

European Research Area Public consultation questionnaire

Fields marked with * are mandatory.

Introduction

This public consultation forms an integral part of the preparation of the European Research Area Act (the 'ERA Act').

[The Commission Communication on a Competitiveness Compass for the EU](#), adopted on 29 January 2025, included the ERA Act as one of the flagship actions aimed at 'closing the innovation gap' with other global economic powers. The ultimate objective of the ERA Act is to strengthen the capacity and performance of the EU's research and innovation ('R&I') ecosystem and to help the EU become the world's most attractive destination for researchers. The ERA Act aims to tackle enduring issues that hinder the efficiency and performance of the European R&I ecosystem, such as fragmented regulatory frameworks, disparities in research and development ('R&D') investment, and barriers to knowledge sharing and cooperation. Building on [Enrico Letta](#)'s and [Mario Draghi](#)'s 2024 reports, the ERA Act will be an opportunity to ensure the 'fifth freedom', the free circulation of researchers, scientific knowledge and technology in the EU's single market. The ERA Act will do this by tackling obstacles to this fifth freedom, through the uniform application of rules and the enforcement of EU policies to create a level playing field for researchers and innovators across the Member States. The ERA Act is closely linked to other initiatives announced in the [Commission's Political Guidelines](#), in particular the proposal for a European Innovation Act.

The purpose of this public consultation is to collect feedback on the key challenges that the ERA Act aims to address and on potential solutions to tackle them by means of EU-level legislation.

The issues addressed include:

- reaching public and private investment goals;
- aligning the policies and programmes of the EU and the Member States, and across the Member States;

- challenges related to upholding the fundamental values of the European Research Area;
- improving the framework conditions for research and researchers.

This consultation questionnaire is structured around the main areas and problems that fall within the scope of the future legislation. It will take a maximum of 25 minutes to complete the full questionnaire but you are also welcome to only respond to the sections that are relevant for you.

The results of this public consultation will be summarised in a report that will be published on the [Have your say](#) website. The results will also be analysed together with other data that is being collected through targeted stakeholder consultations and an impact assessment. At the end of the survey, you will have the possibility to upload a file with a more detailed contribution.

*** Please select the sections of the questionnaire to which you would like to contribute:**

- 1. Strengthen R&D investment and bring it up to the 3% GDP target to address the current lack of investment.**
- 2. Greater alignment of R&I investments, policies and programmes between the EU and Member States, and between Member States.**
- 3. Improve the general conditions for research and researchers in Europe.**
 - 3.1. Upholding the fundamental values of the European Research Area: freedom of scientific research; gender equality and equal opportunities.**
 - 3.2. Ensuring the free circulation of researchers and scientific knowledge: researchers' careers and mobility; free circulation of scientific knowledge; European research infrastructure consortia; knowledge valorisation.**
 - 3.3 Aligning guidance on artificial intelligence (AI) in research.**
 - 3.4 Improving consistency in approaches to international cooperation and research security across the EU.**

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business
- Consumer organisation
- EU citizen
- Environmental organisation

- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

*** First name**

Denise

*** Surname**

Schuetz-Kurz

*** Email (this won't be published)**

schuetz@vci.de

*** Organisation name**

255 character(s) maximum

German Chemical Industry Association (VCI)

*** Organisation size**

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

15423437054-40

*** Country of origin**

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

- Afghanistan
- Åland Islands
- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Djibouti
- Dominica
- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Libya
- Liechtenstein
- Lithuania
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Saint Martin
- Saint Pierre and Miquelon
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname

- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Myanmar/Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Türkiye
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine

- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena
Ascension and
Tristan da Cunha
- Saint Kitts and Nevis
- Saint Lucia
- United Arab Emirates
- United Kingdom
- United States
- United States
Minor Outlying
Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

If you are contributing as an individual researcher, what is your main scientific field of research?

- Natural sciences
- Engineering and technology
- Medical and health sciences
- Agricultural and veterinary sciences

- Social sciences
- Humanities and the arts

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* **Contribution publication privacy settings**

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

1. Strengthen R&D investment and bring it up to the 3% GDP target to address the current lack of investment

The EU's [R&D intensity](#), measured as the proportion of GDP spent on R&D, is still well below the target of 3% of GDP set by the [European Council in Barcelona in 2002](#), despite the steady but slow progress made since then. In 2023, approximately EUR 381 billion was invested in R&D in the EU, which accounts for only 2.22% of the EU's GDP. The large disparities between Member

States (ranging from 0.5% to 3.6% of GDP) are partly due to the lack of private investment in R&D compared with other major economies (China, Japan, South Korea, United States, etc.). The low level of R&D intensity negatively affects the EU's competitiveness and, therefore, its socio-economic progress and the resilience of our society, and accentuates the R&D investment gap with other countries.

