

Simplification in Horizon Europe

LERU's feedback on the simplification measures introduced in, and proposed for, the 2025 and the 2026-2027 Horizon Europe Work Programmes

Introduction

LERU is an advocate for simplification and has made many recommendations in the past on how to realise this, including in the LERU FP10 paper¹. We therefore warmly welcome the focus of the European Commission (EC) on simplification for the R&I Framework Programme. We hope that this will lead to an FP that is even more attractive and accessible to applicants and beneficiaries.

This note addresses the simplification measures announced in the publication of the 2025 Horizon Europe Work Programme (WP) and those that are foreseen in the draft 2026-2027 WPs. It focuses especially on simplification in pillar II. The note is based on an analysis of the draft WPs done by, and on detailed suggestions for further simplification received from, EU research managers and experts at the LERU member universities. We hope this feedback and these proposals can be a source of inspiration for those working on simplification of Horizon Europe and preparing the implementation of the future programme.

1. Work programme and call development: analysis on the basis of the 2025 and the draft² 2026-2027 work programmes

LERU welcomes limiting topics that only fund one project.

We **welcome less prescriptive and shorter topic descriptions** which can allow for greater flexibility, creativity and the latest insights on how to approach the challenge set in the topic and deliver on the expected outcomes³.

- LERU underlines that for less prescriptive topics it is crucial that the challenge is clear, but the methodology or pathway to impact is up to the applicant.
- Less prescriptive topics also means limiting the length of the scope in calls and adopting a standardised format for it (e.g. include relevant references to reports, policies, previous or on-going projects as well as expected target groups), avoiding including long lists of activities⁴. The list of activities should be as limited and coherent as possible, and activities should only be included if needed to show some direction.
- LERU also underlines the importance of easily understandable topics that use far less jargon. The destination introduction to calls should provide all relevant policy context to guide applicants to address the policy priorities.
- Evaluators should receive a clear briefing and training on the broader context of the challenge set by the EC, beyond their (often specific or partial) expertise, to judge the 'fit' of a proposal in the

¹ <https://www.leru.org/files/Publications/LERU-paper-blueprint-EU-FrameworkProgramma-FP10.pdf>

² These are the draft WPs available in June 2025.

³ In line with the [LERU FP10 paper](#)

⁴ See LERU FP10 paper and the [Note on precompetitive, collaborative R&I in FP10](#)

scope of the challenge at hand. Reviewers should be clearly instructed to identify the unique qualities of proposals in terms of originality, significance and rigour. These trainings and briefings should be accessible to applicants during proposal preparation.

To allow for less prescriptive topics that deliver more impactful projects while limiting potential negative side-effects, LERU recommends:

- to consider setting up standing panels of evaluators to evaluate first stage proposals on their fit within the scope of the call. A panel structure would ensure experts with the right expertise assess the proposal and it would reduce time to grant.
- to further increase the number of two-stage applications, thereby mitigating the expected increase of the number of proposals. Comments on the two-stage application process can be found below.

We **welcome a more strategic focus of the Work Programme** that includes fewer topics, which are better aligned with long-term strategic goals, rather than short-term (political) priorities.

- These priorities need to be set in all transparency, after consultation of all relevant bodies, which should certainly include experts, including researchers from different disciplines.
- Making choices also implies that other domains will have fewer opportunities, potentially increasing the oversubscription in the bottom-up channels. Also, it is difficult to predict what R&I is needed to help overcome the next crisis or which technology will drive competitiveness in the medium or long run. To safeguard a minimum acceptable success rate and to fund the as yet-unknown but possibly key technologies for the future, additional funding will be needed for bottom-up programmes.

However, **we also notice indications of increased market-orientation.**

- The foreseen topics on the Clean Industrial Deal aim to achieve Technology Readiness Level (TRL) 7 with very large budgets per project.
- The expectations for Research and Innovation Actions (RIA) seem increasingly focused on innovation. The wording used in the expected outcomes includes high TRL activities, e.g. 'develop pilot demonstrators', 'develop and deploy', 'achieve significant reduction in the production costs', 'demonstrate processes', and the project requires business and exploitation plans, and sometimes explicitly expect projects to reach the end TRL of 8 (for examples, see annex). The distinction between RIAs and Innovation Actions (IA) is becoming increasingly blurry.⁵ LERU emphasizes that it is important to keep funding the middle section of the R&I process. Research insights need to mature and be valorised before commercialization, scaling or deployment is possible⁶.

To complement the above, we underline that the topics of the Work Programmes should also go beyond a sole focus on industry or competitiveness⁷.

