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Regulation (EC) No 1049/2001 — HR costs, Employment structure (FTE vs Freelancers), and HR-focused audit coverage in Direct-Management Grants (2014–2023)



0.



Request submitted 0.



Assessment 0.



Reply sent 0.

Overview

Status

Open

Request details

Request No.: 2025/5328

Request date: 17/10/2025

Commission department: RTD - Directorate-General for Research and Innovation

Language of requested document(s): English 

Request message

Dear Sir/Madam, Pursuant to Regulation (EC) No 1049/2001, Article 15 TFEU, and Articles 41–42 of the Charter of Fundamental Rights, I request access to administrative, statistical, and management documents for all direct-management grants/funding (2014–2023, inclusive), in a form that enables quantitative comparison of HR cost structures and audit coverage, including dynamics of contractor versus employee use. My aim is to enable full cross-border and cross-category analysis in the public interest, on the economic, integrity, and compliance implications of HR practices in EU-funded activities. This request reflects the standard grant framework where beneficiaries submit cost aggregates, and person-level/time-sheet data is examined when a check/review/audit occurs. I am therefore asking only for aggregates and routine exports from your grant/audit systems. Scope A — HR/Personnel vs Services/Subcontracting (by year, Member State, legal-entity type) Provide a machine-readable export (CSV/XLSX) with annual aggregates for 2014–2023, broken down by:

- Member State of beneficiary;
- Legal-entity type: public body; private for-profit company; private non-profit (please include NGOs/NFPOs in this bucket and, if you use a more granular NGO/NFPO flag, also show that split). For each breakdown, report:

1. Declared and accepted/reimbursed amounts for these cost categories (terminology per the applicable Model Grant Agreements):
 - o Personnel/Staff costs (H2020/HE Art. 6.2.A categories), with sub-breakdown where available:
 - A.1 Employees (on payroll);
 - A.2 natural persons under direct contract (non-employment—proxy for freelancers/self-employed);
 - A.3/A.4 (owner-managers/seconded staff, if used).
 - o Subcontracting (Art. 6.2.B).
 - o Purchase of services/other goods & services (the services portion under Art. 6.2.D).
2. Counts:
 - o Number of grants with non-zero personnel costs;
 - o number of beneficiaries declaring personnel costs;
 - o number declaring A.2 (>0).
 - o If recorded, number of service contracts declared (and vendor-type flag if your systems distinguish natural person vs legal person suppliers in services/subcontracting).
3. Derived indicators (if held/auto-generated):
 - o Average share of personnel costs in total direct eligible costs, by Member State and legal-entity type.
 - o Average daily rate

Deadline

22/11/2025

Actions

Ask for a review 

Withdraw request



and/or person-month valuation for A.2 (if your systems calculate/store it). 4. Classification crosswalks: o The mapping from your internal legal-entity types to “public / private for-profit / private non-profit (NGO/NFPO)” and any mapping used for FTS/SEDIA categories (provide data dictionary/codebook). Scope B — Employment structure signals: person-months and duration 5. For the same breakdowns (year, Member State, legal-entity type), provide aggregated “use of resources” data captured in the Portal reporting (person-months): o Total person-months reported under personnel; where possible, show person-months linked to A.1 vs A.2. o If your systems store counts of unique persons declared under personnel (A.1/A.2), provide those counts (aggregated). o If you record metadata that allow inference of average engagement duration for A.2 natural persons (e.g., person-months per natural person or equivalent), provide: mean, median, p25/p75 per year and breakdown. Note: If A.1 vs A.2 person-months or unique-person counts are not recorded centrally, please confirm non-existence and provide the closest available proxy (e.g., total person-months and number of beneficiaries declaring A.2). Scope C — HR-focused controls: checks/reviews/audits 6. Numbers of controls initiated and concluded per year (2014–2023), with the same Member State and legal-entity breakdowns, distinguishing: o Ex-post audits of beneficiaries; o Desk reviews/checks; o System/process/thematic audits (if applicable). For each, indicate whether HR/personnel costs were tested (Y/N flag or scope code). 7. Amounts and findings for HR testing (aggregated): o Personnel amounts examined; amounts found ineligible/corrected; amounts recovered/offset. o Finding typologies counts for HR errors (e.g., missing/defective time records, rate calculation errors, misclassification as services/subcontracting, ineligible contract type), using your standard cause codes. 8. Method notes and consolidation: o Briefly describe how HR testing is flagged in your control registers (scope fields/codes). o If a central audit service (e.g., DG RTD Common Audit Service) consolidates part of these statistics for your programmes, include the consolidated tables or forward internally. Legal handling and format • Format: CSV/XLSX + data dictionary/codebooks for all fields and codes. • Partial access: Apply Article 4(6) (redact where needed; release the rest). • Transfers/consultation: If another service holds part (e.g., central audit function), transfer/consult under Article 6(2) and inform me of the split reference(s). • Existence: Where a requested field is not held centrally, please issue a reasoned nil-return for that field (this avoids blanket refusals for “non-existent” documents). • Database exports: If the data resides in your systems, a routine export using existing search tools qualifies as a “document” for 1049/2001 purposes and should be disclosed (CJEU Typke). • Timeframe: 01/01/2014–31/12/2023 (inclusive). If 2024 snapshots exist, I welcome them as a separate extract. I look forward to your reply within the legal deadlines. Please deliver electronically to watch@brussels-leaks.eu in machine-readable form. Yours faithfully, Anca Paduraru

