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Bestyrelsesformanden
J.nr. GEUS 020-00308
Ref. PBA

19. januar 2010

Høringssvar på evalueringsrapport for 2009-evalueringen på Universitetsområdet .

Universitets- og Bygningsstyrelsen har i brev af 3. december 2009 anmodet GEUS om eventuelle kommentarer til den nyligt afsluttede internationale evaluering af den universitetsreform ('det nye forskningslandskab'), som blev gennemført i 2007.

Indledningsvis skal det bemærkes, at GEUS blev anmodet om at indsende materiale (på engelsk) til evalueringen, og at dette materiales oplysninger og bemærkninger af 20. april 2009 er et centralt grundlag, for GEUS' høringssvar i forhold til de bemærkninger og anbefalinger, evalueringen - i forhold til GEUS - fremkommer med.

Dertil kommer de oplysninger, bemærkninger og anbefalinger, som GEUS i 2006 indsendte til Videnskabsministeriet i forbindelse med de politiske overvejelser, der førte til den universitetsreform, der er grundlag for 2009 evalueringen.

Endelig henvises til Klima- og Energiministeriets vurdering indsendt til Universitets- og Bygningsstyrelsen 17. april 2009 (bilag 1).

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*GEUS er en forsknings- og
rådgivningsinstitution
i Klima- og
Energiministeriet*

Universitetsevaluering 2009.

I Universitetsevaluering 2009 er GEUS behandlet under afsnit 5.5.2 ”The non-merged GRI’s”. Den specifikke analyse af GEUS begrænser sig til 7 linjer (side 65).

Det anføres her at:

“In any event, through the participation in Geocenter it has good synergies with the University of Copenhagen”.

- og at -

”the panel does for example not find that the confidentiality argument raised by GEUS is particular strong in justifying its continuous independence. Arrangements for confidential research can be made with the universities just as it can be with governmental research institutions”.

Analysen indeholder ikke yderligere vurderinger og forholder sig ikke til de argumenter, som lå til grund for bevarelsen af GEUS som en selvstændig institution.

Regeringen anførte ved sin beslutning i 2006, der var baseret på en grundig analyse og dialog samt et omfattende materiale, at:

”Den faglige kortlægning har vist, af Danmarks og Grønlands Geologiske Undersøgelse (GEUS) har myndighedsopgaver af særlig karakter, herunder på råstofområdet, samt i relation til søsterinstitutioner i andre lande. Institutionen er det største samlede forskningsmiljø på det geologiske område, ligesom den med sine opgaver i Grønland har stor betydning for Rigsfællesskabet, blandt andet i relation til Kontinentalsokkelprojektet.

For at varetage disse hensyn og understrege institutionens særlige status fastholdes institutionen som en statsinstitution og reorganiseres med et nyt navn”.

”For samtidigt at realisere de ønskede forskningssynergier indgår GEUS i et formaliseret samarbejde med de geologiske institutter på både Københavns Universitet og Aarhus Universitet og danner Geocenter Danmark”.

Det var argumentationen der førte til regeringens samtidige beslutning om at etablere en særskilt lov for GEUS. Lov nr. 536 af 6. juni 2007 om De Nationale Geologiske Undersøgelser for Danmark og Grønland (GEUS), der blev vedtaget af et enigt Folketing i juni 2007 med opbakning fra alle partier. GEUS er i dansk sammenhæng en enestående institution og loven afspejler dette og de særlig opgaver GEUS har.

Ingen af disse ovenstående forhold, der også var beskrevet i det til evalueringspanelet fremsendte materiale, har panelet forholdt sig til. Panelet gør endvidere opmærksom på (s.69), at det ikke føler sig kompetent til at pege på konkrete "merger matches" vedrørende de 4 ikke-indfusede GRI'er.

Panelets behandling af problemstillingen omkring fortrolige data er af rent teoretisk karakter, idet der ikke er foretaget en vurdering af de særlige opgaver, GEUS har med hensyn til at fungere som national databank for fortrolige olie-gas- og mineral data i Danmark og Grønland, data som er af meget stor kommerciel og samfundsmæssig værdi. Der er ikke kun tale om fortrolig forskning, men tale om streng fortrolighed i forhold til myndighedsopgaven.

Heller ikke GEUS' rolle som ansvarlig for Kontinentalsokkelprojektet, og dermed Rigsfællesskabets mulighed for at gøre territoriale krav gældende i henhold til FNs Havretskonvention, er behandlet af panelet.

Såvel i forbindelse med analysen i 2006 som i forbindelse med Universitetsevaluering 2009 har GEUS' hovedinteressenter udtrykt deres anbefaling af, at GEUS fortsat bevares som en forskningsinstitution udenfor universiteterne (jf. Klima- og Energiministeriets statement af 17. april 2009).

Grønlands Hjemmestyre v. Råstofdirektoratet har bl.a. på baggrund af erfaringerne og udviklingen fra 2006 til 2009 fundet at:

"BMP finds it reassuring that GEUS continuous to exist as an independent sector research institution". (bilag 1). Dette ligger i direkte forlængelse af det ønske, Grønlands daværende Landstyreformand Hans Enoksen i et brev (23. januar 2006) til daværende Statsminister Anders Fogh Rasmussen udtrykte, nemlig at Hjemmestyret "ville hilse det meget velkomment, at GEUS som Rigsinstitution for både Danmark og Grønland atter får sit eget lovgrundlag..."

Også Ministeriet for Videnskab, Teknologi og Udvikling har som interressent i Kontinentalsokkelprojektet og i lyset af dette projekts nationale betydning fundet det ”of crucial importance that the functions of GEUS in the project can be upheld in an unchanged manner in the coming years”, og det anføres omkring GEUS’ funktioner at: ”It would hardly be possible to maintain this double function (uafhængig forskning og absolut dataconfidentialitet) within universities. Projektet og den følgende behandling i FN regi vil kræve GEUS’ deltagelse i en længere årrække.

Endelig har panelet ikke forholdt sig til, at Geologiske Undersøgelser (GEUS’ søster organisationer) internationalt (i ca. 160 lande) netop ikke er en del af et universitetsmiljø, men grundet geologiske undersøgelser særlige opgaver er fastholdt som offentlige institutioner udenfor universitetssektoren.

