

While research related to dual-use products or technologies is not prohibited, any research and innovation activities carried out under Horizon Europe must have an exclusive focus on civil applications. Consequently, funds to beneficiaries based in Israel were only awarded for research activities with civilian purposes. Activities intended for military applications are ineligible¹. However, Horizon Europe projects' results² may be developed into technologies with a dual-use potential, even if they were originally intended and funded for purely civil applications. This transition could happen beyond the lifetime of the project itself.

Article 2(2) of the Agreement on the association of Israel to Horizon Europe³ sets out the principle that Israeli entities participate in the Horizon Europe programme under terms and conditions equivalent to those applicable to legal entities established in the EU. While any actions of the State of Israel cannot be considered automatically attributable to Israeli entities participating in Horizon Europe, Israel needs to comply with Article 2 of the Euro-Mediterranean Agreement⁴. In the context of Israel's intervention in the Gaza Strip and the ensuing humanitarian catastrophe, the Commission has come to the conclusion that Israel is violating human rights and humanitarian law thus breaching Article 2 of the Euro-Mediterranean Agreement. Therefore, it has proposed to the Council to partially suspend the Horizon Europe Association Agreement with Israel so that legal entities established in Israel would not be eligible to participate in calls for grant and investment support under the Horizon Europe European Innovation Council Accelerator. Furthermore, in her State of the Union Speech on 10 September 2025, the Commission President announced a further package of measures.

The XTEND project funded a commercial and financial viability study only, no grant was deployed to develop any technology⁵. The project UnderSec cited above⁶ is currently under ethical review.

¹ In line with the grant agreement, when implementing the projects all beneficiaries must ensure that all the activities under the project comply with this horizontal rule as well as with ethical principles and relevant national, EU and international legislation.

² Once the project is over.

³ Agreement between the EU, of the one part, and Israel, of the other part, on the participation of Israel in the EU programme Horizon Europe — the framework Programme for Research and Innovation, OJ L 95, 23/03/2022.

⁴ 'Relations between the Parties, as well as all the provisions of the Agreement itself, shall be based on respect for human rights and democratic principles, which guides their internal and international policy and constitutes an essential element of this Agreement.'

⁵ At the time of submission, the applicant self-declared the proposal did not involve dual-use items and confirmed it did not raise concerns regarding the exclusive focus on civil applications. During the evaluation process, the company underwent an ethics pre-screening which did not reveal any issues. No other ethics issues were detected during the feasibility study report preparation. Furthermore, by signing the grant agreement, the company assumed a legal obligation to ensure that the activities carried out under the action were exclusively focused on civil applications. Beyond the grant for the feasibility study, which implementation was completed in 2020, no investment component or other funding was provided to the company nor by the SME (small and medium-sized enterprises) Instrument neither by the European Innovation Council Accelerator.

⁶ Sensor-based prototype system for underwater security: <https://cordis.europa.eu/project/id/101121288>.