Meeting the EU's 3% target would require an additional investment of EUR 134 billion per year across the EU. Therefore, to achieve the 3% target by 2030, the EU would need substantial additional funding from both private and public sources, a better alignment and complementarity between public and private investments, and better coordination of policies at both national and EU levels.

Current situation

To what extent do you agree with the following statements?

	Strongly agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Strongly disagree	No opinion
The EU's innovation gap with other major economies is largely caused by underinvestment in R&D.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
We should reduce disparities in R&D intensity between Member States, which create innovation gaps inside the EU.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increasing R&D intensity should be a priority at EU level to boost socio-economic progress and competitiveness in the EU.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Possible way forward

To what extent are the following suggestions appropriate for EU-level legislation to increase R&D intensity?

	Very appropriate	Somewhat appropriate	Neither appropriate nor inappropriate	Somewhat inappropriate	Very inappropriate	No opinion
Define national R&D intensity targets, where public investments are solid obligations.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ask Member States to write multiannual national plans or roadmaps for implementation and monitoring of progress towards R&D intensity targets.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensure the better use of public R&D investments to further mobilise private R&D investments.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide the reasoning behind your responses and/or additional suggestions. Are there any other key challenges regarding the need to increase R&D intensity or possible ways to address this challenge that you think should be considered?

2000 character(s) maximum

Industry (Start ups, Scale up, SMEs, Mid Caps as well as big Industry) must be recognised as an equal player in the ERA. The ERA Act should create innovation-friendly conditions across the entire innovation chain—from basic research to pilot plants and industrial scaling—with predictable governance, lean permitting for pilot /demonstration plants, and simplified state-aid frameworks (GBER/R&D&I/IPCEI). Potential national trajectories and multi-annual plans towards at least 3% R&D intensity should be designed in a way to crowd-in private investment. To close current support gaps, the categories 'small mid-caps' (SMCs <750 employees) and 'mid-caps' (<3000 employees) should be applied swiftly, especially in the context of R&D&I. This definition of mid-caps was already used in the Investment Plan for Europe (2015) and has already been applied in some funding programmes such as Horizon Europe (2021). Applying Better Regulation Toolbox #22 and establishing technology-neutral regulatory sandboxes (incl. sector-specific experimentation clauses) are key levers to reduce bureaucracy and enable scale-up, notably across TRL 5–7.

2. Greater alignment of R&I investments, policies and programmes between the EU and Member States, and between Member States

In addition to the lack of R&D intensity, the EU falls short of what it could achieve in R&D because policies and investment priorities are not sufficiently coordinated between Member States and between the EU and the Member States. R&I in Europe is governed at multiple levels, with policies and investment pursued at the local, regional, national and EU levels, scattered across ministries in different Member States.

Investments in R&D are often dispersed and poorly aligned between Member States, while only about 10% of total R&D spending is managed through EU-wide programmes. By contrast, competitors like the United States benefit from a single national strategy, leading to a more coordinated allocation of resources and the strategic alignment of investment priorities. This disparity is especially problematic for sophisticated and complex technologies such as AI, quantum computing or biotech. This fragmentation of European R&D investments makes it difficult for the EU to address common challenges by focusing on a coherent set of strategic areas, and leads to missed opportunities for collaboration and network effects.

Current situation

To what extent do you agree with the following statements?

	Strongly agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Strongly disagree	No opinion
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The lack of mechanisms to coordinate and prioritise research and innovation policies at EU level reduce the effectiveness of R&D investments.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The existing institutional structures and instruments are insufficient to align policies and R&D investments across Member States, and between Member States and the EU, and to set out strategic priorities.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU spending on R&D is not well-aligned with key EU-wide policy priorities, e.g. industrial policy.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Existing mechanisms that support R&D initiatives co-funded by different actors (notably European Partnerships [1]) are not sufficient to address the current needs for coordination and alignment.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The system of European Partnerships is too complex and fragmented in terms of its implementation modalities.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
There are too many European Partnerships to ensure critical mass and strategic orientation.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

[1] *‘European Partnership’ means an initiative, where the EU, together with private and public partners, commit to jointly supporting the development, implementation and evaluation of a programme of activities, and where the costs are shared between all partners.*

Possible way forward

To what extent are the following suggestions appropriate for EU-level legislation to better align R&D investments, programmes and policies?

