



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

Maritime Policy and Blue Economy

Call for proposals MARE 2018/07

Preparatory Action

"Common curriculum for skippers of small commercial vessels"

1. INTRODUCTION

Legal base:

Preparatory Action within the meaning of Article 54(2) of Regulation (EU, Euratom) No 966/2012 of the European Parliament and of the Council of 25 October 2012 on the Financial Regulation (FR) applicable to the general budget of the Union (OJ L 298, 26.10.2012, p. 1.).

Budget line: 11 06 77 13

Financing Decision: C(2017) 7844 of Nov. 28 2017.

Background

Currently, professional qualifications for skippers of small commercial vessels (SCV)¹ are not automatically recognised between Member States. This acts as a barrier to intra-EU trade and imposes additional costs and efforts on skippers when needing to work across the EU.

Each Member State sets its own regulations on the type and nature of qualifications that private and professional skippers must hold. These differ across Member States for a number of reasons such as differing cultural attitudes to safety and regulation, different maritime traditions and different local meteorological and oceanographic conditions. Each Member State then allows the holder of its qualification to skipper boats in its coastal waters and to skipper boats which are flagged to the State in question.

As a result, professional skippers working outside their home waters or on vessels whose flag is different from the state of which they are holding their qualifications are limited in their flexibility and mobility. Especially in boating hot spots such as the Mediterranean, where boats under various European flags are based in the same port, this has severe effects, such as restricting professional skippers from driving identical vessels due to the different country flag.

Charter boat skippers, marine service staff who move boats in or between ports, delivery skippers and dive boat skippers who ferry their customers are all affected.

Directive 2005/36, as amended by Directive 2013/55/EU, provides for general rules on mutual recognition of professional qualifications, unless the matter is covered by other specific EU legislation. There is no automatic recognition for qualifications of professional skippers. Instead the Directive provides for a general system of recognition that allows Member States to compare qualifications of origin against their national requirements. For the recognition of skippers' qualifications, requests must be submitted individually for each destination country and this constitutes an administrative burden for them. The differences between the qualifications held by the requesting skipper and the

¹ The scope of the term 'small commercial vessels' as used here, excludes all vessels and skippers covered by Directive 2009/45/EC, SOLAS and the STCW Convention. Currently, under SOLAS and STCW definitions, a master (skipper) of a yacht falls under the STCW requirements of qualification only for vessels carrying more than twelve passengers and only for vessels engaged in international voyages (Regulation V/2 of STCW and SOLAS scope of application). The qualifications of skippers of small commercial vessels which are falling under the definition of "passenger ship" under SOLAS 1974, as amended, and thus under the scope of application of the STCW convention, are currently regulated under Directive 2008/106/EC and Directive 2005/45/EC.

qualifications required by the destination Member State are sometimes significant and, as a consequence, time-consuming and expensive re-qualification measures are required. On the other hand, although sometimes these differences are insignificant, the skipper is still obliged to follow the entire procedure once more for the destination Member State. Furthermore, skippers must often repeat the entire professional qualifications curriculum and exam for each Member State where they wish to operate.

Consequently, charter companies in need of professional skippers able to work in many Member States at short notice have difficulties finding them, in particular during peak seasons. The issue is not just limited to skippers of charter boats. Many boating-related jobs include roles that require the worker to hold an appropriate skipper licence.

This constraint on the charter market's potential has become even more relevant due to the prevailing trend towards more boat chartering and less boat ownership.

Private skippers' licences (PriSL) are also issued by each Member State without an EU-wide mutual recognition scheme. Charter companies in some Member States accept the International Certificate of Competence (ICC)² for signing charter contracts with private skippers. The ICC is nevertheless not recognised by the main charter countries within the EU. EU-wide recognition of the ICC could ease intra-EU trade and also help attract more private charter clients from other parts of the world. However, the ICC falls outside the scope of this preparatory action, which concerns skippers' qualifications for professional purposes (skippers employed to sail yachts for commercial reasons).

A study on the possibility to establish a common curriculum for skippers has already been commissioned by the European Commission in 2015³. This study obtained some interesting conclusions, however it took into consideration only 7 of the 28 Member States and only 3 coastal States.

The European Commission decided therefore to further explore the possibility of defining a common curriculum for skippers of Small Commercial Vessels (SCV) and to give a particular emphasis to the conditions of obtaining a skipper's licence in the coastal Member States in order to facilitate their mobility within the EU single market.

2. OBJECTIVES

The general objective of the preparatory action underlying this call for proposals is to increase the opportunities for free movement of professional skippers.

The specific objective is the implementation of a Core Curriculum for Skippers of SCV at EU level.

Any EU-wide automatic mutual recognition and/or greater ease of compliance with specific national additional requirements will, as the restrictions on mobility described in the Section 1 'Introduction – background' are diminished, attract new persons to the economic sectors deploying small commercial vessels, such as nautical tourism, and create new jobs and work opportunities. This will also create new opportunities for coastal and insular regions.

² International Certificate for Operators of Pleasure Craft (also referred to as ICC); United Nations Economic Commission for Europe (UNECE) Inland transport committee. The ICC applies to inland waters and/or coastal waters. <http://www.unece.org/fileadmin/DAM/trans/doc/2011/sc3wp3/ECE-TRANS-SC3-147-Rev1e.pdf>.

³ http://www.tcc-scv.eu/wpdemo/wp-content/uploads/2014/10/O1-A1_TCC-SCV_SAPH-1.pdf

The impact will extend beyond the direct effect as the small commercial vessel sector is also an entry point for the growing superyacht industry and for merchant seafarers who are in need of qualified staff.

Considering the specificities of the nautical tourism sector and the professional skipper's job, both highly concentrated in the coastal Member States, it is essential to give particular emphasis to the conditions of obtaining a skipper's licence in these States. For this reason, the project must take into account the conditions of obtaining a skipper's licence in the most important coastal Member States of the EU and obtain all the necessary information from the Authorities responsible for giving this licence.

In order to be eligible, the project must therefore take into account at least the five Member States which have the biggest share of nautical tourism, i.e. Greece, Italy, France, Spain and Germany. In these Member States the information gathered by the project must always include, besides any other source proposed, information from the Authorities responsible for giving a professional skipper's licence⁴.

The exploration of other Member States in addition to these five will be considered an advantage, as will contacts with other professional associations, educational or vocational entities, or other non-governmental organisations to obtain more practical information.

A proposed project, taking into account all 28 Member States and collecting information from all public authorities and private players of the sector, will be maximally advantaged as far as this aspect (extent of coverage) is concerned.