Det bemærkes endvidere, at panelet nævner synenergi med Københavns Universitet (KU) i Geocentret, men at panelet ikke har bemærket, at Geocenter København, som led i regeringens beslutning om GEUS’ status, udvidedes til Geocenter Danmark, således at Danmarks andet geologiske universitetsinstitut på Aarhus Universitet (AU) indgik. Det var en beslutning bestyrelserne for GEUS, AU og KU fandt var den løsning, der bedst bidrog til integration mellem universitetsforskning og sektorforskning på det geologiske område. Den styrende statut er tiltrådt i juni 2008 af bestyrelserne for Københavns Universitet, Aarhus Universitet og GEUS samt departementscheferne for Klima- og Energiministeriet og Ministeriet for Videnskab, Teknologi og Udvikling. Gennem Geocenter Danmark er det samlede geologiske miljø på tværs af landet blevet bundet sammen i et forpligtende samarbejde. De resultater, der herved er – og vil blive – opnået, er ikke vurderet. Eventuel fusion med ét universitet vil netop modvirke den synergi på tværs af de geologiske institutioner og landet som helhed, der ellers er opnået.

Det skal endeligt bemærkes, at GEUS har myndighedsopgaver inden for et meget betydeligt antal love og bekendtgørelser. Det drejer sig bl.a. om lovene vedrørende Grønlands Selvstyre, Inatsisartut lov om mineralske råstoffer og aktiviteter af betydning herfor (den nye grønlandske råstoflov), Undergrundsloven, Lov om Nordsøenheden, Vandforsyningsloven, Råstofloven (for Danmark) samt indirekte Miljømålsloven.

Udviklingen siden indmelding i forhold til Universitetsevaluering 2009.

Universitetsevalueringen er foretaget med start i foråret 2009 og med indsendelse af materiale i april 2009.

Af betydning for GEUS' opgaver er der siden sket det, at Selvstyreloven for Grønland, der indebærer en stor og vedvarende bistand til det Grønlands Selvstyre i bestræbelserne på at gøre råstofferne i Grønland til et bærende erhverv, er trådt i kraft i juni 2009. Som det første område har Grønlands Selvstyre med hjemmel i Selvstyreloven hjemtaget råstofområdet. Dette er sket med vedtagelse i november 2009 af "Inatsisartut lov om mineralske råstoffer og aktiviteter af betydning herfor". Loven indebærer en udmøntning af det i loven forudsatte samarbejde mellem GEUS og Råstofdirektoratet, og der er i december 2009 indgået aftaler på såvel ministerniveau, som mellem GEUS og Råstofdirektoratet. Samarbejdet er bl.a. baseret på, at GEUS stiller forskning til rådighed og udfører institutionsspecifikke opgaver af særlig relevans for råstofefterforskning (vederlagsfrit dvs. via finansloven) til brug for myndighederne i Grønland. GEUS' opgaver og roller er indskrevet i begge love, og Grønlands Selvstyre ved Råstofdirektoratet indgår fortsat i GEUS' bestyrelse.

Inden for Geocenter Danmark er arbejdet udviklet med fælles strategiske satsninger, og der er i efteråret 2009 hjemtaget yderligere store forskningsprojekter, hvori parterne udgør kernen i forskningssamarbejdet, og som udbygger og bekræfter Geocenter Danmark konstruktions potentiale.

Anbefaling.

Universitetsevaluering 2009 bidrager ikke med nye synspunkter eller analyser for så vidt angår GEUS, og den forholder sig ikke til det grundlag som Folketingets beslutning om GEUS' status blev taget på, eller til interessenternes anbefalinger om den bedste løsning for GEUS' placering i det nye forskningslandskab. Disse anbefalinger er blevet fastholdt og suppleret ved Klima- og Energiministeriet efter indhentning af synspunkter fra interessenterne. Den positive betydning, som

etableringen af det forpligtende samarbejde mellem de 2 universiteter med geologisk uddannelse og GEUS har for det danske geomiljø, er heller ikke afspejlet.

En ændring af GEUS' status vil ikke være i overensstemmelse med de grønlandske ønsker, og den ville indebære en betydelig opgave med revision af love og bekendtgørelser – ikke alene i forhold til lov om GEUS, men også i forhold til Selvstyreloven for Grønland, Grønlands nye Råstoflov, samt et betydeligt antal andre love og bekendtgørelser, hvori GEUS indgår.

På baggrund af ovenstående skal GEUS' bestyrelse anbefale, at man ikke genovervejer en fusion af GEUS med et bestemt dansk universitet, men at der fortsat fokuseres på at styrke GEUS i forhold til løsning af GEUS' opgaver og forpligtigelser over for en bred kreds af interessenter og på at styrke udviklingen i samarbejdet inden for Geocenter Danmark til gavn for dansk og grønlandsk geovidenskab og forskeruddannelse.



Per Buch Andreasen
Bestyrelsesformand for GEUS



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BILAG 1

Statement on The Geological Survey of Denmark and Greenland (GEUS) for the background report to the independent international expert panel evaluating the new Danish research landscape

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In connection with the collection of background material for the 2009 evaluation of the 2006 reorganization of the Danish research landscape, the Ministry of Climate and Energy, under whose authority GEUS is, has been asked to produce a statement on the situation of GEUS in the new research landscape.

Økonomi- og
Personalesekretariat

April 17, 2009

/ LINSH

The statement will be made on the two items suggested in enclosure 1 of the letter 'Evaluering på universitetsområdet i 2009' received from the Danish University and Property Agency on February 6, 2009:

1. An assessment of the trend in the quality of the research based tasks performed for other governmental institutions. External evaluations of the institution conducted since 2006 should be enclosed and commented on.

GEUS performs tasks for a number of governmental institutions, from which the Ministry of Climate and Energy has gathered statements on the trend in the quality of the tasks that GEUS performs for them:

- The Danish Energy Agency (Energistyrelsen) under the Ministry of Climate and Energy (written statement)
- The Danish North Sea Partner (Nordsøfonden) under the Ministry of Climate and Energy (written statement)
- The Environmental Protection Agency (Miljøstyrelsen) and the Agency for Spatial and Environmental Planning (By- og Landskabsstyrelsen) under the Ministry of the Environment, as well as the department of the Ministry of the Environment (written statement – one common statement from all three institutions)
- The Ministry of Science, Technology and Innovation (written statement)
- The National Board of Health (Sundhedsstyrelsen) under the Ministry of Health and Prevention (verbal statement)
- The Bureau of Minerals and Petroleum under the Greenland Home Rule (written statement)

In the statements, besides listing the tasks that GEUS performs for them, all institutions express satisfaction with the work performed by GEUS. None of the institutions find the quality of GEUS' work to have changed since the restructuring of the research landscape. Translations of the statements are given in enclosures 1-5.



Based on the statements given by the above mentioned institutions, the Ministry of Climate and Energy concludes that since the restructuring of the research landscape seemingly no change has taken place in the quality of the research based tasks that GEUS performs for other governmental institutions.

