Pilot Projects and Preparatory Actions (PPPA)

Call for proposals

Integrated Surveillance mechanism: Regional Cable hubs
PPPA-2026-REGIONAL-SUBMARINE-ISM

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EUROPEAN COMMISSION
Directorate-General for **C**ommunications **N**etworks, **C**ontent and **T**echnology

CNECT.H – Cybersecurity and Trust Directorate
CNECT.H **.**01 **–** Cybersecurity Technology and Capacity Building Unit

CALL FOR PROPOSALS

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0. Introduction

This is a call for proposals for EU action grants in the field of pilot projects and preparatory actions.

The regulatory framework for this EU Funding Programme is set out in:

- Regulation 2024/2509 (EU Financial Regulation)[1] Pilot project within the meaning of Article 58(2)(a)

The call is launched in accordance with the Financing Decision[2] and will be managed by the European Commission, Directorate-General for Communications Networks, Content and Technology (DG CNECT).

The call covers the following topic:

- PPPA-2026-REGIONAL-SUBMARINE-ISM-CABLE-HUBS — Integrated Surveillance mechanism: Regional Cable hubs

We invite you to read the call documentation carefully, and in particular this Call Document, the Model Grant Agreement, the EU Funding & Tenders Portal Online Manual and the EU Grants AGA — Annotated Grant Agreement.

These documents provide clarifications and answers to questions you may have when preparing your application:

- the Call Document outlines the:
  - background, objectives, scope, activities that can be funded and the expected results (sections 1 and 2)
  - timetable and available budget (sections 3 and 4)
  - admissibility and eligibility conditions (including mandatory documents; sections 5 and 6)
  - criteria for financial and operational capacity and exclusion (section 7)
  - evaluation and award procedure (section 8)

[1] Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council of 23 September 2024 on the financial rules applicable to the general budget of the Union (recast) ('EU Financial Regulation') (OJ L, 2024/2509, 26.9.2024).

[2] Commission Implementing Decision C(2026)1770 final of 20/03/2026 concerning the adoption of the work programme for 2026 and the financing decision for the implementation of the pilot projects and preparatory actions in the field of "Communications Networks, Content and Technology" .

  - award criteria (section 9)
  - legal and financial set-up of the Grant Agreements (section 10)
  - how to submit an application (section 11)
- the Online Manual outlines the:
  - procedures to register and submit proposals online via the EU Funding & Tenders Portal ('Portal')
  - recommendations for the preparation of the application
- the AGA — Annotated Grant Agreement contains:
  - detailed annotations on all the provisions in the Grant Agreement you will have to sign in order to obtain the grant *(including cost eligibility, payment schedule, accessory obligations, etc)*.

1. Background

Submarine communication cables constitute a fundamental component of the electronic communications infrastructure covered by the NIS2 Directive and are widely recognized by Member States as strategically important and highly sensitive assets. The EU Action Plan on Cable Security[i] underscores their growing exposure to physical, environmental and hybrid threats, and calls for strengthened monitoring, resilience and information-exchange mechanisms.

A significant share of submarine cable infrastructure and related operational data is mostly owned, operated or managed by private, EU, non-EU or globally active entities, and may fall under different national legal or security regimes. Despite these constraints, there is a shared interest in enhancing the protection and resilience of submarine cables against a broad range of threats.

2. Objectives — Themes and priorities — Activities that can be funded — Expected impact

PPPA-2026-REGIONAL-SUBMARINE-CABLE-HUBS-ISM — Integrated Surveillance mechanism: Regional Cable hubs

Objectives

The situational data that could contribute to improved awareness of threats to submarine cables (e.g. sensor feeds, maritime or satellite surveillance data) are subject to complex and heterogeneous governance conditions. These conditions may vary across cable systems, operators and sea basins, reflecting differing ownership structures, contractual arrangements and applicable regulatory or security frameworks. As a result, there is currently limited clarity on how such data could be accessed, combined and used in a structured manner to support cable-security objectives.

The Pilot Project aims, through analytical work and targeted pilot activities in non-operational settings, to determine how private-sector situational data relevant to submarine-cable security could support the functioning of Regional Cable Hubs, as envisaged under the EU Action Plan on Cable Security and currently under implementation at Union level (established under the Digital Europe Programme (DEP) Call 9).

In view of the preparatory nature of the action, proposals are encouraged to build on relevant experience and capacities developed in related Union initiatives on submarine

cable security, including by entities involved in the establishment of Regional Cable Hubs.

Activities that can be funded (scope)

The Pilot Project will combine interaction with the range of concerned private actors related to cable security and analysis with small-scale pilots to explore the full process of accessing and using such data:

- Map the landscape of situational data held by private actors relevant to submarine-cable security, sources and type of such data (cable-related telemetry, sensor feeds, satellite and maritime-surveillance data, underwater-drone outputs and other emerging modalities); identify their technical characteristics (e.g. real-time, proprietary formats, latency, frequency), ownership, confidentiality profile, availability, usage patterns and the legal, contractual, security or other applicable constraints governing their access.

- Assess the feasibility of accessing and integrating such data into a Regional Cable Hub, by first examining the commercial, organisational, regulatory and security conditions under which private actors could interface with Cable Hubs, and then analysing the technical implications of such cooperation, including the requirements for data ingestion (such as APIs, gateways, pipelines, authentication and security controls) and the maturity and limitations of existing commercial or open platforms that could support this integration and subsequent data fusion.

- Analyse interoperability and data fusion challenges across multiple providers, diverse data sources and different sea basins, including whether harmonisation of formats, frequencies and semantics is needed; the potential role of common data models, taxonomies or ontologies; the feasibility of using interoperability and fusion layers; and how these approaches could remain future-proof in light of evolving sensors and emerging sources of data; and finally how interoperable data can be fused to generate coherent situational awareness.

