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Consolidating the European Research Area: for a stronger and more integrated ERA

Coimbra Group's input to the European Commission's consultation on the development of an ERA Act

Context:

Following the call for evidence launched by the European Commission in summer 2025, to which the Coimbra Group (CG) contributed a set of proposed actions, **we welcome the opportunity to provide complementary input through the public consultation on the forthcoming** European Research Area (ERA) Act.

Europe's oldest university network, CG brings together 42 comprehensive universities across 22 countries, whose world-class research and innovation drive meaningful impact in their local knowledge ecosystems. Our network has long **advocated for a fully implemented ERA** as a genuine single market for research and innovation, fostering free movement of researchers, scientific knowledge, and innovation across the EU.

The ERA Act represents **a critical opportunity to consolidate existing legislation and key policy frameworks into a robust and coherent single text**, addressing long-standing structural fragmentation, capitalising on past achievements, and strengthening Europe's global attractiveness and competitiveness in research and innovation.

This paper is structured in two parts. The first section presents key considerations, recommendations and examples of good practices identified by CG Members. The second provides concrete feedback on the main challenges, needs and priorities facing the ERA.

With this paper, the Coimbra Group provides constructive input to inform and support the shaping of the ERA Act and stands ready to collaborate with the European Commission in the forthcoming phases.

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1. Recommendations and good practices

Drawing on the collective experience and perspectives of CG member universities, the following actions could guide the development of the ERA Act:

- **Promoting stable, predictable and sufficient funding**

  Considering national investment capacities, **Member States should be encouraged to adopt multi-annual R&I budgets.** Such an approach would significantly improve universities' capacity to plan strategically, increase co-funding opportunities, sustain long-term research infrastructures, improve research career management and talent retention beyond annual cycles, and increase project continuity (including bridging funding gaps between projects).

- **Stronger commitment toward the 3% R&D investment target**

  CG Members recommend that the ERA act should include a binding target of at least 3% of GDP for investment in R&D, complemented by a specific target for public sector funding.

- **Upholding international R&I cooperation**

  The **ERA Act should actively protect the core principles and values underpinning international R&I cooperation**, thereby ensuring greater harmonisation, legal clarity and fairness across Member States, while maintaining openness as a defining value of European R&I.

- **Establishing a proportionate EU framework for research security**

  The **ERA Act should establish a research security framework that sets EU-level legislative minimum requirements**, accompanied by clearly articulated pathways toward full implementation. This would allow Member States with more advanced experience to maintain and further develop existing good practices, while promoting greater convergence across Europe. At the same time, any legally binding requirements at EU or national level should be carefully defined, developed in consultation with all relevant stakeholders, and proportionate.

- **Supporting EU-level risk assessment and due diligence**

  CG Members **welcome the EU's planned establishment of a competence centre and a platform for assessing risks in international research cooperation at European level,** as well as the development of a common methodology for institutional due diligence. These tools can strengthen consistency, reduce duplication, and support institutions in managing complex international partnerships.

- **Scaling up responsible research assessment**

  The ERA Act should promote the **wider adoption of responsible research assessment practices that rebalance the evaluation of research outputs**, recognising both traditional metrics and a broader range of contributions. These include open science practices, research data, collaboration and societal impact, beyond narrow bibliometric indicators. Such measures would further support and incentivise participation in the Coalition for Advancing Research Assessment (CoARA).

- Establishing minimum standards for researchers' rights

  The EU should **establish in the ERA Act minimum standards for researchers' rights, explicitly encourage compliance with the European Charter for Researchers and further support the deployment of the Human Resources Strategy for Researchers (HRS4R) label**, with the objective of reducing the current fragmentation that forces researchers to navigate 27 different national/regional employment frameworks. Furthermore, it should ensure the portability of pensions and social benefits for researchers.

- Relevance of the research managers and administrators

  The ERA Act should explicitly recognise that **research managers and administrators (RMAs)** are essential contributors to the success of research and innovation systems. They play a pivotal role in the design, implementation and submission of research projects, in ensuring compliance, in supporting researchers throughout the project lifecycle, and in enabling institutions to participate effectively in EU programmes. **Strengthening their professional environment, skills and career recognition** is therefore directly linked to the **performance and competitiveness of the ERA**.

