



ANNEX

Coimbra Group Response to the EU Commission's Green Paper

Brussels, 31 August 2007

The following presents the responses to the individual issues raised in the European Commission's Green Paper and is attached as an Annex to the Coimbra Group Statement.

Elements of the European Research Area vision

1. Are these the essential elements that the European Research Area should provide? Are there other elements which should be taken into account in the vision?
2. What should be the roles of EU, national and regional policies to establish such a European Research Area and take best advantage of the European dimension in the context of globalisation and national and regional specialisation?
3. What EU initiatives could best leverage overall public and private efforts to realize the vision?

1. The vision of a European Research Area (ERA) presented in the Green Paper seems to involve the progressive transfer of responsibilities for research from national to European levels. Any vision for an ERA must be premised on the added benefits of the European level, otherwise many of the outcomes of the vision could be negative:

- removal of decision-making further from researchers;
- a top-down emphasis which undermines creativity;
- a profoundly misguided view that networks of regional specialisms should be the model for European research;
- a failure to recognise the key attributes that make universities such powerful contributors to the research effort.

2. We cannot accept the premise of this question that a necessary part of the context should be national and regional specialisation. As we have argued above, the EU should exploit its size by creating a playing field, a research area that permits individual Member States to maximise their potential, not to become the central research policy and research funding body in Europe. European-level responsibilities should be to coordinate provision of expensive facilities, to remove barriers to mobility, support development of the ERC as a potentially powerful competitive driver for excellence in basic research, create simple, efficient common patenting and IP procedures, and to explore major collaborative opportunities as they occur.

The national level should be responsible for its own thematic priorities for research, priorities for capacity building, and processes of application and commercialisation, including the necessary legal frameworks, that are well-adapted to the national economy. It would be more logical for individual states to be responsible for innovation-related activity, as

economic benefit is delivered at national and regional levels, with Europe, in contrast being a driver of basic research competition. Europe should also provide a forum whereby larger, supra-national programmes could be discussed and developed. Note that hitherto, the most successful joint European science ventures have not been FP supported.

3. It is naive to suppose that private industry will be a ready source of funding for an ERA. It will only do so if this is in its commercial interest. The most important priority in engaging private industry in research support is by processes that are designed to stimulate industry's demand for research rather than asking industry to support the supply side. In this regard, the Coimbra Group Universities supports the LERU proposal to use the power of public procurement as a demand stimulator. See also below, response to question 18.

Realising a single labour market for researchers

4. Is there a need for a more effective European framework to improve significantly the recruitment, working and geographical and inter-sectoral mobility conditions for researchers, including enforceable measures?
- In particular:
5. How could the principles established in the European Charter for Researchers and the Code of Conduct for their Recruitment be effectively implemented, in order to develop fully the European dimension of research careers, including the transnational opening of vacancies and funding opportunities for researchers?
 6. Is there a need for a European framework to ensure portability of social security provisions for researchers across Europe?
 7. How could 'flexicurity' principles (e.g. combining labour market flexibility with employment security) be applied to the researcher labour market?
 8. How could we increase the numbers and quality of researchers in Europe by attracting young research talents, ensuring real equal opportunities for men and women and exploiting the experience and expertise of end-of-career researchers, for example in advisory and training roles?
 9. Should joint approaches be developed to increase the coherence and impact of the various schemes aiming at networking European researchers abroad as well as foreign researchers in Europe? Similarly, is there scope to increase the coherence and impact of European and national schemes for international mobility of researchers (for example by jointly developing international 'Fulbright-like' fellowships)?
 10. How could the specific education and training needs of researchers be addressed at all stages of their careers, starting with post-graduate and doctoral curricula, building on the Bologna process for higher education?

