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The European University Association (EUA) welcomes the decision of the ERC Review Panel, in conducting its work, to open a consultation with the main European organizations representing stakeholders concerned with European research policy and funding instruments. EUA has offered its views at all stages in the development of the European Research Council, its membership, operating procedures on eligibility of applicants and peer review panel remits, and it believes that this openness to take account of stakeholders' views and feedback will continue to be ERC's "hallmark". The early dialogue established between EUA and the ERC President and Chairman of the Scientific Council, Professor Fotis Kafatos, has been valued highly, particularly his willingness to engage in exchange and debate with university leaders and researchers at major EUA membership conferences and at the launching of its new Council for Doctoral Education.

Prior to addressing the three key elements of the current review on which stakeholders' views are being currently requested, the EUA would wish to make the following general remarks:

General remarks

In its first two years of existence, the ERC has demonstrated already its strong capacity to act successfully as a catalyst in mobilizing scientific excellence in Europe. As a new funding instrument on the European landscape, the ERC has achieved both high visibility and legitimacy, amongst researchers and the institutions in which they are based, as a mark of research excellence in Europe.

To maintain and strengthen this position, ERC funding will need to be substantially increased to support the high quality applications evaluated otherwise there will be the clear risk that this major achievement will be dissipated by the gradual effect of researchers and institutions turning away because of low success rate of applications due to limited resources. ERC funding should be increased in absolute and relative terms within the overall framework and balance of research funding at European, national and regional levels.

University-based research in Europe needs to be financially sustainable and this has to be achieved in a reality where external competitive funding sources, both public and private, account for an ever greater proportion of university research budgets. EUA, as a major part of its work on university financing, has emphasized that European research funding schemes are major drivers in the move towards full costing in Europe's Universities. EUA has recognised that the anticipated high volume of applications has been a determining factor in the ERC's decision to limit the re-imbusement of indirect research costs to a flat rate of 20% but we hope that the

ERC Scientific Council will review this decision. Universities need to receive the full costs of conducting externally-funded research. The EUA is committed to the principle of full cost research funding and regards the FP7 new eligible research cost model as a move in the right direction.

Review and evaluation of the work of the ERC is an important task and it should be kept in mind that only two application rounds have been fully conducted and that funded ERC projects have only therefore started recently. A further review in two years' time would be an appropriate point to make a fuller assessment. It is critical that universities as major stakeholders take part in an independent review process as it develops in future years.

Review Panel Key Issues I – ERC Structures and Mechanisms, criteria of scientific excellence, autonomy, efficiency and transparency

With its specific structure and selection mechanisms the ERC as a new and “learning organization” has shown autonomy from political influence and efficiency in the face of high expectations and high levels of demand particularly in the first round of ERC Starting Grants. The essential principle on which ERC was created has been fulfilled – the support of investigator-driven scientific projects evaluated according to the sole principle of scientific excellence. This principle must be ensured also for the future.

However, in ensuring that scientific excellence is the sole criterion, an evaluation of the selection process from a gender perspective is desirable. For example, how career breaks will be addressed in the evaluation of ERC Advanced Grants is an important issue. In general, the low participation of female researchers deserves further analysis and attention.

ERC should consider also publishing advice (based on analysis of the first call for ERC Starting Grants) to young researchers particularly from new Member States on how to improve their chances of success. It is essential to provide support generally to young researchers in the application process and in their understanding of the decisions reached. More feedback from panels would be valuable particularly in the case of those applications falling just short of the threshold mark for a grant. It is noted also that it is sometimes difficult to get in touch with ERC officials, and the National Contact Points (NCP) links with university research offices have not always been satisfactory.

The application procedures should be as clear and simple as possible. It is important that applicants gain a positive impression from the process. Researchers – especially talented young researchers – must be continually attracted to apply for grants and hence the application process should not be too burdensome and time-consuming, and in the case of those who are successful the administrative reporting requirements during the period of the grant should be limited to enable full energy to be devoted to the research effort.

