



Questions and Answers

Call for proposals MARE/2020/08

Strengthening regional coordination in the field of data collection

Last update on 23 July 2020

Q1: In the call for proposal, it is written that: PGECON is not an RCG but operates in a similar way and with the same objectives and is, therefore, subsumed under the reference to "RCGs" in this call for proposals. But it is also said that: Concerning Annex 1, applications should focus on one of the mentioned RCGs.

The question is: does Annex 1 (Establishing Regional Work Plans (RWP)) apply to PGECON and not only to formally RCGs

A1: Although in the title of Annex 1 of this call for proposal, PGECON is not named explicitly, under the "Background section" of the same Annex 1, we refer to the results of SecFish project as well as to the EU-MAP pilot studies. These references relate to socio-economic variables (including environmental variables in aquaculture, which, are a PGECON topic). Also, on page 5 of the main document we recognise that PGECON is subsumed under the reference of RCGs.

For these two reasons, Annex 1 applies also to PGECON.

Q2: For Annex 2 "Actions in support of the work of RCGs" is it mandatory to have a consortium composed of three partners from three different Member States, or may a proposal be submitted by a sole participant who is based in one of the Member States?

A2: The call for proposals MARE-2020-08 is a multi-beneficiary grant, as stated in Section 6.2.1 of the Call for Proposals. Therefore proposals must be submitted by a consortium composed of at least three legal entities. Nevertheless, the requirement for including applicants from different Member States applies only for Annex 1 (as pointed in section 6.2.2). For Annex 2, it is acceptable to submit a proposal from a consortium composed by applicants from the same Member State.

Q3: In the call for proposals and Annexes 1, 2 and 3, it is not clear whether the projects should foresee communication & dissemination activities; however, in the proposal template, it is mentioned that the projects should have a WP dedicated to these tasks. What should we consider in the Work Plan? Shall a Work Package be dedicated to communication, or shall not?

A3: The proposal template (Grant Application form. Section III) provides general guidance about the information requested to describe the action. Project activities, outputs and impacts must be aligned to the call expectations described in section 2 of the Call for Proposals and Annexes 1 to 3. The application form suggests including a specific work package for communication and dissemination activities, but this is not compulsory. In any case, please consider that the award criterion 4 (Section 9 of the Call for Proposals) will assess the project impact: dissemination activities should be contemplated in the proposals even when applicants do not dedicate a specific work package to them.

Q4: I would like to ask whether involving RCG Chairs or Members (i.e. National Correspondents -NC) with an active role (e.g. WP leader) in the consortium working on a proposal under the Call MARE/2020/08 may represent a conflict of interest.

A4: Including RCG Chairs or Members, with an active role in a consortium for the submission of a proposal under the Call MARE/2020/08 does not represent a conflict of interest, as these RCGs members are not involved in the budget implementation for this call (art 61 of the Regulation (EU, Euratom) 2018/1046 of 18 July 2018 on the financial rules applicable to the general budget of the Union).

Q5: We have been invited to collaborate in the preparation of a proposal by a group of RCGs and my doubt is about point 6.2 of the call "Multi beneficiary consortium requirements" and we would like to kindly ask for your clarification about the following aspects of the call text:

In case of a proposal where it is duly justified the convenience for a joint proposal among different RCGs, should the rule of at least three member states apply for each RCG involved or just for the proposal?

A5: This rule applies for the proposal independently of RCG, but it depends on the annex it replies to; please see the answer nr2 above.

Q6: According to 6.5 observers cannot receive any funds from this call. Would it be allowed that institutions other than partners (and not acting as observers) are invited to participate in some of the project discussions and documents and receive some funds to cover travel and subsistence costs and/or even limited daily fees for their contributions? Could we do this through the organisation of a pool of collaborating experts? Should we identify them all in the proposal and add letters of commitment from them?

A6: If other institutions or individuals are participating in some tasks of the project and they are not observers, and require some form of remuneration or cost reimbursement, this looks like subcontracting of activities and as such is permitted within the grant's budget (please refer to section 11.1.e of the call for more information on subcontracting).

Q7: Is the deadline on the 31st (July) at 12:00 a deadline for the reception of the documents in DG Mare or is it the deadline for the submission (with a certified submission by the post office)?

A7: The deadline for submission is 31/07/2020 at noon for the certified submission, meaning the post stamp counts or other express delivery service certificate of sending. It does not say that it has to arrive at DG MARE before noon on Friday 31st July.

Q8: The call text in its article 6.1.6 foresees the eligibility of affiliated entities.

"Affiliated entities

Legal entities having a legal or capital link with applicants, which is neither limited to the action nor established for the sole purpose of its implementation, may take part in the action as affiliated entities, and may declare eligible costs as specified in section 11.2.

For that purpose, applicants shall identify such affiliated entities in the application form. The affiliated entities will have to comply with the eligibility and exclusion criteria."

It also foresees Subcontracting as an eligible cost for the proposal, though under some provisions as specified in section 11.1.e) of the call text and (for contracts above 130.000€) in the Model Grant Agreement.

However, in the same section 11.1 but letter f) it is said, "Financial support to third parties is not an eligible expenditure."

We understand that third parties may be interpreted as affiliated third parties (the same as affiliated entities) or, otherwise, subcontractors.