- Improving employment conditions for postdoctoral researchers

  CG Members **support the inclusion in the ERA Act of requirements for employers to grant postdoctoral researchers full access to social welfare provisions**. Furthermore, although in some countries this is already the case, postdoctoral researchers should be recognised as a distinct staff category with clear regulations reflecting their specific working conditions (including career stage, supervision/mentoring, independence, workload balance, and predictable career progression).

- Strengthening the protection of academic freedom

  Regarding how the ERA Act could better safeguard and strengthen **academic freedom**, CG Members agree that **an EU-level legal framework ensuring consistent and enforceable protection of academic freedom would be beneficial.** This would provide greater clarity, predictability and common standards across Europe, while respecting institutional autonomy.

  The ERA Act should include the following key elements:
  - a **clear definition** of academic freedom and **minimum protection standards**;
  - **monitoring and early-warning mechanisms**;
  - **safeguards for institutional autonomy and governance integrity**; and
  - **effective remedies and appeal channels in cases of infringement**.

  While **safeguarding academic freedom is essential, measures should not result in additional administrative or reporting burdens for applicants to EU funding**. CG Members could therefore be supportive of EU-level mechanisms, potentially linked to eligibility for EU funding, provided they are based on **clear indicators**, **due process**, **proportionality**, and **robust independent assessment**.

- Strengthening gender equality, diversity and equal opportunities

  CG Members consider it important that the ERA Act explicitly **recognises and addresses challenges specific to gender equality, diversity, inclusion and equal opportunities** within the European Research Area.

- Enhancing knowledge valorisation and societal impact

  To improve **knowledge valorisation and transformation**, **research assessment systems overly focused on high-impact publications and traditional metrics should be rebalanced**, as they may discourage applied and collaborative research. Therefore, alternative assessment approaches that recognise knowledge transfer, societal impact, and engagement with industry and other actors would better legitimise and incentivise cooperation beyond academia.

- Supporting Open Science practices

  With regard to Open Science, while progress has been made, its adoption remains uneven across Europe, with open access publishing and research data management being the most widely implemented practices. It is therefore crucial that the ERA Act includes measures capable of enabling **large-scale, systemic transformations towards Open Science** across the continent. CG would also welcome a reference in the ERA Act to the Barcelona Declaration on Open Research Information

- Reducing administrative burden, harmonising R&I procedures

  To conclude these recommendations, the ERA act should include concrete measures to reduce administrative burden and further harmonise core R&I procedures (e.g. for cross-border HR management; reporting requirements).

2. Challenges, needs and priorities by CG Members:

- Challenges in R&D investment

  Current levels of R&D investment present **multiple challenges** for CG Members: difficulties in attracting private investment at scale (especially for higher-risk TRL transitions); heavy regulatory and administrative burdens resulting in longer time-to-contract and time-to-grant; insufficient and unpredictable national funding. Moreover, in most EU countries research activity is heavily dependent on short-term, competitive project funding, resulting in significant administrative costs and burden.

- Fragmentation in research security and due diligence

  Fragmented and divergent national approaches to research security and due diligence (screening, dual-use considerations, data governance) create **legal uncertainty** and **uneven conditions** for international scientific collaborations across Member States.

- Barriers to researchers' mobility

  Researchers face obstacles including **heterogeneous and fragmented employment and contractual frameworks** across countries, complex visa and residence procedures for non-EU talent, difficulties in **recognition/portability of social security and benefits**, and, in some countries, language barriers with university and local administration, and practical family support issues (housing, childcare, dual-career support).

- Minimum standards and institutional support

  Most CG Members support the inclusion in the ERA Act of clear **minimum standards** and enforceable expectations for research-performing organisations, combined with **practical guidance and support** for implementation. For example, the Swedish Higher Education Act already mandates the active promotion of gender equality in all university operations.