	Very appropriate	Somewhat appropriate	Neither appropriate nor inappropriate	Somewhat inappropriate	Very inappropriate	No opinion
Create a coordination instrument to allow the EU and the Member States to set out their strategic R&D priorities together.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The competencies of the ERA governance bodies (i.e. the ERA Forum and the European Research and Innovation Committee - ERAC) could be expanded and applied to the definition of strategic priorities and to the alignment of R&D investments and policies.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The European Partnerships should concentrate a critical mass of funding in key strategic areas, which are aligned with the EU's priorities.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The system of European Partnerships should be constructed in such a way that it is flexible enough to adapt to evolving EU policy priorities, for instance by re-orienting existing European Partnerships, possibly ending existing Partnerships or creating new ones.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

<p>The system of European Partnerships should become more transparent and easier to use by creating and running partnerships in a harmonised way.</p>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>Key provisions for implementing European Partnerships should be included in the ERA Act.</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>The respective roles of public and private actors should be taken into account in creating and running European Partnerships</p>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide the reasoning behind your responses and/or additional suggestions. Are there any other key challenges regarding policy and investments alignment or possible ways to address them that you think should be considered?

2000 character(s) maximum

Persistent fragmentation reduces effectiveness. The ERA Act should enable a coordination between the EU and Member States to co-set strategic priorities and align investments, with systematic industry involvement. European Partnerships should concentrate critical mass in strategic areas (incl. chemistry), remain flexible to re-orient/sunset, and be more transparent and easier to use. Convergence should rely on best practices rather than rigid harmonisation. Use innovation stress-testing and regulatory sandboxes to anticipate implementation barriers.

3. Improve the general conditions for research and researchers in Europe

3.1 Upholding the fundamental values of the European Research Area

In 2021, the Council of the EU agreed on a set of fundamental values underlying the revamp of the ERA in the [Pact for Research and Innovation in Europe](#). The ERA must ensure that its fundamental values are respected in full throughout the EU in a consistent and fair manner. These values are the unquestionable promotion of the freedom of scientific research, and of ethics and integrity when carrying out R&I, and the promotion of gender equality and equal opportunities.

3.1.1 Freedom of scientific research

There is currently no harmonised EU-level legal framework that ensures the consistent and enforceable protection of freedom of scientific research in the Member States. Researchers and research institutions across the EU face a combination of pressures that, in practice, can limit the full exercise of freedom of research.

The absence of a clear and enforceable EU framework has contributed to uneven levels of protection of freedom of scientific research in the Member States. This has led to significant disparities between Member States, making the EU a less attractive destination for global research talent, and undermining the objectives of the ERA.

Current situation

To what extent do you agree with the following statements?

	Strongly agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Strongly disagree	No opinion
There is no clear and enforceable legal protection for the freedom of scientific research in my country.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Higher education institutions and research-performing organisations lack enough autonomy from undue interference, whether political, economic, or otherwise. This undermines their ability to safeguard freedom of scientific research effectively.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Social and cultural pressures, including public criticism, online harassment or media backlash, can discourage researchers from addressing certain topics or sharing their findings openly.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Precarious employment and lack of stable career paths undermine the independence of researchers.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Europe needs stronger and more uniform legal safeguards to protect and promote freedom of scientific research.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Possible way forward

To what extent would the following suggested measures be appropriate to address the identified problems?

	Very appropriate	Somewhat appropriate	Neither appropriate nor inappropriate	Somewhat inappropriate	Very inappropriate	No opinion
Establish uniform, legally binding protection at the EU level for the freedom of scientific research.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Require EU Member States to implement minimum standards protecting the freedom of scientific research, while allowing some flexibility at Member State level.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Define clear core rights for individual researchers and rights and obligations for research institutions.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Create mechanisms to enforce compliance with the freedom of scientific research, such as linking respect for this freedom to access to EU funding, including for research, or cutting EU funds when the freedom of scientific research is not respected.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensure that legal measures to protect freedom of scientific research also strengthen the autonomy of research institutions and promote transparent governance in research institutions.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Complement legal measures with awareness-raising, education, and programmes to promote a culture of scientific freedom and integrity.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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Please provide the reasoning behind your responses and/or additional suggestions. Are there any other points you would like to make regarding the need to protect the freedom of scientific research and the potential way forward?

