

(English version)

**Question for written answer E-002657/26
to the Commission
Marc Botenga (The Left)
(26 June 2026)**

Subject: Horizon Europe: legal basis for the suspension announcement of 4 March 2022

On 22 October 2025, the Commission stated that the measures announced on 4 March 2022 ⁽¹⁾ concerning the suspension of cooperation with Russian entities and of payments to those entities, as well as the decision no longer to sign new contracts with Russian entities under Horizon Europe, were based on EU restrictive measures and Horizon Europe eligibility restrictions ⁽²⁾. However, as previously pointed out, those provisions were adopted after the March 2022 decision ⁽³⁾.

In its subsequent reply, the Commission no longer referred to those provisions. Instead it referred to subsequent 'relevant legal measures' and 'far-reaching restrictive measures', 'adopted subsequently' to 24 February 2022, without identifying the precise legal basis for the March 2022 decision ⁽⁴⁾. The fifth sanctions package, adopted on 8 April 2022, gave the Commission the competence to terminate the participation of Russian public bodies or public-related entities in ongoing Horizon Europe projects.

1. Regarding the suspension of cooperation with, and payments to, Russian entities under Horizon Europe, can the Commission identify the specific legal provision in force on 4 March 2022, which gave it the competence to act?
2. Regarding the March 2022 decision no longer to sign new contracts with, and to suspend payments to, Russian entities, can the Commission confirm that this was an executive decision taken on its own authority?

Submitted: 26.6.2026

**Question for written answer E-002661/26
to the Commission
Marc Botenga (The Left)
(26 June 2026)**

Subject: Horizon Europe: case-by-case assessment versus general suspension of payments to Russian entities between 4 March and 8 April 2022

On 4 March 2022, the Commission publicly announced a general suspension of payments to, and cooperation with, Russian entities under Horizon Europe ⁽¹⁾. On 8 April 2022, the Commission announced that with the adoption of the fifth package of sanctions against Russia, the participation of all Russian public bodies or public-related entities in ongoing Horizon Europe projects would be terminated ⁽²⁾. In February 2026, the Commission instead stated that both the suspension of payments and the termination of participation had been carried out based on a 'case-by-case assessment' ⁽³⁾.

1. How does the Commission reconcile its announcement of 4 March 2022 of a general suspension of payments to Russian beneficiaries with its claim of February 2026 that suspension decisions had been taken only subsequently under specific legal instruments as a series of individual case-by-case measures?
2. If there was a general suspension, what legal basis did the Commission use to enact it before the restrictive measures included the fifth package of sanctions entered into force?
3. If the measures were taken on a case-by-case basis, can the Commission specify how many individual decisions were taken between 4 March and 8 April 2022, and on what legal basis?

Submitted: 26.6.2026

**Joint answer given by Ms Zaharieva on behalf of the European Commission
(5 October 2026)**

¹ https://ec.europa.eu/commission/presscorner/detail/en/ip_22_1544

² https://www.europarl.europa.eu/doceo/document/E-10-2025-001178-ASW_EN.html

³ https://www.europarl.europa.eu/doceo/document/E-10-2025-004664_EN.html

⁴ https://www.europarl.europa.eu/doceo/document/E-10-2025-004664-ASW_EN.html

¹ https://ec.europa.eu/commission/presscorner/detail/en/ip_22_1544.

² https://research-and-innovation.ec.europa.eu/strategy/strategy-research-and-innovation/europe-world/international-cooperation/bilateral-cooperation-science-and-technology-agreements-non-eu-countries/russia_en.

³ https://www.europarl.europa.eu/doceo/document/E-10-2025-004664-ASW_EN.html.

1. In its answer to Written Question E-004664/2025 ⁽¹⁾ on 3 February 2026, the Commission explained that following the announcement on the suspension of cooperation with Russian entities under the Horizon Europe programme of 4 March 2022, the termination of Russian entities' participation in Horizon Europe grants and the suspension of related payments were carried out on a case-by-case basis, under the applicable legal framework.

The statement of 4 March 2022 followed the European Council Conclusions of 24 February 2022. Between 4 March and 8 April 2022, the Commission took preparatory steps in view of forthcoming EU restrictive measures ⁽²⁾, including the fifth sanctions package of 8 April 2022 ⁽³⁾. Given the scale of Horizon Europe, preparation was necessary to ensure compliance.

2. The statement anticipated the entry into force of the restrictive measures. Implementation steps affecting Russian entities' participation in Horizon Europe grants remained based on the legal provisions applicable at the relevant time. A case-by-case assessment was necessary to identify the concerned grants and the EU restrictive measures applicable to each Russian entity.

⁽¹⁾ https://www.europarl.europa.eu/doceo/document/E-10-2025-004664-ASW_EN.html.

⁽²⁾ The restrictive measures adopted following the European Council Conclusion of 24 February 2022 include: Second package of sanctions against Russia of 25 February 2022; third package of sanctions against Russia between 28 February 2022 and 2 March 2022; sectoral measures against Russia of 9 March 2022; fourth package of sanctions package of sanctions against Russia of 15 March 2022; fifth package of sanctions against Russia of 8 April 2022.

⁽³⁾ Council Regulation (EU) 2022/576 of 8 April 2022 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine. OJ L 111, 8.4.2022, pp. 1-66, ELI: <http://data.europa.eu/eli/reg/2022/576/oj>.