

#### Call management rules and conditions

Julià Rebés Legal Officer



### Context of PRIMA Call 2025



- PRIMA WP 2025 approved by EC and Board of Trustees
- First PRIMA call aligned with Horizon Europe rules
- One-stage submission process (new)
- New PRIMA eligibility rules: SMEs in Section 1 (IA actions)
- New requirement to sign the grant agreement: gender related aspects for certain applicants





# Eligibility conditions



- Eligibility conditions under PRIMA Calls are governed by two layers:
  - A. Horizon Europe Standard Eligibility Conditions
  - B. PRIMA-Specific Eligibility Conditions (PRIMA Work Programme 2025)
    - This constitutes a derogation from the standard Horizon Europe eligibility conditions, which normally require 3 entities from 3 different EU Member States or HE Associated Countries.
- Note: Gender Equality Plan (GEP) is not an eligibility condition but a grant signature requirement for certain type of participants.





### Eligibility Rules - Section 1





#### Eligibility Conditions – Section 1 (Innovation Actions)

Eligibility for Section 1 Innovation Actions results from the combination of:

- General eligibility conditions (AWP 2025, p. 66 Table 19)
- Additional eligibility conditions specified per topic (AWP 2025, pp. 27-35)

A proposal is eligible if it includes:

- At least 4 independent legal entities, all established in PRIMA Participating States, with:
  - At least 3 of them established in different countries
  - At least 1 established in an EU Member State or a Horizon Europe Associated Country, not being a Mediterranean Partner Country (MPC)
  - At least 2 established in MPCs
  - At least 1 is a Small or Medium-Sized Enterprise (SME), as defined in Article 2 of the Annex to Recommendation 2003/361/EC (novelty of AWP 2025).

Always check the topic-specific eligibility conditions in the AWP 2025.





### Eligibility Rules - Section 1 (IA actions) \*\*\* WWW.prima-med.org





#### **Definition of SME**

According to Article 2 of the Annex to Commission Recommendation 2003/361/EC:

The category of micro, small and medium-sized enterprises (SMEs) is made up of enterprises which:

- Employ fewer than 250 persons, and
- Have an annual turnover not exceeding EUR 50 million, or
- An annual balance sheet total not exceeding EUR 43 million.

#### Categories of SMEs:

- Micro: <10 employees and ≤ EUR 2 million turnover
- Small: <50 employees and ≤ EUR 10 million turnover
- Medium: <250 employees and ≤ EUR 50 million turnover</li>

The SME status must be confirmed at proposal submission stage.





# Eligibility Rules – Section 1 - Examples



- Example of an eligible consortium:
- France (PRIMA PS EU) University
- Italy (PRIMA PS EU) Research Centre
- Tunisia (PRIMA PS MPC) **SME**
- Jordan (PRIMA PS MPC) Public Research Institute
- ✓ Meets all criteria:
- 4 independent entities from PRIMA PS
- At least 3 different countries
- At least 1 from EU/non-MPC (France or Italy)
- At least 2 from MPCs (Tunisia + Jordan)
- At least 1 SME (Tunisia)

- **Example of an eligible consortium:**
- France (PRIMA PS EU) University
- Italy (PRIMA PS EU) Research Centre
- Egypt (PRIMA PS MPC) University
- Egypt (PRIMA PS MPC) SME
- ✓ Meets all criteria:
- 4 independent entities from PRIMA PS
- At least 3 different countries (France, Italy, Egypt)
- At least 1 from EU/non-MPC (France or Italy)
- At least 2 from MPCs (both from Egypt, which is allowed)
- At least 1 SME (Egyptian SME)

X Example of an ineligible consortium:

**#PRIMAInfoDay** 

www.prima-med.org

- Portugal (PRIMA PS EU) Research Institute
- Turkey (PRIMA PS MPC) University
- Morocco (PRIMA PS MPC) Public Body
- Lebanon (PRIMA PS MPC) University
- **X** Not eligible because:
- No SME included, as required by topicspecific eligibility conditions





