

Call reference: EUBA-EFSA-2023-BIOHAW-06

Call title: Establishing capacities for active surveillance of highly pathogenic avian influenza in wild birds in Europe.

Question 1

Double reporting of HPAI positive samples directly to EFSA and through the official notification system. HPAI positive samples from wild birds have to be notified to the national competent authorities (CAs), which are then reporting to ADIS and EFSA. In the case of this project, if we were to report to EFSA and to the national CAs would be a double reporting (i.e., 1x in the project directly to EFSA and 1x via the official channel with reporting by the authorities and to ADIS and subsequently to EFSA again). The diagnostic costs of the samples that are reported through the official system are usually covered by the CAs, which get reimbursed by the EU. We wondered how the costs are shared in this case. We understand that the grant is not linked to the costs, and we have to organize the budget internally, but it is important to clarify this point for our internal cost estimation. The questions are:

- a) Are HPAI positive samples going to be reported twice to EFSA?
- b) Are the diagnostic costs of HPAI positive samples intended to be financed via the project or are these costs supposed to be covered by the competent authorities?

Answer 1

a) *Yes, the information must be sent to the coordinators as well as to ADIS. The information needed for the project must be submitted at sample level. This is not the case for the submission in ADIS, where information is given at an outbreak level.*

b) *As explained below in answer 2, the type of grants taking the form of financing not linked to the costs **focuses on achievement of results**, not on costs. The cost model which you use to plan activities in the frame of this call for proposals is not subject to eligibility or verification assessment of the costs by EFSA.*

However, it should be noted that the obligations regarding no double funding linked with other initiatives/grant agreements you may have signed with EFSA, with other EU institutions or with other public authorities remain unchanged. This means that the diagnostic costs of the samples that are reported through the official system and are usually covered by the CAs must be covered by the competent authorities.

Question 2

Clarification on par. 1.8 “Grant principles”. Here it is stated: “Article 180(3) of the EU Financial Regulation specifically states that the following grant principles are NOT applicable where the grant takes the form of financing not linked to the costs pursuant to article 125(1)(a):

- *Co-financing: In accordance with Article 190 of the Financial Regulation, grants shall involve co-financing.*
- *No-profit: In accordance with Article 192(3)(d) of the Financial Regulation, grants shall not have the purpose or effect of producing a profit within the framework of the project for the applicant or partner.*
- *Non-cumulative: In accordance with Article 191(3) of the Financial Regulation, in no circumstances shall the same costs be financed twice from the EU budget.”*

Our interpretation of this statement is the following, please confirm whether the interpretation is correct:

- a) Co-financing is NA: In this grant the beneficiary (BEN) is not obliged to bear 20-40% of the project costs itself. However, the BEN can of course pay extra if needed to deliver the promised results.
- b) Not-profit is NA: Beneficiaries are allowed to be below the grant amount with our real costs and make a profit.
- c) Double funding: double funding is not prohibited. But on page 8 it is stated "The aim is to complement but not to double-fund already existing or planned activities, which is why allocated budget and tasks may vary between lots". How should this apparent discrepancy be interpreted?

Answer 2

Please note that the text of the call is a direct application of the legal basis referred to in Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union.

We can confirm that for grants taking the form of financing not linked to the costs pursuant to art. 125(1)(a) of the Regulation above mentioned:

- *In line with art. 180.3(a), the art. 190 on co-financing is not applicable. The beneficiary is not required to bear (co-finance) the project costs;*
- *In line with art. 192.3(d), the art. 192 paragraph 1 of the above-mentioned Regulation ('no-profit principle') does not apply. This means that the beneficiary may indeed be below the grant amount costs and benefit from profit if their actual costs are below the grant amount; In line with art. 180.3(a), the art. 191 (3) of the above-mentioned Regulation regarding double funding does not apply. Having said that, the call for proposals has been designed to avoid double-funding of ongoing initiatives/actions linked with the objectives of the call but rather to foster synergies and to build upon existing activities/efforts put in place at regional, national and European level. For this particular call, the diagnostic costs of the samples that are reported through the official system and are usually covered by the CAs must be covered by the competent authorities.*

Question 3

Travel costs and accommodation for annual meetings. Are the expenses related to attending annual meetings and on-site training expected to be covered by the allocated budget (not linked to costs)?

Answer 3

All expenses linked with the implementation of the activities are expected to be covered within the allocated budget of the call for proposals (including travel and accommodation expenses).