



10 September 2025

# Paving the way for the European Research Area Act

## Input from the Coimbra Group

The **Coimbra Group** (CG) welcomes the efforts of the European Commission to give new impulse to the European Research Area (ERA) through the forthcoming ERA Act and appreciates the opportunity to provide feedback at this stage of the [call for evidence](#), as well as through the targeted consultation in April 2025.

CG has always been a strong advocate of a **fully implemented ERA** as a genuine single market for researchers, scientific knowledge, and technology across the EU. Since the adoption of the new ERA and its more inclusive governance framework, CG has actively contributed to shaping and advancing successive ERA policy agendas (2022-2024 and 2025-2027).

Yet the **exclusive reliance on voluntary commitments by Member States has proven insufficient to tackle the structural barriers and persistent gaps** that continue to hinder, for our universities, the full realisation of the ERA and the achievement of the promised 'fifth freedom'. The urgency of this issue is clearly highlighted in the [2024 ERA Communication](#) and in the [Letta](#) and [Draghi](#) reports, among other key documents.

Overall, CG fully endorses the problem assessment and strongly support the proposed solutions, which we consider essential to embed in future EU legislation. CG stands ready to contribute further to the development of this legislative proposal, drawing on the expertise and experience of its member universities across 22 countries.

To prepare this contribution, all CG universities were consulted via email to gather their insights on the context and objectives of this initiative, their specific needs and challenges and existing or proposed solutions. This document first outlines key concerns expressed by our members, followed by a set of considerations intended to inform the further development of the ERA Act.

A pressing issue is the **lack of stable, and in many countries, sufficient, investment in R&I at both national and European level**. This longstanding problem requires urgent action, as it impacts directly or indirectly many of the other challenges. **CG recommends that the ERA Act include a binding target for R&D investment of at least 3% of GDP**, complemented by a specific target for public sector funding. Furthermore, the relatively low proportion of core (or institutional) national funding allocated to universities and research institutions in most EU countries forces them to rely on external, competitive project-based funding. This situation creates significant risks, undermining the strategic capacity of universities and hampering the full realisation of the ERA's objectives (including difficulties in matching Horizon Europe co-funding).



Another major concern raised by CG universities is **the decline in researcher mobility, both across countries and between sectors**. This is hindered by, among other factors:

- The absence of common rules on the mobility of European and international researchers (including for instance the possibility to carry EU/national research grants and social security entitlements seamlessly across borders).
- Fragmented career frameworks across the EU, including contract and working condition.
- Inconsistent recognition of academic achievements.
- Precarious working conditions in academia.
- Lack of formal recognition for teaching and research activities conducted during stays abroad.
- Non-portability of pensions.
- Limited funding for short sabbaticals.
- Restrictive or inefficient migration policies, particularly affecting non-EU scholars, including visa processes. For example, long processing times at national migration agencies and a lack of expertise in assessing highly qualified researchers create serious obstacles.

**An additional challenge is the uneven landscape of research investment, infrastructure, and regulation across Member States.** Complex bureaucracy, fragmented administration, and divergent national R&I funding and audit rules create delays, administrative burdens and legal uncertainty in collaborative cross-border projects notably. Low and uneven investment, combined with difficulties in engaging with the private sector, further weakens the competitiveness of some institutions.

Several universities have highlighted practical measures to address both of these challenges: For example (1) Uppsala University launched a pilot study to improve administrative support for mobility, aiming to simplify processes for students and researchers; (2) the University of Bologna has promoted initiatives such as investing EU structural funds in research facilities, aligning national research plans with European strategies across the entire research cycle, and directly recruit ERC and MSCA awardees; (3) the University of Cologne has introduced clear [intellectual property guidelines](#) and provides extensive administrative and legal support for research collaborations and start-ups.

**CG members also identified barriers to fully implement Open Science.** These range from cultural resistance to financial and technical obstacles as well as insufficient incentives, recognition and staff support and a lack of coordination between the EU-funded initiatives. The adoption of Open Science practices is progressing unevenly, with open access publishing and research data management being the most widely implemented. This area requires a systemic approach. **It is therefore crucial that related measures in the future ERA Act enable large-scale transformations towards Open Science across the continent.** A general problem is that researchers often do not see Open Science as improving research quality, while funding, incentives, and staff support remain insufficient. In Germany there are reports of uneven adoption, with stronger progress in open access and data management than in open peer review or citizen science, largely due to limited resources. In France, despite national tools such as HAL, challenges remain around researcher engagement, high publication fees, insufficient support for FAIR data, and regulatory hurdles.