## Eligibility Rules – Section 2







#### Eligibility Conditions - Section 2 (Research and Innovation Actions)

Eligibility for Section 2 Research and Innovation Actions results from the combination of:

- General eligibility conditions (AWP 2025, p. 81-82 Table 21)
- Additional eligibility conditions specified per topic (AWP 2025, pp. 43-53)

A proposal is eligible if it includes:

- At least 4 independent legal entities, all established in PRIMA Participating States, with:
  - At least 3 of them established in different countries
  - At least 1 established in an EU Member State or a Horizon Europe Associated Country, not being a Mediterranean Partner Country (MPC)
  - At least 2 established in MPCs

Participants must also:

- Comply with their national funding regulations
- Be eligible for funding from their national funding agencies





#### Requirement - Gender related aspects







Having a Gender Equality Plan (GEP) applies to:

- Public bodies
- Higher education institutions
- Research organisations
- …established in an EU Member State or a Horizon Europe Associated Country

#### WHEN must it be fulfilled?

- At proposal stage: a self-declaration confirming the existence or commitment to a GEP must be uploaded
- At grant agreement signature: a valid GEP must be in place

This requeriment is defined in the PRIMA AWP 2025 (p. 20-21),

• in alignment with Article 7 of Regulation (EU) 2021/695 establishing Horizon Europe

The requirement applies to both Section 1 and Section 2 of the 2025 PRIMA Call





### The PRIMA Grant Agreement







- Based on HE MGA, adapted to PRIMA
- Signed between PRIMA Foundation and Coordinator
- 44 articles + annexes (Project, Budget, Accession forms)
- Legal framework for project implementation:
  - To guarantee that the action granted will be implemented as (1) agreed between PRIMA and the consortium and (2) in compliance with the provisions of the contract and all other obligations under applicable law.
  - In addition, in case a beneficiary breaches any of its obligations, the grant agreement establishes sanctions.





### Structure of the PRIMA Grant Agreement



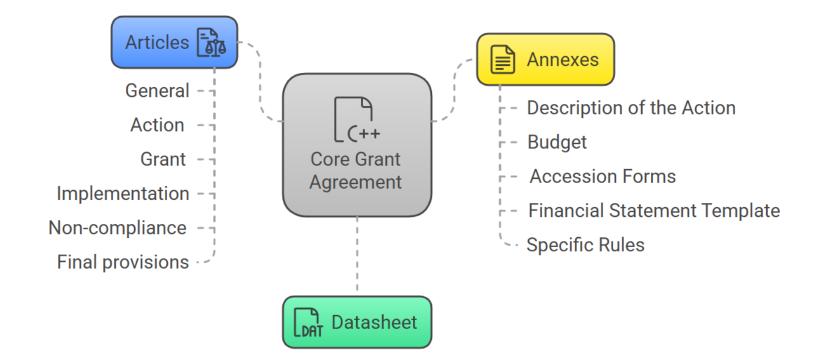




- Based on the Horizon Europe Model Grant Agreement (MGA):
- Core Grant Agreement:
  - Datasheet: Summary of key action details
  - Articles 1–44 structured into 6 chapters:
  - 1. General
  - 2. Action
  - 3. Grant
  - 4. Implementation
  - 5. Non-compliance
  - 6. Final provisions
- Annexes:
  - Annex 1: Description of the Action
  - Annex 2: Budget
  - Annex 3: Accession Forms (to be signed by beneficiaries within 30 days after Grant Agreement signature between the Coordinator and PRIMA)
  - Annex 4: Financial Statement Template
  - Annex 5: Specific Rules (ethics, visibility, gender, etc.)
- PRIMA will adapt the HE MGA to reflect its specific legal basis, as defined in the PRIMA Decision.



