Contribution

HT. 618 – Consultation on the draft R&D&I-Framework

No 1.2 lit c (12):

The main problem is the financing of research infrastructure. Such high costs most SMEs and research organisations themselves cannot easily afford.

No 1.3 lit f (15):

The new definition of the ‘arm´s length principle’ causes more uncertainties than improving the situation. In most cases only one special researcher, one special team of researchers or one research organisation has the necessary know how. Then a transparent and unconditional tender procedure makes no sense.

No 1.3 lit l (second sentence):

The word ‘also’ can be deleted, because it’s only an example explaining the first sentence and not something additional.

No 1.3 lit cc:

It is not clear why the commission tries to define the size of a project. It should be the task of the beneficiaries and the granting authorities to decide which size is most efficient and generates the best output.

No 1.3 lit ee:

When conducts a research and knowledge dissemination organization ‘independent’ research? Whether such an organization is privately or public owned, in most cases the owner has a clear influence on all decisions and then it’s doubtful if independent research really exist. We suggest deleting the word ‘independent’.

No 2.1.1 (20):

The limit of 15% of economic activities is very low. We would suggest a limit of 25%.

No 5.2.1 (47):

Not every scheme will visibly increase the level of R&D&I in the whole Union. Will this provision favour big schemes?

No 5.5.1.4 (83):
Sentence two and three are contradictory, either Union funding does not constitute state aid and should not be taken into account or it has to be considered.

No 6 (119):

When can aid budgets be quantified as ‘large aid budgets’?

ANNEX I

(b,c)

The costs of instruments and equipment and the costs for building and land are only considered as eligible as calculated on the basis of good accounting practice. Why is there a difference concerning the eligibility between the Draft of the GBER and the Framework? We would prefer the GBER provision.

AustriaTech | Daniela Fabits | 17th February 2014