- 4-7. We have no doubt that creating a framework that would facilitate greater mobility of researchers would be a major step forward for Europe. The problems are two-fold. One is the issue of pension and social security portability, and the other is the practices in many Member States that, by accident or design, restrict mobility. A first step in resolving the former should be a common heads of government declaration that mobility is desirable, followed by a meeting of representative technicians to identify and set parameters on possible solutions. For the second, it would be useful as a first step to conduct a survey to determine the proportion of non-nationals holding research and academic posts in each Member State, in order to understand the parameters of the problem as a basis for discussion at heads of govt. level.
8. We doubt that mobility across Europe will, of itself, be a major attractor of the best indigenous or international talents. The solutions are well known internationally. They are: to provide the young with the resources to work on important problems; to give them responsibility and not merely use them as "lab rats"; to offer prestigious, long term personal fellowships (e.g. the UK Royal Society Research Fellowships Scheme which offers highly prestigious fellowships up to 10 years duration); to ensure an excellent and dynamic intellectual environment (it is clear for example that, other things being equal, the setting of a

distinguished and excellent university is a much more powerful attractor than a specialist government laboratory or multi-node network of specialist groups); and to cater for the needs of researchers' families in pleasant environments (those of us that attempt to attract excellent candidates know just how important the latter is).

9. Fulbright-like fellowships are a fine idea, as is the creation of international fellowships with non-European institutes. But they are icing on the cake and second order in relation to the larger ERA issue. Networks themselves are not particularly strong attractors for young researchers.
10. There are a plethora of processes which could be developed. They include: internships for doctoral students; transferable skills programmes; good career advice for doctoral students and post-doctoral researchers; recognition that the non-academic route is not tantamount to failure; early responsibilities for post-doctoral researchers, etc. However, it is important that these processes are introduced through principles of best practice, rather than by regulation, which can often inhibit good ideas. The CG Universities have taken a number of initiatives in this direction, e.g. the launch of transferable skills summer courses, co-supervision best practice, career guidance activities, etc.

Developing world-class research infrastructures

11. How could the EU, on the basis of identification of needs by ESFRI, effectively decide on pan-European research infrastructures and their funding – the latter involving the Community (including possible synergies with EU cohesion policy instruments), Member States, industry, the EIB and other financial institutions?
12. Should a European legal framework be developed to facilitate, in particular, the emergence and operation of new forms of research infrastructures of pan-European interest, including electronic infrastructures? What other policy and legal changes are necessary to encourage the private sector to invest more in research infrastructure?
13. Is there a need to define common and transparent principles for the management of, and access to, infrastructures of European interest?
14. How can the longer-term continuous improvement of research infrastructures be ensured, e.g. through S&T programmes associated with them and European electronic infrastructures?
15. Should a global forum on research infrastructures be created, involving third countries and international organisations, where Europeans could speak with one voice (as they did in the ITER project on nuclear fusion research)?

11. We strongly approve of the approach that ESFRI has taken in creating a roadmap for European facilities, which will give unprecedented opportunities for the most talented European scientists if it can be realized. The approach represented by ESFRI is one of the essential ways in which European-level initiatives can contribute to an effective ERA, and is consistent with our view of the ERA as expressed in the CG Statement to which this is an annex. The key issue is financial. We believe that funding these capacities through the Framework Programme (FP) should have a much higher priority than much standard FP funding and initiatives such as networks of excellence.
12. If the ESFRI roadmap were embedded in the FP system, would a separate legal framework be necessary? We are sceptical that an electronic framework would be a wise investment. The rapid evolution of broadband network systems is likely to make major top-down initiatives rapidly redundant.
13. Yes. The nature of such principles will vary according to the nature of the provision, but in general access should be determined by the quality of the proposal. The rules for management of and access to many national facilities which ESFRI should be able to evaluate would provide a useful template.
14. It is vital that research infrastructure procurement should be driven by research need and vision. The ERC might be able to provide a valuable input into this process in addition to national research councils that are able to articulate national research needs.

15. The global dimension is important. It should be driven by three criteria: areas where global collaboration is necessary to enlarge human perspectives, responding to the needs of global humanity, and supporting the development agenda.

Strengthening research institutions

16. How can the resources of European research institutions be strengthened in the most cost-effective manner, in order to enable them to achieve excellence and compete on a world scale?
17. How can research actors be better encouraged to create world-class virtual centres of excellence, such as in the context of the proposed European Institute of Technology, the FP7 'networks of excellence' and national and regional initiatives, and to share structures that pool the research management capabilities of several institutions?
18. Is there a need for a European regulatory initiative to facilitate the creation of public-private partnerships?
19. How can the EU and Member States best stimulate the emergence of European and global virtual research communities, exploiting fully the potential of computing, information and communication infrastructures?
20. Should action be taken to develop: (i) principles for autonomy and for the management of research by research institutions, notably universities; (ii) shared criteria for the funding and assessment of research institutions, notably universities, giving stronger weight to linkages beyond academia, as well as to output and performance factors?