— [Show less](#) (.)

Communication  (.)

More (0) 

Acknowledgement of receipt

Received: 08:59 AM | 17/10/2025

**● European Commission**

Dear Sir or Madam,

We hereby acknowledge the receipt of your request for access to documents sent on 17/10/2025 and registered on 17/10/2025 under the case number 2025/5328.

We will handle your request within 15 working days as of the date of registration. The time-limit expires on 07/11/2025. We will let you know if we need to extend this time limit for additional 15 working days.

To find more information on how we process your personal data, please see [the privacy statement](#).

Yours faithfully,



Directorate-General for Research and Innovation - Access to Documents
European Commission

**General correspondence**

Received: 11:15 AM | 07/11/2025



● **European Commission**

Dear Ms. Paduraru,

This is to confirm that DG RTD has received your email of 30 October clarifying the scope of your request registered under ref. number 2025/5328.

We are working on it and, should we have any further question, we will come back to you in due time.

Concerning your explicit reference to the executive agencies REA, CINEA and HADEA, we understand you are already in contact with them, but that your clarifications have not yet reached them.

Therefore, to facilitate the process, we have shared your clarifications with these agencies, so that they can update and assess your request under their competencies.

Kind regards,

RTD Access to documents

Reply

General correspondence

Received: 11:11 AM | 09/12/2025



● **European Commission**

Dear Ms Paduraru,



We refer to your request for public access to documents/database, including your clarifications of 30 October, registered in the Commission under ref. EASE 2025/5328 for DG Research and Innovation (DG R&I) and EASE 2025/5329 for DG Communications Networks, Content and Technology (DG CNECT).

As we informed you on 7 November, given that you specifically referred also to the Commission's executive agencies REA, CINEA and HADEA, your clarifications were also forwarded to these agencies, so that they could register and assess your updated request as well.

First of all, we would like to apologize for the time taken to handle your request. As it relates to Commission's internal databases and repositories that are managed by DG R&I for all the services and agencies implementing R&I funding, including those you address in particular, it required, together with the identification of any data held by the Commission under the scope of your request, additional interservice consultations and cross-check of the information extracted for all of them.

This being said, as these consultations are now concluded, we are pleased to inform you that your reply is currently under finalization and that, for the reason explained above, DG R&I will be able to provide you with one reply on behalf of all the services addressed in it. We are doing our best to send it, at the latest, by the beginning of next week.

We thank you again for your patience and for your cooperation in the clarification of this request.

Kind regards,

R&I Access to documents



● Me

Dear R&I Access to documents,

It's today January 9, 2026, close to 3 months since the request was made. So far this remained the only active request, which is mindblowing when it comes to the data about reimbursed HR costs.

Thank you for your support, looking forward to the data.

My best,

Anca Paduraru





EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR RESEARCH AND INNOVATION

Directorate H – Common Implementation Centre
The Director

Brussels
RTD.H.1

To: PADURARU, Anca
e-mail: watch@brussels-leaks.eu

Subject: Your application for access to documents EASE 2025/5328

Dear Ms. Paduraru,

We refer to your request for access to documents and aggregated data submitted on 17 October 2025 to the European Commission within the framework of Regulation 1049/2001⁽¹⁾, and registered in the Directorate-General for Research and Innovation (DG R&I) under case number in subject.

