A response from FEAM to the European Commission consultation on the Green Paper *From Challenges to Opportunities: Towards a Common Strategic Framework for EU Research and Innovation funding*

The Federation of European Academies of Medicine (FEAM) welcomes the opportunity to respond to the European Commission Green Paper on a common strategic framework for future EU research and innovation funding.[i] As the umbrella body for national academies of medicine across Europe, FEAM provides the European authorities with independent, authoritative advice on matters of medical science and public health including research and innovation. Our remit includes veterinary medicine, which is important to both medicine and public health.

FEAM supports the principles developed in the Green Paper and hopes to play a critical part in developing the future proposals that set out practical ways in which these principles might be implemented. As the organisation that represents the national academies of medicine across Europe, FEAM offers an unparalleled resource for European policymakers. We would therefore be pleased to harness the expertise of our members to guide the Commission in further developing the proposals set out in its Green Paper through meetings, workshops or additional briefing documents.

Rapid recent advances in medical science present the European Union with opportunities to improve both health and wealth. Research and innovation in medicine and health offers a catalyst for economic growth that could help restore public finances across Europe, could allow Europe to tackle increasing competition from emerging economies and could address pan-European challenges such as the ageing population and pandemic infectious disease. To achieve this goal the European Union should ensure science and innovation remains a funding priority and welcome commitments to increase European R&D spending to 3% of GDP by 2020.[ii]

FEAM acknowledges the analysis made by the European Commission about current EU research and innovation programmes and shares many of the Commission's conclusions and concerns. We support the central proposal of the Green Paper that seeks to align core elements of EU level support for research and innovation post-2013 within a coherent

strategic framework. If correctly drafted and implemented, this should improve efficiency and reduce complexity. The common strategic framework should ensure EU research funding focuses on those activities that cannot easily be achieved at the national level and should complement rather than distort successful national research agendas. Much might be learned at the European level by monitoring the progress of various of the new national research funding initiatives such as the French 'Grand Emprunt' and German Excellence Initiative.

FEAM is keen as a matter of principle to increase the participation of newer member states in research and innovation conducted at the European level, but this should be achieved without compromising excellence as the central criteria for funding. A set of excellence criteria or aspirations should be agreed to give guidelines to applicants and reviewers. When deciding on funding models the European Union should seek a balance between research into 'Grand Challenges' that focus on the needs of society and fundamental research that can produce substantial and often unanticipated rewards. The new common strategic framework should be based upon a non-linear 'ecosystem' model of innovation where ideas are exchanged between different disciplines, academia, industry, health policymakers, charities and health services. We emphasise the critical role of the healthcare-university environment in facilitating research and the need to ensure that public-private partnerships protect public money, maintain accountability and transparency, tackle potential conflicts of interest and can involve researchers from smaller countries.

The proposals in the Green Paper could greatly simplify European research and innovation funding as the rules for participants remain burdensome and in many cases deter applications. Programmes should be based much more on trust and be more tolerant of risk. Auditing and reporting should be kept to the absolute minimum while protecting public funds and maintaining accountability. In addition we are concerned that vital research may be slowed because some countries require additional national level peer-review over and above by properly constituted peer-review at the European level. We encourage national funding agencies to communicate with each other and European funding bodies more often.

A vibrant European industrial bioscience sector will translate scientific discoveries into new treatments and interventions, generate public revenue and create high-value jobs. We therefore support in principle financial instruments to encourage and facilitate innovation in industry. Of particular value to the medical science industry are measures to provide finance to innovative companies, to incubate ideas for longer before they enter the market and the use procurement to stimulate innovation through mechanisms similar to the US Small Business Research Initiative (SBRI).[iii] A key priority is to better promote the mobility of researchers between industry, academia and health services. We also stress the importance of fundamental research and investigator led translational research in improving health and wealth.

When making decisions about European level funding the European Commission should also consider the wider environment in which research is conducted. Without a facilitative research environment funding will not provide maximum returns. A good example is the introduction of the Clinical Trials Directive (CTD). This was intended to harmonise

authorization of EU Clinical Trials on medicinal products and to improve the collection of reliable data; but has made the European Union a less conducive environment for certain types of research. Moreover, the CTD has dramatically increased the administrative burden and costs for academia and has deterred academic clinical research. Further details of FEAM's position on this matter can be found in our statement '*Opportunities and challenges for reforming the EU clinical trials directive: an academic perspective*'.[iv]

Brussels, May 2011

[i] European Commission (2011). *From challenges to opportunities: towards a common strategic framework for EU research and innovation funding.*
http://ec.europa.eu/research/csfri/pdf/com_2011_0048_csf_green_paper_en.pdf#page=2

[ii] European Commission (2010). *Europe 2020. A European strategy for smart, sustainable and inclusive growth.*
http://europa.eu/press_room/pdf/complet_en_barroso___007_-_europe_2020_-_en_version.pdf

[iii] Further information on the SBRI can be found at: http://www.sbir.gov/

[iv] FEAM (2010). *Opportunities and challenges for reforming the EU clinical trials directive: an academic perspective*.
http://www.leopoldina.org/fileadmin/user_upload/Politik/Empfehlungen/FEAM/FEAM_Statement_EU-clinical-trials-directive_2010.pdf