Since 2006, one external evaluation has been made of GEUS' work. This was a scientific evaluation of the programme area Water Resources for the period 2000-2007 published in 2007. A copy is given in enclosure 6. In enclosure 7, a translation of the minister's comments on the evaluation is given.

2. The ministry's motivated assessment of whether non-integration is continuously estimated as the most fruitful arrangement for the institution's performance of its tasks.

When the research landscape was reorganized in 2006, GEUS remained one of four research institutions that were not merged with the universities, but rather retained their status as sector research institutions within the state. In the case of GEUS, a new Act (Act 536 of June 6, 2007) was adopted, establishing GEUS as a sector research institution under the then Ministry of the Environment. In connection with the change of Government in November 2007, GEUS was transferred to the new Ministry of Climate and Energy.

In connection with the decision to retain GEUS as a sector research institution outside of the universities, it was also decided to enlarge the formalized cooperation between GEUS and the University of Copenhagen – having existed since 1995 under the name of Geocenter Copenhagen – to also include the University of Aarhus, thereby changing its name to Geocenter Denmark.

Geocenter Denmark today is a formalized collaboration between GEUS and the Universities of Copenhagen and Aarhus, comprising the Institute of Geography and Geology and the Geological Museum at the University of Copenhagen as well as the Institute of Geology at the University of Aarhus. The Institute of Geography and Geology and GEUS are situated in the same building complex at Oester Voldgade 10 in Copenhagen, while the Geological Museum is situated in a nearby building at Oester Voldgade 5-7.

The Government's decision to keep GEUS as a state institution was motivated in the following words:

"The professional mapping has shown that the Geological Survey of Denmark and Greenland (GEUS) performs tasks for the authorities of a specific character, including tasks within the field of mineral resources as well as in relation to sister institutions in other countries. The institution represents the largest aggregation of scientists within the field of geology, and with its tasks in Greenland has big importance for the Kingdom of Denmark, such as in relation to the Continental Shelf Project [see below. red]."



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In order to account for these concerns and emphasize the special character of the institution, it is retained as a state institution..." (unofficial translation)

Source: Memorandum from the Ministry of Science, Technology and Innovation on the 2006 Government decision on reorganization of the research landscape: "Nyt danmarkskort på universitets- og forskningsområdet" dated October 4, 2006

Based on the above accounts from other state institutions served by GEUS, statements made by GEUS representatives themselves as well as the ministry's own assessment of the situation of GEUS and the special character of the tasks performed by GEUS, *the Ministry of Climate and Energy estimates that the non-integration of GEUS – that is, the retaining of its status as a research institution outside of the universities – is continuously the most fruitful arrangement for GEUS' performance of its tasks.*

Before detailing below the considerations upon which this assessment is based, one significant practical disadvantage of the non-integration of GEUS with the universities in 2006 has to be mentioned. In 2006, parallel to the restructuring of the research landscape, a majority in the Danish parliament passed the act on the so called Globalization Fund, stipulating that from 2007 through 2012 a total of 21 billion will be invested in research and development. Of these, 5 billion will be given to the universities as basic appropriation means. GEUS however, along with the three other institutions remaining sector research institutions outside of the universities, does not have access to the basic appropriation means, because these means are directed only at the universities. In order to ensure fair competition and equal opportunities for contributing to the fulfillment of the Government's research objectives, it is important that GEUS is ensured access to an amount proportionally corresponding to the basic appropriation means given to the universities from the Globalization Fund.

The following sections present the considerations upon which the assessment given above is based – that is, the assessment by the Ministry of Climate and Energy that the non-integration of GEUS with the universities is considered the most fruitful arrangement for GEUS' performance of its tasks. This will at the same time details the rationale behind the above mentioned government considerations motivating the decision in 2006 to keep GEUS as a state institution.

Confidentiality of geo-data

Serving as the national geo-databank, GEUS holds highly confidential data on oil, gas and mineral resources. The data serve as the basis for private extractive companies' projects worth billions of kroner. The basic idea of scientific knowledge sharing characterizing the value concept of universities would make it particularly difficult for GEUS to retain the required confidentiality of geo-data, and an integration of GEUS into a university might thereby impede the performance of this key task and purpose of the institution.

The same logic applies to the need for confidentiality in connection with the Continental Shelf Project. GEUS is the project manager of the Danish Continental Shelf Programme covering five areas around Greenland and the Faeroe Is-



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lands, where it is possible to make claims to extend the Danish Kingdom's continental shelf beyond 200 nautical miles in accordance with the United Nations Convention on the Law of the Sea.

The Ministry of Science, Technology and Innovation for whom GEUS manages the project, makes the following statement:

"Since 2002, GEUS has been the manager of the Continental Shelf Project for the Ministry of Science, Technology and Innovation [...] In order to protect the kingdom's negotiating position vis-à-vis the UN as well as neighbouring states with overlapping demands, it is of utmost importance that the data collection and interpretation can take place in absolute confidentiality. These are not conditions normally given by the universities, and conditions that it would be difficult to combine with the universities' rules of the independence of scientific research. Truly, the former Danish Space Center (Dansk Rumcenter), now DTU-Space, participates in the project, but this is more as data supplier. GEUS, on the other hand, participates as a manager of the project, also with respect to strategic considerations regarding the claims to be made by the kingdom, which is solely a policy task. The present organization of GEUS ensures that in this project, GEUS can perform both a sector research institution function and a managing function in relation to the project and the relevant authorities. It would hardly be possible to maintain this 'double function' within the universities. In that case, the managing functions would probably have to be transferred to a governmental authority.

In consideration of the national character of the Continental Shelf Project and the deadlines under which the project must be carried out, the Ministry of Science, Technology and Innovation finds it of crucial importance that the functions of GEUS in the project can be upheld in an unchanged manner in the coming years"

Source: Statement made by the Ministry of Science, Technology and Innovation pr. e-mail on April 4, 2009, (translation given in enclosure 4)

The access of the Greenland Home Rule to GEUS

In 1995, the Geological Survey of Denmark and the Geological Survey of Greenland merged to form the Geological Survey of Greenland and Denmark. In November 2008, a majority of the Greenlandic population voted in favour of extended self-governance for Greenland. As a result, the exploration and exploitation of Greenland's mineral resources is expected as one of the first issues to be transferred to Greenland's full responsibility, when the self-governance as planned is effectuated on June 21, 2009. The Danish government will however continue, and through GEUS finance, the basic geological mapping and research of Greenland's geology. Greenland, on the other hand, is obliged to use GEUS as geoscientific expertise and consultant at least for the next five years and pay for GEUS' advisory assistance. Furthermore, the Greenland Bureau of Minerals and Petroleum will continue its joint projects with GEUS, in order to develop the mineral, oil and gas sector.