2000 character(s) maximum

Complement legal measures with awareness and integrity programmes. Safeguards should coexist with proportionate, project-based risk assessments, avoiding broad labels that could chill research. All measures should involve as little bureaucratic effort as possible.

3.1.2 Gender equality and equal opportunities

Gender equality is a core value and key priority for the EU, and as such it is integral to European research and innovation. Since 2020, the EU gender equality policy in research and innovation aims to address intersections of gender with other social categorisations (e.g. ethnicity, disability, and sexual orientation), as well as to promote geographical and sectoral inclusiveness, especially by involving the private sector. Despite significant efforts and some positive developments, there are still disparities in this area. To address this, [gender equality plans](#) have been introduced as a condition to receiving EU research funding. The plans require public bodies and research and higher education organisations to outline concrete actions and commitments to promote gender equality. However, private sector organisations (where the gender gap is largest) are exempt from producing gender equality plans, and the effectiveness of the plans varies across the EU.

To improve the quality of research and develop effective solutions that benefit society as a whole, research and innovation must not only welcome all talents but also consider gender and equal opportunities for other social categories, such as ethnicity, disability and age, in their content. Gender, however, is incorporated in less than 2% of scientific publications ([She Figures 2024](#)). These and other related issues underscore the need for a stronger EU framework to promote gender equality and equal opportunities in research and innovation, building on existing initiatives and ensuring a consistent approach across the EU.

Current situation

To what extent do you agree that the following problems should be addressed to promote and achieve gender equality and equal opportunities more effectively in research and innovation?

	Strongly agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Strongly disagree	No opinion
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The inadequate and fragmented uptake of gender equality policies across the EU (e.g. gender equality plans).	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Inconsistent national and limited EU-level frameworks for the monitoring and evaluation of gender equality policies and actions.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Insufficient consideration of gender and other social factors (e.g. ethnicity, disability, age) in research and innovation content.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lack of support for researchers with caregiving responsibilities.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lack of engagement of the private sector in addressing gaps in gender equality and inclusiveness.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Possible way forward

To what extent are the following suggestions appropriate for EU-level legislation to promote gender equality and equal opportunities more effectively in research and innovation?

	Very appropriate	Somewhat appropriate	Neither appropriate nor inappropriate	Somewhat inappropriate	Very inappropriate	No opinion
Establish legally binding minimum rules for gender equality plans, specifying the organisations that are required to implement them, the essential components of the plans, and the processes for national-level monitoring and compliance.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Set a minimum level of spending on gender equality policies and actions in research and innovation at EU, national, and organisational levels.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Incorporate considerations of gender and other social factors (e.g. ethnicity, disability, age) into public research and innovation programmes, with regular reporting and evaluation.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Develop legislation to make big private companies more involved in improving gender equality and inclusiveness.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

<p>Include the cost of caring for dependents in public research funding programmes to help researchers with caregiving responsibilities to overcome barriers to participation and career progression.</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
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Please provide the reasoning behind your responses and/or additional suggestions. Are there any other key challenges regarding gender equality and equal opportunities or possible ways to address them that you think should be considered?

2000 character(s) maximum

3.2 Ensuring the free circulation of researchers and scientific knowledge

3.2.1 Researchers' careers and mobility

Attractive research careers in different sectors are a fundamental part of a fully-fledged European Research Area. Following the adoption of the Council [Recommendation establishing a European framework to attract and retain research, innovation and entrepreneurial talents in Europe](#) in December 2023, stronger legal measures can be considered to address specific issues which would help to strengthen research careers and improve the mobility of researchers across the ERA.

Current situation

To what extent do you agree that the following problems currently prevent research careers in the EU from being more attractive?

	Strongly agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Strongly disagree	No opinion
Widespread use of fixed-term contracts, in particular because of project-based funding and /or national legislation.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Insufficient social security benefits for early-career researchers, notably PhD candidates.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of support for researchers to develop their careers.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National and organisation-level obstacles preventing seamless mobility between Member States (e.g. administrative and language barriers) and between organisations.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Obstacles to the mutual recognition by Member States of researchers' academic qualifications for work purposes.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Obstacles to the recognition by Member States of academic qualifications gained in non-EU countries.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Obstacles for researchers from non-EU countries in obtaining visas to work in EU Member States.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Obstacles for researchers from non-EU countries who have a work-related visa issued by an EU Member State to move to other Member States.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

