



Coordination of the  
European Research  
Community on Nuclear  
Materials for Energy  
Innovation

# CONNECT-NM: The EURATOM Co-funded Partnership on Nuclear Materials

## Webinar: Understanding Consortium Composition

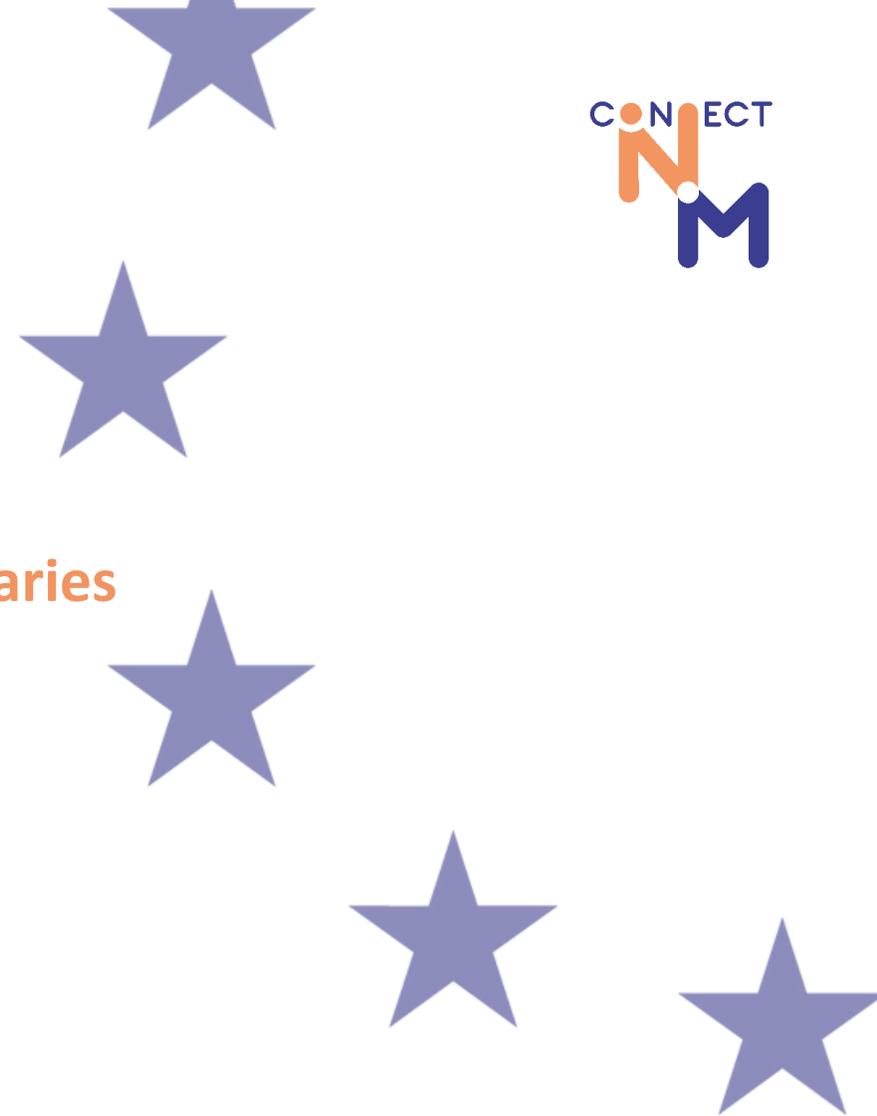


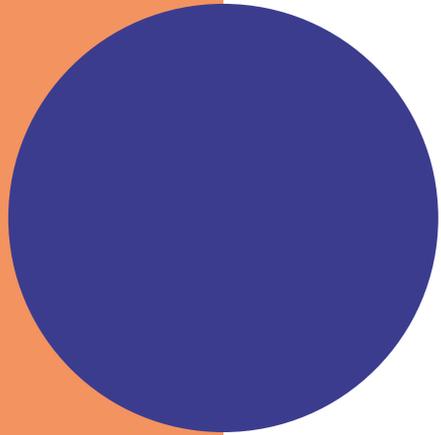
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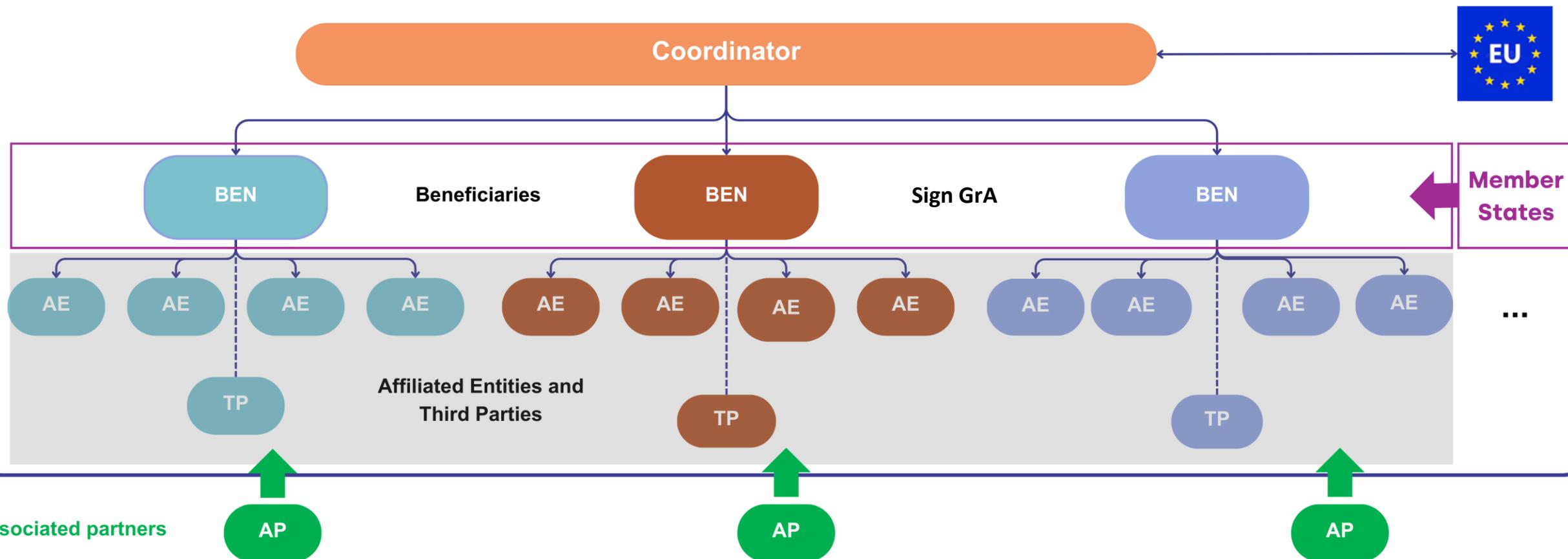


