

Science Europe Response to the European Commission Consultation on the application of the 'Do No Significant Harm' Principle under the 2028-2034 Multiannual Financial Framework (MFF)

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Context

The application of the Do No Significant Harm (DNSH) principle under the 2028-2034 Multiannual Financial Framework (MFF) should support Europe's environmental objectives while recognising the specific characteristics of research activities. The European Commission's proposed approach, outlined in the accompanying [Concept Paper](#), is a good step forward.

There is clear evidence of the relationships between the environmental sustainability, climate change, the economy, health and security. There is, therefore, an urgent need for the scientific community and its leadership to set directions and lead by example, to develop and implement measures to advance environmental sustainability.

The consultation sought views on how the principle could achieve an appropriate level of environmental protection while maintaining proportionality, reducing administrative burdens, and meeting policy objectives. It also addressed the possible development of a DNSH approach specific to research activities, highlighting the consultation's relevance to the research and innovation (R&I) community.

This consultation is therefore very timely. Nevertheless, suitable and proportionate approaches are needed to ensure meaningful environmental protection in the work of the R&I sector, without creating unnecessary administrative burdens and in conjunction with other academic values, such as safeguarding the freedom of scientific inquiry and Horizon Europe's autonomy.

The response by Science Europe builds on its [previous advocacy on the next Horizon Europe programme](#), notably its position on [Environmental Sustainability as an Integral Priority for Horizon Europe 2028–34](#), and proposes the following approaches and measures:

On the Specific DNSH guidance for the R&I sector

To ensure effectiveness and impact of DNSH for R&I, specific guidance for the sector should be developed. A single set of criteria, as mentioned by the European Commission, would be ambiguous if not specifically tailored to the R&I sector. Criteria should not be arbitrarily reduced or made excessively flexible, as this may cause uncertainty in the absence of clear guidance.

Relevant specificities include, among others, the relatively small-scale, often repetitive nature of R&I activities, the exploratory nature of research at lower Technology Readiness Levels (TRLs), and the direct as well as indirect R&I impacts (including through the development of new technologies that may be commercialised). These characteristics should be considered in conjunction with the safeguarding of key academic values such as freedom of scientific inquiry, and support for research conducted in the public interest.

On reducing administrative burden and proportionality

The application of DNSH in the R&I context should be proportionate to the scale of the activity, with reasonable and appropriate administrative requirements, as indicated in the EC Concept Paper. For example, requirements for research at low TRL levels should be minimal and aim to identify and manage emerging risks, increasing proportionally as the technology progresses on the TRL scale.

On coherence with other policy objectives

Environmental sustainability is key to the competitiveness and resilience of the EU's R&I ecosystem, within Europe and globally. Environmental sustainability and research excellence can, and should, be mutually reinforcing to the greatest possible extent, even if this is not (yet) always the case. Meanwhile, environmental sustainability should also be considered in conjunction with other values, such as the freedom of scientific inquiry and the autonomy of Horizon Europe.

Deviations from the DNSH principle may be allowed for excellent R&I projects whose environmental impact cannot be realistically abated and when justified by overriding public interest. This aligns with the objectives of Horizon Europe 2028-2034: to "strengthen the EU's competitiveness, scientific technological base, and address global challenges based on excellent research and innovation".

On duplication with other legal requirements

R&I-specific and appropriate guidance can put value on the existing legislation and provide clarification on its application. In this way, DNSH guidance can be complementary to strengthening environmental sustainability in research, as an objective in European R&I policy.

On key features for a specific DNSH approach for R&I activities

In general terms, DNSH in an R&I specific context should be addressed via:

- A proportionate, risk-based approach that reflects the maturity of the research and uncertainty inherent in the research process, applied throughout the project lifecycle.
- Capacity-building and awareness-raising measures supporting the implementation of DNSH in research, including examples and clear practical guidance that enable R&I stakeholders to consistently assess and reflect on the environmental impacts across the range of R&I activities.
- A focus on reducing environmental risks and mitigation measures, while avoiding unnecessary duplication of existing environmental assessment requirements.

This approach should be developed in consultation with R&I stakeholders, for example through a European Commission Expert Group or similar committee, to analyse available knowledge and facilitate finding solutions for the effective application of DNSH.

On the “Where feasible or appropriate” principle

DNSH guidance for R&I should reflect both the fundamental importance of environmental sustainability, and the contribution of the sector to the public interest through advancing science and scientific solutions to societal issues. The application of ‘*where feasible and appropriate*’ principle should consider the importance of academic values such as freedom of scientific inquiry and the autonomy of the R&I sector. Derogations should not be overly broad and should be well justified, as indicated above.

On additional criteria for climate change adaptation

Additional criteria for climate change adaptation can be included for some activities in view of their exposure and size, in accordance with the specific needs and features of the European R&I sector. As indicated in the Concept Paper, “a limited number of additional criteria could apply to large-scale infrastructure projects and/or critical infrastructure at high potential risk and for which no climate resilience analysis is required.” This provision could therefore apply specifically to research infrastructures such as data centres.

Conclusion

In view of the clear evidence of the relationships between the environmental sustainability, climate change, economy, health and security, Science Europe reiterates the urgent need for the scientific community and its leadership to be involved in the development and implementation of measures concerning environmental sustainability in the R&I sector.

The recommendations from Science Europe can be summarised in three points, as follows:

- Commitment to environmental sustainability alongside fundamental scientific values, notably research excellence and the freedom of scientific enquiry,
- Strike a balance between effective application of DNSH principle and avoiding disproportionate or ineffective administrative procedures,
- Focus on capacity-building, awareness-raising, and provide guidance respecting the specificities of the R&I sector.

Engaging stakeholders through a structured process for continuous mutual learning should be supported to facilitate the implementation of DNSH in R&I and other sectors.

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.