

SFAI MAKEDONIJA DOOEL Skopje St. 11 Oktomvri 24-1/4 1000 Skopje Republic of North Macedonia Tel. number: +389 (0)2 3166 144 Fax number: +389 (0)2 3166 156 Tax number: MK4080021599709 Bank account: 250-0101023078-05 Depositor: Sparkasse Banka AD, Skopje

### **REPORT ON FACTUAL FINDINGS**

Mr. Dusko Hristov, Project director and Finance manager HRANA ZA SITE – BHM Skopje (the "Coordinator") Str. Rudi Cajavec 35/3, 1000 Skopje – Aerodrom

29 September 2021

Dear Mr. Dusko Hristov,

In accordance with the terms of reference dated 15 January 2016, that you agreed with us on 3 September 2021, we provide our Report of Factual Findings ("the Report"), with respect to the accompanying Final Financial Report for the period covering 1 January 2018 through 30 June 2021 (Annex 1 of this Report). You requested certain procedures to be carried out in connection with your Final Financial Report and the European Union financed Grant Contract concerning "W-S-S Effect (food Waste – food Security – food Sustainability Effect) Building Capacities and Cultivating Accountability for real alleviation of (food) poverty", Grant Contract Number IPA/2017/394-257 (the "Grant Contract").

#### Objective

Our engagement was an expenditure verification which is an engagement to perform certain agreed-upon procedures with regard to the Final Financial Report for the Grant Contract between you and the European Commission (the "Contracting Authority"). The objective of this expenditure verification is for us to carry out certain procedures to which we have agreed and to submit to you a report of factual findings with regard to the procedures performed.

#### **Standards and Ethics**

Our engagement was undertaken in accordance with:

- International Standard on Related Services ('ISRS') 4400 Engagements to perform Agreed-upon Procedures regarding Financial Information as promulgated by the International Federation of Accountants ('IFAC);
- The Code of Ethics for Professional Accountants issued by the IFAC. Although ISRS 4400 provides that independence is not a requirement for agreed-upon procedures engagements, the Contracting Authority requires that the auditor also complies with the independence requirements of the Code of Ethics for Professional Accountants;

#### **Procedures Performed**

As requested, we have only performed the procedures listed in Annex 2 of the terms of reference for this engagement (see Annex 2 of this Report).

These procedures have been determined solely by the Contracting Authority and the procedures were performed solely to assist the Contracting Authority in evaluating whether the expenditure claimed by you in the accompanying Final Financial Report is eligible in accordance with the terms and conditions of the Grant Contract.

Because the procedures performed by us did not constitute either an audit or a review made in accordance with International Standards on Auditing or International Standards on Review Engagements, we do not express any assurance on the accompanying Final Financial Report.

(Continued)

#### REPORT ON FACTUAL FINDINGS

### **Procedures Performed (Continued)**

Had we performed additional procedures or had we performed an audit or review of the financial statements of the Beneficiaries in accordance with International Standards on Auditing, other matters might have come to our attention that would have been reported to you.

#### Sources of Information

The Report sets out information provided to us by you in response to specific questions or as obtained and extracted from your accounts and records.

#### **Factual Findings**

The total expenditure which is the subject of this expenditure verification amounts to 303,396 €.

The Expenditure Coverage Ratio is 98%. This ratio represents the total amount of expenditure verified by us, expressed as a percentage of the total expenditure, which is the subject of this expenditure verification. The latter amount is equal to the total amount of expenditure reported by you in the Financial Report and claimed by you for deduction from the total sum of the pre-financing under the Grant Contract as per your Payment Request as of 28 February 2019.

We report the details of our factual findings, which result from the procedures that we performed in Chapter 2 of this Report.

#### Use of this Report

This Report is solely for the purpose set forth above under objective.

This Report is prepared solely for your own confidential use and solely for the purpose of submission by you to the Contracting Authority in connection with the requirements as set out in Article 15 of the General Conditions of the Grant Contract. This report may not be relied upon by you for any other purpose, nor may it be distributed to any other parties.

The Contracting Authority is not a party to the agreement (the terms of reference) between you and us and therefore we do not owe or assume a duty of care to the Contracting Authority who may rely upon this expenditure verification report at its own risk and discretion. The Contracting Authority can assess for itself the procedures and findings reported by us and draw its own conclusions from the factual findings reported by us.