- Assess the quality and limitations of the situational awareness generated from these data sources. Determine the realistic contribution that private-sector monitoring and situational data can make to submarine-cable security by evaluating the spatial precision, timeliness, coverage, reliability and confidence that can be achieved when such data is combined within a Regional Cable Hub, while also identifying the technical, regulatory and commercial limitations that constrain the level of situational awareness attainable under different data-access and integration scenarios.

- Design and carry out pilot or proof-of-concept demonstrations (e.g. using sample datasets, synthetic data or sandbox integrations with selected providers) to test and validate key assumptions on data access, integration, interoperability and situational-awareness outputs, and to refine the practical feasibility of the proposed cooperation models.

- Produce a consolidated assessment of feasible partnership models between Regional Cable Hubs and private holders of cable-relevant monitoring and situational data, setting out the key commercial, contractual, technical and regulatory requirements for such arrangements, evaluate the extent to which they can enhance the situational awareness achievable for submarine-cable security, and identify gaps where further EU-level policy guidance, standardisation or supporting measures may be needed.

Expected results

- A consolidated reference on private situational data relevant for submarine-cable security
  A structured description of the main categories of private situational data and actors relevant for submarine-cable security, including their sensitivity profile, typical usage, and the key legal, regulatory and commercial constraints affecting possible access by Regional Cable Hubs.

- Interoperability and data fusion pathways for multi-source, multi-basin use
  Clear conclusions on the main interoperability and data fusion challenges and feasible solutions (e.g. common data models or ontologies, interoperability layers, translation and fusion layers), including indications on which approaches are realistically applicable across multiple providers and sea basins, and how they can remain extensible to accommodate new data sources and actors over time.

- A proof-of-concept demonstration showing how selected private situational data can be accessed, integrated and processed within a Regional Cable Hub–type environment, together with a practical demonstration of the situational-awareness outcomes that such integration can produce. This includes evidence on the achievable levels of spatial precision, timeliness, coverage and reliability under pilot conditions, as well as identification of the constraints that limit performance.

- Partnership models and recommendations for EU follow-up
  A concise set of partnership models through which Regional Cable Hubs could obtain or use private situational data (e.g. service-based, data-sharing, or hybrid arrangements), with associated requirements for their viability and compliance, an assessment of their expected impact and limitations on situational awareness, and recommendations for possible EU-level guidance, support measures or follow-up actions.

3. Available budget

The available call/topic budget is EUR 3,940,000. The EU co-financing is limited to 50 % of the total eligible costs.

Project(s) budget

We expect to fund 1 project.

We reserve the right not to award all available funds, depending on the proposals received and the results of the evaluation.

4. Timetable and deadlines

Timetable and deadlines (indicative)	
Call opening:	14 July 2026
Deadline for submission:	19 November 2026 – 17:00:00 CET (Brussels)
Evaluation:	December 2026-January 2027
Information on evaluation results:	December 2026-January 2027

GA signature:	March 2027
Start date of the project:	April-May 2027

Duration

The indicative duration of the action is 18 months; other durations are not excluded.

Extensions are possible, if duly justified and through an amendment.

5. Admissibility and documents

Proposals must be submitted before the call deadline *(see timetable section 4)*.

Proposals must be submitted electronically via the Funding & Tenders Portal Electronic Submission System (accessible via the Topic page in the Calls for proposals section). Paper submissions are NOT possible.

Proposals (including annexes and supporting documents) must be submitted using the forms provided *inside* the Submission System (⚠ NOT the documents available on the Topic page — they are only for information).

Proposals must be complete and contain all the requested information and all required annexes and supporting documents:

- Application Form Part A — contains administrative information about the participants (future coordinator, beneficiaries and affiliated entities) and the summarised budget for the project *(to be filled in directly online)*
- Application Form Part B — contains the technical description of the project *(template to be downloaded from the Portal Submission System, completed, assembled and re-uploaded)*
- mandatory annexes and supporting documents *(templates to be downloaded from the Portal Submission System, completed, assembled and re-uploaded)*:
  - detailed budget table/calculator
  - CVs of core project team: not applicable
  - activity reports of last year: not applicable
  - list of previous projects (key projects for the last 4 years) *(template available in Part B)*
  - ownership control declarations (including for associated partners, affiliated entities and subcontractors)

Please note that the amounts entered into the summarised budget table (filled in directly online) must correspond to the amounts calculated in the detailed budget table. In case of discrepancies, the amounts in the online summarised budget table will prevail.

At proposal submission, you will have to confirm that you have the mandate to act for all applicants. Moreover, you will have to confirm that the information in the application is correct and complete and that all participants comply with the conditions for receiving EU funding *(especially eligibility, financial and operational capacity, exclusion, etc)*. Before signing the grant, each beneficiary and affiliated

entity will have to confirm this again by signing a declaration of honour (DoH). Proposals without full support will be rejected.

Your application must be readable, accessible and printable (please check carefully the layout of the documents uploaded).

Proposals are limited to maximum 70 pages (Part B). Evaluators will not consider any additional pages. Shorter proposals are welcome.

- For more information about the submission process (including IT aspects), consult the Online Manual

6. Eligibility

Eligible participants (eligible countries)

In order to be eligible, the applicants (beneficiaries and affiliated entities) must:

- be legal entities (public or private bodies)
- be established in one of the eligible countries, i.e.:
- EU Member States (including overseas countries and territories (OCTs))
- EEA countries (Norway, Iceland, Liechtenstein)

Given the security-sensitive nature of the action, participation shall be further restricted, in accordance with Article 136 of Regulation (EU, Euratom) 2024/2509, to exclude legal entities controlled by a third country other than a Member State or an EEA country (including those established in the eligible countries listed above but controlled by a third country or by a third-country legal entity). Control' means the possibility to exercise decisive influence on the participant, directly or indirectly, through one or more intermediate entities, 'de jure' or 'de facto'. This includes not only ownership of more than 50% (shareholding), but also any other elements and/or rights that can amount to control.

Therefore, entities must not be directly or indirectly controlled from a country that is not an eligible country. All entities will have to fill in and submit a declaration on ownership and control.

