Position Statement on the Digital Omnibus: Defining Scientific Research

27 November 2026

The European Commission's proposal for a Digital Omnibus, published in autumn 2025, introduces amendments to several EU digital legislative frameworks, including a proposed definition of "scientific research" under the General Data Protection Regulation (GDPR). Science Europe welcomes the opportunity to comment on the proposed definition and its implications for scientific research.

The GDPR plays an important role in the research ecosystem by establishing the rules governing the processing of personal data, while providing specific flexibilities and safeguards for scientific research. These include provisions allowing further processing of personal data for research purposes and derogations from certain obligations, subject to appropriate safeguards.

Rationale for a proposed definition of scientific research in the Digital Omnibus

Science Europe welcomes the proposal to introduce a definition of scientific research in the Digital Omnibus as, importantly, it will determine which research activities can benefit from these legal provisions.

To fulfil its purpose, this definition must reflect the nature of research and the diversity of research activities and methodologies. Scientific research should not be defined narrowly or focused on a utilitarian concept of research that views the value, justification, and ethics of scientific and academic inquiry entirely through its consequences and practical outcomes rather than the pursuit of knowledge for its own sake.

Rather, scientific research should be defined according to the open and diverse nature of the research activity and the methods through which it is conducted; not primarily by its anticipated contribution to innovation or its practical application.

The broad scope of the definition does not mean that any activity can automatically qualify as scientific research. The methodological, ethical and transparency requirements set out in the definition, together with the safeguards under Article 89(1) GDPR, provide the necessary conditions to ensure that research-related flexibilities are used for genuine scientific research and with appropriate protection of personal data.

The Council's negotiating mandate, as in Coreper[1] on 21 October 2026, is a step in the right direction by removing the explicit reference to innovation and placing greater emphasis on scientific methods, ethical standards, transparency and independence. Nevertheless, its definition remains partly outcome-oriented and does not explicitly recognise the diversity of research

[1] Committee of Permanent Representatives of the Governments of the member states to the European Union

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activities, including basic, exploratory and reproducibility research. It also leaves insufficient room for research that seeks to validate existing findings or investigate questions without a predictable outcome.

Ahead of the upcoming negotiations, Science Europe calls for the definition to be further refined to ensure that it is inclusive and reflective of actual research practices.

Proposed amendment to the Council's definition of scientific research

Science Europe therefore proposes the following amendments* to the definition put forward by the Council on 21 October 2026:

'Scientific research" means any research ~~conducted with the aim of contributing to the growth of society's general knowledge and wellbeing, generating new or complementing existing scientific knowledge~~, **including basic, exploratory and reproducibility research, irrespective of its technology readiness level or anticipated application,** following a methodological and systematic approach consistent with standards of the relevant scientific field**s**, ~~including~~ **according with the highest** ethical standards and producing verifiable and transparent results, **with due regard to the principles of openness in research, that are subject to scrutiny and peer review**, ~~conducted~~ in an autonomous and independent manner. **This shall include, but not be limited to, actions that seek to validate existing results, develop new knowledge, complement existing scientific knowledge or apply existing knowledge in novel ways.** This does not exclude that the research may also aim to further a commercial interest.'

Call to the co-legislators

Science Europe calls on the co-legislators in the European Parliament to ensure that the final definition is inclusive, methodologically grounded and reflective of actual research practices. It should recognise the diversity of research activities, irrespective of their technology readiness level or anticipated application, and acknowledge recognised and rigorous scientific methods, as well as transparency, as key characteristics of scientific research. Science Europe and its Member Organisations remain committed to contributing their expertise to this process.

Science Europe is the organisation representing major public organisations that fund and perform excellent, ground-breaking research in Europe. It brings together the expertise of some of the largest and most respected European research organisations to jointly push the frontiers of how scientific research is produced and delivers benefits to society

* Text in strikethrough indicates wording from the Council's definition that has been removed; text in bold indicates additions proposed by Science Europe.