

ALLEA RESPONSE TO EUROPEAN COMMISSION CONSULTATION ON SUPPORT FOR DUAL-USE TECHNOLOGY DEVELOPMENT

The European Federation of Academies of Sciences and Humanities (ALLEA) welcomes the opportunity to provide feedback on the [European Commission's White Paper](#) to support the development of dual-use technologies. Although we encourage the initiative to explore possibilities for cross-fertilisation between what are now strictly separated research programmes, we wish to share our concerns with respect to a possible new funding instrument dedicated to research projects with potential dual-use applications (described as “option 3” in the White Paper).

ALLEA is concerned that a new funding instrument dedicated to potential dual-use projects will add an unnecessary layer of complexity to the already complex landscape of funding programmes. As noted in the White Paper, potential future applications are often uncertain at the start of research projects, and a decision at the outset that a project proposal entails a potential dual-use application will be extremely difficult, if not impossible, in many cases. The artificial division of research projects based on speculative outcomes is expected to create challenges similar to those already experienced when researchers are asked to categorise their project as basic or applied research before work has even started.

In addition, a separate funding instrument for projects with potential dual-use outcomes requires that the number of projects to be funded, as well as the required budget, is defined at the outset. This will likely mean that a proportion of the budget available for the next Framework Programme (FP10) will be used to fund the new dual-use funding programme, without having sufficient insight into the quality or number of applications under the new instrument. In practice, this could result in a situation where projects of similar scientific quality are funded under the dual-use programme, but not under FP10, or *vice versa*.

As a result, ALLEA is concerned that a new funding instrument may create adverse incentives for researchers to ‘game’ the system - applicants may be tempted to inflate or even fabricate potential dual-use applications in order to meet the criteria for funding eligibility through that instrument. This will make it increasingly difficult for reviewers to identify those research projects that truly have promising dual-use applications. Other applicants may submit the same or a very similar proposal to both the dual-use and Horizon funding programmes to increase their chances of a positive outcome, which risks further contributing to the already high pressure on the peer review system.

For these reasons, we urge the European Commission to integrate any support for projects with possible dual-use applications into the existing funding programmes (described as “option 1” and “option 2” in the White Paper), while providing clarity on what qualifies as “dual-use” through an unambiguous definition and guaranteeing that budget intended for research with civil applications is not diverted to defence or security projects. This would avoid some of the unintended consequences described above and allow all projects within the same themes to undergo an equitable assessment of their scientific quality, as well as the potential benefits and risks to society.

About ALLEA

ALLEA is the European Federation of Academies of Sciences and Humanities, representing more than 50 academies from about 40 countries in Europe. Since its foundation in 1994, ALLEA speaks out on behalf of its members on European and international stages, promotes science as a global public good, and facilitates scientific collaboration across borders and disciplines. Learn more here: www.allea.org

About this statement

This ALLEA Statement has been prepared by the ALLEA Permanent Working Group on Science & Ethics, with additional input from the ALLEA Working Group on the ERA. Through its Working and Expert Groups, ALLEA provides input on behalf of European academies to pressing societal, scientific, and science-policy debates and their underlying legislations. With its work, ALLEA seeks to ensure that science and research in Europe can excel and serve the interests of society.

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