<p>Insufficient mapping of national and organisational career structures for researchers against the R1-R4 career profiles (R1 First-Stage Researcher; R2 Recognised Researcher; R3 Established Researcher; R4 Leading Researcher), with a negative impact on intersectoral and interoperable careers.</p>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>Insufficient use of the R1-R4 career profiles in vacancies.</p>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>Administrative complexities related to business trips for researchers (e.g. the need to complete A1 forms [2]).</p>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

[2] *An A1 form is a portable document that, in line with Regulation (EC) No 883/2004 and Regulation (EC) No 987/2009, serves as proof of the social security legislation applicable to a person (employee or self-employed) temporarily working in a different Member State.*

Possible way forward

To what extent are the following suggestions appropriate for EU-level legislation to address the identified problems?

	Very appropriate	Somewhat appropriate	Neither appropriate nor inappropriate	Somewhat inappropriate	Very inappropriate	No opinion
Ensure that national laws do not impede or overly complicate the ability of public sector employers to offer open-ended, indefinite or permanent contracts to researchers.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensure that researchers at all career stages, including PhD candidates, have the same level of social security benefits.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Develop an EU-level contract template for the recruitment of researchers, which employers in the public and private sectors can use voluntarily. This template would ensure that minimum standards are met, making positions more attractive to researchers and facilitating mobility, including between Member States.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Carry out measures to prevent practices that could lead to discriminatory behaviour against some researchers and make it more difficult to be mobile, such as the exclusive use of the local language of a Member State in job advertisements and employment contracts.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Facilitate the automatic recognition (for work purposes) of the academic qualifications that a researcher gained in an EU Member State.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increase the understanding and transparency of the skills and academic qualifications of researchers.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Facilitate the recognition (for work purposes) of the academic qualifications that a researcher gained in a non-EU country.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Facilitate the visa application process for researchers from a non-EU country and reduce the obstacles to their mobility within the EU.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Carry out a mapping exercise to align national and organisational career structures with the R1-R4 researcher profiles.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensure that all job vacancies addressed to researchers use the R1-R4 profiles.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduce the administrative burden associated with researchers' business trips.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide the reasoning behind your responses and/or additional suggestions. Are there any other key challenges regarding enhanced research careers and mobility that you think should be considered, including national-level obstacles preventing seamless mobility across Member States?

2000 character(s) maximum

3.2.2 Free circulation of scientific knowledge

Despite progress in promoting open access, which has been driven especially by the open science policies and actions of the EU and the Member States, the proportion of scientific publications and research data available through open access remains well below targets. Legal and technical obstacles, and other barriers such as research assessments based on the quantity of publications in prestigious journals, are impeding access to, and reuse of research output. The lack of standardisation and interoperability of research data within and across scientific disciplines and across borders is a major obstacle to achieving the free circulation of scientific knowledge.

Current situation

To what extent do you agree with the following statements, which describe possible obstacles to ensuring access to and sharing of scientific knowledge?

	Strongly agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Strongly disagree	No opinion
Insufficient open access to publicly funded peer-reviewed publications.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Certain publishing requirements (e.g. transfer of author rights or embargoes) may limit open access to publicly funded peer-reviewed publications.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Insufficient open access to publicly funded research data, software and other research outputs.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Barriers (technical, legal etc.) preventing efficient access to and the sharing and reuse of data and other research outputs across borders within the EU.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Barriers (technical, legal, etc.) preventing efficient access to and the sharing and reuse of data and other research outputs between scientific thematic areas.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Apart from legal constraints imposed by sector-specific or cross-cutting legislation on data management, there are additional barriers that impede researchers' access to publicly funded data that could be overcome with targeted legislation.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Insufficient alignment between research institutions and between EU countries on the requirements for open access to publicly funded research.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
There is legal uncertainty over how researchers can share, access and reuse copyright-protected material or sensitive data for scientific purposes.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Insufficient use of existing legal possibilities and market-based mechanisms to share, access and reuse copyright-protected material for scientific purposes.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Rising costs for research institutions to access scientific information and publish in open access.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Insufficient information about agreements between public institutions and publishers on the supply of scientific information and open access publishing services.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Current research assessment practices are primarily based on the number of publications in prestigious journals and do not take into account the intrinsic quality and impact of the research and the diverse contributions of researchers.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Possible way forward

To what extent are the following suggestions appropriate for EU-level legislation to achieve the free circulation of scientific knowledge?