Based on the information received and on a comparison between the common parts and the differences between the national legislations, the proposed project must come to a conclusion whether there is a reasonable common part within the requirements of the Member States considered (including the use of foreign languages) to propose a common European curriculum and whether this common part is important enough to sufficiently reduce the obligation for the skippers to repeat the entire professional qualifications curriculum and exam for each Member State where they wish to operate.

This means that the project must address five sub-objectives:

1) Compilation of all available relevant information

- Map and analyse the existing national qualifications and training curricula for skippers of small commercial vessels, breaking them down into the individual items which together make up the given qualification requirements/curriculum.
- When Member States have arrangements for the validation of experience acquired outside formal training, these must also be mapped.
- Skippers of yachts and small commercial vessels which are falling under the definition of "passenger ship" under SOLAS 1974, as amended, and thus under the scope of application of the STCW convention, must be excluded from this mapping and analysis (and any follow-up activities to be performed by this Preparatory Action).

⁴ If the proposal does not include information from the Authorities responsible for giving professional skipper's licence for these Member States, it will be rejected.

- The information found through the mapping must also be used for an analysis and comparison with any ongoing discussions and proposals regarding the qualification of skippers at the IMO level, where relevant.

2) Synthesis of a core curriculum based on comparison of information

- Any elements of national qualifications and training curricula found by the mapping and analysis to be identical across Member States are to be combined into a "core curriculum for skippers of small commercial vessels (SCV)", common to all EU Member States. This combination process must take into due account, and refer to the various actions and initiatives included in the context of the New Skills Agenda for Europe, in particular the revised Recommendation on the European Qualifications Framework for Lifelong Learning.
- The elements which are not common from Member State to Member State (either being found in the requirements of one State but not in that of another or found in the requirements of all States but with different content in each) are to be identified and listed for each Member State separately, as 'national specific qualifications'.

3) Assessment of proportionality of policy suggestions

- Assess the need for, and the proportionality of, any proposed measures making up part of these follow-up actions. In particular if they take the form of suggested regulatory measures affecting access to the profession. This assessment is to be presented in detail, with a clear enunciation of the principles used to judge proportionality

4) Obtain the views of stakeholders and Member States; follow-up actions

- Carry out surveys, meetings, workshops or any other appropriate and effective method, to obtain the views of the relevant stakeholder representatives, both on the topic of the preparatory action itself as on the outcomes of the project as described above.
- Carry out surveys, meetings, workshops or any other appropriate and effective method, to discover the attitude of the competent authorities of all coastal Member States to:
 - endorse/adopt the 'core curriculum' and to acknowledge each other's 'national specific qualifications';
 - allow holders of the 'core curriculum' to operate small commercial vessels in their waters, providing that the holder has also augmented the common curriculum with any additional 'national specific qualifications' for that Member State;
 - work towards a commonly agreed full EU professional skipper's licence ('ProSL') or a similar EU-wide professional identification⁵, which could co-exist with national licences;

⁵ Such identification must not be confused with the 'European Professional Card' as used in Directive 2005/36/EC, introduced by Directive 2013/55/EU.

- explore the possibilities of making use of the tools introduced by Directive 2013/55/EU amending Directive 2005/36/EC, such as Common Training Frameworks or Common Training Tests, to develop regimes for automatic recognition on the basis of common sets of knowledge, skills and competences (to be based on the levels of the European Qualifications Framework for Lifelong Learning⁶);
 - agree on the need for, and the proportionality of, the proposed measures formulated as follow-up actions by the project, in light of the pursued public interest objectives.
- Formulate possible follow-up actions to achieve, or at least move towards, an EU-wide automatic mutual recognition and/or greater ease of compliance with specific national additional requirements.
 - The views of the relevant stakeholder representatives must be collated into a report, with focus on any practical solutions proposed by the stakeholders
 - Assess Member States' competent authorities' response/attitude to proposals for follow-up actions and the relative chances of success of each of these actions. Produce a comprehensive report on this.

5) Dissemination

- Produce a clear presentation which will allow all professional skippers to see which additional qualifications to their own they will need for sailing a vessel flagged in another Member State and which extra courses they need to take to achieve these qualifications.
- In case the assessments under sub-objective 4 have shown willingness among Member States for a particular course of action, the project must organise a closing workshop gathering the Member States and the Commission, where this course will be discussed further.

Applicants must therefore explain how they will achieve these sub-objectives, with what methods, and how wide is their coverage of Member States and stakeholders. They must explain how they intend to structure deliverables such as the reports and presentation to skippers, and how they will organise the consultations and workshop(s).

3. IMPLEMENTATION PERIOD AND TIMETABLE

- The project duration shall start on the first day of the month following the day when the last of both parties signs the related grant agreement or at a fixed starting date specified in the grant agreement.
- The Commission expects projects to run for 18 months, but applicants may propose a different duration, in which case they must explain how this will improve the achievement of the objectives and sub-objectives. The cost-efficiency and efficacy of the proposed duration and the explanation for it will be taken into account during Award Evaluation.

⁶ Council Recommendation of 22 May 2017.

3. TIMETABLE

	Stages	Date and time or indicative period
a)	Publication of the call	End of April 2018
b)	Deadline for submitting applications	(25/07/2018 – 24:00)
c)	Evaluation period	August-October 2018
d)	Information to applicants	October-November 2018
e)	Signature of grant agreement	November 2018

4. BUDGET AVAILABLE

The total budget earmarked for the co-financing of the project is estimated at 750.000,00 EUR.

The Commission expects to fund one project.

The Commission reserves the right not to distribute all the funds available.

5. ADMISSIBILITY REQUIREMENTS

Failure to comply with those requirements will lead to the rejection of the application:

- Applications must be sent no later than the deadline for submitting applications referred to in section 3 (25 July 2018- 24h00 Brussels time).
- Applications must be submitted in writing (see section 14), using the application form in Annex I also available at https://ec.europa.eu/info/funding-opportunities-maritime-affairs-and-fisheries_en#opencallsforproposals
- Applications must be drafted in one of the EU official languages. Submission in English is encouraged and will facilitate the evaluation process.
- Applications must not exceed 100 pages (excluding annexes).

6. ELIGIBILITY CRITERIA

6.1. Eligible applicants

Consortium (multi-beneficiary) requirement: the activities must be implemented by several entities working together, i.e. a 'consortium'.