The Contracting Authority may only disclose this Report to other who have regulatory rights of access to it, in particular the European Anti-Fraud Office and the European Court of Auditors.

This Report relates only to the Final Financial Report specified above and does not extend to any of your financial statements.

We look forward to discussing our Report with you and would be pleased to provide any further information or assistance, which may be required.

Yours sincerely,

Nenad Randielovic

Director

29 September 2021

SFAI MAKEDONIJA DOOEL Skopje Ul. 11 Oktomvri 24-1/4, Skopje



Jane Ivanov

Certified auditor

HRANA ZA SITE – BHM Skopje

Report for an Expenditure Verification of a Grant Contract

External Action of the European Union

W-S-S Effect (food Waste – food Security – food Sustainability Effect) Building Capacities and Cultivating Accountability for real alleviation of (food) poverty

Grant Contract Identification Number IPA/2017/394-257

# TABLE OF CONTENTS:

Report on Factual Findings	1 - 2
Information about the Grant Contract	3 - 5
Procedures performed and factual findings	6 - 14
Annex 1 – Final Financial Report for the Grant Contract	

Page

Annex 2 – Terms of Reference for an Expenditure Verification

## 1. INFORMATION ABOUT THE GRANT CONTRACT

#### 1) Grant Contract

Overall objective is to encourage improvement of the legal and institutional framework that enables proper food waste prevention in the country. Hence, W-S-S\* action is designed with intention to create an adequate environment which stimulates an open debate between CSOs\*\* and different stakeholders (policy-makers, food industry, consumers) and consequently, inspires joint action for prevention and reduction of food waste and food poverty.

The estimated long-term impact of the action - adoption of adequate legislative instruments for food waste prevention and W-S-S campaign is:

(1) Primary: it will encourage reduction of food waste. (W-S-S will campaign and advocate for the country to join UN & EU target: 30% by 2030, 50% by 2050) and

(2) Secondary: it will encourage "rescue" and redistribution of edible surplus food to the needy. (W-S-S will campaign and advocate for reduction of food poverty and improved access to adequate food for 100,000 of the 455,000 living below the poverty line).

Thus, W-S-S Action focuses on two specific objectives:

- To strengthen the Informal Food Coalition capacities for effective strategic planning, evidence-based advocacy, and effective cooperation and communication which will improve their performance, image, connectedness, relevance &c. and
- 2) To rate public's awareness about the necessity of food waste prevention, chiefly the awareness of policy makers, food business, citizens (consumers), CSOs and media.

Through 3 sets of activities, explained below in the application, and in the Concept Note, the action will address the key obstacles or influencing factors that currently prevent effective food waste and food poverty response in the country: (1) low capacities of CSOs to deal with food poverty and food waste, (2) low awareness among citizens, businesses and policy-makers in the country on the correlation between food waste and the food poverty issue and their consequences, (3) lack of national regulation that will prevent food waste and will stimulate food surplus donation (4) lack of relevant food waste data.

The intervention activities W-S-S suggests for that purpose are focused on:

I. Assessment and building of capacity of Coalitions' CSOs with main goal to increase their effectiveness and to empower them to be responsible and responsive social actors and,
 II. Transferring of European (FBAO and FEBA\*\*\*) and region's best practices on food waste prevention and food poverty reduction/to the general public and to policy-makers and the food

## 2) The Action

industry.

The main activities of the actions are as follows:

- I. Activities for building of coalitions' capacities:
  - 1.1. Targeting FBC\*\*\*\* capacity- and partnership-development needs;
- 1.2. Visits from FBC and media to FEBA;
- 1.3. Knowledge exchange workshops with experts from FEBA;
- 1.4. Call for sub-granting of food waste prevention projects;
- 1.5. Networking and learning events
- II. Activities for raising public's awareness:
  - 2.1. Public food banking and food waste prevention presentations at 3 faculties
  - 2.2. Training of 3 young trainers;
  - 2.3. Student's cooking contest
  - 2.4. Preparation of Student's Food Banking Cookbook;
  - 2.5. Visibility and Educational media campaign
  - 2.6. Gathering best Balkan practices on food waste prevention;
  - 2.7. Final conference;
  - 2.8. Media coverage;

#### III. Activities encouraging legal and institutional change:

- 3.1. Gathering best Balkan (and EU) practices on food waste prevention;
- 3.2. Consultations with local, national officials, and businesses;
- 3.3. Expert research on related to food waste prevention regulations;
- 3.4. Compiling expert's opinion on poverty and food security;
- 3.5. Consultations with local, national officials, and businesses;
- 3.6. Food Waste Prevention draft law.

