

Dual-use R&I in Horizon Europe 2028–2034



Our recommendations in short

Neth-ER calls on the Commission, the Parliament and the Council to ensure the following conditions are met if Horizon Europe 2028–2034 (FP10) is opened up to dual-use research and innovation (R&I):

Criteria for the ‘dual-use’ designation

1. Publish clear criteria for the ‘dual-use’ designation in FP10 as soon as possible and clarify how these relate to the Dual-Use Export Regulation ((EU) 2021/821).
2. Do not use the TRL scale as a stand-alone criterion for the dual-use designation.
3. Do not make the designation exclusively dependent on current defence-market demand but take future capability gaps into account as well.

Implementation

4. Apply dual-use potential as an explicit award criterion in calls that the work programme designates as dual-use calls. In other calls it may be weighed under the general impact criterion where it fits the objectives and expected outcomes of a call.
5. Establish a bottom-up route for dual-use projects alongside top-down dual-use calls, in line with the Partial General Agreement on FP10 reached by the Council.

Security procedures and restrictions

6. Uphold open science and international cooperation as the core principles of the programme in line with the principle of ‘as open as possible, as closed as necessary’.
7. Clarify whether additional security procedures will be introduced and whether the security self-assessment will be expanded.
8. Promote uniform and high security standards in the field of research security across the Union, including through initiatives such as the European Research Area Act.

Support measures

9. Clarify well in advance which restrictions apply for both top-down dual-use calls and bottom-up dual-use projects.
10. Provide practical support for security and export control procedures to ensure that dual-use R&I in FP10 does not remain merely a theoretical exercise but a workable route for the R&I sector.

Connection with the European Competitiveness Fund (ECF)

11. Introduce a fast-track mechanism through which the results of dual-use projects can be incorporated more rapidly into the work programmes of the ECF.

Background

The changes to the Framework Programme cannot be seen in isolation from the broader political urgency that has emerged in Brussels in recent years. Rising geopolitical tensions have made European strategic autonomy an existential necessity. Opening up Horizon Europe 2028–2034 to dual-use research and innovation (R&I) is part of the policy response to this: Europe wants to reduce its dependencies while restoring its competitive position, with knowledge and innovation as the foundation. According to the Commission, research with dual-use potential is not yet sufficiently aligned with defence needs from the outset. This results in duplication of effort, costly adaptations at a late stage and missed opportunities for rapid deployability. The core question for FP10 is therefore: how can the European institutions design the programme in such a way that civil and defence-oriented R&I trajectories reinforce each other effectively, in a manner that remains workable for researchers and institutions?

Neth-ER's recommendations

Criteria for the 'dual-use' designation

- ❏ **Neth-ER calls for the Commission to clarify which criteria will be used for the 'dual-use' designation in FP10 and how these relate to the Dual-Use Export Regulation (Regulation (EU) 2021/821).** The R&I sector requires clarity on how the Commission uses the term 'dual-use' in the context of Horizon Europe 2028–2034. The Commission should publish guidance as soon as possible setting out which criteria it applies for identifying calls and projects with dual-use potential. This guidance should adopt an understanding of dual-use that recognises the capacity of fundamental research to underpin innovation serving both sectors. Moreover, the guidance should set out that the designation of 'dual-use' must not be confined to the domains identified as critical and/or strategic, as results from other fields, including the social sciences, humanities, psychology and sport sciences, may equally serve both civilian and defence needs. Such breadth of scope, however, should not come at the expense of precision. The Commission should avoid defining dual-use too vaguely, as this risks inconsistent and overly broad applications that will cause confusion and place undue burdens on the R&I sector. Moreover, the guidance should state explicitly how the applied criteria relate to the list of controlled dual-use items in the Dual-Use Export Regulation. The criteria, together with the Regulation, can then be used by researchers to identify dual-use potential in their proposals at the drafting stage.
- ❏ **Neth-ER rejects the TRL scale as a criterion for determining whether a call or project should be designated as dual-use.** The point on the 'Technology Readiness Level' (TRL) scale up to which a technology or product with dual-use potential can be developed efficiently for both civil and military applications differs from one technological domain to another. [The Commission's guidance on the classification of information in Horizon Europe](#) projects likewise explicitly rejects a fixed TRL criterion. It states that information cannot be designated as security-sensitive on the basis of TRL alone. The Commission notes that the TRL scale is only one of many contextual factors and that classification must be assessed on a case-by-case and domain-by-domain basis. The same logic applies to the assessment of dual-use potential: TRL level does not suffice as a stand-alone criterion.
- ❏ **The identification of potential relevance for European defence needs as part of the dual-use designation must not depend exclusively on current demand from the defence market.** It must also take account of operational capabilities that have been identified as necessary in the longer term but are currently still lacking (the 'capability gaps'). A regularly updated version of the [Capability Development Plan of the European Defence Agency \(EDA\)](#), for instance, could serve as input here. In this way, dual-use projects within the Framework Programme will be better aligned with the needs of the future.

Implementation

- ❏ **Dual-use potential should be an explicit award criterion in calls that the work programme designates as dual-use calls. In other calls, dual-use potential should not constitute a separate award criterion but may be considered under the general impact criterion where relevant to the objectives and expected outcomes of the call.** As civil research and innovation should remain the primary focus of Horizon Europe (2028–2034), the Commission should ensure that this approach to the impact award criterion does not create a structural preference for dual-use proposals in non-dual-use calls or disadvantage exclusively civil proposals that fully meet the objectives and expected outcomes of such calls.