1) Lead applicants must be legal entities. Only legal entities established in the EU Member States are eligible to be lead applicants. They can be public or private bodies. In the event of private bodies, they must be properly constituted and registered under national law.

2). The following applicants are eligible as Lead applicant or as Co-applicants of the Consortium:

- universities, research centres and educational/training institutions (private or public);
- public authorities (national, regional, local administrations);

- public or semi-public bodies;
- profit or non-profit making private or public bodies;
- other interested associations, such as sector or professional associations;

They must be established in EU Member States.

3) Co-applicants may also be legal entities established in:

- EFTA and EEA countries: Iceland, Liechtenstein, Norway, Switzerland;
- Countries around the Mediterranean and Black Sea which are potentially relevant for the free movement of skippers of small commercial vessels based in the EU (for instance, Morocco, Algeria, Tunisia, Montenegro, Albania, Turkey). The relevance of any such entities must be explained and justified by the Lead applicant. The Commission reserves the right to challenge the relevance of these entities.

4) For British applicants: Please be aware that eligibility criteria must be complied with for the entire duration of the grant. If the United Kingdom withdraws from the EU during the grant period without concluding an agreement with the EU ensuring in particular that British applicants continue to be eligible, British entities will cease to receive EU funding (while continuing, where possible, to participate) or be required to leave the project on the basis of Article II.17 of the grant agreement.

5) International organisations⁷ are eligible, but as Co-applicants only.

.

6) In addition, natural persons may participate but only as co-applicants and only if they are self-employed persons or equivalent (i.e. sole traders) where the company does not possess legal personality separate from that of the natural person.

7) 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 11.1. For that purpose, applicants shall identify such affiliated entities in the application form. The affiliated entities (which may only be established in those countries which are eligible for co-applicants) will have to comply with the eligibility and exclusion criteria.

8. In order to assess the applicants' eligibility, the following supporting documents are requested:

- **private entity:** extract from the official journal, copy of articles of association, extract of trade or association register, certificate of liability to VAT (if, as in certain

⁷ An international organisation can be considered as such if the following criteria are all met:

- it is international;
- it is a public sector organisation;
- it is set up by intergovernmental agreements.

The specialised agencies set up by these organisations will also be considered international organisations.

The formal proof is the intergovernmental agreement that establishes the international organisation.

countries, the trade register number and VAT number are identical, only one of these documents is required);

- **natural persons:** photocopy of identity card and/or passport; certificate of liability to VAT, if applicable (e.g. some self-employed persons);
- **affiliated entities:** a document demonstrating their legal/capital link with the applicant.

The Commission reserves the right to ask for additional proofs or documentation for any or all applicants (public or private) during the evaluation phase.

9. Minimum composition and eligibility conditions for consortia:

The application must be submitted by only one Lead Applicant (Coordinator). Among the number of Consortium Partners who carry out the project, one is therefore appointed to act as Lead Applicant/Coordinator and thus forms the link between the Consortium Partners and the European Commission.

Moreover, the Lead Applicant/Coordinator is responsible for the management, communication, implementation and coordination of activities amongst the Partners. All partners of the consortium, including affiliated entities, will provide the lead partner with a power of attorney in writing through a mandate signed for that purpose (Annex VI of this Call). The mandate shall fully empower the Coordinator to act on the partners' behalf in the context of the grant agreement.

The consortium proposed by the Lead Applicant must:

- consist of a minimum of two legal entities
- include at least one representative of the professional skippering sector and/or one maritime educational/training institute.

To allow this condition to be checked, the legal entities making up the consortium must all be clearly identified in the submitted Grant Application form (Annex I of this Call).

The legal entities making up the consortium must all comply with the eligibility, non-exclusion and selection criteria set out in this call for proposals.

Eligibility in scope

In order to be eligible, the project must collect information from the five Member States which have the biggest share of nautical tourism, i.e. Greece, Italy, France, Spain and Germany, and in these five Member States the information gathered by the project must always include, besides any other source proposed, information from the Authorities responsible for giving a professional skipper's licence.

The application must therefore list the principal items of legislation in force in these countries which govern the award of skippers' licences, and it must list the competent authorities (as accurately as possible, i.e. down to the level of departments/units or officials, which are responsible for this legislation and for the award of licences). Incomplete lists will entail rejection of the application.

7. EXCLUSION CRITERIA

7.1. Exclusion

An applicant shall be excluded from participating in call for proposals procedures where:

(a) the applicant is bankrupt, subject to insolvency or winding-up procedures, where its assets are being administered by a liquidator or by a court, where it is in an arrangement with creditors, where its business activities are suspended, or where it is in any analogous situation arising from a similar procedure provided for under national laws or regulations;

(b) it has been established by a final judgment or a final administrative decision that the applicant is in breach of its obligations relating to the payment of taxes or social security contributions in accordance with the law of the country in which it is established, with those of the country in which the authorising officer is located or those of the country of the performance of the contract;

(c) it has been established by a final judgment or a final administrative decision that the applicant is guilty of grave professional misconduct by having violated applicable laws or regulations or ethical standards of the profession to which the applicant belongs, or by having engaged in any wrongful conduct which has an impact on its professional credibility where such conduct denotes wrongful intent or gross negligence, including, in particular, any of the following:

- (i) fraudulently or negligently misrepresenting information required for the verification of the absence of grounds for exclusion or the fulfilment of selection criteria or in the performance of a contract, a grant agreement or a grant decision;
- (ii) entering into agreement with other applicants with the aim of distorting competition;
- (iii) violating intellectual property rights;
- (iv) attempting to influence the decision-making process of the Commission during the award procedure;
- (v) attempting to obtain confidential information that may confer upon it undue advantages in the award procedure;

(d) it has been established by a final judgment that the applicant is guilty of any of the following:

- (i) fraud, within the meaning of Article 1 of the Convention on the protection of the European Communities' financial interests, drawn up by the Council Act of 26 July 1995;
- (ii) corruption, as defined in Article 3 of the Convention on the fight against corruption involving officials of the European Communities or officials of Member States of the European Union, drawn up by the Council Act of 26 May 1997, and in Article 2(1) of Council Framework Decision 2003/568/JHA, as well as corruption as defined in the law of the country where the contracting authority is located, the country in which the applicant is established or the country of the performance of the contract;
- (iii) participation in a criminal organisation, as defined in Article 2 of Council Framework Decision 2008/841/JHA;
- (iv) money laundering or terrorist financing, as defined in Article 1 of Directive 2005/60/EC of the European Parliament and of the Council;