1. SCOPE OF THE REQUEST

Your initial request concerned *administrative, statistical, and management documents for all direct-management grants/funding (2014–2023, inclusive)*. It covered aggregated data on personnel/service cost categories, as described in the HE/H2020 Model grant agreement, and on HR checks, reviews and audits.

On 29 October, the Secretary-General of the European Commission contacted you to clarify the scope of your request, which you narrowed down to *concrete existing documents and limited to a small set of services*. In particular, you specified to be interested in the following:

1. Geographic / management / beneficiary filters

- *Beneficiary countries: **Belgium***
- *Management type: **direct management***
- *Beneficiary type: **private non-profit entities** (as coded in your systems: NGO/NFPO/AISBL/ASBL/foundation or equivalent “non-profit/non-commercial” legal-nature codes)*
- *Time period: 01/01/2014 – 31/12/2024 (inclusive). If 2024 is not yet consolidated, please provide up to the latest year held and specify so.*

⁽¹⁾ Regulation (EC) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents (OJ L 145, 31.5.2001, p. 43), hereinafter referred to as ‘Regulation (EC) 1049/2001’

Note: I use the public FTS filters only to define this population. I am not asking you to generate or reconcile FTS outputs. This matches what the Financial Transparency System shows, as an example, for Belgium: approx. 2 500+ Belgian beneficiaries under direct management over 2014–2023, with around EUR 34 117.93 million contracted and EUR 26 532.21 million consumed. I am using those filters to define the population I am referring to.

2. Commission services to be covered

To respect your instruction to limit to specific departments/services, I am focusing on the main responsible departments that appear in Belgium's allocations (direct management, 2014–2024) listed below:

- *REA – European Research Executive Agency*
- *CNECT – Directorate-General for Communications Networks, Content and Technology*
- *HADEA – European Health and Digital Executive Agency*
- *CINEA – European Climate Infrastructure and Environment Executive Agency*
- *RTD – Directorate-General for Research and Innovation*

*If some of the requested summary tables are held by a central audit/assurance function (e.g., a Common Audit Service or central control unit) rather than the DG listed above, please **consult or transfer** the relevant part under Article 6(2) and indicate the split references. I am not asking you to create new analysis — only to disclose existing annual monitoring/assurance/audit summary tables as held.*

3. Documents requested (what I actually want)

I am not asking you to create new analysis. Please disclose the existing annual monitoring / management / audit summary tables (including dashboards, annual assurance statistics, ex-post audit summary tables, internal XLSX monitoring sheets or equivalent) that each of the above services already holds for internal financial assurance and audit reporting, which cover Belgian non-profit beneficiaries under direct management in the period 2014–2024.

Concretely, for each year 2014–2024, for Belgian non-profit beneficiaries under direct management, I request the tables that show in aggregate (not per project and not per person):

a) Amounts accepted/reimbursed as HR costs:

- *personnel / staff costs.*
- *subcontracting.*
- *purchase of services / external experts / similar outsourced work.*

b) HR cost control coverage:

- *number of audits / ex-post controls / desk checks in which personnel / staff costs of Belgian non-profit beneficiaries were examined.*
- *total amount of personnel / staff cost tested in those controls.*
- *total amount of personnel / staff cost found ineligible or corrected / recovered.*

In this regard, you specified that:

If amounts tested/corrected are not recorded by beneficiary country, please provide the counts of controls where personnel costs were tested for Belgian beneficiaries and indicate the lowest level at which the amounts are held (e.g., programme-wide). “Not recorded centrally” is acceptable where applicable.

If your standard tables are EU-wide or multi-country, please provide them as held (no re-filtering required); I will isolate Belgium/non-profit on my side. If beneficiary-type is coded differently, please include the code legend. If a distinct “non-profit/NGO” filter is not available in your standard tables, please provide the same tables for all Belgian beneficiaries and include the beneficiary legal-nature codes/labels used. I will limit the analysis to non-profit categories on my side.

Where your tables use different cost-category names or aggregate “services” differently, please provide the closest existing categories (e.g., personnel/staff; subcontracting; purchase of services/other goods & services) together with the code legend or mapping used internally. No re-work is requested.