- 📌 **Establish a bottom-up route for dual-use projects alongside top-down dual-use calls, in line with the Partial General Agreement on FP10 reached by the Council.** Top-down dual-use calls should be complemented by a bottom-up route, as also proposed in the Council's Partial General Agreement on FP10. Researchers should be able to indicate at project level that their research is dual-use in nature. To identify these bottom-up dual-use projects, researchers can draw on the criteria applied by the Commission for identifying top-down dual-use calls and on an analysis of the Dual-Use Export Regulation. By providing both a top-down and a bottom-up route, the Commission ensures that dual-use R&I is not defined exclusively by policy makers but also arises from the knowledge and insights of the R&I sector.

Security procedures and restrictions

- 📌 **The Framework Programme must uphold the principles of open science (Article 5 and Article 32) and international cooperation (Article 9).¹** Existing security procedures that apply to purely defence-related R&I, such as those used for the European Defence Fund (EDF), must not be used as a blueprint for dual-use calls and projects in FP10. Within the EDF, the protection of controlled information is the foremost priority, which means that restrictions around data publication, transfer and licensing are a given. Openness, by contrast, is the guiding principle of Horizon Europe and this must be preserved. This calls for a targeted approach based on the principle of 'as open as possible, as closed as necessary'. Where a call is designated as dual-use but purely civil proposals remain eligible for funding, additional security requirements must only be applied to those specific projects that warrant them, not to the entire call. Where restrictions are imposed, for example on the full publication of project results, on the storage and sharing of project data or on cooperation with third countries, it is essential that researchers enter into a project with full knowledge of these restrictions, so that they can make an informed decision on whether or not to submit an application.
- 📌 **The Commission must clarify whether additional security procedures will be introduced for dual-use projects in FP10 alongside the existing security appraisal procedure.** Specifically, it must clarify whether the questions in the security self-assessment will be amended. The current purpose of these questions is to assess the potential misuse of project results, for example results that could be used for criminal or terrorist purposes, or for the development of chemical, biological, radiological or nuclear (CBRN) weapons. Potential undesirable defence applications of dual-use projects therefore fall outside the scope of the current assessment. It must be clarified whether the security self-assessment will be expanded with questions that make it possible to establish if project results have possible dual-use applications and what the impact of these would be. These additional questions must be based on criteria formulated by the Commission for identifying calls and projects with dual-use potential. An analysis on the basis of dual-use export control (Regulation (EU) 2021/821) also remains necessary in order to map the full dual-use nature of relevant technologies.
- 📌 **Security requirements must be harmonised at a high standard across the Union in order to safeguard a level playing field.** The Commission must avoid opting for the lowest common denominator where research security is concerned. Uniform and high security standards must be promoted throughout the Union in the field of research security. Planned European policy initiatives, such as the [European Research Area Act](#), play an important role in this. By laying down minimum requirements in law, they reduce the diversity of national approaches and bring us closer to a consistent European policy landscape. In this way, the security interests of the EU enjoy the same degree of protection within Horizon projects, regardless of the geographical location of the beneficiaries.

¹ [Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing Horizon Europe, the Framework Programme for Research and Innovation, for the period 2028-2034 laying down its rules for participation and dissemination, and repealing Regulation \(EU\) 2021/695](#)

Support mechanisms

- 📌 **The Commission must clarify in advance which restrictions apply for both top-down calls and bottom-up projects.** Carrying out research projects that are explicitly designated as 'dual-use' is new territory for many actors in the R&I sector. Clarity about the frameworks and preconditions within which dual-use projects must be carried out, such as publication restrictions, restrictions regarding the transfer and licensing of results and restrictions on cooperation with partners from third countries, is therefore crucial. Researchers and institutions must have clarity on this before they submit a project application.
- 📌 **Neth-ER calls on the Commission to provide practical support with security and export control procedures to ensure that compliance becomes workable in practice.** The Commission should offer practical assistance, including for carrying out analyses against the Dual-Use Export Regulation and conducting due diligence procedures in the context of research security. Furthermore, experts in the field of dual-use R&I should verify whether the analyses have been carried out correctly and whether the project can indeed be designated as dual-use. Targeted training is also needed for project managers and support staff, with tools that enable institutions to build up their own expertise in this area. Only with such practical support can the Commission ensure that the opening up of the Framework Programme to dual-use projects amounts to more than a paper reality and develops into a workable model that genuinely strengthens the synergies between civil and defence R&I.

Connection with the European Competitiveness Fund (ECF)

- 📌 **Neth-ER calls for a fast-track mechanism that allows results of dual-use projects funded under FP10 to be integrated more rapidly into the work programmes of the ECF.** With dual-use projects in Horizon Europe 2028–2034, the Commission aims to ensure that civil and defence-oriented R&I trajectories reinforce each other. At present, however, it is not clear how defence applications of products and technologies emerging from dual-use R&I in Horizon Europe can be developed further and brought to market outside the Framework Programme. Neth-ER therefore advocates the introduction of a mechanism through which the results of dual-use R&I from the Framework Programme can be incorporated rapidly into the work programmes of the ECF. Similar mechanisms to enhance the overall efficiency of EU R&I financing already exist under the current MFF, such as the spin-in calls of the EU Defence Innovation Scheme (EUDIS) within the EDF. These calls facilitate the further development of civil R&I results for defence use. A similar mechanism could therefore be envisaged, for example, from FP10 to the 'Resilience and Security, Defence Industry and Space' window of the ECF.