

(English version)

**Question for written answer E-002659/26
to the Commission
Marc Botenga (The Left)
(26 June 2026)**

Subject: Horizon Europe: attribution of state conduct to beneficiaries and participating entities

Following Russia's invasion of Ukraine, the Commission announced a blanket suspension of cooperation with all Russian entities before any individual assessment of each beneficiary's conduct had been carried out ⁽¹⁾. The subsequent termination of cooperation in April on the other hand allegedly followed not only the fifth sanctions package but also a case-by-case assessment ⁽²⁾.

However, in replies concerning Israeli participation in Horizon Europe, the Commission stated that Israeli beneficiaries cannot be considered in breach of Horizon Europe obligations merely because they are established in Israel and that restrictive measures must be based on the beneficiary's conduct rather than on the conduct of the State of Israel ⁽³⁾.

1. Does the Commission consider that Russian beneficiaries were subject to restrictive measures because of their own conduct or because of the conduct of the Russian State and how does this differ, in concrete terms, from the situation of Israeli beneficiaries?
2. How does the Commission reconcile its position that the conduct of the State of Israel cannot automatically be attributed to participating Israeli beneficiaries with the measures announced against Russian beneficiaries following the actions of the Russian State?
3. Does the Commission distinguish between its competence to suspend cooperation temporarily and its competence to finally terminate it?

Submitted: 26.6.2026

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

1. In relation to Russian entities, the Council of the European Union adopted several restrictive measures, following the European Council Conclusions of 24 February 2022 ⁽¹⁾. In this context, the Commission's statement of 4 March 2022 anticipated the entry into force of the restrictive measures. As regards Israel, the Commission proposed a partial suspension of the agreement associating Israel to Horizon Europe ⁽²⁾, a suspension of trade concessions with Israel and sanctions on extremist ministers of the Israeli government and violent settlers ⁽³⁾.
2. The steps concerning the participation of beneficiaries in Horizon Europe grants are based on the legal provisions applicable at the relevant time. For Russian entities, a case-by-case assessment was necessary to identify the concerned grants and the sanctions applicable to each Russian entity. For Israeli entities, steps related to their participation in Horizon Europe grants may be taken on the basis of the grant agreement's provisions and in line with the Guidelines on the eligibility of Israeli entities ⁽⁴⁾.
3. As regards international cooperation agreements, in view of the relevant legal basis and the necessary procedural steps, the Commission does distinguish between the two. Temporary suspension falls under Article 218(9) of the Treaty on the Functioning of the European Union (TFEU), requiring adoption of a Council decision on suspension of an international agreement. Termination follows the same procedure as for the adoption of a decision for its conclusion, i.e. a procedure under Article 218(6)(a) TFEU, which requires adoption of a Council decision following the European Parliament's consent.

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

² https://www.europarl.europa.eu/doceo/document/E-10-2025-004664-ASW_EN.html

³ https://www.europarl.europa.eu/doceo/document/E-10-2025-004869-ASW_EN.html

⁽¹⁾ 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.

⁽²⁾ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52025PC0620>.

⁽³⁾ As the Commission explained in its answer to Written Question E-004664/2025, the legal framework impacting the participation of Russian and Israeli entities in Horizon Europe grants differs.

⁽⁴⁾ https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv%3AOJ.C_.2013.205.01.0009.01.ENG&toc=OJ%3AC%3A2013%3A205%3AFULL.