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The Greenlandic authorities have emphasized the importance of their direct access to GEUS as an important parameter for a continued fruitful collaboration. An integration of GEUS into a university would not allow for such direct access.

The Bureau of Minerals and Petroleum (BMP) under the Greenland Home Rule makes the following statement:

"BMP finds it reassuring that GEUS continues to exist as an independent sector research institution. At a possible future reorganization of GEUS in the realm of the universities, focus will expectantly be on research and education, while tasks related to data storage (including confidential data) as well as international promotion of Greenland's mineral resources potential will expectantly be marginalized."

Source: Statement from the Bureau of Minerals and Petroleum under the Greenland Home Rule: *"Redegørelse vedr. GEUS i forbindelse med evaluering af universitetsreformen"* dated April 15, 2009 (translation given in enclosure 5)

Geocenter Denmark

In Geocenter Denmark (see above), GEUS has a close collaboration with the universities. As mentioned above, GEUS and the Institute of Geography and Geology at the University of Copenhagen are situated in the same building. This allows for the shared use of research facilities such as laboratories, geodata, library and logistics, and for collaboration on research projects. In 2006 the Geocenter Copenhagen partners participated in 15 joint research projects, in 2007 and 2008 respectively, the Geocenter Denmark partners participated in 28 and 30 joint research projects. Scientists from Geocenter Denmark furthermore constitute the core competences of a number of large research projects obtained in cooperation with research institutes outside the Geocenter.

Especially within the framework of Geocenter Denmark, GEUS contributes to the education of Master and Ph.D. students, mainly from the University of Copenhagen, but also from the University of Aarhus and a number of other Danish as well as foreign universities. In 2005, GEUS employees were co-supervisors for 73 Master students' thesis work. Half of them, undertaking GEUS-based investigations, had their working facilities at GEUS. In 2008, GEUS employees co-supervised 41 Master's students. In 2005, 45 Ph.D. students had GEUS co-conductors, and 17 of the students were fully employed at GEUS. In 2008 the figure was 61 with 11 fully employed at GEUS. 27 of the 61 Ph.D. students came from Geocenter partners. It deserves mention that the number of students beginning a geology education in Denmark decreased continuously and significantly from 74 in 2001 to 57 in 2007 and 43 in 2008. This development is expected to be reflected in the number of Masters and Ph.D. students at GEUS. GEUS is, in collaboration with its Geocenter Denmark partners, taking part in initiatives aimed at increasing the recruitment of students to the university education in geology at the universities of Copenhagen and Aarhus.

Thus, GEUS in several respects has strong ties to and collaboration with the universities. The Geocenter Denmark arrangement, according to GEUS, in-



creates the synergies between GEUS and both of the university institutions. Hence, the benefits that an independent research institution and a university might obtain from the integration of the research institution into a university, GEUS and the universities of Copenhagen and Aarhus are seemingly already reaping from its close collaboration within the Geocenter Denmark framework. Rather, the integration of GEUS into one of the universities might reduce the possibility for GEUS' strong collaboration with both universities. It is therefore considered doubtful that in these respects there would be additional gains to obtain from a full integration of GEUS into for example one of these two universities.

Conclusion

With regards to the trends in the quality of GEUS' research based tasks performed for other governmental institutions, the Ministry of Climate and Energy concludes that seemingly no change has taken place since the restructuring of the research landscape. This conclusion is based on six different statements made by authorities served by GEUS.

With regards to the question of whether non-integration is continuously estimated as the most fruitful arrangement for the institution's performance of its tasks, the Ministry of Climate and Energy recommends that GEUS is retained as a sector research institution outside of the universities. The recommendation is based on an overall consideration that the specific character of the tasks that GEUS performs warrants such independence from the universities. Three main points detail this consideration, namely; that the need for confidentiality of the geo-data that GEUS maintains – both with respect to the discretion of private extractive companies as in relation to the Continental Shelf Project – would be difficult to uphold if GEUS became part of a university; that an integration of GEUS into a university would impede the direct access of the Greenland Home Rule to GEUS, an access held as decisive by the Greenland Home Rule; and finally that with GEUS' participation in Geocenter Denmark comprising a close collaboration with the universities of Copenhagen and Aarhus, GEUS and the universities are already reaping the benefits that might result from an integration of GEUS into a university.

List of enclosures:

1. Translation of statement by the Danish Energy Agency (Energistyrelsen) dated April 3, 2009.
2. Translation of statement by the Danish North Sea Partner (Nordsøfonden) dated April 15, 2009.
3. Translation of statement by the Agency for Spatial and Environmental Planning (By- og Landskabsstyrelsen) on behalf of itself, the Environmental Protection Agency (Miljøstyrelsen) and the department of the Ministry of the Environment dated April 2, 2009
4. Translation of statement by the Ministry of Science, Technology and Innovation pr. e-mail on April 4, 2009
5. Translation of Statement by the Bureau of Minerals and Petroleum under the Greenland Home Rule dated April 15, 2009



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6. *Scientific evaluation of Programme area 2 Water Resources (2000-2007) at the Geological Survey of Denmark and Greenland, 2007*
7. Translation of the climate and energy minister's comments in letter to GEUS: *Scientific evaluation of GEUS' programme area 2 – Water resources, March 2008.*

NOTAT

3. april 2009
J.nr. 3401/1001-0389
Ref. SF/LGR
Indvinding

Contribution to statement concerning GEUS

By e-mail of March 23, the department has asked for the contribution from the Danish Energy Agency to the response to the enquiry from the Danish University and Property Agency dated February 6, 2009. The department asks for a contribution to its response to the following:

1. "an assessment of the trend in the quality of the research based tasks performed for other governmental institutions. External evaluations of the institution conducted since 2006 should be enclosed and commented on."

according to enclosure 1 of the above mentioned letter dated February 6, 2009.

Below, the contribution from the Danish Energy Agency to the response is given:

In relation to exploitation of the Danish subsoil (oil/gas exploration and production, geothermal energy, storage etc) the Danish Energy Agency receives well documented advice and support from GEUS. The experienced quality of the deliverables from GEUS is unchanged.

GEUS has developed a model (the DK model) for simulating future groundwater resources under a changing climate. The two IPCC scenarios, A2 and B2, have been processed for the end of this century. The already processed data has been provided from GEUS to the climate adaptation portal. The climate adaptation portal was established less than a year ago; therefore the cooperation between GEUS and the climate adaptation portal is still in development. We however, expect a good cooperation with GEUS regarding further deliverances of data in the future.

