



## CLARIFICATION N°7

**Call reference:** GP/EFSA/ED/2022/01

**Call title:** NAM projects in the areas of AOP development and transcriptomics for risk assessment

**Question 1:** We were wondering whether in the estimated budget, we should report all the subcontractor in sheet A.5 or include them in sheet A.1 as “partners”.

**Answer 1:**

As a general rule, subcontracting costs shall be indicated in sheet 5 (subcontracting of tasks).

However, costs of natural persons working under a contract with the beneficiary other than an employment contract (e.g. subcontracting contract) that **can be assimilated to costs of personnel** shall be declared in sheet 1 (cost of personnel). In this case, the following conditions shall be fulfilled:

- the natural person works under the instructions of the beneficiary;
- the result of the work belongs to the beneficiary

Costs of natural persons working under a contract with the beneficiary other than an employment contract that cannot be assimilated to costs of personnel are to be declared in sheet sheet 5 (subcontracting of tasks).

We take the opportunity to remind that partners in the consortium must correspond to the ones indicated in the outline proposal (step 1) and cannot be modified at this stage. Any full application received from a legal or natural person not invited to submit a full application or from a consortium not corresponding to the one indicated in step 1 will be rejected. Invited applicants may include the use of subcontractors according to section 1.6 of the call for proposal.

**Question 2:** Do unit cost apply to subcontractors?

**Answer 2:** No, unit costs do not apply to subcontracting costs, unless these costs can be assimilated to costs of personnel (see above conditions) and are therefore declared in sheet 1 (cost of personnel).