Please provide the tables in their existing format (XLSX/CSV/PDF) plus the short legend/codebook. Partial access under Article 4(6) is fine; personal data can be redacted. Where a field is not held centrally for a given year, please indicate “not recorded centrally” and provide a brief reasoned nil-return for that field. Where access is refused in whole or in part, please identify the document(s) concerned and the legal basis for each redaction/refusal.

Following your clarifications, your request was updated accordingly and narrowed to documents held by DG R&I, DG CNECT and the executive agencies REA, CINEA and HADEA.

Finally, on 9 December, we informed you that, as DG R&I manages the Commission’s internal databases and repositories for all the services and agencies implementing R&I funding, this DG was able to provide you with one reply on behalf of all those addressed in your request.

Under points 3(a) and 3(b) of your request, DG R&I identified five documents (hereafter, the “requested documents”), covering all grants implemented by DG R&I, DG CNECT, REA, CINEA and HADEA:

1. Belgium_cost_entity type_H2020
2. Belgium_cost_entity type_HE
3. UOR Cost Category Description
4. 2025-5328_Audits
5. 2025-5328_Audits_cost categories

6. EXAMINATION UNDER REGULATION (EC) NO 1049/2001

Having examined the requested documents under the conditions of Regulation 1049/2001, we are pleased to inform you that full access can be granted to them. You can find them attached to this reply.

Documents N° 1 and 2 combine, for H2020 and HE, the total of the costs declared of Private for-profit entities (excluding Higher or Secondary Education Establishments)

based in Belgium by year of reporting and cost category. Segmentation per year is done against reporting year, not project signature year.

Document N°3 is a code-book showing the meaning of the cost categories identified for documents N° 1 and 2.

Document N° 4 contains the data requested on HR costs audits only, as no *ex-post controls/desk checks* could be identified. They concern H2020 only, as for Horizon Europe no audit exist yet.

Finally, document N° 5 provides the categories of tested/ineligible staff costs that were identified to extract document N°4, for your reference.

7. DISCLAIMER AND RE-USE OF THE DOCUMENTS

You may reuse the requested document free of charge for non-commercial or commercial purposes, provided that the source is acknowledged and that you do not distort the original meaning or message of the document. The Commission does not assume liability stemming from the reuse.

Yours sincerely,

Matthias Will
Director

PR UOR Cost Category	Description
ADD_FUNDING	Additional funding
ADD_FUNDING_SUBCONTRACTING	Additional funding (subcontracting and internally invoiced goods and services)
DIR_FIN_SUPP_COSTS	Direct costs of providing financial support to third parties
DIR_PERS_AVG_COSTS	Direct Personnel Cost declared as Average Cost
DIR_PERS_COSTS	Direct Personnel Cost declared as Actual Cost
DIR_PERS_UNIT_COSTS	Direct personnel costs declared as unit costs
DIR_SUBC_COSTS	Direct Subcontracting costs
EQUIP_COSTS	Equipment
IINV_GS_COSTS	Cost of Internally Invoiced Goods and services
INKIND_COSTS	Costs of in-kind contributions not used on premises
OTHER_DIR_COSTS	Other direct costs
OTHER_GWS_COSTS	Other goods, works and services
PCP_PPI_SUB_COSTS	Pre-Commercial Procurement (PCP) and Public Procurement of Innovative solutions (PPI) subcontracting costs
SME_OWNER_COSTS	SME owners and natural persons
TRAVEL_SUBS_COSTS	Travel and subsistence