Nordsøenheden

Statens andele af olie- og gaslicenser

NOTAT

Dato: 15. april 2009
J.nr.: 100405/4007-0039
Ref.: LHP

Contribution to statement concerning GEUS

By e-mail of March 31, 2009 the department has asked for the contribution from the Danish North Sea Partner to the response to the enquiry from the Danish University and Property Agency dated February 6, 2009. The department asks for a contribution to its response to the following:

1. "an assessment of the trend in the quality of the research based tasks performed for other governmental institutions. External evaluations of the institution conducted since 2006 should be enclosed and commented on."

according to enclosure 1 of the above mentioned letter dated February 6, 2009.

Below, the contribution from the Danish North Sea Partner to the response is given:

"The Danish North Sea Fund (DNSF) was established late 2005 as the state participant in future licenses for the exploration and production of hydrocarbons in Denmark. The geological staff attached to DNSF was employed in mid 2006 in connection with the licenses awarded in the licensing round in 2006. It has from the establishment been the intension that DNSF shall draw upon geological expertise from GEUS.

DNSF has received skilled assistance from GEUS on certain assignments. The assistance from GEUS on these assignments has been adequate and well organized. We expect a further development in the cooperation with GEUS in the future."



Contribution by the Ministry of the Environment in connection with the Ministry of Science, Technology and Innovation's evaluation of the university area 2009 – GEUS.

The Ministry of the Environment has been asked by the Ministry of Climate of Energy for a contribution to the ministry's statement on the cooperation of the Ministry of the Environment with GEUS. The statement must give *"An assessment of the trend in the quality of the research based tasks performed for other governmental institutions"*

This memorandum gives a short account of the cooperation as well as the assessment given by the Ministry of the Environment of the trend in the quality.

Statement

GEUS up until ultimo 2007 was under the jurisdiction of the Ministry of the Environment. After this, GEUS is under the jurisdiction of the Ministry of Climate and Energy. From 2008 onwards, the Ministry of Climate and Energy consequently enters into performance contract with GEUS. The tasks performed by GEUS for the Ministry of the Environment remain unchanged with the change of jurisdiction. As a result of the municipal structural reform amongst other things, GEUS' tasks for the Ministry of the Environment have expanded with tasks concerning the mapping of ground water resources. GEUS has been awarded resources for this task, and a unit has been established in Aarhus.

GEUS provides research based counselling and performs tasks for the Ministry of the Environment within two main fields; one concerns water resources (ground water), the other mineral resources. The contents and scale of the tasks are included in and agreed on in the performance contract that GEUS enters into with the Ministry of Climate and Energy. Additionally, the status for and development of the tasks are discussed at meetings at the level of management between GEUS and the Agency for Spatial and Environmental Planning as well as at other scheduled meetings.

Assessment of the quality of tasks

The tasks concerning water resources include mapping, monitoring and quality of ground water resources amongst other things. As mentioned above, the task with regards to mapping ground water resources has expanded in connection with the municipal structural reform. The ground water monitoring tasks are included as part of the overall national nature and environmental monitoring programme. The present programme expires in 2009. GEUS contributes to the development of a new programme. The ground water quality task concerns knowledge building on transportation and turnover of substances alien to the environment and pesticides in ground water.

Further, GEUS undertakes tasks concerning mineral resources and geology. The task concerning mineral resources includes continuous gathering of knowledge on the position, quantity and quality of resources, especially at sea. The task concerning geology includes knowledge building on Denmark's surface area geology.

The Ministry of the Environment assesses the quality of the performance of tasks by GEUS to be overall satisfactory. The Ministry of the Environment has not observed any changes in the quality in

recent years. The Ministry of the Environment focuses on agreeing on products to be delivered as well as schedules for cooperation projects between GEUS and the Ministry of the Environment, as well as on continuous exchange of knowledge with the purpose of ensuring that the sector research tasks of GEUS supports the Ministry of the Environment in the best possible way.

Translation of statement made by the Ministry of Science, Technology and Innovation pr. e-mail on April 4, 2009

Since 2002, GEUS has been the manager of the Continental Shelf Project for the Ministry of Science, Technology and Innovation. The project is administered by a contact committee consisting of the Ministry of Science, Technology and Innovation (chair), the Prime Minister's Department, the Ministry of Foreign Affairs, the Ministry of Finance, the Faroese Home Rule and the Greenlandic Home Rule. The contact committee has been fully satisfied with GEUS' handling of the task.

The Continental Shelf Project produces the scientific research and documentation necessary to fulfil the requirements in accordance with the United Nations Convention on the Law of the Sea (UNCLOS), in order for the kingdom to make claims to areas beyond the 2000 nautical miles economic zone. Thus, the project has a national character, and differs from other scientific tasks as:

- a) Just those data required according to the UN Convention on the Law of the Sea must be gathered.
- b) The interpretation of data must follow the guidelines of the UN Convention of the Law of the Sea with respect to making claims.
- c) The objective of the project is to optimize the kingdom's claims in relevant areas.
- d) The project is being carried out under the jurisdiction of the Ministry of Science, Technology and Innovation.

In order to protect the kingdom's negotiating position vis-à-vis the UN as well as neighbouring states with overlapping demands, it is of utmost importance that the data collection and interpretation can take place in absolute confidentiality.

These are not conditions normally given by the universities, and they are conditions that it would be difficult to combine with the universities' rules of the independence of scientific research. Truly, the former Danish Space Center (Dansk Rumcenter), now DTU-Space, participates in the project, but this is more as data supplier. GEUS, on the other hand, participates as a manager of the project, also with respect to strategic considerations regarding the claims to be made by the kingdom, which is solely a policy task. The present organization of GEUS ensures that in this project, GEUS can perform both a sector research institution function and a managing function in relation to the project and the relevant authorities. It would hardly be possible to maintain this 'double function' within the universities. In that case, the managing functions would probably have to be transferred to a governmental authority.

In consideration of the national character of the Continental Shelf Project and the deadlines under which the project must be carried out, the Ministry of Science, Technology and Innovation finds it of crucial importance that the functions of GEUS in the project can be upheld in an unchanged manner in the coming years.

Translation of Statement by the Bureau of Minerals and Petroleum under the Greenland Home Rule dated April 15, 2009:

Statement concerning GEUS in connection with evaluation of the university reform

The Bureau of Minerals and Petroleum (BMP) under the Greenland Home Rule is responsible for the management of mineral resource activities in Greenland. BMP aims at ensuring professional promotion of the mineral potential in Greenland to the international mining industry.

One of the main tasks of BMP is the day-to-day administration of preliminary studies, exploration and exploitation licences within the area of mineral resources.

