdown of the project;
- the use of an institution's own accounting system and practices in order to build the budget.

The last element is, as already mentioned, a demand that should be fully operational even in FP7 whereas the second one requires appropriate changes in the Financial Regulation. Finally, the first element could be tested in the remaining calls of FP7 in order to study the feasibility of this new check.

Conclusion

EUROHORCs members consider that FP7 management improvement is still possible. They strongly believe that the Commission has the necessary highly competent staff and can further develop its efforts on this crucial subject whilst preparing for the future.

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