FAQ for applicants
CBE JU Calls for proposals 2024

Version 5 | 10 June 2024
Purpose

In this document, you will find the most frequently asked questions from potential applicants, as well as the answers to those questions.

The information in this document is based on the rules and conditions in the CBE JU Annual Work Programme (AWP) 2024 as found on https://www.cbe.europa.eu/reference-documents. This FAQ for applicants complements but does not replace the AWP; in the event of different interpretations, the information provided in the AWP always has precedence.

For additional questions, please contact info@cbe.europa.eu.

Version history

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1. Overview of information sources

Q 1.1: Where can I find more information about CBE JU rules and regulations?

The most relevant information sources are:

- The [CBE JU website](#), where you can find:
  - Call-specific information (e.g. Annual Work Plan (incl. topic texts));
  - The [CBE JU networking platform](#) used before, during and after the 23 Apr 2024 info day;
  - Other [CBE JU reference documents](#) (e.g. the Council Regulation establishing CBE JU, the Strategic Research and Innovation Agenda (SRIA), etc.);
  - The recording and presentations of the [Call 2024 Brussels info day](#);
- The [Funding & tender opportunities Portal](#) (formerly known as the Participant Portal), where you can find:
  - As of 24 Apr 2024: the CBE JU Call 2024 topics, incl. the Portal’s topic-specific [partner search facility](#);
  - The ‘Applying for funding’ section of the [Horizon Europe online manual](#) (as CBE JU follows most of the Horizon Europe rules, this online manual is also relevant for CBE JU);
  - The list of [National Contact Points](#). The role of these NCPs is to guide potential applicants in choosing relevant topics and types of action, to provide advice on administrative procedures and contractual issues, and to assist in partner search.
- The [European IPR Helpdesk](#) offers free of charge, first-line support on IP and IPR matters to beneficiaries of EU-funded research projects and EU SMEs involved in transnational partnership agreements.
- The [BIC website](#) (Bio-based Industries Consortium, the private partner of the CBE JU), which provides additional services such as partnering opportunities with BIC members.
- The [EEN website](#) (Enterprise Europe Network), which offers networking and other business & research opportunities (mainly) for SMEs.
2. CBE JU specificities

Q 2.1: What are the differences between CBE JU and Horizon Europe rules?

The Horizon Europe General Annexes apply to CBE JU Call 2024, with the exceptions introduced in section 2.2.3 of the AWP 2024 and reported below:

- The threshold for the evaluation criterion ‘impact’ is 4/5 for all types of actions;
- The threshold for total score is 11/15 for all types of actions;
- An extra, CBE JU-specific evaluation subcriterion in the ‘impact’ evaluation criterion of Innovation Actions incl. Flagships (i.e., evaluators will assess the “Ability to ensure the level of in-kind contribution to operational activities (IKOP)\(^1\) defined in the call/topic as % of total projects eligible costs (IAs 15% and IA-Flagship 20%)”);
- The page limit of the ‘Part B’ part of the proposals is 70 pages for Innovation Actions (incl. flagships), and 50 pages for Research & Innovation Actions (RIAs).

Q 2.2: What are TRLs (Technology Readiness Levels)?

The technological readiness level scale, defined in section B of the Horizon Europe General Annexes, will be used as reference in the CBE JU call to indicate the appropriate technological context. Specifically:

- Research & Innovation Actions (RIAs) are expected to be at the level of laboratory or simulated environments and expected to deliver mainly TRL 5 at the end of the projects;
- Innovation Actions (IAs) are demonstration activities in relevant and operational environments and expected to deliver TRL 6-8 at the end of the projects. In particular, Flagship projects will need to deliver TRL 8 at the end of the projects.

The expected end TRL is specified in each RIA and IA topic.

Q 2.3: What are CBE JU’s ‘specific requirements’?

In addition to the requirements described in each topic text, the proposals must also address specific CBE JU requirements. Rather than repeating these requirements in each topic text, they are presented in section 2.2.3.1 of the AWP 2024.

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\(^1\) Contributions by private members, constituent entities or the affiliated entities of either, by international organisations and by contributing partners, consisting of the eligible costs incurred by them in implementing indirect actions less the contribution of that joint undertaking and of the participating states of that joint undertaking to those costs.
3. Developing consortia / project ideas

3.1 Consortium building

Q 3.1.1: Where can I find organisations to build a consortium?

The 3 most relevant sources are

- The CBE JU networking platform,
- The (members only) BIC partnering platform, and
- The partner search section of the Funding & tender opportunities Portal (see below). For more information, please consult Q 1.1.

Via the partner search facility of the Funding & tender opportunities Portal, organisations can find partners for (CBE JU and other) project ideas among the organisations registered in the Portal. This facility can be accessed via:

- A central page
- Per topic. When opening a topic page on the Portal, organisations can publish partner requests for open and forthcoming topics by logging into the Portal, going to the ‘partner search’ section (accessible via the menu on the left side of the screen), and clicking on the ‘view/edit’ button.

Q 3.1.2: How many partners need to be involved in the consortium?

CBE JU follows the same rules as described in section B of the Horizon Europe General Annexes. Specifically:

- Legal entities forming a consortium are eligible to participate provided that the consortium includes:
  - at least one independent legal entity established in a Member State; and
  - at least two other independent legal entities, each established in different Member States or Associated Countries.
- Applications for ‘Coordination and support actions’ (CSA) may be submitted by one or more legal entities, which may be established in a Member State or Associated Country.

As affiliated entities do not sign the grant agreement, they do not count towards the minimum eligibility criteria for consortium composition (if any).

No additional requirements exist regarding consortium size and resource & funding distribution.
Q 3.1.3: Are partners from non-EU countries excluded?
CBE JU follows Horizon Europe’s ‘global approach’, which means that participants from all over the world, regardless of their place of establishment or residence, can participate in CBE JU calls. However, only participants from the EU, associated countries, and low- and middle-income countries are automatically eligible for funding. For more information, please consult section B of the Horizon Europe General Annexes, as well as the list of participating countries in Horizon Europe.

Q 3.1.4 How to include UK entities in CBE JU Call 2024 proposals?
Since 2024, the UK is an associated country. Therefore, UK entities are automatically eligible for funding in Call 2024. For more information, please consult the list of participating countries in Horizon Europe. This association agreement only applies from call and budget 2024 onwards. Budget coming from 2022 and 2023 will continue funding calls from those years. From a budgetary point of view, this means that any carry over from budget 2022 and 2023 will not be used to finance UK participants. This will be ensured by CBE JU; participants will not have to take any actions in this regard.

