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CoARA Response to the ERA Act Consultation

Research assessment as a strategic lever for the ERA

The Coalition for Advancing Research Assessment (CoARA) welcomes the European Commission's initiative to introduce an ERA Act and strongly supports its objective of strengthening coherence, trust, and effectiveness within the European Research Area (ERA).

CoARA shares the Commission's assessment that research assessment systems are **structural determinants** of research quality, research careers, institutional behaviour, and international cooperation. They shape how research priorities are set, how careers develop, and how institutions respond to policy incentives.

Research assessment also constitutes a **key connecting element across the ERA**, translating European and national policy objectives into institutional practice. In this sense, it functions as an important **vehicle for advancing other major policy agendas**, including:

- Open science, including Diamond Open Access,
- Sustainable and attractive research careers,
- Equality, diversity, and inclusion.

At the same time, research assessment frameworks directly affect the **conditions under which academic freedom is exercised**. In line with the *Magna Charta Universitatum*, which affirms freedom of research and teaching and institutional autonomy as foundational values of European higher education, it is essential that research assessment reform **supports, and does not constrain**, these core freedoms.

Reforming research assessment is therefore not a marginal or technical issue, but a **core enabler of ERA objectives**, including excellence, openness, inclusiveness, and global competitiveness. From this perspective, the ERA Act represents a timely opportunity to consolidate a shared European direction for reform and to improve consistency across related policy domains.

CoARA principles as the reference framework for policy harmonisation

CoARA **strongly recommends** that the principles set out in the *Agreement on Reforming Research Assessment (ARRA)* be recognised within the ERA Act as the **primary reference framework** for policy harmonisation in the area of research assessment.

These principles provide a coherent and operational basis for reform. They:

- Affirm the **primacy of qualitative judgement**, grounded in expert review;

- Require the **responsible, transparent, and contextualised use of quantitative indicators**;
- Call for recognition of the **diversity of research outputs, practices, and contributions**, including publications, data, software, methodologies, societal engagement, teamwork, and leadership;
- Emphasise that assessment criteria must be **aligned with purpose, disciplinary context, career stage, and institutional mission**;
- Discourage **simplistic rankings and one-dimensional comparisons**;
- Promote **transparency** of criteria and decision-making processes;
- Support **equality, diversity and inclusion**, including mitigation of bias;
- Encourage assessment systems to **incentivise open science and knowledge sharing**, including open access, open data, and, where appropriate, open peer review;
- Require **continuous monitoring, evaluation, and improvement** of assessment practices.

Policy harmonisation around these principles is **both necessary and proportionate**. Without a shared reference framework, fragmentation of research assessment practices will persist, undermining researcher mobility, complicating career recognition, weakening cross-border cooperation, and eroding mutual trust within the ERA. It can also lead to uneven conditions for the exercise of academic freedom across national and institutional contexts.

Building on existing European policy instruments

In this context, CoARA recalls the experience of the **European Charter for Researchers and the Code of Conduct for the Recruitment of Researchers**. These instruments have successfully shaped national policies and institutional practices across the ERA through a **principles-based, non-prescriptive approach**.

They demonstrate that European-level guidance, when broadly endorsed and supported through policy alignment, monitoring, and dialogue, can drive meaningful and lasting change while fully respecting:

- Subsidiarity,
- Institutional autonomy,
- Freedom of research.

This experience provides a **relevant and proven model** for advancing research assessment reform at European level. Harmonisation should therefore be understood as alignment around **shared principles and expectations**, rather than uniformity of implementation.

Addressing cascade effects and upstream incentives

CoARA further underlines the importance of addressing the **systemic and cascading effects** of institution-level assessment frameworks.

Research-performing and research-funding organisations operate within incentive structures shaped by external mechanisms such as:

- Global rankings,
- National evaluation exercises,
- Programme and accreditation regimes.

These upstream frameworks strongly influence institutional strategies and are often translated into internal assessment rules. In some cases, this can conflict with the objectives of responsible research assessment and **indirectly constrain academic freedom**.

Legislative and policy action that recognises and seeks to mitigate such cascade effects would constitute a **powerful lever for reform at system level**. By addressing the drivers that shape institutional behaviour—rather than prescribing internal assessment practices—the ERA Act could support more effective and coherent reform while preserving institutional autonomy and academic freedom, as articulated in the *Magna Charta Universitatum*.

Research assessment and the 5th Freedom

CoARA welcomes the increasing policy emphasis, reflected in the *Letta* and *Draghi* reports, on the need to realise a **"5th Freedom"**: the free circulation of knowledge, researchers, data, and innovation.

Research assessment systems play a decisive role in enabling, or constraining, this freedom in practice. Misaligned assessment practices continue to act as **structural barriers**, even where legal mobility formally exists.

Anchoring CoARA principles within the ERA Act would:

- Support cross-border recognition of careers and research contributions;
- Facilitate interdisciplinary and intersectoral mobility;
- Strengthen incentives for openness and responsible knowledge sharing;
- Enhance trust and interoperability between national research systems.

A principles-based, non-prescriptive approach

CoARA supports the use of the ERA Act as a **strong policy signal** that sets clear European expectations regarding research assessment reform. At the same time, experience across diverse national and institutional contexts shows that reform is most effective when pursued through **policy guidance and harmonisation**, rather than through detailed, compliance-driven legal obligations.

Research assessment reform is a **long-term institutional and cultural transformation**. It depends on institutional ownership, capacity building, peer learning, and iterative implementation.

Binding legal obligations that prescribe specific assessment frameworks or impose detailed institutional requirements risk prioritising formal compliance over substantive reform. They may also interact unevenly with national legal frameworks, potentially limiting institutional autonomy and indirectly affecting academic freedom.

CoARA therefore considers that the ERA Act would achieve greater impact if it:

- Explicitly endorses CoARA principles as **European guidelines and policy expectations**;

- Promotes alignment across related policy domains (research careers, open science, equality, diversity and inclusion);
- Supports transparency, reporting, and mutual learning mechanisms;
- Recognises and strengthens communities of practice engaged in implementation.

Conclusion

CoARA fully supports the objectives of the ERA Act and considers research assessment reform a **cornerstone of a stronger, more integrated European Research Area**.

By firmly endorsing shared principles and policy harmonisation, while allowing flexibility in implementation, the ERA Act can accelerate reform, strengthen trust, enable the 5th Freedom, and safeguard academic freedom—without constraining institutional autonomy or stifling innovation.

CoARA stands ready to work closely with the European Commission, Member States, and stakeholders to ensure that the ERA Act serves as an **enabling framework for sustainable, community-driven change** across the ERA.