⁵ Such activities and high TRLs are not in alignment with the definition of a RIA in the general annex

⁶ See LERU [Note on precompetitive, collaborative R&I in FP10](#)

⁷ See LERU Note on precompetitive, collaborative R&I in FP10, p. 2

- In some WPs, the expected TRL level is no longer given. LERU is, in principle, not in favour of TRL levels being used to indicate the stage of the R&I process a project should focus on⁸. So, we welcome this change which is also in line with the demand for less prescriptive topics. However, not mentioning the expected TRL level should also mean that in evaluation there will not be a bias or preference for proposals focusing on a specific part of the R&I process, e.g. close-to-market activities. If there is to be such a bias or preference, that should be clearly mentioned in the WP/call.
- We welcome the (re-)introduction of Fast Track To Innovation, especially as an open topic allowing for low TRL innovation.⁹

Publication of Work Programmes (WPs)

- LERU strongly calls for an on-time publication of WPs: a WP needs to be published at least three months before the call opening, to allow for smoother preparation of project proposals. Last-minute publications hamper the inclusivity of the programme as they are mostly a disadvantage for newcomers or smaller beneficiaries who lack the experience, and often the support, to prepare complicated applications in a short period of time.
- We welcome the intention of the EC to develop a more open, transparent and standardized approach to the publication of draft WPs: access to draft WPs across all (current) Programme Committees will help to guarantee equal access to information across the EU and across applicants. It increases the transparency of the process.

Although the publication of draft WPs is an important step towards equal access, it does not make the first point on on-time publication of the final WPs redundant. Applicants need the final text in time to prepare their application.

Risks for increased complexity instead of simplification

- There is a clear tendency to fund fewer but larger projects. We underline that larger projects will lead to increased complexity in the proposal development phase as well as for project management. Instead of having more (very) large projects, LERU recommends lowering the average grant size and including specific calls for small to medium-sized consortia. Large grants and budgets are needed in some cases, but it should not be(come) a general approach across topics. Because of their complexity, large projects may benefit the larger and established beneficiaries, yet at the same time still increase the perceived need for external help. Also, we have noticed that it is increasingly difficult to find coordinators for these larger grants. Small and medium-sized consortia simplify proposal preparation and implementation, allowing more budget to be spent on research instead of management. Such calls would decrease the barriers to participation, resulting in a more agile research and innovation ecosystem¹⁰.

⁸ See LERU FP10 paper for more details <https://www.leru.org/files/Publications/LERU-paper-blueprint-EU-FrameworkProgramma-FP10.pdf>

⁹ E.g. HORIZON-CL4-2027-01-MATERIALS-PRODUCTION-41: Breakthrough innovations in industrial technologies (Fast Track to Innovation): This is an open topic, intended to cover breakthrough innovations, up to TRL 4, within the scope of the strategic research agendas of the partnerships Made in Europe, Process4Planet, Clean Steel, Innovative Advanced Materials for the EU (IAM4EU) and Textiles for the Future.

¹⁰ See LERU FP10 paper for more details

- Introducing additional or horizontal WPs (like for the Clean Industrial Deal) or (re)introducing action types such as the Fast Track to Innovation would also increase complexity.

Other remarks

- Regarding the inclusion of Social Sciences and Humanities (SSH), we welcome dedicated topics¹¹ that are looking at establish meaningful connections with SSH expertise and hope to see more of such projects in the future.
- LERU suggests to develop and publish an annual call calendar, that is roughly the same in all years of the programming period, for all parts of the programme, with an adequate spread of deadlines throughout the year to safeguard work-life balance of applicants, reviewers, EC and support staff as well as the quality and depth of applications and of the support to applicants.
- Making sure that all the call documents are in the same place, for instance on the portal would also lead to simplification for beneficiaries.

2. Increased two stage evaluations and reducing time to Grant

We welcome all efforts to **reduce time to grant**, which is especially valuable when it comes to innovation and valorisation. LERU also supports the move towards **more calls with a two-stage procedure** as announced for the 2025 WP as one way to ease the workload on applicants. However, we have some concerns and suggestions based on recent announcements:

- The current two-stage evaluation is organised in such a way that a consortium already needs to have a clear plan for the full proposal upon submission for the first stage. Therefore, we recommend that the EC looks into ways to make stage 1 far less demanding, e.g., by making the stage proposal solely focused on the research idea and how it fits the challenges presented in a given topic. Such a short 'pitch' would also ease the workload in the evaluation phase and allow time from submission to result to be reduced. Combined with adequate time between the result of stage 1 and the deadline to submit for stage 2, allowing applicants to develop a full proposal, it would significantly reduce the workload in the proposal stage.
- Also, without any changes as to what needs to be submitted in stage 1, we warn that reducing the interval before stage 2 from three to two months will increase the peak workload for applicants and will have an effect on the quality of the proposal. Therefore, this is certainly not considered a simplification. If this is indeed implemented, it will be absolutely necessary to avoid that these two months overlap with holiday periods such as the summer months or Christmas.
- We welcome the fact that unsuccessful applicants will receive all individual assessments from each evaluator¹². We would welcome all comments to be shared with all applicants after stage 1, to increase transparency and support high quality applications. The sharing of these evaluations with all should happen as soon as possible after the conclusion of stage 1.
- Removing the consensus phase will reduce the evaluation time of the first phase. However, while offering individual assessments to rejected applicants might offer them more concrete insights on

¹¹ e.g. HORIZON-CL4-2026-01-MATERIALS-PRODUCTION-Y1: Enhancing industry-academia knowledge exchange in Social Sciences and Humanities (SSH) (CSA)

¹² There is some unclarity in the different leaked documents on simplification on whether this is only for rejected applicants or not.

how to improve their proposal for subsequent proposals, this will not reduce time to grant (as they are rejected).¹³

- Time to grant could be reduced in Grant Agreement Preparation phase by offering all feedback (evaluators, FO, ethics, ...) at the same time instead of spreading it over a period of different weeks.
- Another way to reduce time to grant, is to stick strictly to “evaluated proposal as is”: applicants are sometimes met with demands for changes in substance/scientific content of the proposal in the negotiation phase. In addition, project officers sometimes request more technical changes such as changes to work packages, timelines, adding deliverables etc. LERU underlines the importance of guidelines/rules to be applied in a unified way and across the board, and for the EC to control this. This would certainly speed up the grant preparation stage.

3. Changes to the proposal template

LERU welcomes the **removal of the table of Role Participants in part A** as the roles of the participants are sufficiently explained in the narrative of the proposal.

We welcome the simplifications regarding the **Impact Section**:

- Focusing the description of the expected impact on what is expected in the topic, without the requirement to demonstrate broader (scientific, economic, technological and societal) impact, will allow for a more precise description of impact by the applicants. In addition, omitting the requirements on providing information on ‘Scale and Significance of the project’s contribution to the expected outcomes and impacts’ will help coordinators to no longer have to struggle to find appropriate KPIs based on assumptions which, in the long term, are, (at least partly), out of their hands¹⁴.
- Reducing the page expectations (and consequently the level of detail) of the Dissemination, Exploitation and Communication (DEC) section further reduces the emphasis on non-directly R&I-related parts of the proposal. Combined, these simplifications measures might reduce the (often perceived) need for additional and external help to write these sections. However, the reduction by 2 to 4 pages seems too much. In most cases, the omitted sections are only less than one page long.
- We underline that the EC will need to very clearly brief evaluators on these changes so that those that have already reviewed proposals in previous years don’t penalize the 2025 applicants. From the [LERU ESR analysis](#) it was clear that Scale and significance is a very common place for negative comments, so evaluators are certainly used to assessing this in detail.
- While we agree that the relevance of the 2.3 Summary Table needs to be assessed as it now duplicates information, making it ‘optional’ could lead to confusion. Researchers might want to include it ‘just to be sure’. In addition, evaluators might be confused as to what degree the table, if included, should be considered. While the table remains a good heuristic tool to develop the impact section during proposal phase, it should be clear that it is not a requirement. Therefore, we recommend removing the table from the template.

¹³ There is some unclarity in the different leaked documents on simplification on whether this is only for rejected applicants or not.

¹⁴ cf. LERU Report on first experiences with proposal preparation and submission in Horizon Europe, p. 10.

University of Amsterdam • Universitat de Barcelona • University of Cambridge • University of Copenhagen • Trinity College Dublin • University of Edinburgh • University of Freiburg • Université de Genève • Universität Heidelberg • University of Helsinki • Universiteit Leiden • KU Leuven • Imperial College London • University College London • Lund University • University of Milan • Ludwig-Maximilians-Universität München • University of Oxford • Sorbonne University • Université Paris-Saclay • University of Strasbourg • Utrecht University • ETH Zurich • University of Zurich

Removal of tables requesting information on ‘purchase costs’, ‘other costs’ and ‘in-kind contributions’

- We agree with the proposal of the EC to delete this information from the proposal and to request other information in the Grant Agreement Preparation.
- We recommend including a threshold in euro (e.g., equipment > 10.000 euro) for equipment costs rather than a ratio threshold (15% purchase costs vs staff costs). This would be easier for applicants.