Moreover:

- participation in any capacity (as beneficiary, affiliated entity, associated partner, subcontractor) is limited to entities from eligible countries
- project activities (included subcontracted work) must take place in eligible countries (see section geographic location below and section 10)
- the Grant Agreement may provide for IPR restrictions (see section 10).

For more information on the ownership and control assessment process, see guidance-on-participation-in-eu-calls-with-ownership-and-control-restrictions_en.pdf

Beneficiaries and affiliated entities must register in the Participant Register — before submitting the proposal — and will have to be validated by the Central Validation Service (REA Validation). For the validation, they will be requested to upload documents showing legal status and origin.

Other entities may participate in other consortium roles, such as associated partners, subcontractors, third parties giving in-kind contributions, etc *(see section 13)*.

Specific cases and definitions

Natural persons — Natural persons are NOT eligible (with the exception of self-employed persons, i.e. sole traders, where the company does not have legal personality separate from that of the natural person).

International organisations — International organisations are NOT eligible.

Entities without legal personality — Entities which do not have legal personality under their national law may exceptionally participate, provided that their representatives have the capacity to undertake legal obligations on their behalf and offer guarantees for the protection of the EU financial interests equivalent to that offered by legal persons[3].

EU bodies — EU bodies (with the exception of the European Commission Joint Research Centre) can NOT be part of the consortium.

Affiliated entities[4]

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 10.

For that purpose, applicants shall identify such affiliated entities in the proposal and application form.

Associations and interest groupings — Entities composed of members may participate as 'sole beneficiaries'[5] or 'beneficiaries without legal personality'[6]. Please note that if the action will be implemented by the members, they should also participate (either as beneficiaries or as affiliated entities, otherwise their costs will NOT be eligible).

EU restrictive measures — Special rules apply for entities subject to EU restrictive measures under Article 29 of the Treaty on the European Union (TEU) and Article 215 of the Treaty on the Functioning of the EU (TFEU)[7]. Such entities are not eligible to participate in any capacity, including as beneficiaries, affiliated entities, associated partners, subcontractors or recipients of financial support to third parties (if any).

EU conditionality measures — Special rules apply for entities subject to measures adopted on the basis of EU Regulation 2020/2092[8]. Such entities are not eligible to participate in any funded role (beneficiaries, affiliated entities, subcontractors, recipients of financial support to third parties, etc). Currently such measures are in place for Hungarian public interest trusts established under the Hungarian Act IX of

[3] See Article 200(2)(c) EU Financial Regulation 2024/2509.

[4] In accordance with Article 190 FR, entities that satisfy the eligibility criteria and that do not fall within one of the situations referred to in Articles 138(1) and 143(1) FR and that have a link with the applicant, in particular a legal or capital link, which is neither limited to the action nor established for the sole purpose of its implementation, will be considered as entities affiliated to the applicant.

[5] See Article 190.1 (a) EU Financial Regulation - 2024/2509 - Entity which itself is not a legal entity, but is made up of several legal entities which satisfy the criteria for applying for a grant (e.g. European Research Infrastructure Consortia (ERICs), European economic interest groupings (EEIG), European groupings of territorial cooperation (EGTC), joint ventures, etc) does NOT mean the same as mono-beneficiary.

[6] For the definitions, see Articles 190(2) and 200(2)(c) EU Financial Regulation 2024/2509.

[7] Please note that the EU Official Journal contains the official list and, in case of conflict, its content prevails over that of the EU Sanctions Map.

[8] Regulation (EU, Euratom) 2020/2092 of the European Parliament and of the Council of 16 December 2020 on a general regime of conditionality for the protection of the Union budget (OJ L 325, 20.12.2022, p. 94).

2021 or any entity they maintain (see Council Implementing Decision (EU) 2022/2506, as of 16 December 2022).

The indicative list of affected entities (the trusts and the entities they maintain) is available under this link[9]. This link will bring you to the official Annex to Hungarian Act IX of 2021.

For more information, *see Rules for Legal Entity Validation, LEAR Appointment and Financial Capacity Assessment*.

Consortium composition

Proposals must be submitted by a consortium composed of at least two Member States, represented by competent public authorities such as ministries, agencies or other public entities responsible for cable security, maritime security, resilience, or the protection of critical infrastructure. The involvement of a larger number of Member States is preferable. As well as that other relevant public or private partners may also participate in the consortium to support the Hub's technical and operational implementation.

Eligible activities

Applications will only be considered eligible if their content corresponds wholly (or at least in part) to the topic description.

Eligible activities are the ones set out in section 2 above.

If applicable, Projects should take into account the results of projects supported by other EU funding programmes. The complementarities must be described in the project proposals (Part B of the Application Form).

Projects must comply with EU policy interests and priorities *(such as digital security and resilience, critical infrastructure protection, environment, social, security, industrial and trade policy, etc)*. Projects must also respect EU values and European Commission policy regarding reputational matters (*e.g. activities involving capacity building, policy support, awareness raising, communication, dissemination, etc*).

Financial support to third parties is not allowed.

Geographic location (target countries)

Activities should normally take place in the EU waters or airspace of the eligible countries, but may extend into neighbouring or international areas, if this is necessary for the implementation of the projects (in view of their nature and their objectives).

Ethics

Projects must comply with:

- highest ethical standards and
- applicable EU, international and national law.

Security

No specific rules. Please refer to the general provisions in the MGA (Art. 13).

[9] 2021. évi IX. törvény - Nemzeti Jogszabálytár

Projects involving EU classified information must undergo security scrutiny to authorise funding and may be made subject to specific security rules (detailed in a security aspects letter (SAL) which is annexed to the Grant Agreement).

