

ALLEA Response to the Call for Evidence on the ERA Act

Submitted on behalf of the European Academies of Sciences and Humanities,
represented by ALLEA

Stakeholder in the ERA Forum

General Remarks

ALLEA, as the representative of the European Academies of Sciences and Humanities, welcomes the European Commission's initiative to develop a legislative proposal for a European Research Area (ERA) Act. We strongly support the ambition to make the ERA a true single market for research, scientific knowledge, and technology, underpinned by fundamental values of academic freedom, research integrity, openness, inclusivity, and excellence.

The ERA Act should build on existing initiatives rather than create parallel structures, ensuring coherence, effectiveness, and the full participation of stakeholders across Member States, regions, and disciplines. Importantly, the ERA Act must strike the right balance between short-term applied priorities and the need to preserve and expand the space for curiosity-driven, fundamental research, which is indispensable for long-term innovation and societal progress.

1) National Commitments to Reach the 3% R&D Target

- Legally anchored national commitments: The ERA Act should enshrine the collective 3% R&D investment target as a binding commitment, while allowing sufficient flexibility in how Member States and regions achieve it. National R&D investment plans should be transparent, include measurable milestones, and be subject to regular monitoring and reporting.
- Balance of funding streams: Public and private investment must support the full spectrum of research, from fundamental science to applied innovation. Investigator-led and ERC-style frontier research funding must remain central, with governance safeguards ensuring the independence of the ERC and continuity of its leadership.
- Capacity-building for smaller and less-developed regions: Additional instruments should address persistent disparities across the ERA, helping smaller nations and regions strengthen infrastructures, avoid brain drain, and develop competitive proposals. Regional capacity-building should include specific calls, access to research leadership roles, and routes for regions to contribute directly to ERA priorities.

2) Better Alignment of Investments and Policies

- Strategic coordination: The ERA Act should reinforce political coordination mechanisms between Member States and the EU to align R&D investment

and policy priorities. This requires robust structures under the ERA Forum and ERAC to ensure co-design, monitoring, and accountability.

- Synergies with related policies: Research investment should be closely aligned with policies on education, industry, sustainability, and digitalisation, without undermining the autonomy of scientific research. This alignment should promote interdisciplinarity and explicitly recognise the central role of the social sciences, humanities, and the arts (SHAPE) in addressing complex societal challenges.
- Regional and institutional inclusion: Alignment efforts must adopt an ecosystem approach that includes universities, academies, research institutes, universities of applied sciences, vocational institutions, and technology centres. Regions should have structured opportunities to feed into national and EU-level priority setting.
- Openness to international collaboration: While strengthening European competitiveness and research security, alignment mechanisms must maintain Europe's openness to international scientific collaboration, including with the UK and other global partners. Research security measures should be proportionate, risk-based, and not hamper legitimate academic exchange.

3) Improvements in Framework Conditions

a) Free circulation of researchers and knowledge

- Research careers: The ERA Act should address precarity and fragmentation in research careers, particularly for early- and mid-career researchers. Key measures include:
 - Stable and attractive career pathways, with dedicated starter and follow-up grants for young principal investigators.
 - More flexible and portable funding models, including smaller, simpler awards alongside larger challenge-oriented grants.
 - A European Researcher Mobility Passport and harmonised recognition of degrees and research experience.
 - Improved portability of grants, pensions, and social rights, as well as family-friendly provisions to improve inclusion of women and researchers with caring responsibilities.
- Mobility: Policies should ensure seamless geographical and intersectoral mobility across the ERA, with simplified procedures for visas, residence permits, and recognition of qualifications.
- Open Science: The ERA Act should advance robust and sustainable mechanisms for open access to publicly funded research results and data, ensuring equitable participation across institutions and disciplines. Policies must avoid shifting public funds disproportionately to commercial

publishers and must mitigate inequities between resource-rich and resource-poor institutions.

- Research infrastructures: The Act should strengthen the legal and financial frameworks for shared European research infrastructures, paying particular attention to the sustainability of facilities in smaller Member States and ensuring equitable access through cross-border collaboration.
- Knowledge valorisation: Improved frameworks should facilitate the societal and economic impact of research, while recognising diverse pathways of impact, including cultural and policy contributions, beyond market uptake.

b) Upholding ERA fundamental values

- Academic freedom: The ERA Act should legally anchor the freedom of scientific research, protecting researchers and institutions from political or ideological interference and ensuring the free exchange of ideas and results.
- Research integrity and ethics: Building on the European Code of Conduct for Research Integrity, the Act should enshrine the highest ethical standards in research and provide consistent support structures across Member States, including for responsible use of new technologies such as AI.
- Equality, diversity, and inclusion: Concrete measures should promote gender equality, equal opportunities, and broader diversity within research systems. This requires monitoring mechanisms, dedicated funding schemes, and the systematic removal of structural barriers.

c) International cooperation and research security

- Coherent approaches: The ERA Act should ensure greater consistency in Member States' policies towards international R&I cooperation, while promoting responsible openness to global collaboration.
- Research security: A proportionate and harmonised minimum standard for research security should be developed across the EU, ensuring that legitimate research activities remain open while sensitive knowledge is adequately protected.

4) Reducing Bureaucracy

The ERA Act provides an opportunity to reduce administrative burdens that limit the efficiency and inclusiveness of research funding. Application procedures should be simplified, reporting requirements streamlined, and unnecessary duplication avoided, without undermining the integrity of peer review. Monitoring the use of indirect costs and ensuring that EU research funds directly benefit researchers will further increase efficiency and trust.

Conclusion

The ERA Act offers a historic opportunity to transform the European Research Area into a truly integrated and competitive single market for research and innovation. To succeed, the Act must:

- Legally anchor investment commitments,
- Strengthen alignment across EU and national levels while respecting research autonomy,
- Improve framework conditions for researchers and institutions,
- Safeguard the ERA's fundamental values,
- Ensure inclusivity across disciplines, career stages, and regions, and
- Reduce unnecessary bureaucracy while preserving excellence.

ALLEA and its Member Academies stand ready to contribute further expertise and support in shaping and implementing the ERA Act.