- (v) terrorist-related offences or offences linked to terrorist activities, as defined in Articles 1 and 3 of Council Framework Decision 2002/475/JHA, respectively, or inciting, aiding, abetting or attempting to commit such offences, as referred to in Article 4 of that Decision;
 - (vi) child labour or other forms of trafficking in human beings as defined in Article 2 of Directive 2011/36/EU of the European Parliament and of the Council;
- (e) the applicant has shown significant deficiencies in complying with main obligations in the performance of a contract, a grant agreement or a grant decision financed by the Union's budget, which has led to its early termination or to the application of liquidated damages or other contractual penalties, or which has been discovered following checks, audits or investigations by an authorising officer, OLAF or the Court of Auditors;
- (f) it has been established by a final judgment or final administrative decision that the applicant has committed an irregularity within the meaning of Article 1(2) of Council Regulation (EC, Euratom) No 2988/95;
- (g) for the situations of grave professional misconduct, fraud, corruption, other criminal offences, significant deficiencies in the performance of the contract or irregularity, the applicant is subject to:
- (i) facts established in the context of audits or investigations carried out by the Court of Auditors, OLAF or internal audit, or any other check, audit or control performed under the responsibility of an authorising officer of an EU institution, of a European office or of an EU agency or body;
 - (ii) non-final administrative decisions which may include disciplinary measures taken by the competent supervisory body responsible for the verification of the application of standards of professional ethics;
 - (iii) decisions of the ECB, the EIB, the European Investment Fund or international organisations;
 - (iv) decisions of the Commission relating to the infringement of the Union's competition rules or of a national competent authority relating to the infringement of Union or national competition law.
 - (v) decisions of exclusion by an authorising officer of an EU institution, of a European office or of an EU agency or body.

7.2. Remedial measures

If an applicant declares one of the situations of exclusion listed above (see section 7.1), it should indicate the measures it has taken to remedy the exclusion situation, thus demonstrating its reliability. This may include e.g. technical, organisational and personnel measures to prevent further occurrence, compensation of damage or payment of fines. The relevant documentary evidence which illustrates the remedial measures taken must be provided in annex to the declaration. This does not apply for situations referred in point (d) of section 7.1.

7.3. Rejection from the call for proposals

Applicants will not be granted financial assistance if, in the course of the grant award procedure, they:

- a. are in an exclusion situation established in accordance with section 7.1;

- b. have misrepresented the information required as a condition for participating in the procedure or has failed to supply that information;
- c. have previously involved in the preparation of calls for proposal documents where this entails a distortion of competition that cannot be remedied otherwise.

The same exclusion criteria apply to affiliated entities.

Administrative and financial penalties may be imposed on applicants, or affiliated entities where applicable, who are guilty of misrepresentation.

7.4. Supporting documents

All applicants, both the lead applicant and its partners, must provide a declaration on honour, signed and dated by an authorised representative, certifying that they are not in one of the situations of exclusion listed in that declaration of honour.

This obligation is to be fulfilled by filling in and signing the relevant form in Annex IV of this Call (it is also available at https://ec.europa.eu/info/funding-opportunities-maritime-affairs-and-fisheries_en).

Each applicant in the consortium must sign a declaration form in its name and on behalf its affiliated entities.

The Commission reserves the right to verify whether the successful applicants are in any of the situations of exclusion by requiring the supporting documents listed in the declaration on honour.

8. SELECTION CRITERIA

8.1. Financial capacity

Applicants must have the financial capacity required to implement and complete the proposed project.

They must have stable and sufficient sources of funding to maintain their activity throughout the duration of the grant and to participate in its funding.

The applicants' financial capacity will be assessed on the basis of the following supporting documents to be submitted with the application:

For those individual beneficiaries (other than the lead partner/coordinator) requesting an EU contribution of \leq EUR 60 000 as part of the overall grant amount, only the Declaration on honour in Annex IV of this Call will be requested.

For the Coordinator and all other beneficiaries requesting an EU contribution of $>$ EUR 60 000 as part of the overall grant amount, the following supporting documents will be requested:

- a declaration on honour using the relevant form in Annex IV of this Call (to be provided by each of the applicants), AND

EITHER

- the profit and loss account as well as the balance sheet for the last financial year for which the accounts were closed as per template provided in Annex V of this Call, filled in with the relevant accounting figures;

- for newly created entities: the business plan if the above documents are not yet available;
- OR
- the simplified balance sheet for the same year as per template provided in Annex V of this Call, filled in with the relevant accounting figures.

The Commission may request further supporting documents to confirm the financial capacity.

For public entities:

On the basis of article 131(3) FR and given the eligibility criteria set for applicants under section 6.1 of this call for proposals, such applicants are considered to have stable and sufficient sources of funding to maintain their activity throughout the period during which the action is being carried out and to participate in its funding. This type of applicant has to submit a declaration on honour, using the relevant form in Annex IV of this Call, that they have the financial capacity to carry out the project, but no additional supporting documents are requested.

8.2. Operational capacity

Applicants must have the professional competences as well as appropriate qualifications necessary to complete the proposed action.

In this respect, the applicant or applicants have to submit a declaration on their honour, using the relevant form in Annex IV of this Call, and the following supporting documents:

- a succinct (maximum 5 pages) description of each applicant in the consortium, particularly focusing on its principal activities over the past 10 years and any projects and activities performed by it during that period which are connected to the policy field of this call and the actions to be carried out under its terms of reference;
- summarised curriculum vitae (maximum 2 pages each) of the key persons responsible for managing and implementing the project (accompanied where appropriate, by a list of relevant publications).

The Commission may request further supporting documents to confirm the operational capacity.

9. AWARD CRITERIA

Eligible applications will be assessed on the basis of the following criteria:

Relevance (weighting 30/100, minimum quality threshold 15/100):

Subcriterion 1: Quality of assessment of existing European and international standards and initiatives (weighting 10/30, minimum quality threshold 5/10)

- The quality, rigour and accuracy of the preliminary assessment of the project's scope in terms of defining which skippers and vessels are falling under the definitions of SOLAS 1974, the STCW convention and Directives 2008/106/EC and 2005/45/EC.

- The quality, rigour and accuracy of the assessment of ongoing discussions and proposals regarding the qualification of skippers at the IMO level and how these affect the proposed project.
- The degree to which the various actions and initiatives included in the context of the New Skills Agenda for Europe, in particular the revised Recommendation on the European Qualifications Framework for Lifelong Learning, are taken into account in these processes and the relevance of this to the final outcomes of the project.