These rules (governed by Decision 2015/444[10] and its implementing rules and/or national rules) provide for instance that:

- projects involving information classified TRES SECRET UE/EU TOP SECRET (or equivalent) can NOT be funded
- classified information must be marked in accordance with the applicable security instructions in the SAL
- information with classification levels CONFIDENTIEL UE/EU CONFIDENTIAL or above (and RESTREINT UE/ EU RESTRICTED, if required by national rules) may be:
  - created or accessed only on premises with facility security clearance (FSC) from the competent national security authority (NSA), in accordance with the national rules
  - handled only in a secured area accredited by the competent NSA
  - accessed and handled only by persons with valid personnel security clearance (PSC) and a need-to-know
- at the end of the grant, the classified information must either be returned or continue to be protected in accordance with the applicable rules
- action tasks involving EU classified information (EUCI) may be subcontracted only with prior written approval from the granting authority and only to entities established in an EU Member State or in a non-EU country with a security of information agreement with the EU (or an administrative arrangement with the Commission)
- disclosure of EUCI to third parties is subject to prior written approval from the granting authority.

Please note that, depending on the type of activity, facility security clearance may have to be provided before grant signature. The granting authority will assess the need for clearance in each case and will establish their delivery date during grant preparation. Please note that in no circumstances can we sign any grant agreement until at least one of the beneficiaries in a consortium has facility security clearance.

Further security recommendations may be added to the Grant Agreement in the form of security deliverables *(e.g. create security advisory group, limit level of detail, use fake scenario, exclude use of classified information, etc)*.

Beneficiaries must ensure that their projects are not subject to national/third-country security requirements that could affect implementation or put into question the award of the grant *(e.g. technology restrictions, national security classification, etc)*. The granting authority must be notified immediately of any potential security issues.

7. Financial and operational capacity and exclusion

Financial capacity

[10] See Commission Decision 2015/444/EU,Euratom of 13 March 2015 on the security rules for protecting EU classified information (OJ L 72, 17.3.2015, p. 53).

Applicants must have stable and sufficient resources to successfully implement the projects and contribute their share. Organisations participating in several projects must have sufficient capacity to implement all projects.

The financial capacity check will be carried out on the basis of the documents you will be requested to upload in the Participant Register during grant preparation *(e.g. profit and loss account and balance sheet, business plan, audit report produced by an approved external auditor, certifying the accounts for the last closed financial year, etc)*. The analysis will be based on neutral financial indicators, but will also take into account other aspects, such as dependency on EU funding and deficit and revenue in previous years.

The check will normally be done for all beneficiaries, except:

- public bodies (entities established as public body under national law, including local, regional or national authorities) or international organisations
- if the individual requested grant amount is not more than EUR 60 000.

If needed, it may also be done for affiliated entities.

If we consider that your financial capacity is not satisfactory, we may require:

- further information
- an enhanced financial responsibility regime, i.e. joint and several responsibility for all beneficiaries or joint and several liability of affiliated entities *(see below, section 10)*
- prefinancing paid in instalments
- (one or more) prefinancing guarantees *(see below, section 10)*

or

- propose no prefinancing
- reject the participation of the applicant in the proposal and request reallocation of the tasks to another applicant of the consortium or their replacement without compromising the quality of the proposal;
- request that you are replaced or, if needed, reject the entire proposal.

If the financial capacity of the consortium as a whole or of the coordinator or single or "sole applicant/beneficiary" is considered insufficient, the Authorised Representative Officer of the Commission may reject the application.

For more information, *see Rules for Legal Entity Validation, LEAR Appointment and Financial Capacity Assessment*.

Operational capacity

Applicants must have the know-how, qualifications and resources to successfully implement the projects and contribute their share (including sufficient experience in projects of comparable size and nature).

This capacity will be assessed together with the 'Quality' award criterion, on the basis of the competence and experience of the applicants and their project teams, including operational resources (human, technical and other) or, exceptionally, the measures proposed to obtain it by the time the task implementation starts.

If the evaluation of the award criterion is positive, the applicants are considered to have sufficient operational capacity.

Applicants will have to show their capacity via the following information:

- description of the consortium participants
- list of previous projects (key projects for the last 4 years) *(template available in Part B)*.

Additional supporting documents may be requested, if needed to confirm the operational capacity of any applicant.

In the event of an application grouping several applicants (consortium), the above requirements shall apply to the combined capacity of all members of the consortium.

In the case of legal entities forming one applicant (the "sole applicant/beneficiary"), as specified in section 6, the above requirements apply to each one of those entities.

Exclusion

Applicants which are subject to an EU exclusion decision or in one of the following exclusion situations that bar them from receiving EU funding can NOT participate[11]:

- bankruptcy, winding up, affairs administered by a liquidator or by a court arrangement with creditors, suspended business activities or other similar procedures (including procedures for persons with unlimited liability for the applicant's debts) provided for under Union or national law
- in breach of social security or tax obligations (including if done by persons with unlimited liability for the applicant's debts)
- guilty of grave professional misconduct[12] (including if done by persons having powers of representation, decision-making or control, beneficial owners or persons who are essential for the award/implementation of the grant)
- committed fraud, corruption, links to a criminal organisation, money laundering, terrorism-related crimes (including terrorism financing), child labour or human trafficking (including if done by persons having powers of representation, decision-making or control, beneficial owners or persons who are essential for the award/implementation of the grant)
- shown significant deficiencies in complying with main obligations under an EU procurement contract, grant agreement, prize, expert contract, or similar (including if done by persons having powers of representation, decision-making or control, beneficial owners or persons who are essential for the award/implementation of the grant)
- guilty of irregularities within the meaning of Article 1(2) of EU Regulation 2988/95 (including if done by persons having powers of representation, decision-making or control, beneficial owners or persons who are essential for the award/implementation of the grant)
- created under a different jurisdiction with the intent to circumvent fiscal, social or other legal obligations in the country of origin or created another entity with

[11] See Articles 138 and 143 of EU Financial Regulation 2024/2509.