Q 3.1.5 How to include Swiss entities in CBE JU Call 2024 proposals?
CBE JU operates within the Horizon Europe framework, and according to the official list of participating countries in Horizon Europe, legal entities (including companies and SMEs) located in Switzerland can participate in all calls open to non-associated third countries in Horizon Europe, which includes calls from institutionalised partnerships such as CBE JU. However, according to Horizon Europe rules, Swiss entities are not automatically eligible for CBE JU funding.

In the current non-associated third country mode, researchers and innovators in Switzerland are funded directly by the Swiss Confederation if the complete project proposal has been positively evaluated by the European Commission, its agencies or Joint Undertakings (more information here; the financial guarantee can be found here). When adding Swiss entities in CBE JU proposals, please ensure that the detailed budget of the Swiss participants is mentioned not only in the project proposal but also in Annex 1 of the Grant Agreement. Please follow the guidelines of the Swiss government to determine how / where to indicate the budget of the Swiss participants in the CBE JU proposal.

Disclaimer: CBE JU is not responsible for the accuracy and reliability of the information provided by the official website of the Swiss Government.

Q 3.1.6: Can one organisation be involved in multiple Call 2024 proposals?
Yes. Each proposal will be evaluated on its own merits, including the expertise and operational capacity of the consortium. However, if the same organisation is involved in multiple proposals that are invited to the Grant Agreement Preparation (GAP) phase, then their operational capacity will need to be reassessed. If deemed insufficient, there is a risk that the organisation will be asked to choose in which project they want to participate in.
Q 3.1.7: What type of organisation should be the project coordinator? Are there differences per type of action?

It is up to the proposal writers to convince the expert-evaluators that the coordinator has the right expertise to manage the (type and size of the) consortium, that the management structures & procedures are adequate, etc. Therefore, different types (e.g. universities, SMEs, large enterprises,...) of coordinators are possible, in all different types of action (CSA, RIA, IA).

Q. 3.1.8: Is there any legal requirement to build a consortium with BIC and/or private industrial partners?

As CBE JU is an industry-driven programme, many expected impacts listed in the topic texts can only be effectively reached with some form of industrial involvement or support. In addition, the level of in-kind contribution to operational activities (IKOP)\(^2\) will be taken into account during the evaluation of Innovation Action (incl. Flagships) project proposals (see Q 2.1), and IKOP can only be provided by BIC members.

For IA (incl. Flagships) proposals, certificates of BIC membership should be uploaded/attached to the proposal as an Annex (one document combining all membership certificates). These certificates should be requested to BIC via https://bic.elisca.app/membership/certificate/registration.

This means that for Innovation Actions, if organisations want that their IKOP is counted towards the thresholds established for Innovation Actions incl. flagships, they should be a BIC member or become a BIC member before the call closure date of 18 September 2024, 17:00 Brussels time.

The following information concerning the above-mentioned membership has been provided by BIC\(^3\):

- **Companies** in proposal consortia that are not yet a BIC member can become an Industry BIC ‘Full’ member or a BIC ‘Project’ member. BIC ‘Project member’ is a temporary status, at the earliest, from the opening of an annual call, until the results of the evaluation are known and/or the grant agreement has been signed:

- **Universities, research institutes or non-for-profit organisations** that want to contribute with IKOP and that are not yet an ‘Associate member’ of BIC, can become Associate members before the closure date of the annual call:

More information on how to join BIC can be found on https://biconsortium.eu/membership/join-us and https://biconsortium.eu/frequently-asked-questions.

\(^2\) Contributions by private members, constituent entities or the affiliated entities of either, by international organisations and by contributing partners, consisting of the eligible costs incurred by them in implementing indirect actions less the contribution of that joint undertaking and of the participating states of that joint undertaking to those costs.

\(^3\) CBE JU is not responsible or involved in the internal BIC procedures.
Q 3.1.9: My company/department is not a BIC member but is linked to a different legal entity that is a BIC Member. Do I need a separate BIC membership certificate to provide IKOP in an IA proposal?

Yes. While BIC membership extends to all legal entities within a group of companies, the name and [PIC number](#) of the legal entity appearing in the proposal need to match the ones on the BIC membership certificate, as only contributions from BIC members can be qualified as IKOP. Hence, each legal entity appearing in a proposal and wishing to contribute IKOP must possess a unique BIC membership certificate.

Legal entities linked to current BIC industry members can request a BIC membership certificate by following the steps explained on [https://biconsortium.eu/frequently-asked-questions](https://biconsortium.eu/frequently-asked-questions), and by using [https://bic.elisca.app/membership/certificate/registration](https://bic.elisca.app/membership/certificate/registration) to request the certificate.

Q 3.1.10: Both my company/department and an affiliated entity are in an IA proposal and want to provide IKOP. Do we both need to apply for BIC membership? Do we need two separate certificates?

Yes to both questions. While BIC membership extends to all legal entities within a group of companies or institution, the name and [PIC number](#) of the legal entity appearing in the proposal need to match the ones on the BIC membership certificate, as only contributions from BIC members can be qualified as IKOP. Hence, each legal entity appearing in a proposal and wishing to contribute IKOP must possess a unique BIC membership certificate.

For more information about specific cases (e.g. what to do if one or none of the 2 entities is a BIC member?), please consult the BIC website on [https://biconsortium.eu/frequently-asked-questions](https://biconsortium.eu/frequently-asked-questions).
3.2 From idea to proposal evaluation

Q 3.2.1: Can CBE JU check if a proposal idea is good or in line with the topic text?

No, mainly because of the following reasons:

- CBE JU Calls follow a competitive process, and the programme office cannot provide individual guidance in the interest of transparency and fairness;
- CBE JU proposals are not evaluated by CBE JU staff members, but by external experts with diverse expertise, who evaluate each proposal individually and in a panel setting. It is therefore up to each consortium to clearly describe how their proposal ticks all the boxes described in the topic text, and to convince these external experts (not CBE JU staff) that and how the proposal’s objectives, concept, expected impacts and implementation measures are in line with the topic text;
- The CBE JU topic texts are the result of co-creation between the European Commission and BIC (http://biconsortium.eu/), and include the feedback from CBE JU’s Scientific Committee and States Representatives Group. Based on these inputs, the topic texts are written in such a way that they clearly explain the challenge, yet leave a fair amount of freedom to proposal writers to come up with a suitable solution. It is up to each consortium to convince the external experts if and how the proposal’s solution is appropriate to address the challenges and expected impacts described in the topic text.
- Proposal writers have 30-70 pages depending on the type of action to develop their idea and to convince expert-evaluators. A 1-page summary of a proposal idea might at first sight be 100% relevant for a topic text, but when described in 30-70 pages, it might NOT be relevant after all (and vice versa).