To simplify the proposal phase and template even further, LERU recommends to

- shorten applications in general: the standard page limit for applications should be shortened to 30 pages maximum. However, for more complex topics (e.g. requiring larger consortia, business cases, etc.) more pages should still be possible.
- leave all compulsory items such as data management/FAIR data and other compulsory open science elements out of the Part B. Open Science (OS) elements should only be mentioned in the excellence section if the proposed activities go beyond what is requested from all applicants in relation to recommended/additional OS practices. Mandatory elements and compulsory items should be tick-boxes in the A-form, in the same way as the ethics section, especially if it is something participants must deliver due to contractual obligations.
- limit the number of milestones and deliverables consortia can add to their proposal. Currently consortia often tend to outline their work as detailed and ambitiously as possible to convince the evaluators, leading to too many milestones and deliverables, complicating evaluation and – if granted - reporting.
- clarify third-party categories: e.g. linked third parties/affiliated entities/subcontracting/third party free of charge, etc. The terminology is complicated, can be vague and open to interpretation. It would be desirable to distinguish third parties by means of clear and consistent criteria across categories. Furthermore, it would be helpful to receive guidance how to identify third parties, with examples of expectations of contributions as well as their responsibilities towards projects. Changes to categories can impact on existing relationships so should be carefully considered and clearly justified.
- add the option of reimbursing third party-in-kind contributions as a lump sum. This is especially needed when third parties are based in countries where meeting the requirements of actual cost grants is difficult.

4. Funding and Tenders Portal

LERU welcomes the many efforts that were already made to improve the Funding and Tenders Portal. We have some recommendations **to further simplify and create and even more user-friendly participant portal**. In general, we would welcome for the EC to resume discussions with portal users about possible improvements. More specifically, we suggest to:

- Improve the findability of suitable calls and allow for better filtering options.
- Increase the portal's stability and performance independent of the number of people that are using the portal. Although the portal's functionality is better than it has been, there are still issues relatively often. In addition, it should allow risk-free simultaneous data entry by multiple users.
- Enable automatic access for, and inform LEARs and Account Administrators of, all proposals and grants linked to their organisation on the Portal. Currently organisations get notifications of

applications only when they are submitted, which is too late. Having immediate access when PIC is added, would be very helpful.

5. Grant agreement preparation (GAP)

In general, we underline that **streamlining of guidance and information** is key to a simplified grant agreement preparation (GAP). More specifically, we recommend to:

- standardize guidelines: conflicting instructions from project officers can lead to confusion and slow down the process.
- Link the information on deliverables, milestones, work packages, ... that is provided in the proposal text Part B) automatically to the required fields in the portal during GAP. Currently, for instance transferring data from the proposal to the Description of the Action (DoA) is cumbersome and error-prone, because it has to be done manually. If the proposal information was structured differently, i.e. tables in Work Packages, project milestones (PMs) and deliverables right from the beginning, the transfer from proposal to DoA would be much easier and less time consuming.
- make the timeline and guidelines for GAP available in advance to allow beneficiaries to prepare for and manage the GAP workload. Tight deadlines for GAP processes and completion put a large amount of pressure on beneficiaries, especially those with multiple grants.

6. Project implementation

For simplifying project implementation, it is absolutely key that beneficiaries have **timely access to reliable guidance documents such as the Annotated Model Grant Agreement**. This is important for beneficiaries to be able to establish stable processes for project management.

In addition, LERU recommends simplifying amendments by

- reducing the cases when amendments are needed: given the high frequency of amendments in grant agreements, certain types of modifications should be pre-approved or processed automatically to reduce administrative burdens.
- simplifying the change requests themselves: for example, simple no-cost extensions should be done in a very quick and simple process.
- shortening the maximum of 90 days for the EC to provide feedback on an amendment. Now, it can take too long before amendments are approved, resulting in uncertainty and project delays.

7. Reporting

Implementing some of the steps presented in this section would result in a more trust-based approach, without letting go of the control of taxpayers' money being spent appropriately.

- Lighter reporting is key, meaning a reduction of the granularity of the reporting. A bigger emphasis on scientific reporting rather than financial reporting would be welcome.
- Again, ensure consistency in the answers provided by Project Officers and Financial Officers to questions from beneficiaries.
- Reduce the number of predefined indicators requiring input.