### 1. INFORMATION ABOUT THE GRANT CONTRACT (Continued)

- IV. Activities promoting protection of the poor and vulnerable from the Covid-19:
  - 4.1. Provision of food for Covid-19 emergency food aid;
  - 4.2. Provision of cotton/cloth face masks;
  - 4.3. Provision of sanitizers;
  - 4.4. Video production and airing;
  - 4.5. Production of informative leaflet;
  - 4.6. Design and printing of branded WSS Covid-19 T-shirts;
  - 4.7. Distribution of Covid-19 packages.

The Action was implemented by Organization for support and aid for the socially excluded and poor citizen FOOD FOR ALL – BHM SKOPJE ("the Coordinator") in partnership with SIBAHE – Slovenska Banka Hrane Slovenian Food Bank and Women's Organization of Strumica (the Co-beneficiaries").

The total costs of the Action eligible for financing by the Contracting Authority is estimated at EUR 342,424. The Contracting authority undertakes to finance a maximum of EUR 308,182 equivalent to 90% of the total eligible cost of the Action.

- \* Food Waste food Security food Sustainability Effect
- \*\* Civil Society Organizations
- \*\*\* European Federation of Food Banks
- \*\*\*\* Food Bank Coalition

# 1. INFORMATION ABOUT THE GRANT CONTRACT (Continued)

# 3) The Budget of the Action

Following are the key budget information as defined in the Annex III of the Grant Contract:

	Costs (in EUR) Total
Costs	Budget
1. Human resources	143,800
2. Travel	3,057
3. Equipment and supplies	838
4. Local office	-
5. Other costs, services	61,789
6. Other	102,940
7. Subtotal direct eligible costs of the Action (1-6)	312,424
8. Indirect costs (maximum 7% of 7, subtotal of direct eligible costs of the	
Action)	21,000
9. Total direct eligible costs of the Action (7+8)	333,424
10. Provision for contingency reserve (maximum 5% of 7, subtotal of direct	
eligible costs of the Action)	9,000
11 Total aligible costs (0,10)	242 424
11. Total eligible costs (9+10)	342,424
12. Taxes and Contributions in kind	
13. Total accepted costs of the Action (11+12)	342,424

The above presented budget is the final approved revised budget of the Action.

The Contracting authority has undertaken to finance a maximum of EUR 308,182 equivalent to 90% of the direct and indirect eligible budgeted cost of the Action totaling EUR 342,424.

### 2. PROCEDURES PERFORMED AND FACTUAL FINDINGS

We have performed the specific procedures listed in Annex 2A of the terms of reference for the expenditure verification of the Grant Contract ('ToR'). These procedures are:

- 1. General Procedures;
- 2. Procedures to verify conformity of Expenditure with the Budget and Analytical Review;
- 3. Procedures to verify selected Expenditure.

We have applied the rules for selection of expenditure and the principles and criteria for verification coverage as set out in Annex 2B (sections 3 and 4) of the ToR for this expenditure verification.

The total expenditure incurred and verified by us amounts to 303,396 €, which is summarized in the table below. The overall Expenditure Coverage Ratio is 98%.