However, please consult your National Contact Points to obtain idea-specific feedback. Furthermore, organisations from some so-called ‘widening countries’ can request an external expert to provide recommendations on how to improve their proposal’s quality. For more information, please consult the relevant page of the NCP_WIDERANET portal.

Q 3.2.2: Can CBE JU provide more information on the interpretation of topic texts?

CBE JU will discuss any significant topic interpretation issues with BIC and/or the EC. If clarifications on a topic (not proposal) level are necessary, they will be added to this FAQ document under heading 6 (Call 2024 topic-specific Q&A), so that this information is publicly available. If you have topic interpretation questions, please contact info@cbe.europa.eu.

Q 3.2.3: Since our project idea is very confidential, what measures are taken by CBE JU to ensure confidentiality?

Expert-evaluators and CBE JU staff are bound by a confidentiality agreement and will incur serious sanctions in case of violations. Furthermore, CBE JU services will verify that no conflicts of interest could occur before a proposal is allocated to expert-evaluators.
Q 3.2.4: Which Annexes should be added to proposals?

The only mandatory annex is the ‘part B’ of the proposal (= the descriptive / narrative part of your application). In Call 2024, the following annexes should be added to your proposal (only) if applicable:

- **IAs incl. Flagships:**
  - One annex including all BIC membership certificate(s)
  - IKAA Annex (optional and indicative Annex during submission and evaluation; see Q 4.2.4)
- **Flagships:** Business plan
- **CSAs:** ‘Financial Support to Third parties’, if applicable.

All Annexes should be uploaded via the Funding & Tender Opportunities Portal. CBE JU-specific ‘Part B’ and other annex templates are found under each topic in the Funding & Tender Opportunities Portal but also on [https://www.cbe.europa.eu/open-calls-proposals](https://www.cbe.europa.eu/open-calls-proposals).

The BIC membership certificate should be requested directly to BIC. More info: see Qs 3.1.8-10 above.

Q 3.2.5 How are the CBE JU KPIs taken into account during the evaluation?

Key Performance Indicators (KPIs) are indicators to be used to monitor the progress of the CBE programme vis-à-vis its objectives. By fulfilling the requirements under the expected outcomes described in the topic text, the proposal, if selected for funding, is implicitly expected to contribute to these KPIs.

Therefore, when evaluating the impact criterion, the focus will be on how the proposal contributes to the expected outcomes listed in the topic text, not on the related KPIs referred to in the topic text; the latter will become relevant during the Grant Agreement Preparation (GAP) and the subsequent project implementation. Specifically: if a proposal is invited to the GAP, annual deliverables on KPI reporting will be included in the Grant Agreement. This way, how a project contributes to the CBE JU KPIs will be monitored in a more explicit way throughout the project’s duration. More info can be found in the KPI handbook, published on [https://www.cbe.europa.eu/strategic-research-and-innovation-agenda-sria](https://www.cbe.europa.eu/strategic-research-and-innovation-agenda-sria).

Q 3.2.6 How should ‘wider impacts’ be understood and described in the proposal?

Section 2.1 of the proposal template asks to “Describe the unique contribution your project results would make towards (1) the outcomes specified in this topic, and (2) the wider impacts, in the longer term, specified in the CBE JU annual work programme and Strategic Research and Innovation Agenda (SRIA) ([https://www.cbe.europa.eu/reference-documents](https://www.cbe.europa.eu/reference-documents)).“

The wider impacts are those expected to be generated by the CBE JU initiative by reaching its objectives, as set in the Council Regulation (EU) 2021/2085 of 19 November 2021 establishing the Joint Undertakings under Horizon Europe. The CBE JU generic and specific objectives are reported in the AWP 2024 in section 1.1. ‘Mission statement of the CBE JU’, and have been used as bases to identify the strategic priorities in the SRIA, which are clearly identified in each topic. By contributing to these strategic priorities and their related CBE JU objectives, the applicants/or selected projects are expected to contribute to wider impacts that will be generated by the CBE JU. Therefore, please refer to the CBE JU specific objectives and the link to CBE JU SRIA strategic priorities identified per topic to describe how your proposal will contribute to attain the ‘wider impacts’ of the CBE initiative.
Q 3.2.7 How are proposals with a similar score ranked?
CBE JU uses the same ‘priority order’ principles (no derogation) as described on p. 26-27 of the Horizon Europe General Annexes.

Q. 3.2.8 What if the project goes beyond the end TRL envisaged in the topic text?
The expected technological maturity at the end of each project is clearly defined in each topic text. If some of the activities described in a proposal would result in a higher (than the one(s) described in the topic text) end TRL, then it needs to be very clear from the proposal text that only a limited part (both in activities as spent resources) of the project goes beyond the topic’s envisaged end TRL. This is particularly sensitive for RIAs that propose activities that go beyond TRL 5, as different funding rates and requirements are set for IA proposals. Therefore, it is essential to clearly describe the starting and envisaged end TRLs of all components of your project, so that external expert-evaluators can clearly assess if and how much of the proposal’s activities fall within the topic’s TRL scope.

Q 3.2.9 How should synergies with other (non-EU-) funded projects be described?
In section 1.2 Methodology, all proposals should describe ‘synergies and complementarities’ with relevant national or international research and innovation activities, including ongoing or finalised BBI/CBE JU projects. In some topic texts, additional requirements to describe ‘synergies and complementarities with results of specific past and ongoing EU-funded projects’ may be also included. In addition, clearly explaining how exactly your proposal idea relates to past and ongoing projects can add significant value, since:

• This is a practical way to convince expert-evaluators that you are aware of the state of the art in your scientific field;
• It can be a part of your communications and/or exploitation strategy, since ‘freedom to operate’ and future collaborations can thus be identified;
• It reduces the risk of (the appearance of) double funding. In order to limit such appearances, it is advised to not just mention a list of project acronyms, but to clearly describe how exactly your proposal will build on / collaborate with past and ongoing projects.