Project Context Code	PR Participant LE Type Descr	PR UOR Cost Category	YEAR	PR UOR Costs in Eur
HORIZON	Private for-profit entities (excluding Higher or Secondary Education Establishments)	DIR_PERS_COSTS	2025	5,724.00
HORIZON	Private for-profit entities (excluding Higher or Secondary Education Establishments)	DIR_SUBC_COSTS	2025	335,827.96
HORIZON	Private for-profit entities (excluding Higher or Secondary Education Establishments)	EQUIP_COSTS	2025	189,080.21
HORIZON	Private for-profit entities (excluding Higher or Secondary Education Establishments)	IINV_GS_COSTS	2025	366,800.00
HORIZON	Private for-profit entities (excluding Higher or Secondary Education Establishments)	OTHER_GWS_COSTS	2025	3,189,775.13
HORIZON	Private for-profit entities (excluding Higher or Secondary Education Establishments)	TRAVEL_SUBS_COSTS	2025	223,236.17
HORIZON	Private for-profit entities (excluding Higher or Secondary Education Establishments)	DIR_PERS_COSTS	2024	133,849.03
HORIZON	Private for-profit entities (excluding Higher or Secondary Education Establishments)	DIR_SUBC_COSTS	2024	809,315.95
HORIZON	Private for-profit entities (excluding Higher or Secondary Education Establishments)	EQUIP_COSTS	2024	1,528,338.04
HORIZON	Private for-profit entities (excluding Higher or Secondary Education Establishments)	IINV_GS_COSTS	2024	23,141.25
HORIZON	Private for-profit entities (excluding Higher or Secondary Education Establishments)	OTHER_GWS_COSTS	2024	2,691,791.79
HORIZON	Private for-profit entities (excluding Higher or Secondary Education Establishments)	TRAVEL_SUBS_COSTS	2024	209,516.95
HORIZON	Private for-profit entities (excluding Higher or Secondary Education Establishments)	DIR_SUBC_COSTS	2023	3,830,385.06
HORIZON	Private for-profit entities (excluding Higher or Secondary Education Establishments)	EQUIP_COSTS	2023	16,481.75
HORIZON	Private for-profit entities (excluding Higher or Secondary Education Establishments)	OTHER_GWS_COSTS	2023	268,474.14
HORIZON	Private for-profit entities (excluding Higher or Secondary Education Establishments)	TRAVEL_SUBS_COSTS	2023	41,406.01

Project Co	PR Participant	LE Type	Descr	PR UOR Cost Category	YEAR	PR UOR Costs in Eur
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)			DIR_SUBC_COSTS	2025	16,915,202.17
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)			IINV_GS_COSTS	2025	219,235.28
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)			OTHER_DIR_COSTS	2025	93,474,053.74
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)			DIR_FIN_SUPP_COSTS	2024	668,410.82
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)			DIR_PERS_AVG_COSTS	2024	150,206.45
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)			DIR_PERS_COSTS	2024	106,819.63
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)			DIR_SUBC_COSTS	2024	2,299,997.36
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)			IINV_GS_COSTS	2024	148,373.35
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)			OTHER_DIR_COSTS	2024	9,091,489.91
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)			PCP_PPI_SUB_COSTS	2024	7,185,652.05
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)			DIR_FIN_SUPP_COSTS	2023	172,750.00
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)			DIR_PERS_AVG_COSTS	2023	58,203.06
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)			DIR_PERS_COSTS	2023	55,772.87
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)			DIR_SUBC_COSTS	2023	2,038,960.99
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)			IINV_GS_COSTS	2023	235,182.51
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)			INKIND_COSTS	2023	9,252.40
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)			OTHER_DIR_COSTS	2023	5,893,839.88
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)			DIR_FIN_SUPP_COSTS	2022	1,511,250.00
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)			DIR_PERS_COSTS	2022	813,774.34
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)			DIR_PERS_UNIT_COSTS	2022	18,242.00
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)			DIR_SUBC_COSTS	2022	3,381,152.81
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)			IINV_GS_COSTS	2022	310,054.21
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)			INKIND_COSTS	2022	176,707.73
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)			OTHER_DIR_COSTS	2022	7,511,163.76
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)			DIR_PERS_COSTS	2021	163,011.81
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)			DIR_SUBC_COSTS	2021	1,978,853.87
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)			IINV_GS_COSTS	2021	69,475.00
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)			INKIND_COSTS	2021	9,041.86
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)			OTHER_DIR_COSTS	2021	3,896,329.71
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)			DIR_PERS_COSTS	2020	139,835.33
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)			DIR_SUBC_COSTS	2020	3,507,091.03
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)			IINV_GS_COSTS	2020	223,422.99