Subcriterion 2: Quality of the methodology proposed to achieve subobjectives 1 and 2 (compilation of available information and synthesis of a core curriculum) (weighting 15/30, minimum quality threshold 7/15)

- The quality of the methods proposed to map, analyse, disaggregate and compare the existing national qualifications and training curricula for skippers of small commercial vessels, and any arrangements for the validation of experience acquired outside formal training.
- The feasibility and practicability of the methods or procedures envisaged to ensure geographical coverage of all EU Member States by the mapping and analysis work.
- The extent of the coverage proposed, i.e. the number of Member States which will be covered and the spectrum of professional, educational/vocational, non-governmental and any other relevant organisations which is covered.
- The quality of the process for combining elements of national qualifications and training curricula, which are found by the mapping and analysis to be identical across Member States, into a "core curriculum for skippers of small commercial vessels".
- The quality of the process for listing elements which are not common from Member State to Member State, as 'national specific qualifications'.
- The rigour and quality of the comparison between the "core curriculum" and the "national specific qualifications" versus the STCW requirements for passenger vessels and any current proposal for the qualification of skippers at the IMO level.

Subcriterion 3: Quality of the proportionality of proposed follow-up actions (weighting 5/30, minimum quality threshold 3/5)

The relevance and quality of the proposed assessment (including the principles on which it is based) of the proportionality of any proposed measures and/or follow-up actions.

Project implementation and cost-effectiveness (weighting 30, minimum quality threshold 15):

Subcriterion 1: The effectiveness and coherence of the work plan and internal project governance (weighting 20/30, minimum quality threshold 10/20)

- The feasibility in terms of activities and timetable.
- How appropriate and balanced the allocation of tasks and deployed human and other resources is, in relation to the outcomes envisaged.
- Quality and practicability of project management set-up.
- Complementarity of partners.
- Quality of project progress monitoring and risk management.

Subcriterion 2: Assessment of the budget and of the allocation of financial resources (weighting 10/30, minimum quality threshold 5/10)

- Clarity of presentation of budget (Annex III of this Call) and of explanations given in the Grant Application Form (Annex I of this Call, III 'Information on the Action for which the Grant is requested, Section 3)
- Degree of cost-effective allocation of financial resources in relation to the expected results and the planned activities and outputs.

Impact (weighting 40/100, minimum quality threshold 20/100):

Subcriterion 1: Quality of dissemination of the expected results to the relevant audiences (weighting 10/40, minimum quality threshold 5/10)

- The quality, in terms of both content comprehensiveness and communication clarity, of the proposed presentation towards professional skippers about additional qualifications and extra courses needed to operate in more than one Member State (provision of mock-ups or models in the application is welcome).
- The quality of the planning for a potential closing workshop gathering the Member States and the Commission.

Subcriterion 2: Quality of outreach to interested parties, of proposed synergies and policy suggestions and of the viability of the project after the end of the EU financing (weighting 30/40, minimum quality threshold 15/30)

- The feasibility, range/comprehensiveness (any identification and listing of stakeholders in the application will be welcome) and efficacy of the methods proposed to obtain the views of the relevant stakeholder representatives on the topic of the preparatory action.
- Quality of any proposals to create synergies between the institutions and bodies (educational, stakeholders, competent authorities...) active in the field;
- Quality of the proposed methods to involve Member State competent authorities and gain their support. In particular, the feasibility, range/comprehensiveness and efficacy of the method proposed to assess the willingness of the competent authorities of coastal Member States to respond to the outcomes of the project and its follow-up actions. Any proof of contacts with, or commitments from, Member State authorities which can be mentioned in the application, will be welcome.
- Quality of the proposed structure and editing process for the reports about stakeholder and Member State attitudes.
- Quality of method proposed to formulate follow-up actions and to ensure that the results of the project will be as lasting as possible, in particular how the work started by the project and any networks/linkages achieved, will be continued after the end of the EU financing.
- The overall expected relevance of the proposed working methodology and of its results in terms of project outcomes, towards achieving the objectives of the action as a whole, and generating results directly usable by stakeholders and competent authorities. Applicants are strongly encouraged to include a discussion of this aspect in their application.

10. LEGAL COMMITMENTS

In the event of a grant awarded by the Commission, a grant decision, drawn up in euro and detailing the conditions and level of funding, will be sent to the Lead Applicant, as well as the information on the procedure to formalise the agreement of the parties.

The two copies of the original agreement must be signed by the Lead Applicant on behalf of the Consortium and returned to the Commission immediately.

The award of a grant does not establish any entitlement for subsequent years.

11. FINANCIAL PROVISIONS

11.1 Eligible costs

Eligible costs shall meet all the following criteria:

- they are incurred by the beneficiary.
- they are incurred during the duration of the action, with the exception of costs relating to final reports and audit certificates;
 - The period of eligibility of costs will start as specified in the grant agreement.
 - If a beneficiary can demonstrate the need to start the action before the agreement is signed, the costs eligibility period may start before that signature. Under no circumstances can the eligibility period start before the date of submission of the grant application.
- they are indicated in the estimated budget;
- they are necessary for the implementation of the action which is the subject of the grant;
- they are identifiable and verifiable, in particular being recorded in the accounting records of the beneficiary and determined according to the applicable accounting standards of the country where the beneficiary is established and according to the usual cost accounting practices of the beneficiary;
- they comply with the requirements of applicable tax and social legislation;
- they are reasonable, justified, and comply with the requirements of sound financial management, in particular regarding economy and efficiency.

The beneficiary's internal accounting and auditing procedures must permit direct reconciliation of the costs and revenue declared in respect of the action/project with the corresponding accounting statements and supporting documents.

The same criteria apply to costs incurred by the affiliated entities.

Eligible costs may be direct or indirect.

11.1.1. Eligible direct costs

The eligible direct costs for the action are those costs which:

with due regard for the conditions of eligibility set out above, are identifiable as specific costs directly linked to the performance of the action and which can therefore be booked to it directly, such as :

- (a) **Personnel:** the costs of personnel working under an employment contract with the beneficiary or an equivalent appointing act and assigned to the action, provided that these costs are in line with the beneficiary's usual policy on remuneration.

