



EUROPEAN COMMISSION

DIRECTORATE-GENERAL FOR EDUCATION, YOUTH, SPORT AND CULTURE

Youth, Education and Erasmus+
Erasmus+ Coordination

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(E+/NA/DIR/2022/028)

NOTE FOR THE ATTENTION OF THE DIRECTORS OF THE NATIONAL AGENCIES

Subject: Guidance to National Agencies for participation of Russian organisations and individuals in Erasmus+ and European Solidarity Corps

1. POLITICAL CONTEXT AND LEGAL BASE

Following the military aggression of Russia against Ukraine, the Council of the European Union adopted on 8 April 2022 the [Council Regulation \(EU\) 2022/576¹](#), which is the [fifth package of restrictive measures against Russia](#). These measures include:

1. Adding further Russian entities and individuals to the sanctions list.
2. Introducing a specific provision stating that *“it shall be prohibited to provide direct or indirect support, including financing and financial assistance or any other benefit under a Union, Euratom or Member State national programme and contracts within the meaning of Regulation (EU, Euratom) 2018/1046, to any legal person, entity² or body established in Russia with over 50% public ownership or public control.”*
3. There are a few exceptions to this prohibition including in case of *“mobility exchanges for individuals”* or *“people-to-people contacts”*.

This note intends to provide guidance to the National Agencies on which type of activities involving Russian nationals and entities, under Erasmus+ and European Solidarity Corps, can still continue and which shall be terminated.

¹ 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.

² As per the definition provided in the 2022 Erasmus+ Programme Guide (page 409): a legal entity is “a natural person or a legal person created and recognised as such under national law, Union law or international law which has legal personality and which may, acting in its own name, exercise rights and be subject to obligations, or an entity which does not have legal personality as referred to in point (c) of Article 197(2) of the Financial Regulation”

2. ACTIVITIES THAT MAY CONTINUE UNDER BOTH PROGRAMMES

The following activities, supported under either programme, can continue³⁴:

- Ongoing Erasmus+ **Key Action 1: International Credit Mobility projects** with Russian individual participants may continue. National Agencies can proceed with the selection of new projects under the 2022 call based on the exemption allowing for **individual participants in mobility exchanges** with direct benefit for Russian individuals (students and staff). Where possible, National Agencies should encourage their Higher Education institutions not to provide Russian sending/hosting organisations with funds from the Organisational Support for the mobilities to and from Russia.
- The **international opening of the intra-Erasmus+ countries** higher education and vocational education and training student and staff mobility (with the possibility to offer **outgoing** mobility to Russia).
- Erasmus+ **youth mobility projects** and **European Solidarity Corps volunteering projects**.

Overview of actions that can continue:

1. Ongoing projects - Erasmus+ 2014-2020 and Erasmus+ 2021 Call	
<p>Erasmus+ Mobility</p> <ul style="list-style-type: none"> • International Credit Mobility • International opening of the intra-Erasmus+ countries higher education and vocational education and training student and staff mobility (outgoing) 	<p>To maintain individual mobility exchanges, ongoing ICM projects can continue with both incoming and outgoing mobility.</p> <p>The international opening of the intra-Erasmus+ countries higher education and vocational education and training student and staff mobility towards Russia (outgoing mobility) under the 2021 call can continue.</p> <p>Sanctions screening on individual basis needs to continue (NAs to give clear instructions to beneficiaries).</p>

³ In so far as the individuals and entities involved are not included in the Consolidated Sanctions List:

- [PDF](#) - v.1.0
- [CSV](#) - v.1.0
- [CSV](#) - v.1.1
- [XML \(Based on XSD\)](#) - v.1.1
- [XML \(Based on XSD\)](#) - v.1.0

⁴ In so far as national regulations still allow the move of individuals from and to Russia.

<p>Erasmus+ KA-1 youth actions:</p> <ul style="list-style-type: none"> • Mobility of young people ‘Youth exchanges’ • Mobility projects for Youth workers • Youth participation activities 	<p>To maintain individual mobility exchanges contacts, Erasmus+ youth actions involving Russia can continue.</p> <p>Sanctions screening on individual basis needs to continue (NAs to give clear instructions to beneficiaries).</p>
<p>European Solidarity Corps volunteering actions:</p> <ul style="list-style-type: none"> • Volunteering Projects 	<p>To maintain people-to-people contacts, these European Solidarity Corps actions involving Russian individuals can continue.</p> <p>Sanctions screening on individual basis needs to continue (NAs to give clear instructions to beneficiaries).</p>
<p>2. Projects submitted under the Erasmus+ and European Solidarity Corps 2022 call with ongoing or upcoming selection</p>	
<p>Erasmus+ mobility</p> <ul style="list-style-type: none"> • International credit mobility – ICM KA 171 • International opening KA 121 and KA 131 	<p>To maintain mobility exchanges for individuals, the selection and contractualisation process of new ICM projects involving Russia can continue with both incoming and outgoing mobility.</p> <p>The international opening of the intra-Erasmus+ countries higher education and vocational education and training student and staff mobility towards Russia (outgoing mobility) under the 2022 call can continue.</p> <p>Sanctions screening on individual basis needs to continue (NAs to give clear instructions to beneficiaries).</p>
<p>Erasmus+ KA-1 youth actions</p> <ul style="list-style-type: none"> • Mobility of young people ‘Youth exchanges’ • Mobility projects for Youth workers • Youth participation activities 	<p>To maintain people-to-people contacts, the selection and contractualisation process of new Erasmus+ youth projects involving Russia can continue.</p> <p>Sanctions screening on individual basis needs to continue (NAs to give clear instructions to beneficiaries).</p>