[12] 'Professional misconduct' includes, in particular, the following: violation of ethical standards of the profession; wrongful conduct with impact on professional credibility; breach of generally accepted professional ethical standards; false declarations/misrepresentation of information; participation in a cartel or other agreement distorting competition; violation of IPR; attempting to influence decision-making processes by taking advantage, through misrepresentation, of a conflict of interests, or to obtain confidential information from public authorities to gain an advantage; incitement to discrimination, hatred or violence or similar activities contrary to the EU values where negatively affecting or risking to affect the performance of a legal commitment.

this purpose (including if done by persons having powers of representation, decision-making or control, beneficial owners or persons who are essential for the award/implementation of the grant)

- intentionally and without proper justification resisted[13] an investigation, check or audit carried out by an EU authorising officer (or their representative or auditor), OLAF, the EPPO, or the European Court of Auditors.

Applicants will also be rejected if it turns out that[14]:

- during the award procedure they misrepresented information required as a condition for participating or failed to supply that information
- they were previously involved in the preparation of the call and this entails a distortion of competition that cannot be remedied otherwise (conflict of interest)
- Applicants that do not comply with the ownership and control requirements set out in Section 6 will also be excluded from participation.

8. Evaluation and award procedure

The proposals will have to follow the standard submission and evaluation procedure (one-stage submission + one-step evaluation).

An evaluation committee (assisted by independent outside experts) will assess all applications. Proposals will first be checked for formal requirements (admissibility and eligibility, *see sections 5 and 6*). Proposals found admissible and eligible will be evaluated against the operational capacity and award criteria *(see sections 7 and 9)* and then ranked according to their scores.

For proposals with the same score a priority order will be determined according to the following approach:

The ex aequo proposals will be prioritised according to the scores they have been awarded for the award criterion 'Relevance'. When these scores are equal, priority will be based on their scores for the criterion 'Impact'. When these scores are equal, priority will be based on their scores for the criterion 'Quality'.

If this does not allow to determine the priority, a further prioritisation can be done by considering the overall project portfolio and the creation of positive synergies between projects, or other factors related to the objectives of the call. These factors will be documented in the panel report.

All proposals will be informed about the evaluation result (evaluation result letter). Successful proposals will be invited for grant preparation; the other ones will be put on the reserve list or rejected.

Applicants invited for grant preparation and those placed on the reserve list will be required to provide supporting documents to verify their financial and operational capacity including evidence of compliance with the ownership and control requirements set out in Section 6 (see section 7).

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[13] 'Resisting an investigation, check or audit' means carrying out actions with the goal or effect of preventing, hindering or delaying the conduct of any of the activities needed to perform the investigation, check or audit, such as refusing to grant the necessary access to its premises or any other areas used for business purposes, concealing or refusing to disclose information or providing false information.

[14] See Article 143 EU Financial Regulation 2024/2509.

⚠ No commitment for funding — Invitation to grant preparation does NOT constitute a formal commitment for funding. We will still need to make various legal checks before grant award: *legal entity validation, financial capacity, exclusion check, ownership and control structure verification, etc*.

Grant preparation will involve a dialogue in order to fine-tune technical or financial aspects of the project and may require extra information from your side. It may also include adjustments to the proposal to address recommendations of the evaluation committee or other concerns. Full compliance will be a pre-condition for signing the grant.

If you believe that the evaluation procedure was flawed, you can submit a complaint (following the deadlines and procedures set out in the evaluation result letter). Please note that notifications which have not been opened within 10 days after sending will be considered to have been accessed and that deadlines will be counted from opening/access *(see also Funding & Tenders Portal Terms and Conditions)*. Please also be aware that for complaints submitted electronically, there may be character limitations.

9. Award criteria

The award criteria for this call are as follows:

1. Relevance (40 points):

- Clarity and consistency of the action
- Objectives and extent to which they match the themes and priorities and objectives of the call
- Contribution to the EU strategic and legislative context
- Impact/interest for a number of countries (EU or eligible non-EU countries); possibility to use the results in other countries; potential to develop mutual trust/cross-border cooperation

2. Quality (40 points):

- Logical links between the identified problems, needs and solutions proposed (logical frame concept)
- Quality of the consortium and project teams[15]
- Appropriate procedures and problem-solving mechanisms for cooperating within the project teams and consortium
- Methodology for implementing the project (concept and methodology, organisation of the work (procedures and allocation of resources), management, involvement of subcontractors, timetable, risks and risk management, monitoring and evaluation)
- Cost effectiveness (sufficient/appropriate budget for proper implementation; best value for money)

3. Impact (20 points):

[15] This includes the operational capacity (know-how, qualifications, human and technical resources, EU dimension), as indicated in Section 7.

- Ambition and expected long-term impact of results on target groups/general public
- Appropriate and security-conscious dissemination strategy
- Sustainability of results after EU funding ends.

Award criteria	Minimum pass score	Maximum score
Relevance	21	40
Quality	21	40
Impact	11	20
Overall (pass) scores	60	100

Maximum points: 100 points.

Individual thresholds per criterion: 21/40, 21/40 and 11/20 points.

Overall threshold: 60 points.

Proposals that pass the individual thresholds AND the overall threshold will be considered for funding — within the limits of the available budget (i.e. up to the budget ceiling) and the number of projects to be funded, as announced in section 3. Other proposals will be rejected.

10. Legal and financial set-up of the Grant Agreements

If you pass evaluation, your project will be invited for grant preparation, where you will be asked to prepare the Grant Agreement together with the EU Project Officer.

This Grant Agreement will set the framework for your grant and its terms and conditions, in particular concerning deliverables, reporting and payments.

The Model Grant Agreement that will be used (and all other relevant templates and guidance documents) can be found on Portal Reference Documents.

Starting date and project duration

The project starting date and duration will be fixed in the Grant Agreement *(Data Sheet, point 1)*. Normally the starting date[16] will be after grant signature. A retroactive starting date can be granted exceptionally for duly justified reasons — but never earlier than the proposal submission date.

Indicative project starting date: *see timetable section 4 above*

Indicative project duration: *see section 4 above*.

