

Position Paper: Universities of Applied Science Denmark's Response to the European Commission's Proposal for Horizon Europe 2028–2034

On behalf of the **Universities of Applied Science Denmark (Danske Professionshøjskoler)**, we **welcome** the European Commission's proposal for the Regulation establishing Horizon Europe 2028–2034.

We strongly **support** maintaining Horizon Europe as a **standalone** programme with its own legal framework and **appreciate** the intention to nearly double the **budget** to **€175** billion. We also **value** the continued **commitment to support excellent and collaborative research and innovation**, while acknowledging the essential contributions of **diverse participants** within research and innovation ecosystems. These elements demonstrate a clear recognition of the significant role R&I has in advancing Europe's prosperity, resilience, and global competitiveness. As institutions conducting **applied research**, and **translating knowledge into implementable solutions**, we see ourselves having a vital role in the proposed framework.

We appreciate the Commission's efforts to **simplify** access to EU funding through **shorter** work programmes, **less prescriptive** topic descriptions, **reduced time-to-grant** and **simplified and streamlined European Partnerships**

These measures can enhance **flexibility**, **reduce administrative burden**, and broaden **participation**, particularly for institutions with limited resources.

While we **welcome the overall proposed structure**, we are **concerned about Pillar II**, particularly **the balance within** between the "Competitiveness" and the "Society" part.

The close alignment with the European Competitiveness Fund (ECF) raises concerns about the future direction and scope of Horizon Europe, especially for collaborative research. While Horizon Europe is formally a standalone programme, the proposed shared governance, joint work programmes, and unified rulebook risk undermining its autonomy and reduces its ability to support research guided by scientific quality and societal relevance

This concern is amplified by the proposed **division of funding within Pillar II**.

Of the total €75.876 billion allocated to this pillar, approximately 90% (€68.270 billion) is earmarked for competitiveness-related activities directly linked to ECF priorities, while only 10% (€7.606 billion) is allocated to the more bottom-up "Society" component, which includes both the New European Bauhaus Facility, EU Missions and global societal challenges.

This imbalance threatens the programmes' ability to address critical societal challenges beyond politically prioritized areas. By addressing broader societal challenges R&I contribute to safeguard social

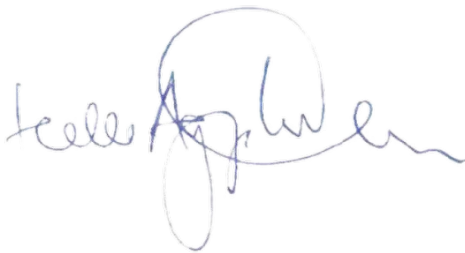
welfare, promote lifelong learning, and strengthen social cohesion—all **essential for Europe's democratic resilience and long-term competitiveness.**

In summary we recommend the following:

- ✓ **Rebalance Pillar II** funding to ensure substantial support for the "Society" component, recognising that addressing broader societal challenges is foundational to long-term competitiveness.
- ✓ **Consider a proper governance model** that ensures that scientific quality and societal relevance remain the primary drivers for funding decisions.
- ✓ **Ensure that simplification measures** truly reduce administrative burden and are flexible enough to accommodate diverse actors and institutional realities, including young research environments.
- ✓ **Ensure support for collaborative R&I that acknowledges the role of applied research** in turning scientific knowledge into implementable solutions

We will be happy to continue the dialogue and look forward to following the negotiations.

On behalf of the Universities of Applied Science Denmark



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