	Very appropriate	Somewhat appropriate	Neither appropriate nor inappropriate	Somewhat inappropriate	Very inappropriate	No opinion
Research-funding organisations (RFOs) responsible for managing public research-funding and research-performing organisations (RPOs) that receive public funding should include in funding agreements requirements for immediate open access to and reuse of publicly funded scientific publications in public open access repositories as a condition to providing public funding for research.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Public RFOs and RPOs receiving public funding shall foresee requirements for researchers and/or their organisations to retain the necessary intellectual property rights to provide immediate open access and reuse of their research outputs.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Public RFOs and RPOs receiving public funding shall foresee, where relevant, requirements for data management plans and open access to research data and other research outputs under the principle ‘ <i>as open as possible, as closed as necessary</i> ’.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Member States should ensure the findability, accessibility, interoperability and reusability (FAIR) of publicly funded research data and other research outputs, and their availability through secure and trusted digital environments.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Member States should ensure that research data is standardised and interoperable within and between different scientific disciplines and across borders.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Member States should ensure the further development of secure and trusted infrastructures for access to, sharing, reuse and preservation of scientific information and data.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The applicable legal frameworks should be reviewed to improve legal certainty and facilitate open access, sharing and reuse of data for scientific purposes in a secure way that ensures privacy.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Publicly funded researchers should have facilitated access (e.g. in terms of technical requirements, available platforms or administrative procedures) to data under the common European data spaces .	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Non-legislative measures should be implemented to improve the awareness and use of existing legal and market-based solutions that make it possible to share, access and reuse protected content for scientific purposes.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

<p>Public RFOs and RPOs that receive public funding should create mechanisms to ensure that assessments of research, researchers and research organisations recognise the diverse outputs, practices and activities that help maximise the quality and impact of research.</p>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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Please provide the reasoning behind your responses and/or additional suggestions. Are there any other key challenges regarding the free circulation of scientific knowledge or possible ways to address them that you think should be considered?

2000 character(s) maximum

We support open access under 'as open as possible, as closed as necessary'. Industrial participation requires robust IPR and trade-secret protection and contractual freedom—mandatory data sharing would be counterproductive. Operationalise FAIR principles with trusted infrastructures (e.g. NFDI/EOSC), global file-format and metadata standards, role-based access and strong cybersecurity. Neutral data-governance via data trustees /clearing houses can facilitate cross-stakeholder sharing while protecting IP/CBI. Provide legal certainty for reuse of protected content for scientific purposes and recognise diverse outputs (datasets, software, standards, prototypes) and socio-economic impact in assessment. Ensure complementarity and legal coherence across data regimes (e.g. health ↔ research data) to avoid overlaps and unintended burdens.

Does RPO include industry?

3.2.3 European Research Infrastructure Consortia

A European Research Infrastructure Consortium (ERIC) is a legal entity set up under EU law to facilitate the establishment and operation of research infrastructures of European interest. The [ERIC Regulation](#) has made it possible to launch and integrate many research infrastructures at European level, which align national investments and research priorities, and pool resources and expertise.

Despite the widely recognised success of the ERIC instrument, which has resulted in the establishment of 32 ERICs so far, a number of issues in the current legislation have been raised both by EU Member States and by the scientific community (see, for example, the [third report on the application of the ERIC Regulation](#)).

To what extent do you agree that the following topics should be considered in view of a possible future amendment of the ERIC Regulation?

	Strongly agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Strongly disagree	No opinion
The possibility for third countries other than associated countries and intergovernmental organisations to join an ERIC as of its establishment as founding members.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The rules in the ERIC Regulation on the applicable law and jurisprudence may create problems either in the setting-up of new ERICs or the resolution of disputes within existing ones.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Further harmonisation of the legal status of ERICs is needed to reduce discrepancies in the recognition by Member States of European Research Infrastructures under national law that hinder the ERICs' efficiency.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please provide the reasoning behind your responses and/or additional suggestions. Are there other key challenges regarding the ERIC regulation or possible ways to address them that you think should be considered?

2000 character(s) maximum

VCI supports low-threshold, predictable access for industry (including SMEs/SMCs/MidCaps) to research and technology infrastructures (pilot lines, testbeds, research factories), with streamlined contractual templates (IP, liability, confidentiality) and dedicated access schemes. We do not take positions on specific ERIC legal amendments beyond facilitating industry access and alignment.