H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)	INKIND_COSTS	2020	839.27
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)	OTHER_DIR_COSTS	2020	5,555,827.06
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)	DIR_PERS_COSTS	2019	226,057.73
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)	DIR_SUBC_COSTS	2019	2,774,527.21
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)	IINV_GS_COSTS	2019	103,724.69
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)	INKIND_COSTS	2019	997.02
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)	OTHER_DIR_COSTS	2019	3,620,195.45
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)	DIR_PERS_COSTS	2018	250,608.68
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)	DIR_SUBC_COSTS	2018	10,860,050.51
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)	IINV_GS_COSTS	2018	50,946.20
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)	INKIND_COSTS	2018	4,754.95
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)	OTHER_DIR_COSTS	2018	4,237,233.10
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)	DIR_PERS_COSTS	2017	140,636.08
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)	DIR_SUBC_COSTS	2017	1,402,125.13
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)	OTHER_DIR_COSTS	2017	1,366,403.18
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)	DIR_PERS_COSTS	2016	14,372.32
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)	DIR_SUBC_COSTS	2016	9,327,215.64
H2020	Private for-profit entities (excluding Higher or Secondary Education Establishments)	OTHER_DIR_COSTS	2016	1,503,708.40

Audit End Year	Number of audits / ex-post controls / desk checks in which personnel / staff costs of Belgian non-profit beneficiaries were examined
2017	4
2018	5
2019	6
2020	6
2021	2
2022	6
2023	5
2024	11
Grand Total	45

Audit End Year	Sum of Total_Absolute_COST	ACTIVITY_TYPE
		Total amount of personnel / staff cost found ineligible or corrected / recovered (Adjustment Against Amount Claimed/Declared)
2017		19,309.58
2018		26,847.42
2019		69,954.54
2020		251,435.76
2021		14,804.00
2022		316,326.00
2023		115,147.82
2024		392,087.55
Grand Total		1,205,912.67

**Total amount of personnel /
staff cost tested in those
controls (Amount
Claimed/Declared)**

1,114,646.52
2,426,342.89
5,798,326.93
9,060,941.90
690,822.67
3,336,799.17
1,931,048.11
4,908,214.59
29,267,142.78

EU Money Monitor

From: EU Money Monitor
Sent: Thursday, 30 October 2025 06:53
To: 'SG ACCES DOCUMENTS'
Subject: RE: Initial requests for access to documents - Ares(2025)9283926

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Secretariat-General team (SG.A.2),

Thank you for your message and transparency support.

In line with Article 6(2) of Regulation 1049/2001, I am formally narrowing and clarifying my request, so it targets concrete existing documents and is limited to a small set of services.

1. Geographic / management / beneficiary filters

For this narrowed request I am only seeking data that meets all of these filters:

- Beneficiary countries: **Belgium**
- Management type: **direct management**
- Beneficiary type: **private non-profit entities** (as coded in your systems: NGO/NFPO/AISBL/ASBL/foundation or equivalent “non-profit/non-commercial” legal-nature codes)
- Time period: 01/01/2014 – 31/12/2024 (inclusive). If 2024 is not yet consolidated, please provide up to the latest year held and specify so.

Note: I use the public FTS filters only to define this population. I am not asking you to generate or reconcile FTS outputs. This matches what the Financial Transparency System shows, as an example, for Belgium: approx. 2 500+ Belgian beneficiaries under direct management over 2014–2023, with around EUR 34 117.93 million contracted and EUR 26 532.21 million consumed. I am using those filters to define the population I am referring to.

2. Commission services to be covered

To respect your instruction to limit to specific departments/services, I am focusing on the main responsible departments that appear in Belgium’s allocations (direct management, 2014–2024) listed below:

- REA – European Research Executive Agency
- CNECT – Directorate-General for Communications Networks, Content and Technology
- HADEA – European Health and Digital Executive Agency
- CINEA – European Climate Infrastructure and Environment Executive Agency
- RTD – Directorate-General for Research and Innovation

If some of the requested summary tables are held by a central audit/assurance function (e.g., a Common Audit Service or central control unit) rather than the DG listed above, please **consult or transfer** the relevant part under Article 6(2) and indicate the split references. I am not asking you to create new analysis — only to disclose existing annual monitoring/assurance/audit summary tables as held.

3. Documents requested (what I actually want)

I am not asking you to create new analysis. Please disclose the existing annual monitoring / management / audit summary tables (including dashboards, annual assurance statistics, ex-post audit summary tables, internal XLSX monitoring sheets or equivalent) that each of the above

services already holds for internal financial assurance and audit reporting, which cover Belgian non-profit beneficiaries under direct management in the period 2014–2024.