- Cooperation with non-academic actors

  To strengthen cooperation between universities, research organisations and businesses, CG Members recommend measures that **reduce structural barriers** and **make collaboration predictable**, incentivised and administratively manageable. Suggested approaches include:

  - **Stronger and longer-term co-funding schemes** for joint R&I projects, including mission-driven and applied research;
  - **Incentives for strategic public-private partnerships** beyond short-term project calls; and
  - Clearer frameworks for IP management, knowledge sharing and standardised contract templates to **reduce negotiations time and legal uncertainty**.

  A successful national example is the **Italian FISA** (Fund for Applied Sciences), an initiative of the Ministry of University and Research (MUR) that finances **innovative industrial research and experimental development projects in strategic areas** such as AI, Photonics and Advanced Manufacturing, with significant funding and a strong focus on Principal Investigators working with host companies.

  CG universities also stress the need for clearer and more practice-oriented guidance for universities and research institutions on the application of **state aid exemptions in concrete cases**, particularly in the context of technology transfer and collaboration with industry. Limited institutional expertise regarding the interpretation of state aid rules often results in overly restrictive interpretations of state-aid rules, without fully taking into account the available exemptions and flexibilities provided under EU state aid law. This creates a risk-averse culture where institutions refrain from engaging in technology transfer or collaborative activities despite available exemptions under EU law.

- Knowledge valorisation

  The main barriers include limited long-term incentives and institutional capacity to translate research results into practical applications, scarce proof-of-concept funding, complex administrative and procurement procedures, intricate IP regulations, and insufficient incentives for researchers to engage in valorisation activities.

Low literacy in knowledge valorisation in many disciplines could be addressed by integrating dedicated training into formal researcher education curricula.

- **Ethical use of AI in research**

  CG Members face several barriers related to the **ethical use of AI**. A key challenge stems from legal uncertainty and inconsistent interpretations of what constitutes compliant and responsible AI use in research, particularly across funding programmes, disciplines and international collaborations. This results in inconsistent requirements from funders, publishers, partners and national authorities, increasing administrative workload and complicating cross-border cooperation.

  Differences in national interpretations also increase administrative burden and risk, especially in international projects involving AI-based research. In some cases, the issue is not the absence of rules, but insufficient practical guidance and knowledge on **how to implement existing frameworks effectively**.

- **Whistleblowing and AI Misuse**

  Some CG members support creating **a dedicated EU-level whistleblowing mechanism.** Such a mechanism could serve as a proportionate escalation route for serious cases of misuse, provided it is well-scoped, protects researchers, and avoids duplicating existing ethics and integrity channels.

  Other Members caution that "**creating an EU level whistleblowing mechanism dedicated specifically to AI misuse in research would be premature**" due to unclear definitions and considerable uncertainty regarding ethical requirements, acceptable research practices, and the boundary between legal obligations (AI Act, GDPR) and broader ethical expectations.

  In this context, a dedicated whistleblowing mechanism could lead to disproportionate reactions, unfair reputational harm, and a chilling effect on legitimate research, without clear evidence that AI misuse currently represents a systemic problem beyond existing misconduct channels. A reassessment in 2–3 years is therefore recommended, once frameworks and detection capabilities mature.

  In the meantime, efforts should prioritise:

  - Practical EU-wide guidance;
  - Institutional capacity-building and validated tools;
  - AI literacy and ethics training;
  - Systematic monitoring; and
  - An adaptive regulatory approach, while leveraging existing research-integrity channels.

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For further reference:

- Italian Fund for Applied Sciences (FISA)
- Ministerial Decree No. 637/2024 (Italy)
- Equality plan from the University of Granada
- Internal R&I funding instrument (*Plan Propio de Investigación y Transferencia*) (University of Granada)
- HR Excellence in Research at Charles University
- Barcelona Declaration on Open Research Information
- Swedish Higher Education Act
- Agreement on Reforming Research Assessment
- University of Cologne's Patent and Utilisation Guidelines
- Academic Freedom Monitor 2024: Analysis of de facto state of academic freedom in the EU - Country overview
- Academic Freedom Monitor 2024: Overview of de jure academic freedom protection
- EP Academic Freedom Monitor 2024: Key findings and policy options
- Austrian spin-off fellowships