The part of the ERC process whereby young researchers are invited to an interview in Brussels has merits and benefits as an innovative approach. However, it is important to ensure that projects are not finally selected on the basis of the best oral presentations but rather on their greatest research potential. The interviews are relatively short and hence it is important to send precise information to the interviewee addressing the purpose, content and conduct of the interview.

In general, the implementation mechanisms of the ERC grant schemes have shown a reasonable degree of flexibility and “user-friendliness” towards the applicants. After the overwhelming wave of proposals following the first call, applications have been dealt within a reasonable time period but improvements need to be achieved in the administrative procedures leading to the transfer of funds to the successful applicants.

The transparency of the ERC peer review procedures for the evaluation of proposals is crucial. It is critical to engage the most qualified peer reviewers in order to ensure respect and acceptance of the process and final funding decisions reached. ERC should consider a wider consultation with European stakeholder organisations and national research councils for the recommendation of qualified peer reviewers.

The structures and mechanisms of the established panels of experts covering the three main scientific domains have been well-conceived but there is room for better implementation of the evaluation criteria across the 25 panels. For example, the present number of sub-field/topic components in each panel range from 10 – 12. To deal effectively and fairly with the full range and diversity of research themes in each panel domain, the number of components should be increased with a parallel effort to select panel members with interdisciplinary competencies that cover the most innovative aspects of the scientific domain. Alternatively, to ensure the necessary coverage of scientific domains in frontier research, it should be considered to increase the number of panels from the present 25 to 30-35.

Greater turnover of panel members should also be considered in order to facilitate the coverage of the widest spectrum of research themes within each scientific domain. In order to maintain an appropriate balance between continuity and change within the panel memberships, a turnover in the range of 25 to 50% of panel membership every second year should be sought.

Review Panel Key Issues II – Process and Criteria for the Selection of the Members of the Scientific Council

The substantial commitment and dedication that the Scientific Council has put into launching successfully the ERC is highly appreciated by the scientific community. The crucial role and

influence of the Scientific Council on the future European scientific development cannot be overstated. It is of the utmost importance to safeguard the prestige and autonomy of the Scientific Council by full transparency of the selection process. As with the initial setting-up of the ERC Scientific Council, and the recent replacement of retiring members, an independent “identification committee” should be established that seeks nominations from major European stakeholders representing universities and other research institutions. EUA notes that the present Review Panel’s remit does not provide much information or perspectives on how the future Scientific Council membership will evolve. Transparency of the selection process will be essential in maintaining the ERC’s credibility. An appropriate balance of membership between universities and other research institutions should be given particular attention, reflecting the need to encourage innovative interdisciplinary approaches in basic research and young researchers.

Review Panel Key Issues III – Advantages and Disadvantages of a Structure based on an Executive Agency and a structure based on Article 171 of the European Commission Treaty

The present model whereby ERC has been established as an Executive Agency has allowed so far for the ERC to work generally in an efficient and flexible manner. A reasonable strategy would seem therefore to allow the ERC to operate as it is for a few years and then evaluate the experience of ERC as an Executive Agency in terms of its efficiency and effectiveness, before any further steps are considered on whether to make the ERC more independent of the European Commission. Whether as an Executive Agency or a structure based upon Article 171, the primary need for the future is to ensure that the ERC should develop as an independent body.

A further important aspect of the debate about the future of the ERC relates to the European Research Area policy framework in FP7 and beyond. From the perspective of universities the continued development of “simplification” of FP7 operational, financial and reporting procedures remains a high priority. A potential risk of having a separate and independent ERC may be the introduction of separate rules and procedures which undermine the progress of the “simplification” process to date. There are already present cases of Joint Technology Initiatives within FP7, and the recently launched European Institute of Technology, where new financial and administrative requirements are being introduced. The ERC Executive Agency should work within the FP7 simplification policy while preserving its core principles of autonomy, excellence and transparency in its decision-making processes.

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