[16] The project start date must normally be the first day of a month and later than the entry into force of the agreement. The Commission can decide on another date, if justified by the applicants. However, the starting date may not be earlier than the submission date of the grant application – except if provided for by the basic act or in cases of extreme urgency and conflict prevention (Article 196 EU Regulation - 2024/2509).

Milestones and deliverables

The milestones and deliverables for each project will be managed through the Portal Grant Management System and will be reflected in Annex 1 of the Grant Agreement.

Form of grant, funding rate and maximum grant amount

The grant parameters *(maximum grant amount, funding rate, total eligible costs, etc)* will be fixed in the Grant Agreement *(Data Sheet, point 3 and art 5)*.

Project budget (requested grant amount): *see section 3 above*.

The grant will be a budget-based mixed actual cost grant (actual costs, with unit cost and flat-rate elements). This means that it will reimburse ONLY certain types of costs (eligible costs) and costs that were *actually* incurred for your project (NOT the *budgeted* costs). For unit costs and flat-rates, you can charge the amounts calculated as explained in the Grant Agreement *(see art 6 and Annex 2 and 2a)*.

The costs will be reimbursed at the funding rate fixed in the Grant Agreement (50%).

Grants may NOT produce a profit[17] (i.e. surplus of revenues + EU grant over costs). For-profit organisations must declare their revenues and, if there is a profit, we will deduct it from the final grant amount *(see art 22.3)*.

Moreover, please be aware that the final grant amount may be reduced in case of non-compliance with the Grant Agreement *(e.g. improper implementation, breach of obligations, etc)*.

Budget categories and cost eligibility rules

The budget categories and cost eligibility rules are fixed in the Grant Agreement *(Data Sheet, point 3, art 6 and Annex 2)*.

Budget categories for this call:

- A. Personnel costs
  - A.1 Employees, A.2 Natural persons under direct contract, A.3 Seconded persons
  - A.4 SME owners and natural person beneficiaries
- B. Subcontracting costs
- C. Purchase costs
  - C.1 Travel and subsistence
  - C.2 Equipment
  - C.3 Other goods, works and services
- D. Other cost categories

D.1 Financial support to third parties -N/A

[17] This is a standard obligation for all EU grants. It may be unselected only under the following condition of Article 195(3) EU Financial Regulation - 2024/2509 actions implemented only by non-profit organisations (i.e. all beneficiaries and affiliated entities are non-profit organisations)

- E. Indirect costs

Specific cost eligibility conditions for this call:

- personnel costs:
  - SME owner/natural person unit cost[18]: Yes
  - volunteers cost: N/A
- subcontracting costs:
  - additional subcontracting rules: Yes
    - subcontracting may not cover core tasks of the action[19]
    - subcontracted activities must take place in eligible countries
- travel and subsistence cost: No (only actual costs)
- travel costs: eligible only in EU and EEA countries
- equipment costs: depreciation
- other cost categories:
  - costs for financial support to third parties: not allowed
- indirect cost flat-rate: 7% of the eligible direct costs (categories A-D, except volunteers costs and exempted specific cost categories, if any)

  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. If you intend to also apply for action grants while receiving an operating grant, please make sure that you either have the accounting tools in place to combine them (or that the operating grants pays off — meaning that it covers enough of your general running costs and overheads to compensate the loss of the indirect costs in the action grants).
- VAT: non-deductible/non-refundable VAT is eligible (but please note that since 2013 VAT paid by beneficiaries that are public bodies acting as public authority is NOT eligible)
- other:
  - in-kind contributions for free are allowed, but cost-neutral, i.e. they cannot be declared as cost
  - kick-off meeting: costs for kick-off meeting organised by the granting authority are eligible (travel costs for maximum 2 persons, return ticket to Brussels and accommodation for one night) only if the meeting takes place after the project starting date set out in the Grant Agreement; the starting date can be changed through an amendment, if needed
  - project websites: communication costs for presenting the project on the participants' websites or social media accounts are eligible; costs for *separate* project websites are not eligible

[18] Commission Decision of 20 October 2020 authorising the use of unit costs for the personnel costs of the owners of small and medium-sized enterprises and beneficiaries that are natural persons not receiving a salary for the work carried out by themselves under an action or work programme (C(2020)7115).

[19] See also section 13- Subcontracting going beyond 30% of the total eligible costs must be justified in the application.

- other ineligible costs: No

Reporting and payment arrangements

The reporting and payment arrangements are fixed in the Grant Agreement *(Data Sheet, point 4 and art 21 and 22)*.

After grant signature, you will normally receive a prefinancing to start working on the project (float of normally 50 % of the maximum grant amount; exceptionally less or no prefinancing). The prefinancing will be paid 30 days from entry into force/financial guarantee (if required) — whichever is the latest.

There will be one or more interim payments (with detailed cost reporting).

In addition, you will be expected to submit one or more progress reports not linked to payments.

Payment of the balance: At the end of the project, we will calculate your final grant amount. If the total of earlier payments is higher than the final grant amount, we will ask you (your coordinator) to pay back the difference (recovery).

All payments will be made to the coordinator or, in the case of a single applicant, to the beneficiary.

⚠ Please be aware that payments will be automatically lowered if you or one of your consortium members has outstanding debts towards the EU (granting authority or other EU bodies). Such debts will be offset by us — in line with the conditions set out in the Grant Agreement *(see art 22)*.

Please also note that you are responsible for keeping records on all the work done and the costs declared.

Prefinancing guarantees

If a prefinancing guarantee is required, it will be fixed in the Grant Agreement *(Data Sheet, point 4)*. The amount will be set during grant preparation and it will normally be equal or lower than the prefinancing for your grant.

The guarantee should be in euro and issued by an approved bank/financial institution established in an EU Member State. If you are established in a non-EU country and would like to provide a guarantee from a bank/financial institution in your country, please contact us (this may be exceptionally accepted, if it offers equivalent security).

Amounts blocked in bank accounts will NOT be accepted as financial guarantees.

Prefinancing guarantees are normally requested from the coordinator, for the consortium. They must be provided during grant preparation, in time to make the prefinancing (scanned copy via Portal AND original by post).