- Providing easily available guidance on reporting, for instance on how to fill the different reporting tables and creating much clearer rules on how to calculate costs, internal invoicing etc.
- Reduce the level of detail on internal invoicing, this has increased from Horizon 2020 to Horizon Europe. A simplifying solution might be to treat 'Internally Invoiced Goods and Services' (IIGS) as direct costs with a flat rate overhead, for consistency with other direct costs, as in Horizon 2020.
- More extensive guidance on expectations around the Justification of Resources (JoR) would be welcome, including examples of costs by subject area to help establish best practice. The JoR should be structured according to budget categories with justifications in against each category.

8. Lump sums

Since lump sums are relatively new and their increased use has been questioned by many, LERU's stance and recommendations on this are grouped separately.

Lump Sums (LS) have the potential to be a simplification at post-award stage if beneficiaries do not (feel they) need to comply to actual cost principles vis-à-vis the EU (such as timesheets or cost justification), and as long as they are not used for projects with a large number of partners. Because of the still existent concerns and unease with the use of LS, LERU recommends the EC not to further increase the use of LS projects in Horizon Europe and to refrain from using LS for very large projects. Therefore, we cannot support the recent EC idea of using Lump Sum in all projects under 10 million EUR, since these would, in practice, cover already most projects. In addition, it is our experience that LS projects with such large budget often have complicated project structures with a very high number of work packages, which lead to less effective execution of R&I activities.

LS are better suited for smaller consortia with smaller budgets (as LERU proposes to introduce), and possibly a shorter duration. For these projects there would be very little need to redesign work packages as they would get an adequate prefinancing up front.

Recommendations for simplifying the use of LS

- We welcome the EC plans to integrate the budget excel file in the portal and suggest integrating the corresponding requested tables in part B (e.g. table 3.1.h, 3.1.i) automatically in the portal as well.
- Provide legal certainty on time recording requirements: A clear, on paper statement that time sheets are not necessary for lump sum projects would be welcome, mostly to address the inter-institutional hesitance to eliminate this administrative practice, which was originally introduced for EU projects and is now commonly used to document time spent on a project.
- Clarify in the grant agreement what evidence should (not) be kept for LS projects and what checks should be carried out. This would help reduce the current uncertainty when F Signing and submitting claims.

Conclusions

LERU looks forward to further efforts by the EC to make Horizon Europe and the next FP as simple as possible and is committed to working closely with the EC to ensure the simplification measures benefit both applicants and beneficiaries, be it smaller, larger, new or experienced ones.

Annex

Examples of RIA shifting towards innovation in the draft WPs:

- HORIZON-CL4-2026-01-MATERIALS-PRODUCTION-15 Technologies for innovative processing and refining of raw materials (RIA)**

 - *Research and Innovation* with no TRL indication, yet is about piloting demonstrators, and requires a business case...
 - ‘Actions should develop pilot demonstrators’
 - ‘Proposals submitted under this topic should include a business case and exploitation strategy’
- **HORIZON-CL4-2026-01-MATERIALS-PRODUCTION-11: Innovative technologies and tools for exploration and data modelling of raw materials (RIA)**
 - RIA: “Actions should develop and deploy advanced geological modelling and mineral system analysis”
- **HORIZON-CL4-2026-01-MATERIALS-PRODUCTION-31: Efficient capture / purification / utilisation of CO2 for the production of competitive products (RIA) (Processes4Planet partnerships)**
 - RIA:
 - ‘Achieve a significant reduction in the production costs of CO2-based products, making them competitive with conventionally produced alternatives. This involves optimizing the integration of CO2 capture, purification, and conversion processes.’
 - ‘Demonstrate processes that minimize energy consumption during the entire conversion process, leveraging advances in process integration that can shift equilibria and the use of renewable electricity and available heat sources’
 - “Contribute to the reduction of carbon emissions by enabling the sustainable use of CO2, supporting circular economy principles through the valorization of CO2 as a resource rather than a waste”
- **HORIZON-CL4-2026-04-MATERIALS-PRODUCTION-40: New or enhanced IAM-enabled sensing functionality**
 - Widespread adoption of low-cost IAM-based sensing solutions in e.g. environmental monitoring, industrial safety, and next-generation smart sensing applications
- **HORIZON-CL5-2027-08-D5-19: Onboard renewable energy solutions and energy saving measures to reduce the fuel consumption of ships by at least 55% (ZEWT Partnership)**
 - RIA: Activities are expected to achieve TRL 8 by the end of the project – see General Annex B.