Q 3.2.10 What is the difference between an economic viability check, a business case, business model, and business plan?
In all Research & Innovation Actions (RIAs), the economic viability of the products and processes to be developed (including an analysis of the value chain and potential market for the envisaged products) should be described in part B of the proposal. Ideally, focus on the potential market of the products and/or processes to be developed including some quantitative information for example on the market size and trends. If possible, please include project projections / estimates of costs of production/revenues of products or technologies.

In all Innovation Actions (IA) including Flagships (IA-Flags), both a business case and business model need to be presented in part B of the proposal. The definitions of the business case and business model in the CBE JU context are provided in the glossary (section 4.2) of the AWP 2024.

The business case should be sound and clearly presented, based on an appropriate study of the market opportunity. The business model should be robust, well-described and detailed; it should clearly define
revenue and costs streams for the actors involved and demonstrate a good understanding of target markets with an analysis of future market competitors.

In all **Flagships (IA-Flags)**, a business plan should be added as a separate annex to the proposal (not described in part B), on top of the description of the business case and business model in part B of the proposal (the business plan does not replace the business case and model). The definition of the business plan in the CBE JU context is provided in the glossary (section 4.2) of the **AWP 2024**.

Some additional elements to consider when creating a business plan include:

- All elements mentioned in the definitions including forecasts of production ramp-up, product sales prices, CAPEX, OPEX, revenues, profit potential, financial parameters etc. should be based on realistic estimates/assumptions and convincing evidence;
- The proposal should include a solid financing plan, providing an adequate basis to demonstrate the viability of the project in the relevant market. It should be convincing that the necessary levels of funding can be achieved;
- Potential risks should be clearly considered and addressed. For example, the business plan should adequately consider the risks arising from the end-consumers' perception of products and elaborate on how the proposed work is differentiated from potential competing solutions;
- Potential barriers should cover factors beyond the scope and duration of the project, covering market, economic, social, environmental and regulatory aspects and actions to overcome them.
4. Financial / budget-related Q&A

4.1 Cost eligibility

Q 4.1.1: Which costs are eligible for CBE JU funding?

All types of eligible costs for CBE JU funding are described in the article 6 of the Grant Agreement (GA). The [Horizon Europe Annotated model GA (AGA)](https://europa.eu) provides more concrete examples. Ineligible costs are detailed under Article 6.3.

As a basic rule, to be eligible, costs must be:

- Actual and incurred by the beneficiary
- Incurred during the project duration (except for costs of the final report)
- Indicated in the estimated budget in Annex 2 (budget of the action)
- Incurred in connection with the action as described in Annex 1 (proposal description)
- Identifiable and verifiable, in particular recorded in the beneficiary’s accounts (according to accounting standards of the beneficiary’s country and to usual cost accounting practices)
- Compliant with the applicable national law on taxes, labour and social security
- Reasonable and justified, and compliant with the principle of sound financial management

Five cost categories are considered:

A. Personnel costs. **New since 1 May 2024**: the option to use [personnel unit costs](https://europa.eu).(see dedicated webinar dd. 19 June 2024 on [Personnel Unit Cost – New cost method in Horizon Europe (19 June 2024)](https://europa.eu))

B. Subcontracting costs

C. Purchase costs (incl. Travel and Subsistence, Equipment and Other goods, works & services)

D. Other cost categories

E. Indirect costs

Q 4.1.2: What are the different types of participants in a consortium?

The [Horizon Europe Annotated model GA (AGA)](https://europa.eu) provides an overview of the different types in its introduction (heading “General > How to set up your project — Consortium composition and roles and responsibilities”), and in art. 8 and 9. In these AGA parts, more information, definitions and examples are provided about:

- the role of the coordinator compared to other beneficiaries;
- the difference between beneficiaries and ‘affiliated entities’ (in previous programmes often called ‘linked third parties’);
- associated partners;
- subcontractors vs suppliers of goods, works and services;
- subcontractors and purchases vs affiliated entities.
**Q 4.1.3: In general, what type of costs can be subcontracted?**

As a general rule, work can be subcontracted in line with the 'best-value-for-money' principle, and provided that conflicts of interest are avoided. In addition, subcontracting may only cover ‘a limited part of the action’. For more information, please consult the AGA, specifically the introduction (p. 10-11), art. 6.2B, and art. 9.3.

**Q 4.1.4: Can engineering costs linked to an IA be subcontracted?**

If the purpose of the action is to carry out the demonstration of a process and test different, e.g. fermentation conditions (the innovation lays in the micro-organism and conditions), then the engineering of the demo plant could be considered as ‘non-core’ activities and carried out under a subcontract. However, if the purpose of the action is to design a specific (e.g. a purification) process and improve it at a big(ger)scale, then the plant engineering would be a core activity and should be carried out by a beneficiary.

In industry practice, the plant engineering and equipment purchase is often done through a subcontractor. Those are usually included in CAPEX (capital expenditure) and depreciated. In this case, engineering costs would be charged to the CBE JU project as depreciation costs of equipment, infrastructure and assets.

**Q 4.1.5: What if only one subcontractor is able to provide the tasks requested?**

Article 6.2 of the AGA indicates that subcontractors must be identified according to best value for money rule and absence of conflict of interests. To do so, beneficiaries must follow their internal rules for awarding contracts and be able to demonstrate that the choice of subcontractor follows these rules. There are specific national laws and requirements on public procurement for public bodies and contracting authorities.

If an adequate procedure has been followed to select subcontractors, it might be acceptable that only one company is able to respond to the quality requirements. In such a case, the contractor should make sure that costs charged by the subcontractor are ‘reasonable, justified and comply with the principle of sound financial management’.

**Q 4.1.6 Do beneficiaries in CBE JU projects need to contribute to the administrative costs of the CBE JU?**

As per Council Regulation (EU) No 2021/0048 of 19 November 2021 establishing the Horizon Europe joint undertakings and, in particular, the CBE Joint Undertaking, the CBE Programme Office is to be financed equally by the Commission and BIC. BIC has established a ‘project contribution’ for its members. This project contribution is solely managed by BIC (not by CBE JU). For more information, please consult [https://biconsortium.eu/membership/frequently-asked-questions](https://biconsortium.eu/membership/frequently-asked-questions).