Those costs include actual salaries plus social security contributions and other statutory costs included in the remuneration. They may also include additional remunerations, including payments on the basis of supplementary contracts regardless of the nature of those contracts, provided that they are paid in a consistent manner whenever the same kind of work or expertise is required, independently from the source of funding used;

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:

- (i) the person works under conditions similar to those of an employee (in particular regarding the way the work is organised, the tasks that are performed and the premises where they are performed);
- (ii) the result of the work belongs to the beneficiary (unless exceptionally agreed otherwise); and
- (iii) the costs are not significantly different from the costs of staff performing similar tasks under an employment contract with the beneficiary;

The recommended methods for calculation of direct personnel costs are provided in the Appendix to this Call for Proposals.

- (b) **Travel and related subsistence allowances**, provided that these costs are in line with the beneficiary's usual practices on travel;
- (c) **Depreciation costs of equipment or other assets (new or second-hand)** as recorded in the beneficiary's accounting statements, provided that the asset:
- (i) is written off in accordance with the international accounting standards and the beneficiary's usual accounting practices; and
 - (ii) has been purchased in accordance with the rules on implementation contracts laid down in the grant agreement, if the purchase occurred within the implementation period;

The costs of renting or leasing equipment or other assets are also eligible, provided that these costs do not exceed the depreciation costs of similar equipment or assets and are exclusive of any finance fee;

Only the portion of the equipment's depreciation, rental or lease costs corresponding to the implementation period and the rate of actual use for the purposes of the action may be taken into account when determining the eligible costs.

- (d) **Costs of consumables and supplies**, provided that they:

- (i) are purchased in accordance with the rules on implementation contracts laid down in the grant agreement; and
 - (ii) are directly assigned to the action;
- (e) **Costs arising directly from requirements imposed by the Agreement** (dissemination of information, specific evaluation of the action, audits, translations, reproduction), including the costs of requested financial guarantees, provided that the corresponding services are purchased in accordance with the rules on implementation contracts laid down in the grant agreement;
- (f) **Costs entailed by subcontracts**, provided that specific conditions on subcontracting as laid down in the grant agreement are met;

11.1.2. Eligible indirect costs (overheads)

Indirect costs are costs that are not directly linked to the action implementation and therefore cannot be attributed directly to it.

A flat-rate amount of maximum 7% of the total eligible direct costs of the action is eligible as indirect costs, representing the beneficiary's general administrative costs which can be regarded as chargeable to the action/project.

Indirect costs may not include costs entered under another budget heading.

Applicants' attention is drawn to the fact that if they are receiving an operating grant financed by the EU or Euratom budget, they may not declare indirect costs for the period(s) covered by the operating grant, unless they can demonstrate that the operating grant does not cover any costs of the action. In order to demonstrate this, in principle, the beneficiary should:

- a. use *analytical cost accounting that allows to separate all costs (including overheads)* attributable to the operating grant and the action grant. For that purpose the beneficiary should use *reliable accounting codes and allocation keys* ensuring that *the allocation* of the costs is done in a *fair, objective and realistic way*.
- b. *record separately:*
 - all costs incurred for the operating grants (i.e. personnel, general running costs and other operating costs linked to the part of its usual annual activities), and
 - all costs incurred for the action grants (including the actual indirect costs linked to the action)

If the operating grant covers the entire usual annual activity and budget of the beneficiary, the latter is not entitled to receive any indirect costs under the action grant.

11.2 Ineligible costs

- a) return on capital and dividends paid by a beneficiary;
- b) debt and debt service charges;
- c) provisions for losses or debts;
- d) interest owed;
- e) doubtful debts;
- f) exchange losses;
- g) costs of transfers from the Commission charged by the bank of a beneficiary;

- h) costs declared by the beneficiary under another action receiving a grant financed from the Union budget. Such grants include grants awarded by a Member State and financed from the Union budget and grants awarded by bodies other than the Commission for the purpose of implementing the Union budget. In particular, beneficiaries receiving an operating grant financed by the EU or Euratom budget cannot declare indirect costs for the period(s) covered by the operating grant, unless they can demonstrate that the operating grant does not cover any costs of the action.
- i) contributions in kind from third parties;
- j) excessive or reckless expenditure;
- k) deductible VAT.

11.3 Form of the grant

11.3.1 Reimbursement of costs actually incurred

The grant will be defined by applying a maximum co-financing rate of 75% to the eligible costs actually incurred and declared by the Coordinator and its partners and affiliated entities.

11.4 Balanced budget

The estimated budget of the action must be attached to the application form (Annex III to this Call, also available at https://ec.europa.eu/info/funding-opportunities-maritime-affairs-and-fisheries_en). It must have revenue and expenditure in balance.

The budget must be drawn up in euros.

The applicant must ensure that the resources which are necessary to carry out the action are not entirely provided by the EU grant.

Co-financing of the action may take the form of:

- the beneficiaries' own resources,
- income generated by the action,
- financial contributions from third parties.

In-kind contributions are not eligible and may not be included in the budget.

11.5 Calculation of the final grant amount

The final amount of the grant is calculated by the Commission at the time of the payment of the balance. The calculation involves the following steps:

Step 1 — Application of the reimbursement rate to the eligible costs

The amount under step 1 is obtained by application of the reimbursement rate specified in section 11.3.1 to the eligible costs accepted by the Commission,

Step 2 — Limit to the maximum amount of the grant

The total amount paid to the beneficiaries by the Commission may in no circumstances exceed the maximum amount of the grant as indicated in the grant agreement. If the amount obtained following Step 1 is higher than this maximum amount, the final amount of the grant is limited to the latter.

Step 3 — Reduction due to the no-profit rule

‘Profit’ means the surplus of the amount obtained following Steps 1 and 2 plus the total receipts of the action, over the total eligible costs of the action.

The total eligible costs of the action are the consolidated total eligible costs approved by the Commission. The total receipts of the action are the consolidated total receipts established, generated or confirmed on the date on which the request for payment of the balance is drawn up by the Coordinator.

The following are considered receipts:

- (a) income generated by the action;
- (b) financial contributions given by third parties to a beneficiary or to an affiliated entity, if they are specifically assigned by the third parties to the financing of the eligible costs of the action reimbursed by the Commission.

The following are not considered receipts:

- (a) financial contributions by third parties, if they may be used to cover costs other than the eligible costs under the grant agreement;
- (b) financial contributions by third parties with no obligation to repay any amount unused at the end of the implementation period.

If there is a profit, it will be deducted in proportion to the final rate of reimbursement of the actual eligible costs of the action approved by the Commission.

Step 4 — Reduction due to improper implementation or breach of other obligations.

The Commission may reduce the maximum amount of the grant if the action has not been implemented properly (i.e. if it has not been implemented or has been implemented poorly, partially or late), or if another obligation under the Agreement has been breached.