**To address these issues, institutions are investing in infrastructure, training, and coordination.** For example, the University of Cologne has adopted guidelines and coordination mechanisms, while the University of



Poitiers has set up a one-stop shop, strengthened doctoral training, supported data management planning, and aligned its efforts with national and European initiatives. These examples show how practical support and better incentives can accelerate the shift to sustainable Open Science.

Despite broad recognition of **academic freedom** as a basic right and a fundamental value, **CG members are increasingly concerned about threats to, and violations of, academic freedom, not only globally, but also within Europe**. Universities are meant to be hubs of open debate, inquiry, and intellectual exchange. Without the freedom to question, debate, and doubt, research cannot thrive. Moreover, research is inherently transnational and knows no borders. Threats to academic freedom in one country impact the entire international research community, and particularly universities. In an increasingly interconnected world, defending academic freedom is therefore a shared global responsibility.

As highlighted in the [European Parliament's Academic Freedom Monitor 2024](#), "there is currently no clear basis for identifying where and how the de jure and de facto protection of academic freedom in the EU Member States can and should be enhanced, due to a lack of agreement on a definition of academic freedom and, consequently, the absence of generally accepted indicators for assessing the state of academic freedom". In addition, the lack of a specific legal framework for academic freedom at European level makes enforcement difficult. **It is therefore crucial that the ERA Act provide robust legal protection for academic freedom, supported by effective mechanisms to ensure its enforcement.**

Based on the needs and considerations expressed by CG members, **the following actions could guide the development of the ERA Act or related EU legislative acts:**

- **Integrate a binding target of at least 3% of GDP for investment in R&D**, complemented by a specific target for public sector funding.
- **Reinforce institutional autonomy**: an ERA act could potentially further enshrine this principle, for instance, by laying the basis for a system of "ombudsmen" or similar, that could react to infringements of institutional autonomy.
- **Simplify and harmonise visa and residence rules** for international researchers.
- Strengthen and streamline **legal and financial safeguards** to enable universities and their researchers to focus primarily on research and fully benefit from the realisation of the ERA.
- Recognize challenges specific to **gender** and support **inclusive policies** for disabled and minority staff.
- Establish **common minimum standards** for researcher careers and contracts, while preserving institutional flexibility.
- Support **sustainable infrastructures** and staffing for **Open Science**, including FAIR publishing models.
- Advance **recognition and assessment reforms** in line with CoARA principles, recognising diverse research outputs (regardless of format or language) and valuing researchers' broader contributions to society.
- Provide clarity and incentives for **university-business cooperation**, including recognition of knowledge transfer in assessment frameworks.



- Better **protect fundamental academic values**, starting with institutional autonomy and academic freedom. This could also include safeguards for whistle-blowers.
- Create a harmonised framework for a **sustainable, equitable Open Science ecosystem**.
- Strengthen **digital sovereignty**, reduce reliance of universities on proprietary providers and closed, non-interoperable systems.
- Collect **reliable national-level data** on research careers and mobility (including at PhD level).
- Ensure the **portability of pensions** and social benefits for researchers.

When the European Commission decides on the specific measures to be embedded in the future ERA Act **it will be essential to distinguish carefully between areas where progress can be achieved through financial incentives and voluntary commitments** (via the ERA Forum and its Policy Agendas, or the Framework Programme's support for a unified ERA), **and areas where binding legal provisions are required**.

**Discussions on an ERA Act should not remain a theoretical exercise** aimed at designing an ideal system. Rather, they must prioritize issues within the current ERA agenda that are sufficiently mature, enjoying broad consensus and demonstrating clear need for action, to be enshrined in EU law.

Finally, the preliminary risk and impact assessment must ensure that the ERA Act avoids unnecessary bureaucratic burdens or unintended side effects, which would undermine its effectiveness. It must maintain a careful balance regarding subsidiarity, fully respecting national differences, institutional autonomy, and the diversity of academic disciplines. The assessment should also address the risk of ambiguity that could lead to divergent interpretations across Europe and, more broadly, prevent a shift in focus from practical improvements to mere legal compliance, thereby **ensuring that the ERA Act delivers tangible and meaningful impact for universities and their communities**.

#### Resources:

- [Agreement on Reforming Research Assessment](#)
- [Barcelona Declaration on Open Research Information](#)
- [Ministerial Decree No. 637/2024 \(Italy\)](#)
- [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](#)