These project contributions are not eligible costs because they are not incurred in connection with the project (action) as described in the Grant Agreement, and are not necessary for its implementation. Furthermore, these contributions may not be deducted from any amounts received by the coordinator as pre-financing.
4.2 Project funding

Q 4.2.1: How many proposals will be funded per topic?
In Call 2024, a budget line has been assigned per topic, and the Annual Work Programme (AWP) 2024 provides per topic the average EU Contribution expected per project. Therefore, depending on the budget available and the requested EU contribution of the proposal(s) retained for funding, more than one project could be funded per topic.

Q 4.2.2: Which funding rates are applicable to CBE JU projects?
CBE JU uses the same funding rates as Horizon Europe, with one exception: the standard funding rate for Innovation Actions (IAs) is 60% of the eligible costs (except for non-profit legal entities, where the funding rate is up to 100% of the total eligible costs).

Q 4.2.3: Why should Innovation Action (IA) participants request less than the maximum funding rate?
To increase their ‘IKOP’ contribution to the project, BIC Members participating in IAs may decide to use a lower funding rate than the maximum applicable funding rate (100% or 60%; see above). A reason for using this lower funding rate could be to fulfill the IA evaluation subcriterion ‘Ability to ensure the level of in-kind contribution to operational activities (IKOP) defined in the call/topic as % of total projects eligible costs (IAs 15% and IA-Flagship 20%)’. To reach this threshold, only the IKOP from BIC consortium members can be taken into account.

Q 4.2.4 How should IKAA and IKOP be taken into account when creating the project budget?
‘Additional Activities (IKAA)’ are described in Section 4.1 of the Call 2024 Annual Work Programme (as found on https://www.cbe.europa.eu/reference-documents). If your proposal (only for Innovation Actions) is expected to generate IKAA in line with this definition, you are requested to include a table as an annex to your proposal. A template of this table is provided here and in the ‘part B’ template. This annex is optional and indicative, and will not be taken into account during proposal evaluation. Should your proposal be invited for Grant Agreement Preparation (GAP), an update of your IKAA contribution will be requested, and the table will need to be created or updated.

‘In-kind contributions to operational activities (IKOP)’ can be deduced from the proposal budget and the list of project participants that are BIC members (IKOP= the difference between BIC participants’ total eligible costs and their requested funding). IKOP has to reach 15% (IAs) or 20%...

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4 Contributions by private members, constituent entities or the affiliated entities of either, by international organisations and by contributing partners, consisting of the eligible costs incurred by them in implementing indirect actions less the contribution of that joint undertaking and of the participating states of that joint undertaking to those costs
(Flagships) of the total eligible costs in the budget to be positively evaluated. These amounts are reflected directly in the proposal’s budget.

IKOP will (only) be taken into consideration during the evaluation of Innovation Actions, via the CBE JU-specific evaluation subcriterion “Ability to ensure the level of in-kind contribution to operational activities (IKOP) defined in the call/topic as % of total projects eligible costs (IAs 15% and IA-Flagship 20%)”. This means that you need to identify the BIC members in your consortium, because only their IKOP will be taken into account for the established thresholds. 15% (IAs) and 20% (Flagship) are minimum thresholds; in this call, no higher scores will be assigned in case of higher (than 15% or 20%) IKOP contributions.

Below, 2 budget examples are provided, each with 5 project beneficiaries.

- Example 1 is an IA-Flagship proposal with 2 BIC members (beneficiaries 1 and 3), whose total IKOP (= total costs minus requested funding) is € 4.8 million. The ratio IKOP / total proposal costs is higher than the requested 20% for Flagships, meaning that this proposal will be scored positively for the IKOP evaluation subcriterion.

- Example 2 is a non-flagship IA with 1 BIC member (beneficiary 1), whose IKOP is € 1.28 million. The ratio IKOP / total proposal costs is lower than the requested 15% for IAs, meaning that this proposal will be scored negatively for the IKOP evaluation subcriterion.

<table>
<thead>
<tr>
<th>Example 1: IA Flagship Criterion: ≥ 20% IKOP</th>
<th>BIC member</th>
<th>Industry / Academia</th>
<th>Total eligible costs</th>
<th>Funding rate</th>
<th>Requested EU contribution</th>
<th>IKOP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Coordinator (BIC member)</td>
<td>Y</td>
<td>industry</td>
<td>€ 7,000,000</td>
<td>60%</td>
<td>€ 4,200,000</td>
<td>€ 2,800,000</td>
</tr>
<tr>
<td>Beneficiary 2</td>
<td>N</td>
<td>academia</td>
<td>€ 590,000</td>
<td>100%</td>
<td>€ 590,000</td>
<td></td>
</tr>
<tr>
<td>Beneficiary 3 (BIC member)</td>
<td>Y</td>
<td>industry</td>
<td>€ 5,000,000</td>
<td>60%</td>
<td>€ 3,000,000</td>
<td>€ 2,000,000</td>
</tr>
<tr>
<td>Beneficiary 4</td>
<td>N</td>
<td>industry</td>
<td>€ 3,000,000</td>
<td>60%</td>
<td>€ 1,800,000</td>
<td></td>
</tr>
<tr>
<td>Beneficiary 5</td>
<td>N</td>
<td>academia</td>
<td>€ 800,000</td>
<td>100%</td>
<td>€ 800,000</td>
<td></td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td></td>
<td></td>
<td><strong>€ 16,390,000</strong></td>
<td></td>
<td><strong>€ 10,390,000</strong></td>
<td><strong>€ 4,800,000</strong></td>
</tr>
</tbody>
</table>

\[
\text{Percentage IKOP} = \frac{€ 4,800,000}{€ 16,390,000} = 29.3\% > 20\% \quad \text{👍}
\]