3.2.4 Knowledge valorisation

Despite the growing policy emphasis and guidance on knowledge valorisation, including the Codes of Practice on the [management of intellectual assets](#), [citizen engagement](#), [industry-academia co-creation](#) and [standardisation](#) to implement [the Guiding Principles for knowledge valorisation](#), structural problems persist that hinder the efficient transformation of research results into societal and economic value.

Knowledge valorisation can have multiple aspects. Issues related to the commercialisation of the outputs of publicly funded R&I were tackled in the public consultation on the European Innovation Act. Therefore, this consultation focuses on other knowledge valorisation aspects.

Current situation

To what extent do you agree that the following problems currently prevent R&I in the EU from achieving optimum levels of knowledge valorisation?

	Strongly agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Strongly disagree	No opinion
There are limited financial and non-financial incentives for researchers, higher education and research-performing organisations to valorise knowledge.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Academic reward systems are predominantly focused on publications and citations, with limited recognition for activities that create socio-economic impacts.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Higher education and research-performing organisations, and their researchers lack the capacity to collaborate with the private sector, public authorities and citizens, and to engage in standardisation activities.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Dedicated support services in universities (e.g. knowledge and technology transfer offices, public engagement units and innovation offices) to facilitate effective knowledge valorisation are under-resourced.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Many researchers lack the training and skills necessary to engage successfully with non-academic collaborators (industry, citizens, public authorities) as part of knowledge transfer and valorisation.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

<p>Researchers' employment conditions lack flexibility for two-way mobility between academia and industry (e.g. short-term secondments) and to engage with external stakeholders (e.g. consulting, collaboration with societal actors and public authorities).</p>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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Possible way forward

To what extent are the following suggestions appropriate for EU-level legislative action to address the identified problems?

	Very appropriate	Somewhat appropriate	Neither appropriate nor	Somewhat inappropriate	Very inappropriate	No opinion
Member States should set knowledge valorisation as a key priority in their research and innovation policies.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
If they haven't already done so, Member States should adopt policies aimed at incentivising researchers and universities to engage in knowledge valorisation activities.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Successful commercialisation, standardisation and engagement with policy makers and the public should be recognised and rewarded in the assessment and progression of research careers.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
If a university decides not to commercialise an invention, the researcher/inventor should be granted full rights to exploit it.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
More schemes for mobility between sectors should be created, allowing researchers to work in industry or the public sector for a certain period, and ensuring their right to return to their previous position.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
A competence framework for knowledge valorisation professionals in public research organisations should be defined.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Member states should develop strategies and measures to upscale knowledge valorisation for informing the design of public policies.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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Please provide the reasoning behind your responses and/or additional suggestions. Are there any other key challenges regarding knowledge valorisation and possible ways to address them that you think should be considered?

2000 character(s) maximum

Set knowledge valorisation as a priority in national R&I policies. Universities/RPOs should adopt clear IPR policies (protection, licensing, transfer) and strengthen transfer offices (or joint structures). Recognise commercialisation, standardisation and policy engagement in career assessment. Enable cash-flow-sensitive licensing (e.g. revenue-contingent royalties/virtual shares) and two-way mobility between academia and industry (with a right of return).

3.3 Aligning guidance on artificial intelligence (AI) in research.

Across the EU, research organisations and funding bodies have issued diverse and often conflicting guidelines on the use of AI in scientific research. As a result, research proposals involving AI are subject to varying requirements on ethics, transparency, intellectual property, data protection and data governance. This fragmented landscape creates uncertainty for researchers and complicates cross-border collaboration between researchers.

Current situation

To what extent do you agree that the following problems regarding the use of AI in research should be addressed?

	Strongly agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Strongly disagree	No opinion
There is a lack of harmonised guidelines on the ethical and responsible use of AI in research across the EU.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Researchers face legal uncertainty and administrative burdens when using AI due to differing national and institutional guidelines.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The fragmented landscape of AI-related codes of conduct undermines cross-border and interdisciplinary scientific collaboration.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The current frameworks do not provide sufficient clarity on how to manage risks such as dual-use, reproducibility, or transparency in the use of AI in research.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Possible way forward

To what extent are the following suggestions appropriate to address the identified problem, and which solutions and should be pursued through EU-level legislation?

