

DEP4ALL Legal and Financial Infosheet

Project and Grant Agreement amendments

OBJECTIVE AND CONTENT OF THE INFOSHEET

The infosheet aims to summarise the main rules and procedures concerning amendments to projects and Grant Agreements (GA) under the Digital Europe Programme (DEP). It provides applicants and beneficiaries with practical guidance on when amendments are required, how they should be prepared and submitted and the main aspects to consider in order to avoid delays, irregularities or non-compliance during project implementation.

LEGAL BASIS AND OTHER DOCUMENTS TAKEN INTO ACCOUNT

- Regulation (EU) 2021/694 of the European Parliament and of the Council of 29 April 2021 establishing the Digital Europe Programme and repealing Decision (EU) 2015/2240 – [DEP Regulation](#)
- Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council of 23 September 2024 on the financial rules applicable to the general budget of the Union (recast) – [Financial Regulation](#)
- General Model [Grant Agreement](#) for the Digital Europe Programme, V1.0, 1.11.2024
- Annotated Grant Agreement ([AGA](#)), Version 2.0, 1.04.2025
- EU Funding & Tenders Portal Online Manual and [guidance documents](#)
- Relevant Work Programmes and Call Conditions

WHAT IS AN AMENDMENT?

An amendment is a formal modification of the Grant Agreement during project implementation. Amendments are necessary when changes affect essential aspects of the action as described in the signed Grant Agreement. Amendments must:

- Be requested before the change takes effect whenever possible
- Be duly justified
- Comply with the principle of equal treatment of applicants
- Not call into question the award decision or alter the original objectives of the call
- Not result in unequal treatment of beneficiaries.

Minor operational adjustments that do not affect the Grant Agreement generally do not require an amendment. The amendment enters into force only after it is signed by the granting authority and, where required, by the coordinator on behalf of the consortium.

WHEN IS AN AMENDMENT NECESSARY?

Amendments are usually required for changes affecting:

Changes in the consortium

- Accession of a new beneficiary
- Termination of participation of a beneficiary

- Replacement of a beneficiary
- Changes in the beneficiary's legal name, legal form, or mergers
- Transfer of rights and obligations.

Changes to the action implementation

- Significant modifications to project objectives, deliverables, milestones or work packages
- Substantial changes to the description of the action (DoA)
- Major changes in the allocation of tasks among beneficiaries
- Changes affecting security requirements or ethics aspects.

Changes related to the budget

- Transfer of budget between beneficiaries or budget categories that significantly affects the action implementation
- Addition of new subcontracting not foreseen in the Grant Agreement
- Major changes in equipment or procurement plans.

Budget flexibility is allowed within the limits set by the Grant Agreement. Not every budget transfer requires an amendment, provided that:

- The action is implemented as described
- The changes do not affect the eligibility conditions or equal treatment principles
- The amendments are not explicitly required by the granting authority.

Changes to project duration

- Extension of the project duration
- Suspension and resumption of the action.

Other changes

- Changes to bank account information
- Modifications related to intellectual property or exploitation arrangements where relevant.

CHANGES THAT USUALLY DO NOT REQUIRE AN AMENDMENT

The following changes can generally be managed without a formal amendment, unless otherwise specified in the Grant Agreement or requested by the granting authority:

- Reallocations of resources within a beneficiary's budget that do not affect the implementation of the action
- Minor technical adjustments to activities
- Administrative changes such as contact details
- Changes in personnel carrying out the work
- Use of estimated resources differently from initially planned, provided the action objectives remain unchanged.

Beneficiaries should nevertheless notify the coordinator of any significant operational changes. The coordinator is responsible for communicating these changes to the Project Officer.

AMENDMENT PROCEDURE

Who submits the amendment request?

The coordinator submits the amendment request through the EU Funding & Tenders Portal on behalf of the consortium.

When should the amendment be submitted?

Amendment requests should be submitted sufficiently in advance of the intended change. Retroactive amendments are accepted only exceptionally and must be duly justified.

An amendment cannot be approved after the project end date if the amendment concerns changes that should have been implemented during the project duration.

Information typically required

The amendment request usually includes:

- Explanation and justification of the requested changes
- Revised Description of the Action (DoA), where relevant
- Updated budget tables
- Supporting documents for legal or financial changes
- Revised implementation timeline, if applicable.

Processing and approval of amendments

- The Grant Agreement does not set a fixed deadline for the granting authority to approve or reject an amendment request.
- The time needed for assessment depends on the complexity of the requested changes, the completeness of the supporting documentation and the workload of the granting authority.
- The granting authority may request additional supporting information before approving the amendment.

What happens if an amendment request is rejected?

- If the amendment is rejected, the Grant Agreement remains unchanged and continues to apply in its current version.
- The beneficiaries must continue implementing the action in accordance with the existing Grant Agreement or agree on an alternative solution with the granting authority.
- Costs related to activities or arrangements that required an approved amendment may be considered ineligible if implemented without prior approval.
- In some cases, the consortium may submit a revised amendment request addressing the concerns raised by the granting authority.
- If the requested change is essential for the continuation of the action and no acceptable solution can be found, other measures under the Grant Agreement may need to be considered (e.g. suspension, termination of participation of a beneficiary, or termination of the action).

FINANCIAL ASPECTS OF AMENDMENTS

Amendments do not automatically lead to an increase of the EU grant amount. The maximum grant amount stated in the Grant Agreement cannot be exceeded unless explicitly authorised by the granting authority. Beneficiaries must ensure that:

- All revised costs remain eligible
- Procurement and subcontracting rules continue to be respected
- The principle of sound financial management is maintained
- There is no double funding.

GOOD PRACTICES FOR MANAGING AMENDMENTS

- ✓ Identify potential changes as early as possible
- ✓ Discuss anticipated changes within the consortium before implementation
- ✓ Contact the Project Officer early in case of uncertainty
- ✓ Maintain updated internal documentation and decision records
- ✓ Ensure consistency between technical and financial modifications
- ✓ Keep evidence supporting the justification of the amendment.
- ✓ Do not assume that an amendment will be approved. Until approval is received, beneficiaries should continue to comply with the signed Grant Agreement and avoid commitments that depend on the requested amendment.

The DEP4ALL project is funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or the European Commission. Neither the European Union nor the granting authority can be held responsible for them.