Structure of the Core Grant Agreement

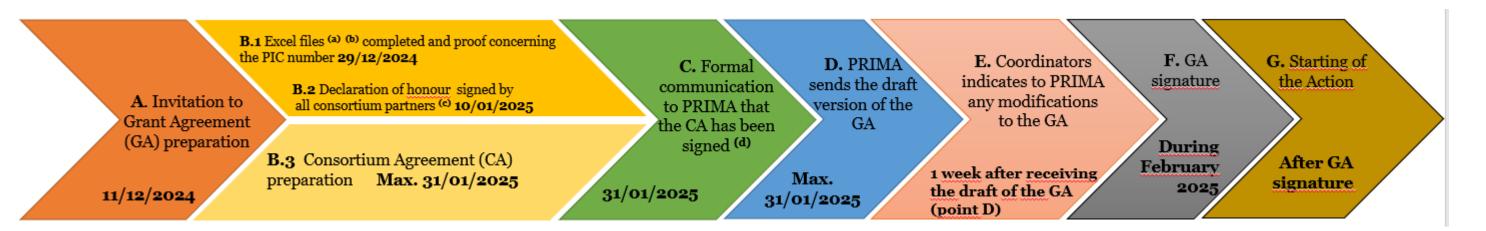


# Grant Agreement Signature Process





Managed by PRIMA (not via Funding and Tenders Portal)
 Example of the workflow of the GA signature for the Call 2024:



- Time to Grant: 8 months from call closure
- Prepare Consortium Agreement early:
  - Complement the grant agreement.
  - No provisions against the grant agreement.
  - PRIMA is not involved.





#### Amendments



- Article 39 HE MGA:
  - "The Agreement may be amended, unless the amendment entails changes to the Agreement which would call into question the decision awarding the grant or breach the principle of equal treatment of applicants."
- Justification required, cannot affect award decision
- Submitted by coordinator
- PRIMA assesses and, if appropriate, approves it





# Amendments – when is needed and







Amendments are necessary for:

when not

- Beneficiaries/affiliated entities changes (e.g. addition/removal/partial takeover)
- Coordinator changes (change of coordinator; change of the bank account the coordinator uses for payments)
- Action implementation changes and financial changes not covered by the budget flexibility rule (e.g. changes of tasks; changes related to subcontract or in-kind contributions; changes related to affiliated entities; consortium requested grant agreement suspension or grant agreement termination)

Amendments are NOT necessary for:

- Budget transfers covered by the budget flexibility
- Name or address changes of a participant done directly in the Participant Register
- Universal takeovers (merger/acquisition) of a participant done directly in the Participant Register
- Changes in the bank's name or branch address, or in the name of the bank account holder done
  directly in the Participant Register





# Types of beneficiaries: coordinators







#### COORDINATORS

• **Directly sign** the Grant Agreement

and beneficiaries

- Central contact point for PRIMA
- **Represents** the consortium (towards the granting authority)
- Obligations
  - monitor that the action is implemented properly
  - act as intermediary for all communications:
    - request and review any documents before passing them to PRIMA
    - submit the deliverables and reports to PRIMA
  - distribute the payments received from the GA to the other beneficiaries without unjustified delay

#### **BENEFICIARIES**

- **Sign** the Accession Form (Annex 3) to join the Grant Agreement within 30 days after the agreement enters into force
- Fully responsible towards PRIMA for implementing the action and complying with all its obligation
- Jointly responsible for the technical implementation
- Obligations:
  - submit to the coordinator in good time: financial statements, technical reports, deliverables
  - inform the granting authority (and beneficiaries) of any events likely to affect or delay the action Co-funded by the