<p>European Solidarity Corps volunteering actions</p> <ul style="list-style-type: none"> • Volunteering projects 	<p>To maintain people-to-people contacts, the selection and contractualisation process of new European Solidarity Corps volunteering projects involving Russian individuals can continue.</p> <p>Sanctions screening on individual basis needs to continue (NAs to give clear instructions to beneficiaries).</p>
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3. STRATEGIC PARTNERSHIPS/ PARTNERSHIPS FOR COOPERATION

Strategic Partnerships and Partnerships for Cooperation are the only actions under indirect management that would not fall under the exception regarding “mobility exchanges for individuals” or “people-to-people contacts” and where the participation of a Russian entity as a partner organisation could have been possible. In these cases, the participation of Russian public entities (50% public ownership) or entities under public control will have to be terminated in ongoing projects. Those entities are not eligible under ongoing calls. To avoid a case-by-case approach, it is proposed that **all institutions delivering education activities established in Russia will be presumed as being controlled by the Russian state**. The new Article 2(35) introduced by the Russian Federal law № 1057895-7 amending the Federal law “on education in the Russian Federation”, introduced the definition of “educational activities” as “activities carried out outside the framework of educational programs aimed at spreading knowledge, skills, values, experience and competence for the purposes of intellectual, spiritual and moral, creative, physical and (or) professional development of a person, satisfying his educational needs and interests, and affecting relations regulated by this Federal Law and other legislative acts of the Russian Federation”.

In this context, this horizontal approach applies to all institutions established in Russia that are performing activities covering learning activities, including formal, non-formal or informal learning activities, in education, training, youth and sport.

For ongoing projects with the participation of a Russian public entity or entity under public control (including all Russian based “education institutions” as defined above), the National Agencies should request the coordinator to remove (through an amendment to the grant agreement) the concerned Russian entity and inform that any costs incurred by it after 8 April 2022 will be declared ineligible. The participation can continue if the beneficiary or the coordinator (if it is a multibeneficiary grant) can demonstrate during the contradictory procedure that the affected Russian participating organisation is not over 50% publicly owned or controlled by the State.

The participation of a Russian body that is neither publicly owned nor under public control, nor delivering educational activities (as defined above) can continue.

For ongoing calls for proposals (grant agreements not yet signed) with the participation of a Russian public entity or entity under public control (including all Russian based “education institutions” as defined above), those entities shall be excluded from the ongoing selection procedures on the ground that there is a change in their legal situation following the Sanctions Regulation. If such an exclusion would have an incidence on the eligibility criteria, before excluding, the AOR may allow the evaluation committee to propose to the applicant either to reassess the feasibility of the project and the eligibility criteria or to replace the Russian entity in order to fulfil the eligibility criteria. In such a case, if the applicant does not wish or cannot replace the Russian partner, the evaluation committee will declare the application ineligible⁵.

The participation of a Russian body that is neither publicly owned nor under public control, nor presumed delivering educational activities (as defined above) can continue.

4. DISCLAIMER AS REGARDS STUDENT AND STAFF MOBILITY TOWARDS RUSSIA

Whereas the possibility of outgoing mobility towards Russia remains open under both International Credit Mobility, as well as under the international opening of the intra-Erasmus+ countries Higher Education and Vocational Education and Training student and staff, sending institutions need to be extremely cautious when it comes to mobility towards Russia, prioritising the safety of participants and taking full account of national travel guidelines.

5. BUDGET FLEXIBILITY UNDER INTERNATIONAL CREDIT MOBILITY (KA 107 AND KA 171):

As we expect limited take-up of mobilities towards Russia, the following budget flexibility is allowed⁶ (as announced in note E+/NA/DIR/2022/023):

- **Budget for ongoing projects (i.e. still open projects financed with 2019 and 2020 budget) for Higher Education institutions with both Russia and Ukraine in their project:**

Allow Higher Education institutions to use unallocated funding from their mobility budget for mobilities to and from Russia to finance, where applicable, mobility from Ukraine.

⁵ Based on assessment, in Key Action 2 projects, this case scenario is not applicable due to the fact that for cooperation partnership projects it is provided that: ‘*organisations from third countries not associated to the Programme can be involved as partners (not as applicants), if their participation brings an essential added value to the project and as long as the minimum participation from three organisations from three different EU Member States and third countries associated to the Programme is fulfilled*’.

⁶ The specific conditions are detailed in a template of addendum to the grant agreement.

- **Budget for the 2022 call projects** (selection process ongoing):

Allow Higher Education institutions that receive funding for both Russia and Ukraine to transfer without an amendment at any given moment during the project implementation funding from projects with Russia to projects with Ukraine, with the intention to boost incoming mobility from Ukraine.

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