

## Wellcome Trust – Written evidence (EUM0034)

### Introduction

1. The Wellcome Trust is pleased to contribute evidence to the inquiry. In responding, we consider the benefits and challenges of EU membership from our perspective as a global charitable foundation that opts to invest the majority of funding in UK research to achieve our goals.
2. We present this evidence from the perspective of UK research, not as a comment on the wider issues associated with the UK's membership of the EU. This submission responds to the four broad themes that the inquiry has set out, namely funding, collaboration, regulation and scientific advice.
3. If the UK leaves the EU, given the considerable strength of the UK's research base we expect there to be arrangements for continuing co-operation, as with non-EU countries such as Norway, but we also judge that there would be disadvantages. These include increased administrative hurdles or financial disincentives with the risk that UK research organisations could become less competitive or marginalised within EU partnership projects.

### Funding

4. Although not without its challenges (applicants have commented on the level of bureaucracy in EU funding programmes<sup>1</sup>), UK research benefits financially from membership of the EU. The UK has traditionally been highly successful in securing EU research funding, including for health research, contributing to the diversity of funding opportunities available to UK based researchers. Under the European Union's Framework Programme 7 (2007-2013) the UK secured €6.1 billion<sup>2</sup>, of which €947 million was for health research<sup>3</sup>.
5. Maintaining this diversity of funding sources is important to ensure that research remains viable and dynamic, as well as being capable of responding to need as it arises. The diversity of funding helps to ensure that the UK remains an attractive location for excellent researchers, and helps attract further research investment. Unless the dynamism of the UK research environment is maintained the Wellcome Trust would find it more difficult to continue funding in the UK at its current level, which is approximately 80 per cent of our research expenditure.

### Collaboration

6. Placing a tangible value on collaboration across EU borders is difficult to do. However, research is a global enterprise and both international collaboration and researcher mobility have been found to be correlated with high research quality<sup>4</sup>. The UK's

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<sup>1</sup> European Commission, EUFORI Study (accessed Oct 2015)

<sup>2</sup> HM Government, Review of the Balance of Competences between the UK and the EU: Research and Development (2014)

<sup>3</sup> AMRC, How can charities make the most of EU research funding? (blog post 24/01/14)

<sup>4</sup> Elsevier, International Comparative Performance of the UK Research Base: A Report Prepared for the

involvement in the EU has enabled UK researchers to participate in infrastructure projects such as European Strategy Forum on Research Infrastructures (ESFRI), projects including ELIXIR, the pan-European infrastructure for biological information, and the European Molecular Biology Laboratory including the European Bioinformatics Institute (EBI) based at the Wellcome Genome Campus in Cambridge, which enables data sharing across Europe.

7. Membership of the EU also promotes UK science internationally. It facilitates access to broader alliances and partnerships in global policy and research activity on significant health challenges such as communicable diseases, drug resistant infection and the impact of climate change on health.

## Regulation

8. The EU plays a significant role in shaping regulation of the research environment in the UK. Harmonisation of regulatory and legal frameworks within the EU can support international collaboration, offering certainty and consistency. This harmonisation is seen as a benefit to UK research and innovation, for example:
  - The Animals in Scientific Procedures directive ensured that the UK's strong regulation of the use of animals and high level of welfare were not undermined. It also contributed to the spread of best practice in animal welfare.
  - Effective European legislation on clinical trials is important given the increasingly global nature of research and the increasing numbers of multi-national trials now taking place. The Clinical Trials Regulation will streamline approvals processes for trials across the EU.
9. However, EU legislating can be bureaucratic and complex. There is also a lack of transparency and consultation in EU decision-making that inhibits engagement<sup>5</sup>. The potential benefits of harmonisation can be affected by inconsistent application of laws across the EU, for example implementation of the previous Clinical Trials Directive. In this, the UK implemented it fully and in doing so put itself at a disadvantage compared to other member states.
10. The increasing move away from Directives towards Regulations within EU legislation can reduce the flexibility of member states to implement legislation in a manner conducive to their cultural and ethical research environment. A further concern is the uncertainty that can subsequently derive from EU legislation – the length of time taken for proposals to pass through the legislative process could be a disincentive to undertaking research within the EU.
11. If the UK left the EU, while it could develop its own regulatory framework, which might have a national advantage, it would still be bound by some EU regulation, for

example for large scale clinical trials. This would also be without the same opportunities the UK currently has to shape the content of legislation.

### **Scientific Advice**

12. Scientific and technological progress and innovation need to be underpinned by effective policy making and informed by the most robust up-to-date scientific evidence. It is also essential to require timely consultation of a cross-section of interested stakeholders and expert groups at the earliest stage possible.
  
13. The Trust was concerned that the removal of the Chief Scientific Adviser post from the Commission would undermine confidence in the development of evidence based policy at EU level. We understand that implementation of the new Scientific Advice Mechanism is anticipated before the end of 2015. It would be unreasonable to comment in detail at this stage, but it would be helpful to have a suitable review period to consider the impact of the new approach.
  
14. Membership of the EU allows the UK to collaborate in global policy and research activity on significant health challenges such as communicable diseases, drug resistant infection and the impact of climate change on health. Although this would be possible outside the EU, membership provides more certain access to natural allies and partnerships for us to facilitate discussions.

*The Wellcome Trust is a global charitable foundation dedicated to improving health by supporting bright minds in science, the humanities and social sciences, and public engagement.*

*20 November 2015*