

Dear Reinhard,

First of all we would like to thank you for explanation and support provided so far in the context of the new provisions on remuneration.

As mentioned during the last NCP meeting, the process of implementing the new rules in Poland is not going on satisfactory and in attempt to facilitate it we have prepared some examples of concrete solutions and entries for the beneficiaries (enclosed), which may be included into their internal regulations. But in order to avoid misleading message, before addressing this information to the beneficiaries, we are sending it to you with kind request for comments on its content and compatibility with H2020 rules on additional remuneration.

As an explanation it should be mentioned that Model 3 of this information is invented mainly for beneficiaries, who at present apply rules on additional remuneration based on ranges, not on exact figures, and for some reason they are not able or willing to change it.

In addition to described above we would like to ask for your opinion regarding one more issue: Would it be possible to exclude from the institutional regulation projects in which remuneration is not based on hourly rates? It is clear for us that situation where the rules are defined only for H2020 projects would not be acceptable. But if after such exclusion the rules apply to all the projects financed by EU and Structural Funds projects, could it be acceptable?

Thank you in advance for your effort and support
If you have any further questions or need for explanation do not hesitate to contact us

Best regards

Barbara and Bartosz

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Dears Barbara and Bartosz,

Thank you for consulting us on this issue. It is indeed in everyone's interest that we all provide good guidance to participants in order to minimise the risk of errors.

As already discussed, we cannot give a conclusive answer regarding the acceptability of internal rules models because we do not know, for example, how they would be implemented in practice. Nevertheless, we have

carefully assessed your different draft models to check the compatibility of the text with the current Horizon 2020 rules. For easy reference, we have included our comments in blue under the relevant sections in the copy of your document attached to this e-mail.

Regarding your additional question (i.e. exclude projects in which remuneration is not based on hourly rates), if our understanding of it is correct, the answer would be no. In fact, from the perspective of H2020 rules on additional remuneration, there is no need to have an hourly rate in the internal rules. The reference or calculation of hourly rates is only needed in order to identify and compare the remuneration paid under different projects. If for example the remuneration is defined as a monthly amount, an hourly rate can be calculated by dividing the monthly amount by the monthly working time. Therefore, with the information available we do not see reasons justifying such exclusion. Please do not hesitate to contact us again providing further details in case of doubt or if we did not correctly understand your question. Note, however, that in the document attached we have suggested a change that may overcome this issue in Model 3.

Finally, I would like to take this opportunity to emphasise the importance of your contribution and feedback for the preparation of the Horizon Europe MGA. Your e-mail and the draft guidance give additional evidence about the difficulties, or reticence, of beneficiaries to define internal rules compatible with the H2020 articles on personnel costs. We will be soon discussing with the MS experts the Commission's draft provisions on personnel costs for Horizon Europe (HE). The current text of the HE Rules for Participation regarding project-based remuneration is quite similar to the H2020 approach. This limits significantly our margin of manoeuvre. However, we are open to assess any implementation proposal which could ensure that the remuneration paid in HE projects remains at the same level than the remuneration paid in national projects. Please do not hesitate to come forward with any simplification proposal in this sense.

Best regards,

Reinhard

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