The amount of the reduction will be proportionate to the degree to which the action has been implemented improperly or to the seriousness of the breach.

11.6 Reporting and payment arrangements

Reporting:

Within 30 days following the entry into force of the Grant Agreement, there will be an Inception Meeting in Brussels at which the Coordinator and its Co-applicants and Affiliated Entities shall provide their signed internal cooperation agreement and present in detail how they intend to carry out the Action. The Commission will be able to comment. The main topics discussed at this meeting shall be written into an **Inception Report** by the Coordinator, and approved by the Commission after any required changes to the draft Report text have been implemented.

Applicants are reminded to include this Inception Meeting in their Time Planning and Budget.

Progress Report: Together with the request for second pre-financing payment, the Coordinator must send a progress report on the implementation of the action

Together with the request for balance payment, the Coordinator must send a **Final Report** consisting of a Progress report on the implementation of the action during Reporting Period 2 following submission of the first Progress Report, and a Report on the overall action and its outcome, including a description of proposed follow-up activity and provision of the deliverables.

Deliverables: Besides any additional deliverables which might be described in the Grant Application Form submitted by the Coordinator, these deliverables are in all cases due:

- Map of existing national qualifications and training curricula
- Core curriculum for skippers of small commercial vessels
- National specific qualifications for skippers
- Presentation to skippers of required additional qualifications
- Assessment of proportionality of proposed measures
- Proposed follow-up measures
- Report on views of relevant stakeholder representatives
- Report on views of Member States' competent authorities

Payment arrangements

The Coordinator may request the following payments provided that the conditions of the grant agreement are fulfilled (e.g. payment deadlines, ceilings, etc.). The payment requests shall be accompanied by the documents provided below and detailed in the grant agreement:

Payment request	Accompanying documents
<p>A pre-financing payment corresponding to 20% of the grant amount (Within 30 calendar days from the entry into force of the Agreement).</p>	<p>Together with copy of a signed internal cooperation agreement, as described in Article 1.8.2 of the Grant Agreement.</p>
<p>A second prefinancing payment, corresponding to 50% of the grant amount</p>	<p>(a) technical report on progress (b) statement on the use of the previous pre-financing instalment</p>
<p>Payment of the balance The Commission will establish the amount of this payment on the basis of the calculation of the final grant amount (see section 11.5 above). If the total of earlier payments is higher than the final grant amount, the beneficiary will be required to reimburse the amount paid in</p>	<p>(a) final technical report; (b) final financial statement; (c) summary financial statement aggregating the financial statements already submitted previously and indicating the receipts (d) If applicable, a certificate on the</p>

excess by the Commission through a recovery order.	financial statements and underlying accounts.
--	---

11.7 Other financial conditions

a) Non-cumulative award

An action may only receive one grant from the EU budget.

In no circumstances shall the same costs be financed twice by the Union budget. To ensure this, applicants shall indicate in the grant application the sources and amounts of Union funding received or applied for the same action or part of the action or for its (the applicant's) functioning during the same financial year as well as any other funding received or applied for the same action.

b) Non-retroactivity

No grant may be awarded retrospectively for actions already completed.

A grant may be awarded for an action which has already begun only where the applicant can demonstrate in the grant application the need to start the action before the grant agreement is signed.

In such cases, costs eligible for financing may not have been incurred prior to the date of submission of the grant application.

c) Implementation contracts/subcontracting

Where the implementation of the action requires the award of procurement contracts (implementation contracts), the beneficiary must award the contract to the bid offering best value for money or the lowest price (as appropriate), avoiding conflicts of interests.

The beneficiary is expected to clearly document the tendering procedure and retain the documentation for the event of an audit.

Entities acting in their capacity of contracting authorities in the meaning of Directive 2014/24/EU⁸ or contracting entities in the meaning of Directive 2014/25/EU⁹ must comply with the applicable national public procurement rules.

Beneficiaries may subcontract tasks forming part of the action. If they do so, they must ensure that, in addition to the above-mentioned conditions of best value for money and absence of conflicts of interests, the following conditions are also complied with:

- a) subcontracting does not cover core tasks of the action;
- b) recourse to subcontracting is justified because of the nature of the action and what is necessary for its implementation;
- c) the estimated costs of the subcontracting are clearly identifiable in the estimated budget;
- d) any recourse to subcontracting, if not provided for in the description of the action, is communicated by the beneficiary and approved by the Commission. The Commission may grant approval:

⁸ Directive 2014/24/EU of the European Parliament and of the Council of 26 February 2014 on public procurement and repealing Directive 2004/18/EC

⁹ Directive 2014/25/EU of the European Parliament and of the Council of 26 February 2014 on procurement by entities operating in the water, energy, transport and postal services sectors and repealing Directive 2004/17/EC

- (i) before any recourse to subcontracting, if the beneficiaries request an amendment
- (ii) after recourse to subcontracting if the subcontracting:
 - is specifically justified in the interim or final technical report and
 - does not entail changes to the grant agreement which would call into question the decision awarding the grant or be contrary to the equal treatment of applicants;
- e) the beneficiaries ensure that certain conditions applicable to beneficiaries, enumerated in the grant agreement (e.g. visibility, confidentiality, etc.), are also applicable to the subcontractors.

d) Financial support to third parties

The applications may not envisage provision of financial support to third parties.

12. PUBLICITY

12.1 By the beneficiaries

Beneficiaries (and their affiliated entities) must clearly acknowledge the European Union's contribution in all publications or in conjunction with activities for which the grant is used.

In this respect, beneficiaries (and their affiliated entities) are required to give prominence to the name and emblem of the European Commission on all their publications, posters, programmes and other products realised under the co-financed project.

To do this, they must use the emblem available at: https://ec.europa.eu/info/resources-partners/european-commission-visual-identity_en

In addition, beneficiaries must use a disclaimer stating that the EU is not responsible for the views expressed in the publications and/or in conjunction with the activities for which the grant is used.

If this requirement is not fully complied with, the beneficiary's grant may be reduced in accordance with the provisions of the grant agreement.

12.2 By the Commission

All information relating to grants awarded in the course of a financial year shall be published on an internet site of the European Union institutions no later than the 30 June of the year following the financial year in which the grants were awarded.

The Commission will publish the following information:

- name of the beneficiary;
- address of the beneficiary;
- subject of the grant;
- amount awarded.

