

EAIC's position paper on the Future EU Multiannual Financial Framework 2028–2034

Position Paper

March 2026

Introduction

The European Association of Innovation Consultants (EAIC) welcomes the European Commission's proposals for the European Union's next Multiannual Financial Framework (MFF) for 2028–2034. Taken together, the proposed architecture for the next Framework Programme for Research and Innovation (FP10 / Horizon Europe 2028–2034), the European Competitiveness Fund (ECF), and the future National and Regional Partnership Plans (NRPPs) represents a major reform of the EU funding landscape, with the ambition of reinforcing Europe's competitiveness, strategic autonomy, innovation capacity, resilience and territorial cohesion.

EAIC supports the overall direction of this reform. Europe needs a more integrated approach linking research, innovation, industrial deployment and territorial development, while preserving the specific objectives and governance logic of each instrument. The next MFF should create a coherent continuum from collaborative research to industrial scale-up and regional implementation, while maintaining accessibility, excellence, predictability and balanced participation across the Union.

At the same time, the success of the future architecture will depend on several conditions: a sufficiently ambitious and stable budget; clear and predictable programming; appropriate use of grants and financial instruments; transparent and expert-based award procedures; strong and differentiated governance between FP10 and the ECF; and a meaningful role for regions and regional innovation ecosystems in implementation.

Drawing on the practical experience of EAIC members in preparing and implementing EU-funded projects across sectors and Member States, this joint paper sets out the Association's main cross-cutting messages for the future MFF.

Position on the future FP10

EAIC welcomes the European Commission's proposal establishing Horizon Europe for the period 2028–2034. The proposed financial envelope of €175 billion (in current prices, €155 billion in 2025 prices) represents an important step forward compared to the current programme. However, given the scale of Europe's technological and industrial challenges, this level should be considered a minimum baseline. EAIC therefore reiterates its previous recommendation that the budget should reach **at least €200 billion**, as already advocated in our June 2024 position.

Maintaining the overall structure of the programme (and its name) is a significant strength. We should maintain continuity with Horizon Europe while modernising governance. We recommend clearer governance rules and simplified participation conditions to reinforce strategic orientations.

The strengthened alignment between research, innovation, competitiveness, and economic security reflects the evolving geopolitical and industrial context of the Union. EAIC supports the ambition to reinforce Europe's technological leadership and strategic autonomy through a more integrated and performance-oriented framework.

However, we identify several areas where targeted adjustments would significantly improve legal certainty, evaluation quality, implementation predictability, and long-term impact delivery. In particular, the increased reliance on lump sum funding, new research security provisions and enhanced governance mechanisms require additional safeguards to ensure fairness and operational clarity for applicants and beneficiaries.

Core Messages

- The Horizon Europe budget should reach **at least €200 billion** in 2025 prices, and the financial envelope should be ring-fenced against erosion through flexibility mechanisms.
- Collaborative research under **Pillar II must remain the backbone of the Framework Programme**, with a share of at least 50% of the overall budget.
- Programme predictability must be strengthened through **multiannual call pipelines, while evaluation integrity must be reinforced through stable award criteria and transparent expert-based evaluation procedures**.
- Dual-use research and international cooperation require **clear participation rules and safeguards for associated and third countries**.
- Lump sum implementation must include **clear safeguards for work package assessment, payment predictability and project management**.
- Research security provisions should be **risk-based, proportionate and operationally clarified**.
- Governance between Horizon Europe and the **European Competitiveness Fund (ECF)** must remain clearly differentiated to preserve excellence-based evaluation.
- European Partnerships should remain **strategic, limited in number and open to newcomers**.

- Professional project management and **post-project impact acceleration mechanisms** should be recognised as essential elements of programme implementation.
- EU **key transversal concepts and terminology** should be harmonised and clarified across **EU funding instruments** and templates, through shared references to reduce ambiguity, administrative burden and inconsistent interpretation.

Stronger mechanisms such as **short-duration acceleration calls to support post-projects exploitation, scaling and capitalisation** of Horizon Europe results are needed.

A detailed position paper is also available here: [FP10](#).