Concretely, for each year 2014–2024, for Belgian non-profit beneficiaries under direct management, I request the tables that show in aggregate (not per project and not per person):

a) Amounts accepted/reimbursed as HR costs:

- personnel / staff costs.
- subcontracting.
- purchase of services / external experts / similar outsourced work.

b) HR cost control coverage:

- number of audits / ex-post controls / desk checks in which personnel / staff costs of Belgian non-profit beneficiaries were examined.
- total amount of personnel / staff cost tested in those controls.
- total amount of personnel / staff cost found ineligible or corrected / recovered.

If amounts tested/corrected are not recorded by beneficiary country, please provide the counts of controls where personnel costs were tested for Belgian beneficiaries and indicate the lowest level at which the amounts are held (e.g., programme-wide). “Not recorded centrally” is acceptable where applicable.

If your standard tables are EU-wide or multi-country, please provide them as held (no re-filtering required); I will isolate Belgium/non-profit on my side. If beneficiary-type is coded differently, please include the code legend. If a distinct “non-profit/NGO” filter is not available in your standard tables, please provide the same tables for all Belgian beneficiaries and include the beneficiary legal-nature codes/labels used. I will limit the analysis to non-profit categories on my side. Where your tables use different cost-category names or aggregate “services” differently, please provide the closest existing categories (e.g., personnel/staff; subcontracting; purchase of services/other goods & services) together with the code legend or mapping used internally. No re-work is requested.

Please provide the tables in their existing format (XLSX/CSV/PDF) plus the short legend/codebook. Partial access under Article 4(6) is fine; personal data can be redacted. Where a field is not held centrally for a given year, please indicate “not recorded centrally” and provide a brief reasoned nil-return for that field. Where access is refused in whole or in part, please identify the document(s) concerned and the legal basis for each redaction/refusal.

Please confirm that this message serves as my Article 6(2) narrowing for the open case numbers (EASE 2025/5326 through 2025/5514, insofar as they concern the services listed above) and that the 15-working-day deadline restarts on this scope.

If, for procedural reasons, you require me to re-submit the same narrowed wording separately to each listed service (e.g. DG RTD / REA / CINEA / etc.), please tell me explicitly which services must receive a separate filing so I can copy-paste this same narrowed request to them.

Kind regards,
Anca Păduraru

From: SG ACCES DOCUMENTS <sg-acc-doc@ec.europa.eu>
Sent: Wednesday, 29 October 2025 19:16
To: EU Money Monitor <watch@brussels-leaks.eu>
Subject: Initial requests for access to documents - Ares(2025)9283926

Subject: EASE 2025/5326 - 2025/5327 - 2025/5328 -2025/5329 - 2025/5330 - 2025/5331 - 2025/5332 - 2025/5333 - 2025/5334 - 2025/5335 - 2025/5336 - 2025/5337 - 2025/5338 - 2025/5339 - 2025/5340 - 2025/5341 - 2025/5342 - 2025/5343 - 2025/5344 - 2025/5345 - 2025/5373 - 2025/5374 - 2025/5375 & 2025/5514.

Dear Ms Păduraru,

We are writing concerning several initial requests for access to Commission documents that you have submitted, registered on 17 October 2025 under case numbers in subject.

Your requests were submitted to several Commission’s departments and concern access to various documents/information (summarising) :

administrative, statistical, and management documents for all direct-management grants/funding (2014–2023, inclusive), in a form that enables quantitative comparison of HR cost structures and audit coverage / EU-wide comparability of HR costs in all direct-management grants/funding (2014–2023, inclusive) / ex post audits/reviews/controls of direct-management grants (2014–2023) where personnel/HR costs were tested / aggregated, non-case-file statistics on investigations/ Central codebooks / mappings used in SEDIA/FTS or equivalent to classify legal-entity types etc.

Please note that the description provided in your application(s) does not enable us to identify any concrete documents.

In addition, the Commission notes that your applications concern potentially a large number of documents and involve several departments of the Commission, the handling of which can result in a **disproportionate administrative burden** for the institution as a whole.

In line with Article 6(2) of [Regulation \(EC\) No 1049/2001](#) regarding public access to documents, we invite you to send us more detailed information on the documents you request, such as references, more circumscribed dates or periods during which the documents would have been drawn up etc.

In addition, we kindly ask to **limit your requests** only to a couple of departments/services which may be concerned by it.

The 15 working days to reply to your request(s) will start running only when you reply to this message. If you do not reply within 7 working days, we will close these cases in line with our detailed rules for the application of Regulation (EC) No 1049/2001.

Kind regards,

SG.A.2 – Access to documents – cr