**European Union** 



# Other types of participants







TYPE	Works on 'action tasks'?	What is eligible for the beneficiary/ affiliated entity?	Must be indicated in Annex 1 GA?	Conditions for participation	GA article
Beneficiaries	YES	Costs	YES	Must be eligible	art 7
Affiliated entities	YES	Costs	YES	Must have a capital or legal link with a beneficiaryand fulfil the same eligibility conditions	art 8
Associated partners	YES	n/a	YES	No specific conditions (APs do not receive funding).	art 9.1
Third parties contributing to the project	Participate in the action as contributors	n/a (except HE: Costs)	YES		art 9.2
Subcontractors	YES	Invoiced price	NO (only subcontracted tasks must be indicated)	Must be best value for money or lowest price and no conflict of interest	art 9.3
Third parties receiving financial support <sup>2</sup>	Participate in the action as recipients.	Amount of support given	YES	According to the conditions in Annex 1 GA	art 9.4







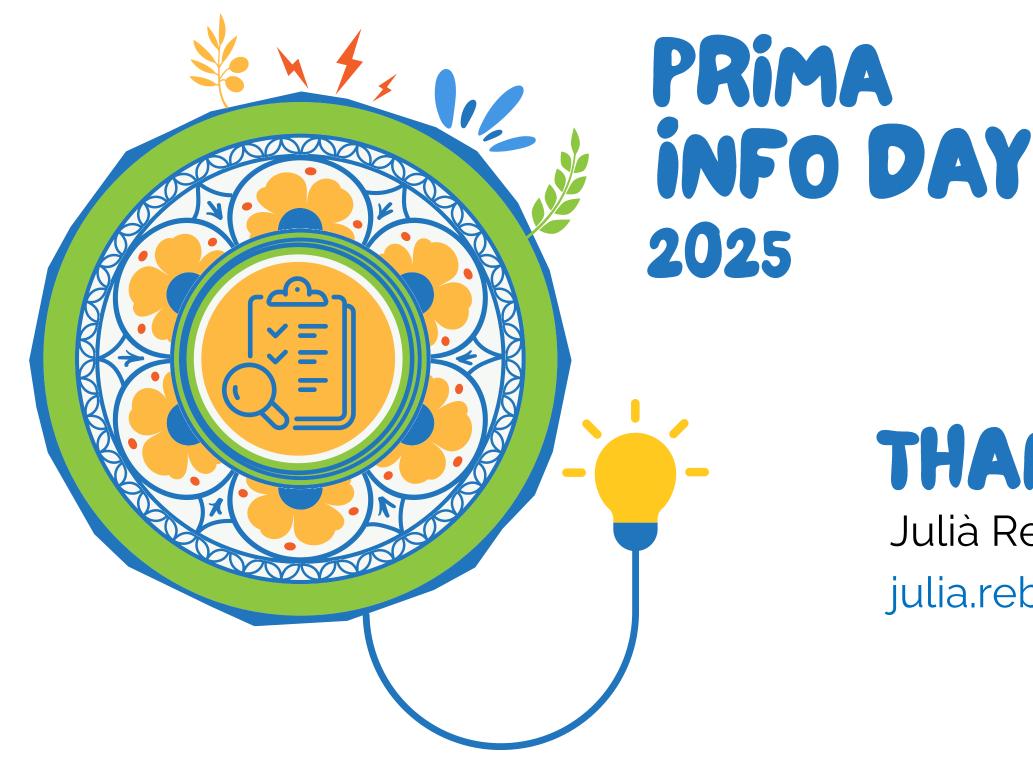


## Usual Legal Questions - Subcontracting

- Subcontracting is allowed only for limited and not core tasks.
- Must ensure best value for money and avoid conflicts of interest (Art. 12 HE MGA).
- Subcontracting between beneficiaries is not allowed.
- Costs and tasks must be detailed in Annex 1 (Description of the Action) and Annex 2 (Budget).
- The beneficiary remains fully responsible for the implementation of subcontracted tasks or third-party contributions.







#### **#PRIMAInfoDay** www.prima-med.org @PRIMAProgram

### THANK YOU

Julià Rebés

julia.rebes@prima-med.org