When processing the cases on mineral resource activity, BMP works with the Geological Survey of Denmark and Greenland (GEUS) amongst others.

In connection with this, BMP has access to counselling and the performing of tasks, which are to provide a basis for the authorities' processing of mineral and hydrocarbon activities in Greenland.

In addition to the continued geological research and mapping of Greenland's mineral resources potential, GEUS assumes an important advisory role in BMP's promotion of the geological potential of the Greenlandic underground to the international oil and mining industry.

Also, BMP has a close cooperation with GEUS within a number of other fields, including data gathering, storage of public and confidential data, cultivation of data and user friendly international communication of data.

BMP in Greenland overall is very satisfied with the specialist knowledge that GEUS, since the transfer of the administration of mineral resources to Greenland, has provided for the development of Greenland's mineral resources sector. BMP has not observed any changes, from before till after the implementation of the university reform, in the quality of the research based tasks performed for the authorities.

BMP finds it reassuring that GEUS continues to exist as an independent sector research institution. At a possible future reorganization of GEUS in the realm of the universities, focus will expectantly be on research and education, while tasks related to data storage (including confidential data) as well as international promotion of Greenland's mineral resources potential will expectantly be marginalized.

Best regards

Jørn Skov Nielsen
Director of the Bureau of Minerals and Petroleum



KLIMA- OG
ENERGIMINISTERIET

**Translation of the climate- and energy minister's letter to
GEUS: *Scientific evaluation of GEUS' programme area 2 – Water resources*, March 2008.**

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Økonomi- og
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April 17, 2009

Scientific evaluation of GEUS' programme area 2 – Water resources

GEUS has forwarded an evaluation report on GEUS' programme area 2, Water resources, which has been prepared for GEUS by an international expert panel.

I take cognizance of the expert panel's report. I note that the panel gives a particularly positive estimation of the research performance of GEUS as being scientifically sharp and competitive. It is pointed out that the strength of this field is its interdisciplinary character founded in several subject areas.

I also take note of the fact that the international panel having prepared the evaluation report concurrently points out that there is room for improvement. The panel estimates that the possibilities for synergy could be exploited even more than is presently being done, and that GEUS could gainfully focus on this. The panel proposes that this might happen by formulating research visions based on societal or scientifically important problems – if possible of a transverse character – that can increase the scientists' motivation for cooperating across subject areas. The panel further provides a number of concrete proposals for supporting interdisciplinary cooperation. And the panel presents a large number of concrete proposals for focus areas for research within this field.

I take cognizance of the fact that GEUS' board has decided to prepare a concrete plan of action based on the recommendations of the report, and that this will be presented in summer 2008.

Finally, I wish to express great satisfaction with the general view of the panel that GEUS demonstrates high quality research within this programme area.

Sincerely,

Connie Hedegaard

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HØRINGSSVAR VEDR. 2009-EVALUERINGEN

Bestyrelsen for SFI – Det Nationale Forskningscenter for Velfærd (herefter SFI) har med interesse læst evalueringsrapporten, herunder overvejelserne om SFI's placering på danmarkskortet for forskning og har diskuteret den på sit møde 7. december 2009. Bestyrelsen koncentrerer sine bemærkninger om de afsnit i rapporten, der vedrører SFI.

Rapporten anbefaler at overveje at indfusionere SFI i et universitet. Den anfører ikke konkrete argumenter bortset fra et synspunkt om, at det vil løse udfordringerne ved at kombinere kvantitative og kvalitative metoder og skabe bedre sammenhæng mellem forskning og myndighedsopgaver.

Bestyrelsen er grundlæggende uenig i denne vurdering.

SFI's formål

SFI er etableret som nationalt forskningscenter for velfærd. Den danske velfærdsforskning er karakteriseret ved at være spredt på en lang række mindre miljøer på universiteterne. Som nationalt forskningscenter har SFI en central rolle som netværksoperatør og synergiskaber på tværs af universiteterne.

SFI's overordnede formål er at levere forskningsbaseret viden til politiske beslutningstagere, forvaltninger og andre, der har interesse for udviklingen i det danske velfærdssamfund. SFI leverer viden til udvikling af velfærdspolitikken på dennes centrale områder. Det sociale område er kernen, men herudover gennemfører SFI forskning og rekvirerede opgaver på en række andre velfærdsområder, f.eks. beskæftigelse, uddannelse og integration.

Det betyder, at SFI's forskning på den ene side skal leve op til det internationale forskningssamfunds kvalitetskrav, mens SFI på den anden side ved løsning af evaluerings- og udredningsopgaver skal bidrage med forskningsbaseret viden til et

omfattende netværk af beslutningstagere og praktikere, som er involveret i udvikling af velfærdssamfundets forskellige politikområder.

SFI's kompetenceprofil er tilpasset dette arbejde og er fagligt og metodisk langt bredere end de kompetenceprofiler, som karakteriserer de enkelte universiteter. Samtidig er universitetsforskning karakteriseret ved en dybtgående specialisering inden for discipliner, hvorimod SFI har behov for og sin forskningsprofil har dokumenteret evne til at sikre et tæt samarbejde mellem disciplinerne.

Gode resultater af samarbejdet med universiteterne

SFI har som selvstændig aktør mulighed for at samarbejde med alle universitetsmiljøer og derigennem at supplere egne kompetencer med mange forskellige disciplinært forankrede spidskompetencer. Herved opnås de bedste mulige forudsætninger for, at myndighedsbetjeningen er solidt forskningsmæssigt baseret.

SFI har siden 2007 haft samarbejdsaftaler med universiteterne med det formål netop med det formål at sikre synergien mellem de stærkeste forskningsmiljøer på velfærdsområdet. Dette samarbejde har gennem de seneste år ført til mange gode resultater.

SFI har i samarbejde med forskere fra forskellige universiteter haft succes med at tiltrække nye og ganske store bevillinger fra strategiske forskningspuljer.

Endvidere er samarbejdet om ph.d. uddannelse med flere universiteter udviklet og gjort mere fleksibelt. Det betyder, at ph.d. studerende uafhængig af ansættelsessted kan arbejde på henholdsvis SFI og universitetet. Det understøtter, at den enkelte studerende henter inspiration og vejledning i de mest relevante videnskabelige miljøer. Det skal endvidere nævnes, at mobiliteten mellem SFI og universiteterne er vokset.