We understand that in both cases, the direct costs incurred for the implementation of the action by these third parties, if the third party has been identified in the proposal and the costs are foreseen in the budget description, are eligible. This is also foreseen in section 11.2.4.a) (...)

"The costs of natural persons working under a contract with the beneficiary other than an employment contract or who are seconded to the beneficiary by a third party against payment may also be included under such personnel costs, provided that the following conditions are fulfilled (...)"

Could you please clarify if we are making the right interpretation about the articles mentioned and explain for us (maybe with an example) when section II.I. f) applies?

A8: Your interpretation that third parties may be understood as affiliated third parties (the same as affiliated entities) or, otherwise, subcontractors is not entirely correct. Please see below the distinction between the affiliated entities, third parties and subcontractors.

An Affiliated entity (section 6.1.6) is one organization that has a link with a beneficiary (in particular a capital or legal link), which is neither limited to the action nor established for the sole purpose of implementing it. It is also called "linked third party" or "entity with a capital or legal link". This term refers typically to clusters, company groups, holdings, networks and decentralized administrative structures (e.g. Médecins Sans Frontières (MSF) national and MSF International). If an affiliated entity will take part in the action implementation, it must be identified and included in the Grant Agreement.

That definition of "linked third party" is different from the third parties understood in grants as "the entities or persons receiving financial support from the beneficiary" (section 11.1.f) which could be, for example, a person receiving a prize awarded following a contest organized by the recipient of the grant. They are not implementing the action, and the beneficiary is not receiving any good or service back from them. This kind of financial support from the recipient of the grant to the third parties is not eligible cost under the current call.

When the beneficiary needs the acquisition of goods or services (or even works from private companies) for the performance of tasks that beneficiaries themselves are unable to undertake, then we talk about subcontracting (e.g. catering provider, IT support, website creation, translation, etc.). It implies contractual relations of a commercial nature between beneficiary or beneficiaries and the subcontractors (section 11.1.e). The EC has no legal obligation with subcontractors (only contractual relationship established by the grant agreement with the recipients of the grant). The tasks that are going to be subcontracted should be identified in the proposal (not necessarily the subcontractor).

Q9: I would like to ask whether the administration (e.g. Ministry, Ministry Department) of an EU Member State involved in the work of a RCG can be considered as a possible observer within a proposal.

A9: Yes, EU MS public authorities involved in the work of a RCG can participate in the project with observer status. Please be aware that, as stated in section 6.5 of the Call for Proposals, the observer status means that the entity will not receive any European Union co-financing and will not join or sign any statements. Thus, participation in any project's activity will be at the observer's own expenses (e.g. travel costs for observers are not eligible under this action). Moreover, these entities will not be taken into consideration for determining compliance with the eligibility criteria for consortia.

Q10: in the case of observers, should we provide all the requested information (e.g. governance, profile, legal entity, operational capacity, etc.) as for the applicants in the application form?

A10: No, the required information in the application form applies only to applicants (and affiliated entities involved in the implementation of the project).

Observers are not parties to the grant agreement and no information is required from them. Applicants are free to provide a letter of support from observers if they consider it will help to strength their proposal (mainly to support award criteria such as "relevance and added value" mentioned in section 9 of the Call for Proposal). But this is not a formal requirement for this call.

Q11: We are experiencing some serious troubles with the delivery of signed DOH by partners to the Coordinators of the Proposals. We have been informed that postal services have restricted no. of deliveries per day and days of delivery and that this is posing some troubles because the documents are not arriving as expected and even we are now considering a resubmission using express courier services, we may need

some days again to get the legal representatives' signatures in original paper copies.

We recommended all the partners to scan the signed DoH and to include this document with all the others which need to be added to the usb memory-stick with the proposal, but we have made them aware that unless you give alternative instructions, the DoH with the original signature needs to be sent in paper, first to the coordinator and then the coordinator sends all these documents to the EC.

Is there any possibility that it is reconsidered the request for the submission of this document originally signed in paper at this point? It is something being asked due to the exceptional circumstances we have to face when dealing with different public services at the moment

Q12: I am contacting you as we are encountering problems with courier and postal services for the delivery of the original copies of the Declaration on honour of the partners of the consortium.

Despite almost 100% of partners have already provided a pdf copy of the DOHs and arranged the despatch of the paper copies, only few DOHs have been received by the coordinator so far, due to restrictions and delays in delivery services.

Therefore, I am afraid to not be able to attach all the DOH paper copies to the application form in due time.

For this reason, I am asking whether it would be acceptable to provide to DG MARE the paper copies of DOHs in a successive step (e.g., during the evaluation of the proposal).

A11 and 12: The Declaration on Honor (DoH) of the partner, in hard copy, is a formal requirement but not an admissibility requirement (section 5 of the Call for Proposals: (i) sent no later than the given deadline, (ii) submitted in written and (ii) drafted in one of the EU official languages). Also, as stated in the section 14 of the call (submission), the applications must be submitted in the correct form, duly completed and dated. They must be submitted in one original copy, signed by the person authorized to enter into legally binding commitments on behalf of the applicant organization. Meaning that the consortium coordinator has to hand sign the application form. Having acknowledged the extraordinary circumstances caused by corona disruptions in delivery services, we invite all applicants to submit their proposal before the provided deadline with the scanned copies and to solve the formal requirements as soon as possible.