	Budget as per <u>contract</u> 1	Reallo- cation/ Addendum 2		Actual expenditure as reported 4		age	Difference budget vs. actual 7(3-4)	Variation (%) 8(7/4)
1. Human Resources 1.1 Salaries (gross salaries including social security charges and other related costs local staff) 1.1.1 Technical	3							
1.1.1.1. Project coordinator (FBMK) 100%	46,800	(672)	46,128	46,010	46,010	100%	118	0%
<ul> <li>1.1.1.2. Project assistant &amp; local coordinator (OWS) 50 %</li> <li>1.1.1.3. Project Director &amp; finance</li> </ul>	11,700	-	11,700	11,669	11,669	100%	31	0%
manager (FBMK) 50% 1.1.2 Administrative/ support staff	23,400	-	23,400	23,386	23,386	100%	14	0%
1.1.2.1 Project administration officer (FBMK) 100% 1.2 Salaries (gross salaries including social security charges and other related costs expat/int. staff)	23,400	(428)	22,972	22,860	22,860	100%	112	0%
1.2.1.1 Capacity building senior officer (FBSL) 20%	, 16,560	-	16,560	16,593	16,593	100%	(33)	0%
1.2.1.2 Helpdesk assistant (FBSL 40% 1.3 Per diems for	) 23,040	-	23,040	23,076	23,076	100%	(36)	0%
<ul> <li>missions/travel<sup>5</sup></li> <li>1.3.1 Abroad (staff assigned to the Action)</li> <li>1.3.1.2 Abroad for FBMK staff in EU (1time x 2 persons x 3 nights = 6)</li> <li>1.3.3 Seminar/conference participants</li> <li>1.3.3.3 Study visit participants in EU (1time x 6 persons x 3</li> </ul>	= 900	(900)	-	-	-	-	-	-
nights=18), within Activity 1.2	2,700	(2,700)	-	-	-	-		
2. Travel 2.1. International travel 2.1.1.1 International travel for project EU Co-applicant staff in MK (4 times x 2persons), within Activities 1.3.1, 1.3.2, 2.1 and 3.6	<u>148,500</u> 2,400	<b>(4,700)</b> (1,809)	<b>143,800</b> 591	<b>143,594</b> 591	<b>143,594</b> 591	<b>100%</b>		<u>    0%  </u>

	Budget as per contract	Reallo- cation/ Addendum		Actual expenditure as reported e		Cover- age (%)	Difference budget vs. actual	Variation (%)
	1	2	3 (1+2)	4	5	6(5/4)	7(3-4)	8(7/4)
2.1.1.2 International travel for project Associate (FEBA staff) in MK (2 times x 2 persons), within Activities 1.3.1, and 3.6 2.1.1.3 International travel FBMK staff in EU (1 time x 2 persons), within Activity 1.2 2.1.1.4 International travel (Study visit of MK participants in EU) (1 timex6 persons), within Activity 1.2	1,200 600 1,800	78 (600) (1,540)	1,278	1,278 - 259	1,278 - 259	100%	-	0%
2.2 Local transportation 2.2.1.1 Local for W-S-S MK project staff	1,800	(872)	928	1,084	1,084	100%	(156)	(17%)
olan	7,800	(4,743)	3,057	3,212	3,212	100%		(5%)
		(1,1.13)	-,1	-,	- ,— - =		()	<u>\- / •/</u>
<ul> <li>3. Equipment and supplies</li> <li>3.1 Purchase or rent of vehicles</li> <li>3.2.1 Purchase of Video projector for FBMK</li> <li>3.2.2. Purchase of computers</li> <li>(Laptop/ desktop for FBMK project staff (including software: Windows)</li> </ul>	300	(44)	256	256	256	100%	-	0%
and license for MS Office) 3.3. Machines, tools	600 -	(18)	582 -	582	582 -	100% -	-	0%
	900	(62)	838	838	838	100%	-	0%
4. Local office	-	-	-	-	-	-	-	-
<ul> <li>5. Other costs, services</li> <li>5.1 Publications<sup>9</sup></li> <li>5.1.1 Project leaflet - design and printing (within activity 2.4)</li> <li>5.1.2 Student's Food Banking Cookbook - design and printing</li> </ul>	450	-	450	450	450	100%	-	0%
(within Activity 2.3)	750	-	750	746	746	100%	4	1%
<ul> <li>5.1.3 Best Balkan practices on food waste prevention design and printing (within activity 3.2)</li> <li>5.1.4 Expert's Opinion on food waste prevention and food poverty reduction - design and printing</li> </ul>	750	-	750	754	754	100%	(4)	(1%)
(within activity 3.4) 5.1.5 Food Waste Prevention draft	750	-	750	754	754	100%	(4)	(1%)
law - design and printing (within activity 3.3 & 3.5) <b>5.2 Studies, research</b> <sup>9</sup>	750	-	750	750	750	100%	-	(0%)
5.2.1 Student's Food Banking Cookbook (within Activity 2.3) 5.2.2 Best Balkan practices on	1,000	-	1,000	-	-	-	1,000	100%
food waste prevention (within Activity 3.2) 5.2.3 Expert's Opinion on food	3,000	-	3,000	-	-	-	3,000	100%
waste prevention and food poverty reduction (within Activity 3.4) <b>5.3 Expenditure</b> verification/Audit 5.3.1 Expenditure	3,000	-	3,000	2,991	2,991	100%	9	0%
verification/Audit-3 times at the end of each year <b>5.4 Evaluation cost N/A</b>	6,000 -	-	6,000 -	5,997 -	5,997 -	100% -	3	0% -