16. The actions of the Commission in promoting international excellence in European research are those that we refer to in answer 2 (above). The key is to provide a European enabling framework that facilitates a strong return on investment by Member States.

17. The premise of this question is fundamentally misconceived, as discussed in the CG Statement and in response to question 2 (above). The networking of specialist institutions, which appears to be the Commission's response to the issue of cost-effective excellence, is likely to be ineffective and costly. It may be politically expedient in the European context, but it is a false direction. The key elements that are missing from the Commission's position are comprehensive research-intensive universities, which, compared with specialist government institutions, are more cost effective loci for basic research, they are able to address the vital inter-disciplinary agenda in a more efficient way than is a network of specialist institutions, they are more powerful attractors of indigenous and global talents, they have, in recent years, proven to be more dynamic and flexible in responding to the innovation agenda than other public research bodies, and, crucially, they integrate research with the education of the rising generation. People with research skills are arguably at least as important as research results.

These reasons are recognized internationally, and most countries, including those of Europe, are making major investments in their university systems. The Commission's network model is a mistaken one. The Commission must find a way of thinking about the research future of Europe that sees these crucial university assets at its heart. They have signally failed to do so as was seen in the EIT which fails to realize that economic benefit is delivered in the regions. Networks of Excellence have largely failed to live up to their fine-sounding name, not because, as the Commission appears to think, because of the absence of legal links between members so as to separate them from their parent institutions, but because a network for a network's sake is inefficient compared with communities of place. A network is efficient in so far as it is a network of convenience for a particular project where complementary capabilities are temporarily brought together.

18. Public-private partnerships (PPP) could be valuable as a means of implementing expensive infrastructure projects, and of course they are normal in many research areas. We do not see the need for special regulations in relation to the latter. Normal legal processes generally suffice. It is important however to heed the many sceptics of PPP in relation to the long term public debts that they incur. It should be noted that an informal network of

organisations centrally placed in research and research administration has been formed to provide guidelines for research institutions and private companies for “Responsible Partnering”. The guidelines are published in a “Handbook: A Guide to better practices for collaborative research and knowledge transfer between Science and Industry”¹. The voluntary use and application of such guidelines will be more far-reaching and successful than any regulatory framework.

19. As referred to above, we are sceptical of both premises of this question: that long-term networks are a desirable European research model and that a top-down communication infrastructure would be a wise investment. We refer to the general comments of the CG Statement.
20. It is clear that autonomy is a major issue for universities in many European countries, where their lack of decision-making powers without recourse to government agreement makes them inflexible and slow in responding to the demands on them. Those university systems that have autonomy have demonstrated by their entrepreneurial spirit and relative success that an oppressive imposition of “principles of management” are not required, provided that there are appropriate systems of accountability for the use of public money. Although the support of the Commission in making the case for autonomy would be valuable, it is not clear that it has any locus beyond that. If the phrase “linkages beyond the university” is to signify anything more than the normal evaluation of output by the normal criteria: educated people, research, public engagement, economic impact, we would refer the Commission to the “Responsible Partnering” example mentioned above.

Sharing knowledge

21. Is there a need for EU-level policies and practices to improve and ensure open access to and dissemination of raw data and peer-reviewed publications from publicly funded research results?
22. What should constitute a European Framework for knowledge sharing between research institutions and industry based on identified good practice and models?
23. Are there specific R&D-related issues, such as the grace period, joint ownership regimes and the research exception that need to be looked at from a European perspective?
24. What conditions should be created to promote innovative approaches in the way that science and technology is communicated, taught, discussed and valued by Europeans, and taken up for evidence-based policy-making?