If agreed with us, the bank guarantee may be replaced by a guarantee from a third party.

The guarantee will be released at the end of the grant, in accordance with the conditions laid down in the Grant Agreement *(art 23)*.

Certificates

Depending on the type of action, size of grant amount and type of beneficiaries, you may be requested to submit different certificates. The types, schedules and

thresholds for each certificate are fixed in the Grant Agreement *(Data Sheet, point 4 and art 24)*.

Liability regime for recoveries

The liability regime for recoveries will be fixed in the Grant Agreement *(Data Sheet, point 4.4 and art 22).*

For beneficiaries, it is one of the following:

- limited joint and several liability with individual ceilings — *each beneficiary up* to their maximum grant amount
- unconditional joint and several liability — *each beneficiary up to the maximum grant amount for the action*

or

- individual financial responsibility — *each beneficiary only for their own debts*.

In addition, the granting authority may require joint and several liability of affiliated entities (with their beneficiary).

Provisions concerning the project implementation

Security rules: *see Model Grant Agreement (art 13 and Annex 5)*

Ethics rules: *see Model Grant Agreement (art 14 and Annex 5)*

IPR rules: *see Model Grant Agreement (art 16 and Annex 5):*

- rights of use on results: Yes

Communication, dissemination and visibility of funding: *see Model Grant Agreement (art 17 and Annex 5):*

- additional communication and dissemination activities: Yes

Specific rules for carrying out the action: *see Model Grant Agreement (art 18 and Annex 5):*

- durability: No

Other specificities

Consortium agreement: Yes in case of multi-beneficiary proposal

Non-compliance and breach of contract

The Grant Agreement (chapter 5) provides for the measures we may take in case of breach of contract (and other non-compliance issues).

For more information, *see AGA — Annotated Grant Agreement*.

11. How to submit an application

All proposals must be submitted directly online via the Funding & Tenders Portal Electronic Submission System. Paper applications are NOT accepted.

Submission is a 2-step process:

a) create a user account and register your organisation

To use the Submission System (the only way to apply), all participants need to create an EU Login user account.

Once you have an EU Login account, you can register your organisation in the Participant Register. When your registration is finalised, you will receive a 9-digit participant identification code (PIC).

b) submit the proposal

Access the Electronic Submission System via the Topic page in the Calls for proposals section (or, for calls sent by invitation to submit a proposal, through the link provided in the invitation letter).

Submit your proposal in 3 parts, as follows:

- Part A includes administrative information about the applicant organisations (future coordinator, beneficiaries, affiliated entities and associated partners) and the summarised budget for the proposal. Fill it in directly online
- Part B (description of the action) covers the technical content of the proposal. Download the mandatory word template from the Submission System, fill it in and upload it as a PDF file
- Annexes (*see section 5*). Upload them as PDF file (single or multiple depending on the slots). Excel upload is sometimes possible, depending on the file type.

The proposal must keep to the page limits *(see section 5)*; excess pages will be disregarded.

Documents must be uploaded to the right category in the Submission System, otherwise the proposal may be considered incomplete and thus inadmissible.

The proposal must be submitted before the call deadline (*see section 4*). After this deadline, the system is closed and proposals can no longer be submitted.

Once the proposal is submitted, you will receive a confirmation e-mail (with date and time of your application). If you do not receive this confirmation e-mail, it means your proposal has NOT been submitted. If you believe this is due to a fault in the Submission System, you should immediately file a complaint via the IT Helpdesk webform, explaining the circumstances and attaching a copy of the proposal (and, if possible, screenshots to show what happened).

Details on processes and procedures are described in the Online Manual. The Online Manual also contains the links to FAQs and detailed instructions regarding the Portal Electronic Exchange System.

12. Help

As far as possible, *please try to find the answers you need yourself*, in this and the other documentation (we have limited resources for handling direct enquiries):

- Online Manual
- Topic Q&A on the Topic page (for call-specific questions in open calls; not applicable for actions by invitation)
- Portal FAQ (for general questions).

Please also consult the Topic page regularly, since we will use it to publish call updates. (For invitations, we will contact you directly in case of a call update).

Contact

For individual questions on the Portal Submission System, please contact the IT Helpdesk.

Non-IT related questions should be sent to the following email address: CNECT-PPPA-2026-REGIONAL-SUBMARINE-ISM@ec.europa.eu .

Please indicate clearly the reference of the call and topic to which your question relates *(see cover page)*.

13. Important

IMPORTANT

- **Don't wait** until the end — Complete your application sufficiently in advance of the deadline to avoid any last minute technical problems. Problems due to last minute submissions *(e.g. congestion, etc)* will be entirely at your risk. Call deadlines can NOT be extended.
- Consult the Portal Topic page regularly. We will use it to publish updates and additional information on the call (call and topic updates).
- Funding & Tenders Portal Electronic Exchange System — By submitting the application, all participants accept to use the electronic exchange system in accordance with the Portal Terms & Conditions.
- Registration — Before submitting the application, all beneficiaries, affiliated entities and associated partners must be registered in the Participant Register. The participant identification code (PIC) (one per participant) is mandatory for the Application Form.
- Consortium roles — When setting up your consortium, you should think of organisations that help you reach objectives and solve problems.