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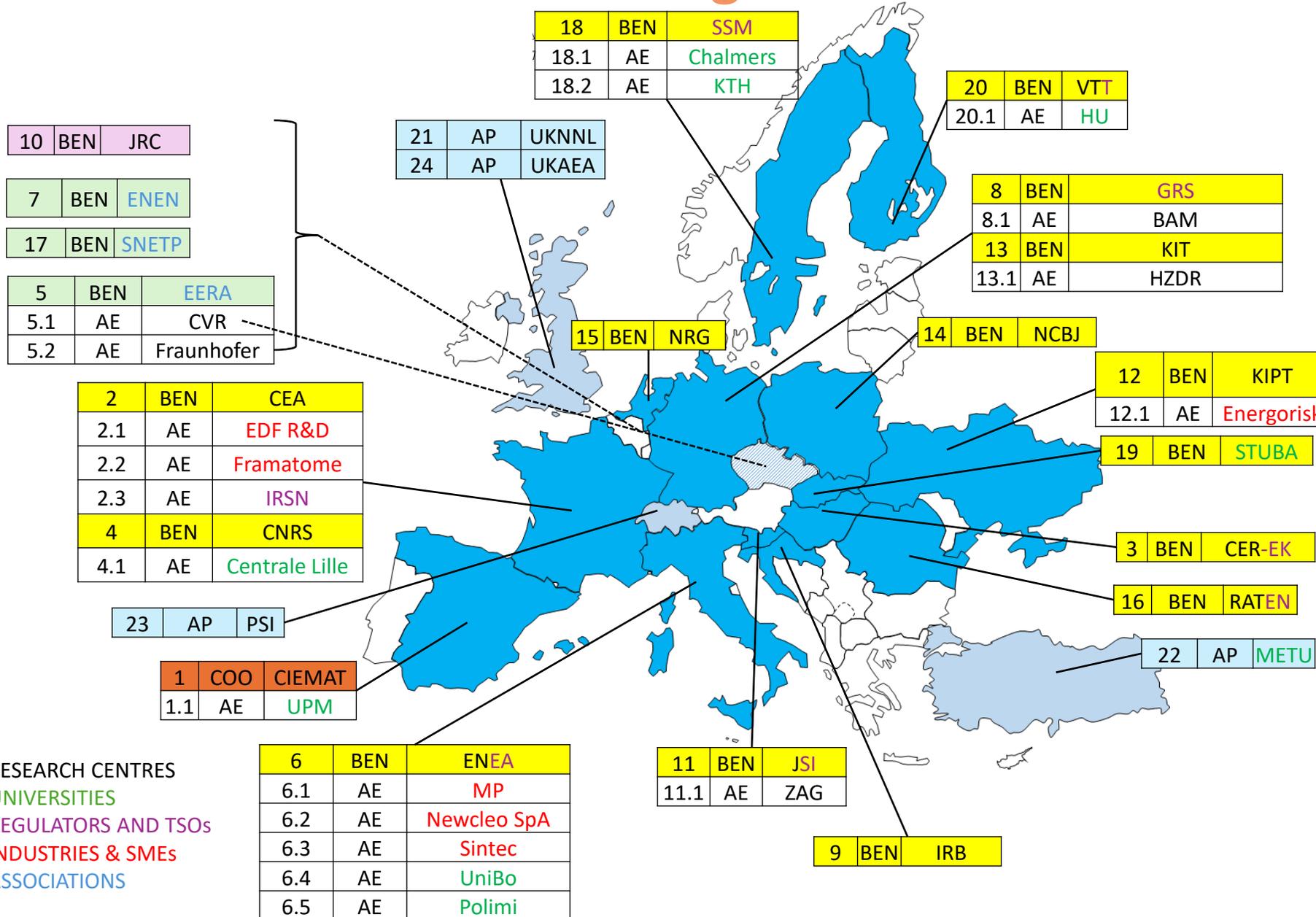


# A complex architecture, with the advantage of flexibility



The objective today is to try to explain what each of these possible statuses corresponds to, legally and in practice, and which one is suitable for new organisations included in the CONNECT-NM consortium

# The current consortium will grow



In total **18 countries** are represented: 14 through beneficiaries, 3 as associated partners, 1 as affiliated entity.

With EERA, SNETP and ENEN, as well as JRC → **20 beneficiaries** (and as many affiliated entities)

**The list will grow through projects**

RESEARCH CENTRES  
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 ASSOCIATIONS

# Dissipating some recurrent doubts

A new organisation can enter the Consortium of CONNECT-NM only *IF* it contributes to it somehow, directly or indirectly.

No new member is added to the Consortium for the sake of it, but because a task has been identified for it.

The mechanism to make the CONNECT-NM Consortium grow and introduce new tasks, and therefore new members to perform them, is via the selection of Projects, mainly through the Open Call.

In practice: New members will be added to the Consortium **only if and when** the Project to which they contribute is accepted for funding via the Open Call

*Not before, but after the acceptance of the Project!*

This will happen via an amendment that the Coordinator will submit once the Project are selected for funding and the task agreement has been signed (in 2026 for the current call)

# The 1M EUR question

When a **new member is added to the Consortium**, because it contributes to a Project that has been accepted for funding, **under which of the 4 possible statuses (BEN, AE, TP or AP) will it be included?**

The answer to this question can only be given on a case-by-case basis, but one key point is that **the future status in the CONNECT-NM consortium depends on the status of the new organisation at the moment of submitting the Project proposal** (roughly), that is **NOW**

There exists NO “procedure” to become AE, or to become TP, or to become AP: either the organisation complies with the conditions to be considered AE of a Beneficiary already **now**, or it cannot become AE later