	Very appropriate	Somewhat appropriate	Neither appropriate nor inappropriate	Somewhat inappropriate	Very inappropriate	No opinion
Promote capacity-building to implement and monitor AI governance in research organisations.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Encourage alignment between national and EU-level research programmes on AI-related standards.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Embed in the ERA Act non-binding EU-wide principles and harmonised guidelines on the responsible and ethical use of AI in research.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

AI misuse whistleblowing mechanism

Currently, there is no EU-level mechanism to report concerns about the misuse of AI in scientific research. Researchers lack trusted and secure channels to raise the alarm when AI is used unethically or for (un)intended harmful purposes. This gap increases the risk that dangerous applications go undetected and undermines trust in the research system.

Current situation

To what extent do you agree that the following problems regarding the current lack of whistleblowing mechanisms for misuse of AI in research should be addressed?

	Strongly agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Strongly disagree	No opinion
The absence of a dedicated mechanism to report misuse increases the risk that harmful or unethical applications of AI go undetected.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Researchers currently lack secure, trusted channels to raise the alarm when AI-based research outputs are repurposed for unintended uses.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
There is a lack of awareness among researchers of where and how to report concerns related to the misuse of AI in research.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Reporting channels, where they exist, are often not tailored to the specific risks and complexities of AI in research.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Possible way forward

To what extent are the following suggestions appropriate to address problems with the potential misuse of AI, and should these solutions be pursued through EU-level legislation?

	Very appropriate	Somewhat appropriate	Neither appropriate nor inappropriate	Somewhat inappropriate	Very inappropriate	No opinion
Create an EU-level whistleblowing mechanism specifically to report the suspected misuse of AI in research.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Link this whistleblowing mechanism to national authorities and research institutions to ensure that responses are well-coordinated.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Create an independent EU body or contact point to manage cases of AI-related whistleblowing in research.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please provide the reasoning behind your responses and/or additional suggestions. Are there any other key challenges or problems regarding Artificial Intelligence guidance in research and possible ways to address them that you think should be considered?

2000 character(s) maximum

Europe should adopt chance-oriented, innovation-friendly AI guidance: avoid rigid horizontal top-down rules, enable regulatory sandboxes, and respect contractual freedom for data access. Excessive ex-ante documentation can delay market entry—use proven risk-assessment methods (e.g. FMEA) and sector-specific governance. Promote differentiated data spaces (e.g. health) with robust IT security and privacy, and invest in skills and continuous training across companies and research organisations.

We are not able to access the current situation. Yet, we see a possible way forward in the above stated way.

3.4 Improving consistency in approaches to international cooperation and research security across the EU

Openness, international cooperation and academic freedom are at the core of world-class research and innovation. However, with growing international tensions and the increasing geopolitical significance of research and innovation, researchers are increasingly exposed to security risks. With the adoption of the [Council Recommendation on enhancing research security](#) in May 2025, the EU has clear political (i.e. non-binding) guidance on how to ensure that international cooperation in research and innovation is both open and secure. However, there are still substantial differences in how research is safeguarded between and within the Member States. There are calls to set minimum requirements at EU level to ensure a level playing field.

Current situation

To what extent do you agree that the following problems should be addressed?

	Strongly agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Strongly disagree	No opinion
The lack of a level playing field in the EU in safeguarding research and innovation against security risks.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

<p>Diverging national approaches to research security, which potentially hinder cooperation between researchers in different Member States (e.g. overlapping and/or conflicting requirements).</p>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>The lack of adequate safeguards for research security in some Member States exposes all of the EU to research security risks ('weakest link' scenario).</p>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>Researchers in Member States with well-developed research security policies are at a disadvantage compared with researchers in Member States that do not have similar policies in place.</p>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Possible way forward

To what extent are the following suggestions appropriate for EU-level legislation to better safeguard against research and innovation security risks?

	Very appropriate	Somewhat appropriate	Neither appropriate nor inappropriate	Somewhat inappropriate	Very inappropriate	No opinion
Recognise research security as a concern for all Member States that requires appropriate measures at national and EU levels.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Set minimum requirements for a consistent approach to research security at national and EU levels.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide the reasoning behind your responses and/or additional suggestions. Do you see any other issues that need to be addressed to support a more coherent and consistent approach to international research and innovation cooperation in a way that is both open and secure?

2000 character(s) maximum

Openness remains essential, yet uneven safeguards create weak-link risks. We support EU-level minimum requirements for research security to ensure a level playing field, implemented project-based and proportionately, consistent with 'as open as possible, as secure as necessary – as strategic as required.' Measures should avoid duplicate/conflicting controls, be coherent with export-control frameworks, and be harmonised across Member States for planning security.

Please upload your file(s)

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

Background Documents

[Consultation questionnaire pdf](#)

Contact

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