Position on the European Competitiveness Fund

The European Association of Innovation Consultants (EAIC) welcomes the European Commission's proposal for the European Competitiveness Fund (ECF). EAIC recognises that global competition in strategic technologies requires a more integrated European approach to research, innovation and industrial deployment, while ECF constitutes an important step in the right direction. EAIC wants to support the developments by providing observations and suggestions for making the ECF the best possible; the following provides our key messages.

1. Increased flexibility and agility vs. ensuring predictability for the users

The proposed Regulation provides for enhanced flexibility in budget allocation and annual work programme design to respond rapidly to evolving strategic priorities. Frequently and strongly shifting funding priorities may however impact the willingness of industry and infrastructure owners to commit resources. Recommendations:

- Setting clear budgetary limits for i) fixed themes, where the budget is ring-fenced for the specific theme, and ii) flexible themes where the budget can be re-allocated
- Defining a process that includes transparency requirements for re-allocations.

2. Defining award criteria in Work Programme level vs. time to build high quality proposals?

The detailed award criteria are planned to be defined in Work programmes level. Consequently, the applicants would have just 3 months from learning about the criteria to the first call deadlines, while building high-quality proposals takes several months more. Furthermore, short preparation periods may also create asymmetries in preparedness among applicants, as organisations with prior insight into emerging priorities or ongoing policy discussions may be better positioned to mobilise resources quickly than newcomers or smaller actors. Recommendations:

- Establishing core award criteria at regulation or delegated act level
- Publishing rolling multiannual (e.g. three-year) indicative call pipelines of the funding scope;
- Publishing draft WPs 6-12 months before deadlines, limiting changes to clearly justified cases
- Maintaining stable core evaluation criteria across programming cycles.

3. Definition of deployment: Clarification for the share of grants in the Toolbox

The ECF toolbox combines grants, loans, equity and guarantees. On the other hand, the concept of "deployment" is not clearly defined or linked with Technology Readiness Levels (TRL), hence it is not clear if the projects will be eligible for grants. Recommendations:

- Providing explicit TRL guidance linked to each funding modality.
- Maintaining sufficient grant envelopes across policy windows.

4. Co-funding vs. SME participation

The definition of co-funding leaves space for different interpretations. While lower funding rates of for-profit organisations are acceptable, the text leaves space for interpretation of potential mandatory in-cash contributions from participants at proposal stage. This could

disproportionately affect SMEs and innovative mid-caps, and limit accessibility and reducing diversity of participation. Recommendations:

- Providing clear definitions in co-financing mechanisms and how they will be implemented in participant level, avoiding compulsory in-cash participation requirements at proposal stage.

5. Project advisory vs. ensuring complementarity with existing Ecosystems

The Regulation foresees a centralised access to a variety of project advisory services. This calls for clarity to ensure complementarity with existing innovation support ecosystems and to avoid unnecessary duplication with services provided by private sector. Recommendations:

- Defining clearly the scope of advisory activities (guidance vs project drafting);
- Fostering complementarity with existing innovation advisory ecosystems which expand the resources for advising and supporting project building, and engage the stakeholders in active building of innovation pipeline

6. Award procedures vs. ensuring expertise and neutrality

The Regulation foresees that funding award procedures can be run jointly with EU Member States, EU institutions, international organisations or other third parties. Recommendations:

- Establishing strict conflict-of-interest safeguards;
- Ensuring independent expert evaluation;
- Publishing governance structures clarifying decision-making roles.

7. Applying single rulebook vs clear terminology

In the current MFF, vague definitions of some of the essential terminologies makes it difficult especially for newcomers to build a competitive proposal. Establishing a single rule book in ECF makes clear terminology increasingly important. Recommendations:

- Establishing a glossary of the key terminology e.g. in the annotated model grant agreement.