21. We would counsel that as this is a rapidly changing area, with open access developing rapidly through a variety of routes, this might not be an appropriate time for EU intervention.
22. The key issue here is the development of a common IP regime that would facilitate interaction between publicly-funded research and business. We have already referred to the need for a European patent under 2 above.
23. As above (22) and with a reference to the “Responsible Partnering” guidelines.
24. There are many national initiatives for innovative science communication and teaching. We are sceptical that another, European initiative would add greatly to what is currently happening. One of the major issues however is how to achieve public engagement in the many areas of new science and technology that have the potential to impact strongly on our lives. Public consent to the adoption of new technologies will be important in determining the return on research investment in many areas, and public involvement in priority setting in research is also becoming a major issue. A responsibility of national governments, and of the EU because of its control over much regulation, should be to ensure adequate public engagement on these issues. The Commission should consider how it might adopt some of

¹ <http://www.responsible-partnering.org/> - EIRMA (European Industrial Research Management Association), EARTO (European Association of Research and Technology Organisations), EUA (European University Association), PROTON (Pan-European Network of Knowledge Transfer Offices and Public Research organisations).

the protocols relating to public dialogue in important areas of policy that are being developed in Member States, preferably in close collaboration with the European Parliament.

Optimising research programmes and priorities

25. Should common principles be developed and used for peer review, quality assurance and joint evaluation of European, national and regional research programmes? Should these programmes be opened to participants from other Member States, and how?
26. Is there a need for shared principles for the accountability of public research funding, which would enhance simplification of rules and procedures and increase its effectiveness and efficiency?
27. What participative processes need to be put in place to enable public authorities to jointly identify and decide upon major societal issues requiring a pooling of resources and capacities?
28. On such societal issues of European or global dimension, how could principles and modalities be established and tested for joint programming of research, involving all stakeholders (research institutions, business, civil society etc.) and bringing together funding from EU, national, regional, business and philanthropic sources?
29. Should the European Community seek membership of intergovernmental research organisations?

25. Many individual Member States already have well developed peer review, QA and evaluation procedures. It would no doubt be of value for these processes to be shared openly to seek to improve practice. Even if programmes were to be opened to those from other Member States, there is no particular reason to harmonise processes. Should programmes be open to those from other Member States whilst remaining resident in the other State? The answer depends on why a Member State has its own research funding system. Circumstances in which opening of publicly funded research to others would not be appropriate would be:
 - developing human capacity in particular fields;
 - developing the national research effort;
 - strengthening institutions;
 - supporting commercial innovation.
 One case where access to researchers from other Member States would be appropriate is research in support of public policy.
26. There is no such need at the moment. Member States can no doubt learn from each other, but there is no need for a common system. It would be of interest to see the opinion of the European Science Foundation to this question.
27. See answer to 24.
28. Ditto.
29. The EU is not in the position of the prime mover for research policy ahead of Member States to justify such a change.

Opening to the world: international cooperation in S&T

30. How can the European Commission and Member States work together to (i) define priorities for international S&T cooperation in close coordination with the other dimensions of external relations; (ii) ensure the coordinated and efficient use of instruments and resources; (iii) speak with one voice in multilateral initiatives?
31. How can the European Commission and Member States work together to explore the potential of initiatives for international research programmes on issues of a global dimension, involving the Community, Member States and third countries?
32. How should S&T cooperation with various groups of partner countries be modulated to focus on specific objectives? Should complementary regional approaches be explored?
33. How can neighbouring countries be best integrated into the European Research Area as

part of the European Neighbourhood Policy?

34. How can the EU's bilateral S&T agreements be made more effective? Are there alternative or complementary instruments that can be used, such as joint calls for projects, involving where possible the Member States?
35. How can common European agendas for S&T cooperation be promoted in multilateral organisations and agreements as well as with regional organisations?

30. There is a serious need in Europe for a forum (a Joint European Research Strategy Council) able to identify the potential for collaboration and coordination (and when this is not appropriate) and then able to recommend to the Commission and to national bodies, through prescribed, formal and recognised routes, how an opportunity might be grasped. It needs to be an expert group with national representatives responsible for national research policy or its implementation. It might also be the forum to determine where (and where not) it is appropriate for Europe to speak with one voice.
31. Such a body as referred to in 30 would also be appropriate for this issue.
32. As 31.
33. Let us learn to walk before we try to run. The European Research Area is still being discussed and developing a clear consensus about its function is the first step.
- 34-35. See 30-32.