SFI og universiteterne overvåger på ledelsesniveau løbende samarbejdsaftalernes udmøntning, og ved den seneste fælles evaluering, der fandt sted i 2009, var der enighed om, at aftalerne udgør de rigtige rammer for samarbejde om forskning, ph.d. uddannelse og andre undervisningsaktiviteter. Samtidig kan SFI trække på universiteternes spidskompetencer ved løsning af myndighedsopgaver. For SFI's virke betyder samarbejdsaftalerne således, at SFI kan bidrage til undervisning i velfærdsforskningens emner på de videregående uddannelser på alle universiteter - samt i den forbindelse fremme uddannelse af forskertalenter med interesse for velfærdsforskning, uanset hvor de måtte befinde sig.

Bestyrelsens konklusion

Bestyrelsen er som nævnt uenig i, at en fusion er svaret på to vigtige udfordringer for SFI, nemlig den metodiske opdeling i kvantitativ og kvalitativ metode og det dobbelte hensyn til forskning af høj kvalitet og samtidig løsning af væsentlige myndighedsopgaver. Bestyrelsen skal henlede opmærksomheden på, at et uafhængigt

panel af internationalt anerkendte forskere på SFI's særlige forskningsområde, som i 2009 gennemførte en evaluering af SFI, fandt, at SFI har potentiale i organisationen til at håndtere disse udfordringer, og fremkom med en række anbefalinger her til. Panelet anbefalede samtidig, at SFI bør opretholdes som selvstændig institution begrundet i den brede legitimitet af SFI's policy-relaterede forskning og i SFI's klare uafhængighed af såvel politiske institutioner som af specifikke universitetsmiljøer.

Det er bestyrelsens enige og entydige vurdering, at SFI bedst bidrager til regeringens målsætninger for forskning og videregående uddannelse på velfærdsområdet, parallelt med løsningen af vigtige myndighedsopgaver, ved at forblive et selvstændigt nationalt forskningscenter.

Med venlig hilsen

A handwritten signature in black ink, appearing to read 'P. Nannestad'. The signature is fluid and cursive, with a long, sweeping tail that extends downwards and to the right.

Peter Nannestad
Bestyrelsesformand



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13. januar 2010

J.nr.:2008-81-5

Ref.: KMP

Med henvisning til brev af 3. december fremsendes hermed bemærkninger til 2009-evalueringen af universiteterne.

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Rapporten anbefaler regeringen at genoverveje den organisatoriske placering af de tilbageværende sektorforskningsinstitutioner, herunder Det Nationale Forskningscenter for Arbejdsmiljø (NFA).

Det er en ganske overraskende anbefaling, fordi der ganske enkelt ikke er sammenhæng mellem præmisser og konklusioner. I rapporten findes ikke noget, der med rimelighed kan betegnes som en egentlig analyse af de indtil nu indhøstede erfaringer med indfusionering af sektorinstitutter. I stedet trækkes antagelser fra den oprindelige debat om indfusionering frem – desværre uden kritisk distance.

Det *antages fx* at indfusionering vil gavne universiteterne, men der nævnes ikke et ord om det vil gavne arbejdsmiljøforskningen, hvilket burde være det centrale og ikke hensynet til universitetet. Den ensidige fokus på universiteternes behov er foruroligende og får rapportens anbefalinger til at fremstå meget svage. Det *antages*, fortsat uden understøttende argumenter, at fusionering vil give højere kvalitet med hensyn til forskning på trods af, at NFA netop har fået en glimrende forskningsevaluering, hvorfra en bisætning trækkes selektivt frem. Som argumentationsform kan dette næppe betegnes som tilfredsstillende – især, når det fremhævede område, ulykkesforskning, heller ikke findes i betydende omfang på universiteterne. Man kunne med fordel nærlæse en nylig artikel af norske forfattere: *Scaling properties of European Research Units*, PNAS 2009 106: 13160-13163, der synes at vise, at administrationen stiger ved fusionering, og det påpeges, at der ikke er evidens vedrørende de netop omtalte antagelser. Artiklen leverer ikke definitiv evidens, men er det tætteste man kommer på at kunne sætte de anvendte antagelser i perspektiv.

Rapporten indeholder som nævnt ingen analyser eller betragtninger om konsekvenserne for arbejdsmiljøforskningen, ligesom spørgsmålet om myndighedsbetjening behandles forbavsende overfladisk ved gennemgangen af erfaringer fra de indfusede sektorinstitutter, fx DMU.

Som bestyrelsesformand for NFA er det fortsat altafgørende for mig, at organiseringen af arbejdsmiljøforskningen også fremover er målrettet globaliseringsreformens målsætninger *samtidigt* med, at den understøtter målsætningerne i den nationale arbejdsmiljøstrategi med forskningsbaseret rådgivning af myndigheder og

arbejdsmiljøsystem. *Samtidig* skal der naturligvis være tale om forskning af høj kvalitet – noget som NFA også leverer. Faktisk mener NFA's bestyrelse, at vi godt og vel matcher universitetsforskningen, og der er ikke overbevisende argumenter for, at en fusion vil være til fordel for forskningskvalitet, forskningen i arbejdsmiljø og dynamiske forskningsinitiativer.

NFA's samspil med Beskæftigelsesministeriet og arbejdsmiljøsystemet er blevet stadig mere intensivt, og NFA's betydning som leverandør af forskningsbaseret viden og rådgivning er i dag væsentlig større end for blot få år siden. Det gælder i forhold til departementets ministerbetjening, og det gælder i forhold Arbejdstilsynets policy- og strategiudvikling samt myndighedsudøvelse. Derfor er det dobbelt beklageligt, at rapporten går så let hen over myndighedsbetjening.

Rapporten overser helt denne centrale NFA-rolle og giver dermed heller ikke noget bud på, hvordan myndighedsbetjeningen skulle kunne sikres, endsiige forbedres, ved en indfusionering på et universitet. Tværtimod anbefales det i rapporten, at den instruktionsbeføjelse i universitetsloven, der er så væsentlig for forskningsbaseret myndighedsbetjening (§17, stk. 2), fjernes eller reformuleres for ikke at anfægte forskernes frie valg af forskningsemner og -opgaver. Dette er et slående eksempel på manglende sammenhæng mellem præmisser og konklusioner.

Rapporten forholder sig heller ikke til det faktum, at regeringens konklusion i 2006 på baggrund af omfattende analyser netop var, at NFA *bedst* kunne bidrage til realiseringen af globaliseringsstrategien gennem et intensiveret samarbejde med universiteterne frem for en indfusionering. Universitetsmodellen var ikke en "one-size-fits-all". I NFA's bestyrelse har vi fulgt dette samarbejde tæt med løbende rapporteringer ved bestyrelsesmøderne, bl.a. vedr. undervisning og adjungering.

