

EN

E-003021/2026

Answer given by Ms Zaharieva
on behalf of the European Commission
(25.9.2026)

The appointment of a candidate whose profile does not correspond directly to the centre's field of activity is not, in itself, incompatible with the Open, Transparent and Merit-Based Recruitment (OTM-R) principles under the European Charter for Researchers and the HR Excellence in Research Award¹. OTM-R requires open, transparent and merit-based procedures, with clear and proportionate criteria applied objectively. Where these requirements are met, including publication of the criteria, a fair and documented assessment and a reasoned decision, such an appointment may be compatible with OTM-R, even if the candidate's background differs from the centre's traditional disciplinary focus.

Individual recruitment cases fall outside the scope of the HR Excellence in Research Award assessment². However, if the issues raised point to broader shortcomings, assessors may recommend measures in CREA's³ OTM-R, action plan, and its internal HRS4R⁴. This would not constitute a judgement on an individual appointment but would aim to strengthen CREA's alignment with OTM-R principles and the Award requirements.

¹ OTM-R (Open, Transparent and Merit-Based Recruitment) is a key part of the HR Excellence in Research Award and, since 2018, a compulsory element of the process. It is embedded in the European Charter for Researchers (Annex II to Council Recommendation of 18 December 2023 on a European framework to attract and retain research, innovation and entrepreneurial talents in Europe, OJ C, C/2023/1640 <https://eur-lex.europa.eu/eli/C/2023/1640/oj/eng>), especially Pillar 2, and it promotes fair, inclusive and merit-based recruitment. OTM-R requires transparent and objective assessment in both recruitment and career progression, without discrimination based on gender, age, ethnic origin, disability, religion, sexual orientation or social background. In line with the Charter, evaluation should consider not only publications and traditional academic metrics, but also diverse career paths, mobility, interdisciplinary experience, teaching, supervision, open science, teamwork, and societal impact. During the assessment phase in the frame of the HR Excellence in Research process, assessors review the organisation's OTM-R policy and wider institutional approach, not individual recruitment cases.

² The European Charter for Researchers sets out 20 principles defining the roles, responsibilities and entitlements of researchers, as well as those of their employers and funders. Organisations may voluntarily endorse the Charter and implement its principles in order to obtain and retain the HR Excellence in Research Award. The award recognises efforts to align human resources policies with the Charter, and regular assessments by experienced, independent experts help ensure continuous improvement. It is important to emphasise that the Charter is a non-binding EU recommendation under Article 288 TFEU. It sets out best practices but does not create legal obligations. This is true both for the original 2005 Charter & Code 2005/251/EC, OJ L 75, 22.3.2005 <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32005H0251> and for the updated 2023 version (Council Recommendation C/2023/1640 of 18 December 2023). Although recommendations allow EU institutions to suggest a course of action and influence national legislation and practice, they are not legally binding on those to whom they are addressed. In addition, while Open, Transparent and Merit-based Recruitment (OTM-R) is an explicit requirement in the documentation to be assessed, evaluators examine the organisation's OTM-R policy and broader institutional approach, rather than individual recruitment cases.

³ Council for Agricultural Research and Economic Analysis (Consiglio per la ricerca in agricoltura e l'analisi dell'economia agraria) <https://www.crea.gov.it>.

⁴ Until 2024, the 'Human Resources Strategy for Researchers' (HRS4R) referred to the process for implementing the European Charter for Researchers and the Code of Conduct for the Recruitment of Researchers (also known as the 'Charter & Code'), which could lead to the HR Excellence in Research Award. Since 2024, the name of the process has been aligned with the name of the award, and the term HRS4R is no longer used to refer to the process; it is now called the HR Excellence in Research process. Today, HRS4R refers exclusively to an organisation's internal HR strategy, setting out its plan for implementing the principles of the European Charter for Researchers.

Beneficiaries in Horizon Europe (HE) projects must comply with the HE legal framework as set out in the HE Framework Programme⁵ and the respective HE grant agreement⁶. This includes, inter alia, compliance with the highest standards of ethical principles and research integrity and any relevant EU, national and international law (see Art. 19 of the HE Regulation). Under the grant agreement, the granting authority may, where appropriate, conduct checks, reviews, audits and investigations and take appropriate action if non-compliance is established.

⁵ <https://eur-lex.europa.eu/eli/reg/2021/695/oj/eng>.

⁶ Horizon Europe Model Grant Agreement, in particular Annex 5, https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/common/agr-contr/general-mga_horizon-euratom_en.pdf.