Upon a reasoned and duly substantiated request by the beneficiary, the publication shall be waived if such disclosure risks threatening the rights and freedoms of individuals concerned as protected by the Charter of Fundamental Rights of the European Union or harm the commercial interests of the beneficiaries.

13. PROCESSING OF PERSONAL DATA

The reply to any call for proposals involves the recording and processing of personal data (such as name, address and CV). Such data will be processed pursuant to Regulation (EC) No 45/2001 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data. Unless indicated otherwise, the questions and any requested personal data that are required to evaluate the application in accordance with the call for proposal will be processed solely for that purpose by the European Commission: DG MARE Unit A2 - Blue Economy Sectors, Aquaculture and Maritime Spatial Planning.

Personal data may be registered in the Early Detection and Exclusion System by the Commission, should the beneficiary be in one of the situations mentioned in Article 106(1) and 107 of the Financial Regulation 966/2012 (for more information see the Privacy Statement on: https://ec.europa.eu/info/data-protection-public-procurement-procedures_en).

14. PROCEDURE FOR THE SUBMISSION OF PROPOSALS

Proposals must be submitted by the deadline set out under section 3.

No modification to the application is allowed once the deadline for submission has elapsed. However, if there is a need to clarify certain aspects or to correct clerical mistakes, the Commission may contact the applicant during the evaluation process.

Applicants will be informed in writing about the results of the selection process.

The application form (Annex I) is also available at https://ec.europa.eu/info/funding-opportunities-maritime-affairs-and-fisheries_en

Applications must be submitted in the correct form, duly completed and dated. They must be submitted in 3 copies (one original clearly identified as such, plus 2 copies) and signed by the person authorised to enter into legally binding commitments on behalf of the applicant organisation.

Where applicable, all additional information considered necessary by the applicant can be included on separate sheets.

Applications must be sent to the following address¹⁰:

European Commission
Directorate-General for Maritime Affairs and Fisheries
Unit A.2 - Blue Economy Sectors, Aquaculture and Maritime Spatial Planning
(Ref.: MARE/2018/07)
Rue Joseph II/Jozef II straat 99,
Office: J-99 06/61
Bruxelles/Brussel B-1049
Belgium

- by post, date as postmark;
- in person, date as receipt;
- by courier service, date of receipt by the courier service.

Applications sent by fax or e-mail will not be accepted.

¹⁰ Article 195.3 RAP

➤ **Contacts**

All questions related to the call may be sent by electronic means (e-mail) to the functional mailbox:

MARE-CALL-FOR-GRANT-PROPOSAL-2018-07@ec.europa.eu , indicating the call reference MARE/2018/07 and the subject title "Common curriculum for skippers of small commercial vessels"

Such questions, together with their answers, if of a general interest, will be published on:

https://ec.europa.eu/info/funding-opportunities-maritime-affairs-and-fisheries_en

In order to ensure equal treatment, questions will only be answered if submitted no later than 10 working days before the deadline for the submission of proposals.

➤ **Annexes** (these documents may also be found on the website:

https://ec.europa.eu/info/funding-opportunities-maritime-affairs-and-fisheries_en)

- Annex I: Grant application form
- Annex II: Model grant agreement
- Annex III: Budget application form
- Annex IV: Declarations on honour
- Annex V: Simplified balance sheet/Profit and loss account and balance sheet
- Annex VI: Mandate giving power of attorney

Appendix

Specific conditions for direct personnel costs

1. Calculation

The ways of calculating eligible direct personnel costs laid down in points (a) and (b) below are recommended and accepted as offering assurance as to the costs declared being actual.

In case beneficiary uses a different method of calculating personnel costs, the Commission may accept it, if it considers that it offers an adequate level of assurance of the costs declared being actual.

a) for persons working exclusively on the action:

{monthly rate for the person multiplied by number of actual months worked on the action}

The months declared for these persons may not be declared for any other EU or Euratom grant.

The **monthly rate** is calculated as follows:

{annual personnel costs for the person divided by 12}

using the personnel costs for each full financial year covered by the reporting period concerned.

If a financial year is not closed at the end of the reporting period, the beneficiaries must use the monthly rate of the last closed financial year available;

b) for persons working part time on the action

(i) If the person is assigned to the action at a fixed pro-rata of their working time:

{monthly rate for the person multiplied by pro-rata assigned to the action multiplied by number of actual months worked on the action}

The working time pro-rata declared for these persons may not be declared for any other EU or Euratom grant. The monthly rate is calculated as above.

(ii) In other cases:

{hourly rate for the person multiplied by number of actual hours worked on the action}

or *{daily rate for the person multiplied by number of actual days worked on the action}*

(rounded up or down to the nearest half-day)

The number of actual hours/days declared for a person must be identifiable and verifiable.

The total number of hours/days declared in EU or Euratom grants, for a person for a year, cannot be higher than the annual productive hours/days used for the calculations of the hourly/daily rate. Therefore, the maximum number of hours/days that can be declared for the grant are:

{number of annual productive hours/days for the year (see below) minus total number of hours and days declared by the beneficiary, for that person for that year, for other EU or Euratom grants}.

The ‘**hourly/daily rate**’ is calculated as follows:

{annual personnel costs for the person divided by number of individual annual productive hours/days}

using the personnel costs and the number of annual productive hours/days for each full financial year covered by the reporting period concerned.

If a financial year is not closed at the end of the reporting period, the beneficiaries must use the hourly/daily rate of the last closed financial year available.

The ‘number of individual annual productive hours/days’ is the total actual hours/days worked by the person in the year. It may not include holidays and other absences (such as sick leave, maternity leave, special leave, etc). However, it may include overtime and time spent in meetings, trainings and other similar activities.

2. Records and other documentation to support the personnel costs declared as actual costs

For **persons working exclusively on the action**, where the direct personnel costs are calculated following **point (a)**, there is no need to keep time records, if the beneficiary signs a **declaration** confirming that the persons concerned have worked exclusively on the action.

For **persons assigned to the action at a fixed pro-rata of their working time**, where the direct personnel costs are calculated following **point (b)(i)**, there is no need to keep time records, if the beneficiary signs a declaration that the persons concerned have effectively worked at the fixed pro-rata on the action.

For **persons working part time on the action**, where direct personnel costs are calculated following **point (b)(ii)**, the beneficiaries must keep **time records** for the number of hours/days declared. The time records must be in writing and approved by the persons working on the action and their supervisors, at least monthly.

In the absence of reliable time records of the hours worked on the action, the Commission may accept alternative evidence supporting the number of hours/days declared, if it considers that it offers an adequate level of assurance.