<table>
<thead>
<tr>
<th>Example 2: IA Criterion: ≥ 15% IKOP</th>
<th>BIC member</th>
<th>Industry / Academia</th>
<th>Total eligible costs</th>
<th>Funding rate</th>
<th>Requested EU contribution</th>
<th>IKOP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Coordinator (BIC member)</td>
<td>Y</td>
<td>industry</td>
<td>€ 3,200,000</td>
<td>60%</td>
<td>€ 1,920,000</td>
<td>€ 1,280,000</td>
</tr>
<tr>
<td>Beneficiary 2</td>
<td>N</td>
<td>academia</td>
<td>€ 590,000</td>
<td>100%</td>
<td>€ 590,000</td>
<td></td>
</tr>
<tr>
<td>Beneficiary 3</td>
<td>N</td>
<td>industry</td>
<td>€ 1,500,000</td>
<td>60%</td>
<td>€ 900,000</td>
<td></td>
</tr>
<tr>
<td>Beneficiary 4</td>
<td>N</td>
<td>industry</td>
<td>€ 3,000,000</td>
<td>60%</td>
<td>€ 1,800,000</td>
<td></td>
</tr>
<tr>
<td>Beneficiary 5</td>
<td>N</td>
<td>academia</td>
<td>€ 800,000</td>
<td>100%</td>
<td>€ 800,000</td>
<td></td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td></td>
<td></td>
<td><strong>€ 9,090,000</strong></td>
<td></td>
<td><strong>€ 6,010,000</strong></td>
<td><strong>€ 1,280,000</strong></td>
</tr>
</tbody>
</table>

\[
\text{Percentage IKOP} = \frac{€ 1,280,000}{€ 9,090,000} = 14.1\% < 15\% \quad \text{👎}
\]
Q 4.2.5 How should the budget table be completed in the Portal?

When completing the budget table in the Funding & Tender Opportunities Portal, the following budget columns are shown, some of which are less or not relevant to CBE JU proposals (all costs in €):

- **Personnel costs.** Please enter the personnel costs for staff working on the project. The following types of personnel costs are allowed:
  - Employees (salaries and social security contributions, taxes and other costs linked to the remuneration, if they arise from national law or the employment contract or equivalent appointing act)
  - Natural persons under direct contract other than an employment contract
  - Costs for seconded persons by a third party against payment (example: a project team member, who is employed by a third party outside the project. The third party is reimbursed by the participant, and the participant charges these costs to the project)
  - Unit costs for the work of SME owners for the action (i.e. owners of beneficiaries that are small and medium-sized enterprises not receiving a salary) or natural person beneficiaries (i.e. beneficiaries that are natural persons not receiving a salary)

- **Subcontracting costs** (i.e. costs for subcontracted action tasks).

- **Purchase costs.** 3 types of purchase costs need to be entered (if applicable) in 3 columns:
  - ‘Travel and subsistence’;
  - ‘Equipment’ (i.e. the costs for equipment, infrastructure or other assets used for the action).
  - ‘Other goods, works and services’.

- **Internally invoiced goods and services** (Unit costs- usual accounting practices)

- **Indirect costs** (Flat rate of other budget categories, calculated automatically)

- **Total eligible costs** (Total of all previous costs, calculated automatically)

- **Funding rate.** The funding rate is defined in the call conditions, and should be 100%, except for ‘for profit’ entities in Innovation Actions (IAs) incl. flagships, whose standard funding rate is 60%. The rate is based on / linked to each legal entity’s status (e.g. SME, non-profit, etc.) as found in the Participant Register. If the funding rate does not seem to be in line with an entity’s legal status, please check and update the entity’s data in the Participant Register. If the problem persists, please contact the IT helpdesk.

- **Maximum EU contribution to eligible costs** = the highest possible EU contribution for this legal entity (= total costs x funding rate, calculated automatically).

- **Requested EU contribution to eligible costs.** The amount that you request as EU contribution needs to be manually entered. This amount can be equal to or lower than the ‘Maximum EU contribution to eligible costs’. In IA (incl. Flagships) proposals, the requested EU contribution can be reduced as to increase the IKOP (cf. Q 4.2.4 above).

- **Income generated by the action.** Please enter the expected income generated by the project (revenues), if any.
• **Financial contributions.** In CBE JU / Horizon Europe, ‘Financial contributions’ refer to funding given by third parties to the benefit of a beneficiary for being used specifically for the action. Hence, a typical example could be a specific nationally funded grant/donation to a beneficiary that covers the same action (and its related costs) than the one submitted for funding under Horizon Europe / CBE JU.

• **Other sources of funding – IKOP.** Please do **NOT** complete this column, as it is not applicable to CBE JU, where IKOP is calculated based on the difference between total costs and total requested funding of BIC members.

• **Own resources.** ‘Own resources’ refer to the resources at the disposal of a beneficiary and that do not qualify as ‘financial contributions’ (see above) per se. Typical examples could be the financial resources that a beneficiary draws directly from its commercial activity; or resources coming from the beneficiary’s annual operating allocation (like a public university receiving a general annual subsidy from its national Ministry).

• **Total estimated project income.** Calculated automatically as the sum of requested grant amount, income generated by the project, financial contributions and own resources.

• **IKAA.** Please enter the amount for expected IKAA (only for CBE JU IAs incl. Flagships, not for RIAs and CSAs; see also Q 4.2.4)
5. Project timing & duration

Q 5.1: What is the typical project duration of CBE JU projects?

The project duration is defined by the consortium in the proposal and must be in line with the project objectives. Unless the topic text states otherwise, typical – but not mandatory – durations for types of actions are:

- For Coordination & Support Actions (CSAs): 2-3 years
- For Research and Innovation actions (RIAs): 3-4 years
- For Innovation Actions (IAs), including Flagships: 4-5 years

Q 5.2: Can a project start before the signature of the Grant Agreement (GA)?

As a general rule, the project starts on the first day of the month following the date when the GA enters into force. The GA enters into force when the last party (i.e. CBE JU) signs it.

If a fixed start date is requested, the start date of the project can never be set before the date of proposal submission. If a fixed date prior to the GA signature is requested, any cost incurred before the GA signature is incurred at the own risk of the consortium member(s). Costs incurred before the official start date of the project are NOT eligible.

Q 5.3: Can the project duration be extended?

The project proposal has to take into account possible causes of delays in the project and plan sufficient time to carry out the action (‘risk management’).

(Only) if unscheduled and exceptional circumstances arise during the project, the consortium has the option to request a duly justified project extension.
6. Call 2024 topic-specific Q&A

In this part, topic-specific Q&A (if any) are addressed per ‘type of action’: Coordination & Support Actions (CSAs), Research & Innovation Actions (RIAs), Innovation Actions (IAs) including Flagship projects. In an introductory section (6.0), terminology-related questions that affect more than 1 topic are discussed.

6.0 Elements relevant for multiple topics

Q 6.0.1 Where can I find more information regarding CBE JU’s terminology?