**The tricky part is to understand whether these conditions are complied with or not**

- Depending on the situation of each potential new member, there may be more than one possible status under which it can enter the Consortium, as well as more the one possible way to enter under the same status: to some extent, it is also a matter of choice
- Some measures can be taken now, to make sure there are no problems later (or to minimise potential problems later) to enter the Consortium

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# Third Parties that receive financial support

## Recipients of Financial Support to Third Parties (Art. 9.4 GA)

Third parties may receive financial support (e.g. **in the form of grants, fellowships, prizes**) by beneficiaries from the project budget only **if this is explicitly foreseen in the work programme** and if article 9.4 is shown in the GA. → **in our case it is foreseen**

The **beneficiary** granting the financial support is **responsible** for the proper use of the financial support by the recipients. The beneficiary must ensure that the recipient complies with certain obligations of the GA (e.g. audits by the European Commission).

- *Like AEs, TPs are also “linked” to a specific beneficiary (not only to the coordinator), which is responsible for the work done by the TP and has to declare the relevant cost under the column “FINANCIAL SUPPORT TO THIRD PARTIES”*
- *NB: since AEs are treated financially the exact same way as beneficiaries, also AEs can have TPs*

The maximum amount to be granted to each third party in CONNECT-NM is EUR 300 000

# Third Parties that receive financial support: what are they?

Recipients of financial support to third parties (grants, prizes or other) do not become party to the Grant Agreement

→ *The inclusion of Third Parties does not require an Amendment (if their function is defined in the Grant Agreement)*

and are not part of the consortium.

*NB This situation may be changed by willingness of the consortium, but the EC does not want to know this*

They do not implement action tasks, but they benefit from them and receive (indirectly) a part of the EU funding. The Grant Agreement defines their role (rights and obligations).

- They do not sign the Grant Agreement (only the beneficiaries do).
- They do not perform action tasks, **but the financial support given to them is part of an action task specified in the DoA Annex 1.**

→ *Their contribution does not appear explicitly as assigned to them, in the description of the task, but they receive money, in the form of a grant given by a beneficiary (declared as financial support to third parties cost, and under its full responsibility), to perform work that is consistent with the task*

# Third Parties that receive financial support: in practice



- A TP is similar to a subcontractor, except that formally the transaction is different:
  - Subcontracting is a commercial agreement made between a beneficiary and a third party for the realization of an entire defined task
  - Financial support to third parties is a non-commercial agreement between a beneficiary (or an affiliated entity) and a third party to provide a sub-grant
- ***Where is the tricky part (besides the limitation to 300 k€)?***
  - When the beneficiary or the AE gives the grant to the TP, it has to declare the whole corresponding expense under the column “financial support to third party”
  - However, being a co-fund action, the beneficiary (or the AE) shall receive only half of the expense incurred → de facto, the beneficiary (or the AE) has to be ready to pay half of the cost of the grant to the TP from its own budget!
- This situation is extremely rarely possible in CONNECT-NM, although some limiting cases, especially for AEs that are private companies, might be found, with some creativity and imagination
- However, we do need to have some third parties, so whenever you see that such an arrangement is possible, please go for it!

**NB: no AE or Beneficiary can be TP of another AE or Beneficiary, and viceversa, so the status of TP prevents from opting to the status of AE or BEN**

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# Affiliated Entities

Affiliated Entities are organisations which are linked to a Beneficiary through a bespoke cooperation agreement (*within the meaning of Article 187 of EU Financial Regulation 2018/10464*), which participate in the Partnership with similar rights and obligations as the Beneficiaries (obligation to implement action tasks and right to charge costs and claim contributions), even though they do not sign either the accession form to the Grant Agreement or the Consortium Agreement.

**Entering the Consortium as an AE is the most desirable status**, because AEs are fully part of it and can do exactly the same things as Beneficiaries, for instance having access to all results to which the Beneficiaries have access to (this is not fully clear for TPs, in fact *a priori* not). However:

- To be able to enter the Consortium (after Project acceptance) as AE requires that a link **pre-exists** between the potential AE and the Beneficiary
- The introduction of new AEs requires an amendment to the GrA
- The **decision** of whether or not the type of link with the Beneficiary (of which evidence must be given) **qualifies an organisation as AE** to that Beneficiary, is **taken unquestionably, and without possibility of complaint, by the Commission**, when the amendment is requested

## Another 1M EUR question

What kind of legal link has to exist between the potential AE and the Beneficiary, in order to opt to be included in the Consortium as AE?