  The roles should be attributed according to the level of participation in the project. Main participants should participate as beneficiaries or affiliated entities; other entities can participate as associated partners, subcontractors, third parties giving in-kind contributions. Associated partners and third parties giving in-kind contributions should bear their own costs (they will not become formal recipients of EU funding). Subcontracting should normally constitute a limited part and must be performed by third parties (not by one of the beneficiaries/affiliated entities). Subcontracting going beyond 30% of the total eligible costs must be justified in the application.
- Coordinator — In multi-beneficiary grants, the beneficiaries participate as consortium (group of beneficiaries). They will have to choose a coordinator, who will take care of the project management and coordination and will represent the consortium towards the granting authority. In mono-beneficiary grants, the single beneficiary will automatically be coordinator.
- Affiliated entities — Applicants may participate with affiliated entities (i.e. entities linked to a beneficiary which participate in the action with similar rights and obligations as the beneficiaries, but do not sign the grant and therefore do not become beneficiaries themselves). They will get a part of the grant money and must therefore comply with all the call conditions and be validated (just like beneficiaries); but they do not count towards the minimum eligibility criteria for consortium composition (if any). Entities that satisfy the eligibility criteria and that do not fall within one of the situations referred to in Articles 138(1) and 143(1) FR and that have a link with the applicant, in particular a legal or capital link, which is neither limited to the action nor established for the sole purpose of its implementation, will be considered as entities affiliated to the applicant (See Article 190.1 (b) EU Financial Regulation - 2024/2509). If affiliated entities participate in your project, please do not forget to provide documents demonstrating their affiliation link to your organisation as part of your application.
- Sole beneficiaries - Associations and interest groupings (EEIG): Entities composed of members may participate as 'sole beneficiary' (see Article 190.1 (a) EU Financial Regulation 2024/2509). Please note that if the action will be implemented by the members, they should also participate (either as beneficiaries or as affiliated entities (if foreseen in the call), otherwise their costs will NOT be eligible). A "sole" beneficiary is a legal entity, whether established specifically or not for the action, and which is:

- formed of several legal entities complying with the eligibility, non-exclusion and selection criteria set out in this call for proposals, and implementing together the proposed action;

- and whose participating members are identified in the grant application (Part A and B)

- Associated partners — Applicants may participate with associated partners (i.e. partner organisations which participate in the action but without the right to get grant money). They may implement action tasks but in contrast to affiliated entities they do not need to have a capital or legal link to a beneficiary and cost incurred by Associated Partners can NOT be declared as eligible cost. In contrast to third parties giving in-kind contributions, the associated partners are fully named in the grant agreement and may implement important tasks by themselves. Entities that do not request funding or are not eligible for funding may participate in an action as Associated Partners, for example out of interest in contributing to the objectives of the action, gaining visibility, or participating due to ongoing (scientific) cooperation with a beneficiary. As with any other participant that does not sign the grant agreement, the beneficiaries need to ensure (e.g. through the consortium agreement) that Associated Partners implement their assigned action tasks in accordance with the grant agreement. The tasks must be set out in Annex 1.

- Consortium agreement — For practical and legal reasons it is recommended to set up internal arrangements that allow you to deal with exceptional or unforeseen circumstances (in all cases, even if not mandatory under the Grant Agreement). The consortium agreement also gives you the possibility to redistribute the grant money according to your own consortium-internal principles and parameters (for instance, one beneficiary can reattribute its grant money to another beneficiary). The consortium agreement thus allows you to customise the EU grant to the needs inside your consortium and can also help to protect you in case of disputes.

- Balanced project budget — Grant applications must ensure a balanced project budget and sufficient other resources to implement the project successfully *(e.g. own contributions, income generated by the action, financial contributions from third parties, etc)*. You may be requested to lower your estimated costs, if they are ineligible (including excessive).

- Completed/ongoing projects — Proposals for projects that have already been completed will be rejected; proposals for projects that have already started will be assessed on a case-by-case basis (in this case, no costs can be reimbursed for activities that took place before the project starting date/proposal submission).

- No-profit rule — Grants may NOT give a profit (i.e. surplus of revenues + EU grant over costs). This will be checked by us at the end of the project.

- No cumulation of funding/no double funding — It is strictly prohibited to cumulate funding from the EU budget (except under 'EU Synergies actions'). Outside such Synergies actions, any given action may receive only ONE grant from the EU budget and cost items may under NO circumstances be declared under two EU grants; projects must be designed as different actions, clearly delineated and separated for each grant (without overlaps).

- Combination with EU operating grants — Combination with EU operating grants is possible, if the project remains outside the operating grant work programme and you make sure that cost items are clearly separated in your accounting and NOT declared twice *(see AGA — Annotated Grant Agreement, art 6.2.E)*. In order to demonstrate that the operating grant does not cover any costs of the action, 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.

- Multiple proposals — Applicants may submit more than one proposal for *different* projects under the same call (and be awarded funding for them).

  Organisations may participate in several proposals.

  BUT: if there are several proposals for *very similar* projects, only one application will be accepted and evaluated; the applicants will be asked to withdraw the others (or they will be rejected).

- Resubmission — Proposals may be changed and re-submitted until the deadline for submission.

- Rejection — By submitting the application, all applicants accept the call conditions set out in this this Call document (and the documents it refers to). Proposals that do not comply with all the call conditions will be rejected. This applies also to applicants: All applicants need to fulfil the criteria; if any one of them doesn't, they must be replaced or the entire proposal will be rejected.

- Cancellation — There may be circumstances which may require the cancellation of the call. In this case, you will be informed via a call or topic update. Please note that cancellations are without entitlement to compensation.

- Language — You can submit your proposal in any official EU language (project abstract/summary should however always be in English). For reasons of efficiency, we strongly advise you to use English for the entire application. If you need the call documentation in another official EU language, please submit a request within 10 days after call publication (for the contact information, *see section 12*).

- Transparency — In accordance with Article 38 of the EU Financial Regulation, information about EU grants awarded is published each year on the Europa website.

  This includes:

  - beneficiary names
  - beneficiary addresses
  - the purpose for which the grant was awarded
  - the maximum amount awarded.

  The publication can exceptionally be waived (on reasoned and duly substantiated request), if there is a risk that the disclosure could jeopardise your rights and freedoms under the EU Charter of Fundamental Rights or harm your commercial interests.

- Data protection — The submission of a proposal under this call involves the collection, use and processing of personal data. This data will be processed in accordance with the applicable legal framework. It will be processed solely for the purpose of evaluating your proposal, subsequent management of your grant and, if needed, programme monitoring, evaluation and communication. Details are explained in the Funding & Tenders Portal Privacy Statement.