The Annual Work Programme (AWP) 2024 provides the following clarifications about terminology:

- In the introduction (p. 4-5), a list of acronyms, definitions and abbreviations is provided;
- A glossary (incl. references) is provided in section 4.2, and includes the explanation of topic-specific terminology;

Q 6.0.2 Where can I find more information regarding CBE JU’s scope, acceptable feedstock, and output requirements?


- Inputs: Annex V provides a non-exhaustive list of potential feedstocks;
- Outputs: “The bio-based solutions and innovations that fall within the scope of CBE should focus on the production of bio-based chemicals, materials, food and feed ingredients and soil nutrients. Biofuels, bioenergy, food and feed, pharmaceuticals and medical devices are not within the remit of the partnership. The activities to be funded by the CBE JU will follow the principles of cascading use of sustainably-sourced biological feedstock (including bio-based waste, residues and side-streams), as well as delivering innovative solutions with improved climate and environmental performance”.

Regarding the feedstock, the AWP’s section 2.2.3.1 defines some specific requirements such as the feedstock type, sourcing, sustainability requirements, environmental performance, etc.

Q 6.0.3 In topics where the EC’s safe-and-sustainable-by-design (SSbD) framework is mentioned in the scope: how should the testing phase of this SSbD framework be taken into account?

Topics including the implementation and testing of the SSbD framework should align the safety and sustainability assessment with the Commission Recommendation (EU/2022/2510) establishing a European assessment framework for ‘safe and sustainable by design’ chemicals and materials”.

Q 6.0.4 Can peat be used as a feedstock?

According to the EU Taxonomy Regulation, the technical screening criteria for the ‘Do-No-Significant Harm’ (DNSH) ambition include the exclusion of any activity involving the degradation of land with high carbon stock, which means wetlands, including peatland, and continuously forested areas within the
meaning of Article 29(4)(a), (b) and (c) of Directive (EU) 2018/2001. This condition is confirmed in the CBE JU SRIA (“Feedstock should be sourced in order to contribute to operations respecting local ecological limits and protection and enhancement of biodiversity and ecosystems services”). Furthermore, under the same DNSH principle, the EU Taxonomy Regulation establishes, covering ‘transition to circular economy’, that peat extraction should be minimised. Therefore: if the topic text provides a broad choice of biomass and if you would consider peat as biomass, you should clearly justify the adherence to the DNSH principle and overall environmental considerations. Furthermore, even if side or waste streams of peat-related bioprocesses would be considered, applicants would not only need to demonstrate they are improving the resource efficiency when using these side or waste streams, but also that the primary process (e.g. burning of peat as fuel) from which these side or waste streams come is also aligned with these sustainability criteria, taxonomy regulation, DNSH ambition, etc.

(Background: Peatlands are ecosystems with a peat soil. Peat consists of at least 30 % dead, partially decomposed plant remains that have accumulated in situ under waterlogged and often acidic conditions. Resolution XIII.12 Guidance on identifying peatlands as Wetlands of International Importance (Ramsar Sites) for global climate change regulation as an additional argument to existing Ramsar criteria, Ramsar convention adopted on 21- 29 October 2018.)

Q 6.0.5 How should the feedstock sourcing eligibility condition be interpreted for associated countries?

Section 2.2.3.1 of the AWP 2024 describes the feedstock sourcing eligibility condition as follows: “Proposals shall confirm in Part B that:

- if the bio-based feedstock is processed in EU/EEA/EFTA countries, the bio-based feedstock comes from such countries or from neighbouring Associated Countries;
- if the feedstock is processed in an Associated Country, the bio-based feedstock comes from the same country or from neighbouring EU/EEA/EFTA countries.

For limited samples of bio-based feedstock for the purpose of testing processes or technologies this eligibility condition does not apply.”

For demonstrating and upscaling value chains however, the feedstock sourcing eligibility condition shall apply, and this value chain needs to be considered when performing an economic viability check (for RIAs), and the business case, model (IA incl. Flagships) and plan (Flagships).

Q 6.0.6 Can e.g. a bio-based polymer currently produced outside of Europe be used as an input?

CBE targets materials and products sourced and manufactured in the EU and so-called ‘associated countries’; see also Q 6.0.5 above. Sourcing of extra-European materials and e.g. polymers produced outside of these countries can be accepted i) (only) for experimental purposes ii) at low TRL, iii) if and only if the applicants also clearly describe the pathway to European production once upscaled. If the polymer cannot be produced in Europe from European biomass, then the proposal will not be eligible, as the feedstock sourcing eligibility criterion as described on p. 23 of the AWP 2024 will not be met.
6.1 IA-Flagship

Q 6.1.2 topic IAFlag-02 ‘Bio-based dedicated platform chemicals via cost-effective, sustainable and resource-efficient conversion of biomass’

a) Considering that the definition of ‘platform chemical’ used in AWP 2024 and SRIA is "intermediate molecules which can be converted to a wide range of chemicals or materials", are sugars from agro-industrial waste obtained with innovative processes eligible as platform chemicals within this topic?

Biomass constituents (such as cellulose, hemicellulose, carbohydrates, lignin, proteins, etc.) are not considered in scope of this topic as dedicated platform chemicals. The topic rather aims at producing bio-based platform chemical(s) which could be obtained from such inputs like the aforementioned biomass components. The production of bio-based platform chemical(s) should reach TRL 8 by the end of the project. Moreover, the scope includes for these platform chemical(s) to be then further converted/validated also into final products (end TRL: 5 and above).

6.2 IA

Q 6.2.1 topic IA-01 ‘Bio-based materials and products for biodegradable in-soil applications’

a) Many EU-funded projects already focus on degradable mulch films, such as Rebiolution, topic HORIZON-CL6-2022-CIRCBIO-02-03-two-stage and PHAntastic, topic HORIZON-CL4-2023-RESILIENCE-01-34. (How) do these projects influence the success chances of a proposal submitted under HORIZON-JU-CBE-2024-IA-01, in case mulch films are the envisaged end product?

In each proposal, applicants need to describe how they go beyond the state of the art, and how their proposal is complementary with ongoing projects (as to avoid double funding). Therefore, if your proposal explains how/why it is different (enough) from the topics & projects mentioned above, the proposal can still receive funding. Furthermore, the scope of the topic text states that “Proposals should seek for links and complementarities and avoid overlaps with past, ongoing and upcoming EU funded projects, including those funded under H2020, HEU, the BBI JU and CBE JU, and the Missions ‘A Soil Deal for Europe’ and ‘Restore our oceans and water’. Collaboration among projects from the same topic are encouraged”.

b) Regarding the validation of trials: are field trials required?