	Budget as per contract	Reallo- cation/ Addendum		Actual expenditure as reported		age	Difference budget vs. actual	Variation (%)
	1	2	3 (1+2)	4	5	6(5/4)	7(3-4)	8(7/4)
<b>5.5 Translation, interpreters</b> 5.5.1 Translation & proofreading of project leaflet from Macedonian into Albanian and English								
language (within activity 2.4) 5.5.2 Translation & proofreading of the Student's Food Banking Cookbook from Macedonian into	84	-	84	18	18	100%	66	79%
Albanian and English language (within activity 2.3) 5.5.3 Translation & proofreading of the Best Balkan practices on food waste prevention from English into	420	-	420	149	149	100%	271	65%
Macedonian and Albanian language (within activity 3.2) 5.5.4 Translation & proofreading of the Expert's Opinion on food waste prevention and food poverty	420		420	401	401	100%	19	5%
reduction from Macedonian into Albanian and English language (within activity 3.4) 5.5.5 Translation & proofreading of the Food Waste Prevention draft	420	-	420	446	446	100%	(26)	(6%)
law from Macedonian into Albanian and English language (within activity 3.3&3.5) 5.5.6 Interpretation from Macedonian / Albanian into English language and vice versa	420	512	932	932	932	100%		0%
(within Activity 1.3.1, 1.3.2, 2.1,3.1,3.6) 5.5.7 Translation of various	3,600	(2,274)	1,326	726	726	100%	600	45%
documents from Macedonian / Albanian into English language 5.6 Financial services 5.7 Costs of	700	-	700	116	116	100%	584	83%
<ul> <li>conferences/seminars<sup>9</sup></li> <li>5.7.1 Participatory Capacity Building Workshop for CSO's (act 1.3.1.)</li> <li>5.7.1.1 Venue rental, refreshments and participant travel costs (act.</li> </ul>								
<ol> <li>1.3.1)</li> <li>5.7.1.2 Accommodation of SIBAHE representatives (act.</li> </ol>	660	351	1,011	1,011	1,011	100%	-	0%
1.3.1)	1,200	(1,117)	83	82	82	100%	1	1%
5.7.1.3 Accommodation of FEBA representatives (act. 1.3.1) 5.7.1.4 Renting translation	1,200	-	1,200	400	400	100%	800	67%
equipment (act 1.3.1)	1,100	(314)	786	286	286	100%	500	64%
5.7.2 Info session for sub-grantees (act 1.3.1)	400	(112)	288	288	288	100%	-	0%
5.7.3 Workshop for grantees (act.1.3.1) 5.7.4 Networking events 5.7.4.1 Venue and refreshments	1,000	-	1,000	704	704	100%	296	30%
(act. 1.3.2) 5.7.4.2 Accommodation of	3,200	(975)	2,225	1,425	1,425	100%	800	36%
SIBAHE representatives, within act 1.3.2	300	(300)	-	-	-	-	-	0%