The EC defines “link to the beneficiaries” as a legal or capital link that is:

- Not limited to the action, and
- Not established for the sole purpose of its implementation.

This includes:

- Permanent legal structures (e.g., association-member),
- Contractual cooperation not limited to CONNECT-NM
- Capital link (direct/indirect control or common ownership)

For more information and examples, see: [https://www.connect-nm.eu/Repository/OpenCalls/2025/Public Info/CONNECT-NM GuidanceforAEs Final.pdf](https://www.connect-nm.eu/Repository/OpenCalls/2025/PublicInfo/CONNECT-NM_GuidanceforAEs_Final.pdf)

Or **Article 8 of the Annotated Grant Agreement (google it!)**

# Another 1M EUR question

What kind of legal link has to exist between the potential AE and the Beneficiary, in order to opt to be included in the Consortium as AE?

In practice, the potential AE needs to:

- Have **ALREADY NOW** a signed cooperation agreement with the Beneficiary, which pre-exists the proposal submission and has not been signed solely for the purpose of being included in CONNECT-NM (if the EC suspects this, they may reject it ...)
- Be able to provide **evidence of the existence of such a link** when requested by the Commission:
  - The Commission asks the Coordinator and the Coordinator asks the Beneficiary (not the potential AE) for such evidence, for all its new AEs → the potential AE at that point does not have to do anything (cannot do anything)

This will happen when the Coordinator submits the amendment to include new AEs. This amendment will be submitted after the Projects have been selected for funding, because they need to be included in the Description of Action as new tasks. So, **evidence of the agreement needs to be given in 2026, but such agreement has to exist now, it cannot be signed in a hurry when the EC asks for evidence of it!**

# Yet another 1M EUR question

Is there a template of agreement between the potential AE and the Beneficiary, that guarantees that the new organisation will enter the Consortium as AE?

**The real answer is: no!**

There are only generic indications and examples that the EC provides, from which one can guess whether the agreement one has, or perhaps has just signed now, or is in the process of signing now (because of CONNECT-NM ...), will be positively judged by the EC. But **no certainty**.

*See: [https://www.connect-nm.eu/Repository/OpenCalls/2025/Public\\_Info/CONNECT-NM\\_GuidanceforAEs\\_Final.pdf](https://www.connect-nm.eu/Repository/OpenCalls/2025/Public_Info/CONNECT-NM_GuidanceforAEs_Final.pdf). Or Article 8 of the Annotated Grant Agreement (google it!)*

Based on each organisation's situation, one can choose what is the best way.

However, **the easiest type of link to be used in order to qualify as AE is by far: "Permanent legal structures (e.g., association-member)"**

By demonstrating (via fee payment) that an organisation is a member of an association that is Beneficiary in CONNECT-NM (EERA, ENEN or SNETP) it is ALMOST SURE that that organisation will be accepted as AE of the association!

**Caveat:** recently gained memberships, as well as recently signed cooperation agreements, might be suspected to have been signed specifically for CONNECT-NM, so the EC might raise doubts about them.

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# When can a new organisation enter as a beneficiary?

This is possible for those organisations that comply with two requirements:

- They are located in a Member State (or Associated Country) of Euratom that is not yet represented by any Beneficiary in the Consortium
- They receive from their Ministry the mandate to represent their Member State (or their Associated Country) in the CONNECT-NM consortium (in this case the mandate is actually specific for CONNECT-NM, differently from the affiliation agreement)

In this case the procedure is neither dissimilar, nor much more cumbersome, than including a new AE via post-call amendment:

- Instead of proof of a cooperation agreement, the new beneficiary has to provide copy of the signed mandate from the relevant Ministry (*in this case, if needed, a template exists, and probably the mandate can be signed any time, even in 2026 ...*)
- When accepted, also by the General Assembly, the new Beneficiary will have to sign the Grant Agreement via accession form, the Consortium Agreement of CONNECT-NM, and be ready, if needed, to manage affiliated entities in its country

## Is it possible that an organisation involved in a project remains excluded because it cannot enter the consortium with any status?