Yes, field trials are a must-have. Please consider both points of the topic:

- “Perform validation trials of the developed bio-based products with the involvement of end users (for example, in case of applications for agriculture are selected, primary sector should be involved).”
- “Demonstrate safe biodegradability of bio-based products designed for specific applications in open environments (soil) under ranges of physical/chemical environmental conditions, including extreme conditions (e.g., temperature, pH) where applicable. Safe biodegradability entails avoiding eco-toxicity, microplastic dispersion and any environmental impacts - from bio-based products including their additives and other components- on natural ecosystems and their services, including on the soil.
fertility, during and after degradation. All these aspects should be monitored and assessed, also in the phase of dispersion in runoff water.

For bio-based materials/products characterization, please refer to available EU standards when available (e.g. biodegradability in soil) and this may involve lab trials first. For the final validation of the targeted end-products, field trials with the involvement of end-users are requested (assessing biodegradability, technical performance, safety, etc…), in line with the envisaged end TRLs (7/8) described in the topic text.

c) Can the proposal focus on agriculture alone? Or should the focus be broader, since the scope mentions landscaping, construction and roadworks?

The topic ‘focuses on products used in soil…’, and proposals should “select one or more product categories, providing a justification of the selection based on the relevance of products in the actual market and/or on environmental considerations”.

**Q 6.2.2 topic IA-02 ‘Sustainable micro-algae as feedstock for innovative, added-value applications’**

a) The topic text states that “Products in scope are those ingredients and intermediates in the medium price range, for which process technologies exist but are currently not cost-competitive enough to meet market demands”. Is more information available about the envisaged price range?

To the best of our (EC + BIC) knowledge, there is no specific price range within a policy reference document. We would like to clarify that the scope targets products which are not currently produced in higher volumes due to high CAPEX and/or OPEX cost demands. They could be analogues of commercially available ones or novel compounds that could not so far be produced at lower costs, and with the potential of not only covering niche applications but also higher volume applications.

**Q 6.2.6 topic IA-06 Innovative bio-based adhesives and binders for circular products meeting market requirements**

a) Is there a minimum quantity of bio-based carbon to be consider a bio-based adhesive? In case of using different additives like particles, fibers, non-woven materials to improve specific characteristics of the component, do they need to be fully bio-based materials? Or could other non-biobased materials be used in small quantities?

While the ultimate ambition should be to strive for 100% bio-based, it is understandable and thus allowed that a minor non-bio-based fraction may be required. The exact percentage may vary depending on the end application. Nonetheless, the non-bio-based content must not affect the safety, sustainability and circularity of the product. Proposals must describe, quantify and justify the minor non-bio-based content.

**Q 6.2.7 topic IA-07 ‘Innovative conversion of biogenic gaseous carbon into bio-based chemicals, ingredients, materials’**

a) Is gaseous carbon from biogas plants in scope?

Yes
b) The topic requires an end TRL of 6-7. Is this TRL required not only for the (i) purification/capturing CO2 technologies but also for the (ii) conversion technologies from CO2 to chemicals as well as for the (iii) recovery and purification of obtained ingredients and final conversion step into chemicals/materials according to the end-user requirement?

At least one technology for each step must reach TRL 6-7. However, the project may develop more technologies/processes for capturing & purification, conversion and recovery, even at a lower TRL, as long as these lower-TRL activities do not form a significant part of the project (as it could then be considered a RIA in disguise).

c) The topic text’s scope requires to “assess the replication/adaptation potential of the proposed technological approach(es) to other sources of biogenic carbon through the analysis of the range of current/potential sources of biogenic carbon emissions from biorefineries/bio-based industrial activities”.

i. Does the replication need to be (only) focused on other origin of biogenic carbon emissions than the one used in the IA-07 proposal?

Correct: the replication of other sources of biogenic carbon than the one used in the proposal must be assessed.

ii. This assessment can be extended also for big emitters of CO2, including those out of the scope of this topic?

No: sources must be selected within the scope of the topic.

iii. This assessment does not imply experimental evaluation, only a theoretical study?

This assessment does not imply an experimental evaluation.

6.3 RIAs

Q 6.3.2 topic RIA-02 ‘Biotech routes to obtain bio-based chemicals/materials replacing animal-derived ones’

a) “Can lab-grown animal cells be used as inputs?”

No, as the topic text clearly states that (bold added for emphasis) “Any non animal-based biomass feedstock in the scope of the CBE JU is considered in scope for this topic”, and The first expected outcome is “Novel, scalable and more sustainable biotech production routes for bio-based and non-animal-derived chemicals and/or materials replacing animal-derived ones”.

Q 6.3.3 topic RIA-03 ‘Sustainable, bio-based alternatives for crop protection’

a) The scope of the topic text states that “Development of fertilisers (including biostimulants) is not in scope”. What is meant with ‘biostimulants’?

Biostimulants as defined in Regulation (EU) 2019/1009 are out of the scope of this topic. Bio-based alternatives with functions covered by Regulation (EC) 1107/2009 are within scope. The development of fertilisers (including biostimulants) is not in scope, but proposals can explore synergistic strategies employing crop protection products and fertilisers.
b) **Do the envisaged end products need to be fully bio-based?**

One of the topic’s main objectives is: “Develop and test innovative processes for obtaining safe and sustainable bio-based alternatives for crop protection”. The topic does NOT include a formal requirement to only develop ‘fully’ (or 100%) bio-based alternatives. However, even if non-bio-based elements are used as e.g. a delivery system, the total package (active ingredient + delivery system) still needs to be convincingly described as being safe & sustainable. In other words: (mostly, if not 100%) bio-based is a requirement for the active ingredient, safe and sustainable is a requirement for the whole end product.

c) **What is meant with a “pest”?**

In the context of this topic, a pest is defined “as any species, strain or biotype of plant, animal or pathogenic agent injurious to plants or plant products” (EU legislation, Regulation 2016/2031).

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**Q 6.3.4 topic RIA-04 ‘SSbD bio-based coating materials for applications under demanding and/or extreme conditions’**

a) **Can an inorganic material be considered as bio-based, if extracted from a bio-based source?**

Yes. Any bio-sourced material, either organic or inorganic, is valid (including a hybrid solution)

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**6.4 CSAs**