

More Clarification and Discussion Needed

Science Europe initial response to the European Commission public consultation on its White Paper on Dual-Use Research

Science Europe welcomes the initiative of the European Commission to consult civil society regarding its recent White Paper on R&D on dual-use technologies. It would like to stress that further discussion on the topic of 'dual use' in the current and next Framework Programme for Research and Innovation is highly needed and should be held with all relevant stakeholders.

While waiting for the outcomes of a reflection within Science Europe Member Organisations, we would like to provide initial input along to a series of key points:

- A flexible, risk-based, and specific case-by-case approach for research projects with dual-use potential would be beneficial at EU level – irrespective of the choice for one of the three suggested options in the White Paper. This will need to take account of regulations at the individual country level and a changing international environment.
- The Commission should provide guidance to assist applicants in assessing whether their projects have dual-use potential and in implementing adequate measures to ensure knowledge security. The list of technologies that should be considered 'dual-use' as provided in Annex I of Regulation 2021/82 is an example of information that would be useful to guide researchers in assessing the dual-use potential of their research projects.
- The notion of science being "as open as possible and as closed as necessary" should be clarified; what does it mean for research funding and performing organisations, and for researchers. When considering opening up the Framework Programme to 'dual-use' research, there must be careful consideration on how this will relate to international co-operation. Principles of academic freedom and reciprocity with third countries must remain in the next Programme.
- Sufficient and adequate funding for basic research must be safeguarded at all costs, regardless of the provisions made for 'dual-use' research in the next Framework Programme.
- Civil research should continue to be clearly distinguished from defence research, as laid down in Horizon Europe's legal provisions (Articles 5 and 7(1)). Investments in 'peace' research should also be promoted. 'Dual-use' research should not be tackled in isolation from other equally important areas of research, such as on diplomacy and peace.
- Knowledge security and open science are at the heart of European research and should be continuously promoted, in an environment where knowledge is shared and used for the benefit of all.

- As the current Framework Programme already funds projects that later turn out to have dual-use implications (namely in Cluster 3 of the second pillar), the expected outcomes of any new measure on dual use implemented in FP10 should be clearly described. Indeed, since most of today's important technologies can be considered dual-use, Science Europe calls for a clear distinction between 'dual-use' and 'dual-use potential'.
- The suggested incorporation of a flag mechanism within relevant calls can be a pragmatic solution, but it will require rigorous research security measures and scrutiny of consortium entities and research candidates to prevent misuse. Moreover, this will require a robust framework for monitoring research on dual-use technologies within the Framework Programme.

Science Europe hopes that these considerations will encourage the Commission to provide more information on the possible implications of each option (both policy- and budget-wise), possibly generate others, as well as to organise further discussions on the topic with stakeholders.

About Science Europe

Science Europe is the association representing major public organisations that fund and perform excellent research in Europe. It brings together the expertise of 40 national institutions to jointly push the frontiers of how scientific research is produced and delivers benefits to society. They collectively invest over €25.1 billion yearly on research in 29 European countries. Science Europe advocates science and the scientific community to realise the European Research Area (ERA), building on the national research policies that its members develop and implement to create the best possible conditions for research.