8. Defined technical pathways vs. technology neutrality

Article 33 sets out multiple technological pathways but does not explicitly state that funding should be guided by the principle of technology neutrality. This may lead to favouring predefined or dominant technologies over emerging innovations or disruptive solutions. Recommendations:

- Confirming explicitly the principle of technology neutrality throughout ECF
- Ensuring an outcome-oriented approach to funding, based on demonstrable impacts

9. Governance: Interface Between FP10 and ECF and performance monitoring

The Regulation establishes a close operational link between FP10 and the ECF. However, clear separation between excellence-driven research evaluation and deployment-oriented industrial instruments is essential, while providing clear mechanisms for transferring from one support modality to another. Moreover, ECF introduces a performance framework aligned with the post-2027 MFF. Recommendations:

- Articulating clearly the governance roles and decision-making competences between FP10 and ECF bodies;

- Establishing transparent transition pathways between FP10-funded projects and ECF deployment instruments, providing a track from ideas to system level demonstrations
- Defining explicit plan for publishing annually time-to-grant, time-to-payment and SME participation metrics, and defining actions how to improve them.

A detailed position paper is also available here: [European Competitiveness Fund](#).

Position on National and Regional Partnership Plans

The EAIC welcomes the European Commission's proposal for the EU's next long-term budget (MFF), which sets the framework for the Union's economic resilience, competitiveness and territorial cohesion for the period 2028–2034 and the creation of National and Regional Partnership Plans for investments and reforms to be developed by Member States and regional authorities, aimed at supporting cohesion policy and targeted measures. Around €450 billion will be available for economic, social and territorial cohesion, with at least €218 billion for less developed regions.

However, the EAIC expresses concerns regarding the marginal role currently envisaged for regions in the planning, implementation and monitoring of EU funds, as well as the implications for accountability, transparency and policy coherence arising from the pooling of different policy areas into a single national plan. Regional authorities hold essential territorial and industrial intelligence and are responsible for policy domains, such as economic development and infrastructure, that are directly linked to competitiveness. While the EAIC supports the ambition to strengthen both competitiveness and cohesion, it stresses the need to formalise the role of regions to ensure place-based, innovation-driven and equitable investment strategies within the new framework.

Cohesion and agricultural policies remain at the core of the proposed architecture and are to be channelled through National and Regional Partnership Plans (NRPPs), conceived as the central delivery mechanism. However, the proposed merging of previously distinct policy strands, such as cohesion policy, the Common Agricultural Policy and the Common Fisheries Policy, within a single planning framework risk creating internal competition between objectives and diluting their territorial focus. The EAIC therefore underlines that the effective functioning of NRPPs will depend on their capacity to maintain a strong and structured link between EU governance and regional and local authorities, whose proximity to economic and social realities is essential for sound investment prioritisation.

Core Messages

- Future EU funding frameworks should **reinforce multi-level governance** by ensuring a meaningful, formal role for regions and structured coordination with national authorities and the Commission.
- Include **structured shared-management arrangements** between regional authorities and the European Commission to support continuous coordination and clarification of responsibilities.
- Enable **technical coordination mechanisms** to facilitate direct exchanges on programme implementation when needed.
- Clear and predictable funding streams—especially for cohesion, S3 and I3—are needed to avoid policy overlap.
- Maintain distinct and well-regulated financial envelopes to provide transparency, ensure traceability of resources and avoid dilution between instruments.

- **Stronger territorial intelligence, including regional indicators and impact assessments**, will improve transparency and accountability.
- Develop regional level indicators and budget transparency tools to support monitoring and reporting. Implementation should rely on **clear national–regional agreements**, co-created project pipelines, and midterm reviews to adapt investments to emerging needs.
- Establish a robust monitoring and evaluation framework to assess regional participation, competitiveness gaps and overall programme performance.

Integrate support mechanisms for high-quality projects and promote structured collaboration among regional innovation ecosystems (public authorities, SMEs, clusters, research actors) to reinforce implementation capacity.

A detailed position paper is also available here: [National and Regional Partnership Plans](#).

About EAIC

The European Association of Innovation Consultants (EAIC) brings together active innovation consultants in the field of European research and innovation projects. The association aims to facilitate the exchange and promotion of best practices, as well as to uphold professional skills and expertise in European RDI funding. To date, the group has assembled more than 50 members who are active throughout Europe. Since 2021, EAIC members have supported more than 550 Horizon Europe projects and more than 70 Innovation Fund projects, while also working extensively with beneficiaries and innovation ecosystems at national and regional level. This practical perspective underpins the recommendations below.

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