I den internationale evaluering af NFA fra 2008 – som 2009-evalueringen stort set ikke omtaler – var det da også evaluatorernes vurdering, at NFA lever op til globaliseringsstrategiens målsætninger om bedre uddannelse, mere undervisning og styrkelse af myndighedsbetjeningen.

Panelet fremhæver, at NFA leverer forskningskvalitet på niveau med universiteterne og leverer en stor og stigende videnskabelig produktion, hvoraf en stor del produceres sammen med både nationale og internationale universiteter.

Det eneste konkrete, faglige argument, som universitetevalueringen anfører for indfusionering af NFA på et universitet, er behovet for at opnå kritisk masse på to konkrete forskningsområder: ulykker og støj. 2008-evalueringen af NFA fremhæver netop, at veludviklede netværk med universiteterne bidrager til at sikre kritisk masse og hindrer faglig sårbarhed.

Det er desuden en illusion, at indfusionering på et universitet i sig selv vil sikre kritisk masse, sådan som den nye evalueringsrapport antager. Opnåelse af kritisk masse er i sidste ende et spørgsmål om, hvorvidt det er muligt at skaffe tilstrækkelig finansiering af et forskningsfelt. Og det gælder uanset, om forskningsfeltet er forankret på et universitet eller udenfor.

Det er også fejlagtigt blot at forudsætte, at arbejdsmiljøforskningen, som er et multidisciplinært forskningsfelt, naturligt kan placeres på ét universitet. Ved en indfusionering vil der i løbet af få år være absolut risiko for, at den sammenhængende forskningsviden, der i dag opbygges på NFA til brug for myndigheder og arbejdsmiljøsystemet i øvrigt, vil blive væsentligt svækket.

NFA har en årelang tradition for omfattende og velfungerende forskernetværk og strategiske samarbejder med universiteter både nationalt og internationalt. NFA har desuden i mange år bidraget til universitetsuddannelserne gennem ph.d.- og specialevejledning samt undervisning. NFA både underviser, planlægger og udvikler uddannelser i samarbejde med universiteterne. Senest har NFA medvirket til skabelsen af en ny eliteuddannelse i Miljøkemi og Sundhed på Københavns Universitet.

Samarbejdet med universiteterne blev formaliseret, da NFA i slutningen af 2006 indgik rammeaftaler med fem universiteter.

Bestyrelsen følger som nævnt udviklingen i disse samarbejder tæt og har med tilfredshed år for år kunnet konstatere, at samarbejdet vokser. Det er min klare opfattelse, at den markante fokus på, hvor der kan skabes synergier gennem samarbejde med universiteterne, langt overstiger den fokus, der ville være opnået med en indfusionering.


Alt i alt mener jeg ikke, at 2009-evalueringen giver et eneste sagligt overbevisende argument for at ændre NFA's forankring i Beskæftigelsesministeriet.

Det faglige grundlag for den nuværende organisering af arbejdsmiljøforskningen er ikke reelt blevet anfægtet af den nye evaluering – snarere tværtimod. NFA har bevist, at det som selvstændigt forskningscenter fuldt ud er i stand til at leve op til målsætningerne i globaliseringsstrategien, samtidigt med, at centret leverer forskningsbaseret myndighedsbetjening og forskningsbaseret rådgivning til arbejdsmiljøsektoren.

NFA's stakeholdere i Beskæftigelsesministeriet og blandt arbejdsmarkedets parter, arbejdsmiljørådgivere, virksomheder og universiteter har senest i forskningsevalueringen fra 2008 anerkendt centrets udfyldelse af denne dobbelte rolle.

Det er derfor min klare indstilling, at nærværende evaluering af universiteterne på ingen måde giver anledning til at genoverveje regeringens beslutning 4. oktober 2006 om at forankre forskningsbaseret uddannelse, rådgivning og myndighedsbetjening på arbejdsmiljøområdet i et selvstændigt forskningscenter i Beskæftigelsesministeriets regi.

Med venlig hilsen



Kjeld Møller Pedersen
Bestyrelsesformand



Den 19. januar 2010

Universitets- og Bygningsstyrelsen
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Att. Pernille Meyn Milthers

Høring over evalueringsrapport for 2009-evalueringen på universitetsområdet

Idet Sektorforskningens Direktørkollegium (SEDIRK) henviser til medlemsorganisationernes individuelle høringssvar til ovennævnte evalueringsrapport, ønsker SEDIRK kun at fremkomme med nogle generelle bemærkninger.

Evalueringspanelet foreslår, at man genovervejer, hvorvidt de sektorforskningsinstitutioner, der ikke blev indfusioneret i universiteterne ved dannelsen af 'det nye forskningslandskab', bør indfusioneres alligevel. Panelet nævner institutionerne NFA, SFI, Kennedy Centret, SSI og GEUS, og diskuterer ganske kort argumentationen i forhold til tre af dem: GEUS, NFA og SFI.

SEDIRK er orienteret om, at ingen af de omtalte institutioner ønsker en fusion med et universitet. I tilknytning hertil finder SEDIRK, at Panelets forslag er usædvanligt svagt begrundet. Panelet afviser uden substantielle argumenter de respektive institutioners begrundelser for at opretholde deres nuværende organisatoriske placering. Samtidig indeholder panelets rapport ingen analyse af fusionernes betydning for de indfusede sektorforskningsinstitutioner, hverken for så vidt angår realisering af de synergier, der var formålet med indfusioneringen, eller de konsekvenser den ændrede organisatoriske placering kan have haft for såvel myndighedsbetjening som deres forsknings ændrede afhængighed af ressortministerierne ved konvertering af basisbevillinger til kontraktbevillinger.

De kriterier, som Panelet nævner side 65 sidste afsnit for evt. at genoverveje situationen for de ikke-indfusede sektorforskningsinstitutioner, er udtryk for netop de samme overvejelser, som for få år siden førte til konklusionerne om *ikke* at foretage fusion af de pågældende institutioner.

Det er SEDIRKs opfattelse, at Panelet ikke har tillagt de særlige opgaver, der varetages af de ikke-indfusede institutioner, nogen som helst vægt. Universiteternes styreform og kultur er imidlertid efter SEDIRKs opfattelse ikke lige velegnet til alle typer af opgaver. Derfor bør man vælge organisatorisk struktur og placering ud fra hensynet til at sikre, at samfundet opnår den bedst mulige varetagelse af de centrale opgaver, der er henlagt til de forskellige institutioner.

Det er SEDIRKs opfattelse, at institutionernes nuværende organisatoriske placering med selvstændige uafhængige bestyrelser udgør en hensigtsmæssig ramme, som både sikrer videnskabelig uafhængighed og myndighedsbetjening af høj kvalitet.

Venlig hilsen

Jørgen Søndergaard
formand

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