**No, there is always the option of entering the Consortium as Associated Partner, i.e., without receiving any EC money.**

However, if the new organisation:

- does not manage to qualify as AE
- cannot be a Beneficiary (no Ministry mandate)
- and finds no Beneficiary that is ready to pay 50% of the cost of the TP (or subcontractor) contribution out of the Beneficiary own budget

then for that organisation it will be impossible to receive money from the EC.

Of course the idea and the intention is to avoid that this may happen and to try to find solutions, but the solutions might not be obvious in some cases ... It is better to anticipate problems than to wait until the last minute.

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# Statuses without right to reimbursement

There are two types of status in this category:

- **Associated Partner:**

Implements action tasks and is part of the Consortium, but, in contrast to an AE it does not need to have any legal link to a Beneficiary. APs are fully named in the Grant Agreement and may implement important action tasks by themselves.

- **Third Party giving in-kind contribution:**

This is at all effects a third party, so it is not part of the consortium and does not implement action tasks, and in addition it provides its contribution in-kind. *It's like a subcontractor that works for free ...*

Between the two possibilities, if an organization knows that it cannot (or does not want to) receive money for the work done, **AP is certainly a better status**, because an AP is fully part of the Consortium.

Typically this is the only possible status for an organisation not in the EU, or not in a Euratom-associated country, and it is unlikely that an EU-based organisation opts deliberately for this status. However, also EU-based organisations may enter as AP (especially if there is no other choice ...).

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## Subcontractors

A subcontractor is an organisation with which a beneficiary, or an AE, establishes a contractual agreement for the realization of work that is explicitly foreseen in the description of action.

Subcontracting generally needs to be properly justified (“best value for money”) and is done following the rules of the Beneficiary/AE.

The payment of the corresponding invoice is declared under the subcontracting column, but again the Beneficiary/AE, although paying 100% of it, won’t be reimbursed for 100%. Thus it is a decision of the Beneficiary/AE whether it is worth (and possible) to subcontract or not.

Subcontracts may be borderline with purchases of services, the main difference is that purchases are necessary for the beneficiary to implement the work, but do not correspond to tasks described as part of the action, whereas subcontracting is to perform a task described as part of the action. Sometimes this distinction is not obvious, though.

Beneficiaries and AEs CANNOT be subcontracted by another Beneficiary or AE of the same Consortium.

# Summary table (from annotated grant agreement)

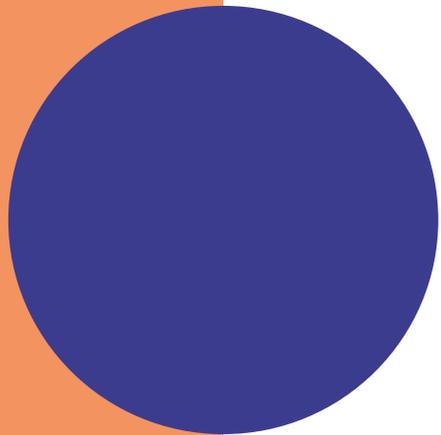


TYPE	Can implement 'action tasks' on its own?*	What is eligible for the beneficiary/ affiliated entity?*	Must be identified in Annex 1 GA?*	Conditions for participation*	Grant Agreement article
Beneficiaries	YES	Costs	YES	Must be eligible	Article 7
Affiliated entities	YES	Costs	YES	Must have a link (e.g. capital or legal link) with a beneficiary and fulfil the same eligibility conditions	Article 8
Associated partners	YES	n/a	YES	No specific conditions (Aps do not receive funding).	Article 9.1
Third parties contributing to the project	NO (participate in the action as contributors)	n/a (exception for HE: Costs)	YES		Article 9.2
Subcontractors	YES	Invoiced price	DEPENDS (usually only subcontracted tasks; for some programmes also subcontractor name)	Must be best value for money or lowest price and no conflict of interest ( <i>plus additional conditions for some programmes</i> )	Article 9.3
Third parties receiving financial support**	NO (participate in the action as recipients)	Amount of support given	NO (only conditions for FSTP recipients)	According to the conditions in Annex 1	Article 9.4

\* Unless otherwise provided for in the call conditions.  
 \*\* Only if allowed in the call conditions.

Creates confusion and refers to a status that is not really of interest for us

# Questions



**Thank you!**

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