			Amended		Verified expenditure	age (%)	Difference budget vs. actual	(%)
5.7.4.3 Renting translation equipment (act. 1.3.2) 5.7.5 Public food banking and food	<u>1</u> 550	2 (550)	3 (1+2)	- 4	- 5	6(5/4)	7(3-4)	<u>8(7/4)</u> 0%
waste prevention 5.7.5.1 Public presentation for 3 faculties (Skopje) (within activity								
<ul><li>2.1)</li><li>5.7.5.1.2 Accommodation of</li><li>SIBAHE representatives in Skopje,</li></ul>	2,700	(1,807)	893	294	294	100%	599	67%
(within activity 2.1) 5.7.5.3 Renting translation	300	(300)	-	-	-	-	-	0%
equipment (act.2.1) 5.7.7 Student's cooking contest	550	(550)	-	-	-	-	-	0%
(within activity 2.2.1) 5.7.8 Training of young trainers (	600	-	600	600	600	100%	-	0%
within activity 2.2) 5.7.9 8 1-day round tables with	300	-	300	195	195	100%	105	35%
MPs and other stakeholders (3.1) 5.7.10 1 Public Hearing (3.1.) 5.7.11 Regional Conference	7,200 300	(3,589) -	3,611 300	1,824 -	1,824 -	100% -	1,787 300	49% 100%
(within activity 3.6) <b>5.8 Professional services</b> 5.8.1 Trainers (within activity 1.3.1	16,100	(16,100)	-	-	-	-	-	0%
<ul><li>&amp; 1.3.2)</li><li>5.8.2 Mentors for sub-grantees (3</li></ul>	2,700	-	2,700	1,618	1,618	100%	1,082	40%
persons) (within activity 1.4) 5.8.3 International consultants (EU legal issues, food waste	1,800	-	1,800	-	-	-	1,800	100%
prevention), within activities 3.1 5.8.4 Local consultants (social and economic issues, food poverty	4,800	(4,800)	-	-	-	-	-	0%
reduction), within activity 3.2 & 3.4 5.8.5 Legal experts for analyzing national legislation, within activity	1,800	-	1,800	-	-	-	1,800	100%
3.3 5.8.6 Legal experts for drafting the Food Waste Prevention law, within	1,800	-	1,800	1,800	1,800	100%	-	0%
activity 3.5 <b>5.9. Visibility actions<sup>10</sup></b> 5.9.1 Web site (design) (within	2,250	(1,050)	1,200	-	-	-	1,200	100%
activity 1.1.1) 5.9.2 Web site (maintenance)	1,200	-	1,200	1,200	1,200	100%	-	0%
(within activity 1.1.1) 5.9.3 On-line platform consultation process (design and	2,400	-	2,400	2,399	2,399	100%	1	0%
maintenance), within activity 2.4) 5.9.4 Social media platforms (FB / Tweeter boosting and	1,000	(1,000)	-	-	-	-	-	0%
maintenance), within activity 2.4 5.9.5 Internet lobbying campaign (design and maintenance), within	3,000	-	3,000	2,832	2,832	100%	168	6%
activity 2.4 5.9.6 Promo materials - provision, design and printing (Project banner, bags, USB flash, folders,	1,000	-	1,000	1,005	1,005	100%	(5)	(1%)
pens, badges), within activity 2.4 5.9.7 Project logo (design), within	4,500	-	4,500	4,488	4,488	100%	12	(1%)
activity 2.4 5.9.8 Photo and video footage,	500	-	500	499		100%	1	0%
within activity 2.4	1,800	-	1,800	1,416	1,416	100%	384	21%

		Reallo- cation/ Addendum	Amended	Actual expenditure as reported	Verified expenditure	age (%)	Difference budget vs. actual	(%)
	1	2	3 (1+2)	4	5	6(5/4)	7(3-4)	8(7/4)
5.9.8.1 Design and airing of FBMK video, within activity2.4 5.9.9 Launching and closing press	3,500	540	4,040	4,040	4,040	100%	-	0%
conference, within activity 2.4	1,000	-	1,000	916	916	100%	84	8%
	95,224	(33,435)	61,789	44,552	44,552		17,237	28%
<ol> <li>Other</li> <li>Sub-granting scheme (within activity 1.4)</li> </ol>		-	60,000	59,508	59,508		492	1%
<b>6.2 COVID-19 Activities</b> 6.2.1 Provision of food for Covid- 19 emergency food aid	-	32,400	32,400	27,124	27,124	100%	5,276	16%
6.2.2 Provision of cotton/cloth face masks		2 400	2,400	2 262	2,363	100%	37	2%
6.2.3 Provision of sanitizers	-	2,400 2,400	2,400	2,363 2,390	2,303	100%	10	
6.2.4 Video production and airing 6.2.5 Production of informative	-	1,500	1,500	1,500	1,500	100%	-	0%
leaflet 6.2.6 Design and printing of	-	900	900	757	757	100%	143	16%
branded WSS Covid-19 T-shirts 6.2.7 Distribution of Covid-19	-	900	900	851	851	100%	49	5%
packages	-	2,440	2,440	2,431	2,431	100%	9	0%
	60,000	42,940	102,940	96,924	96,924	100%	6,016	6%
7. Subtotal direct eligible costs of the Action (1-6)	312,424	-	312,424	289,120	289,120	100%	23,304	7.46%
<ol> <li>8. Indirect costs (maximum 7% of 7, subtotal of direct eligible costs of the Action) - 6.72%</li> </ol>	21,000	-	21,000	19,062	14,276	75%	1,938	9%
9. Total eligible costs of the Action, excluding reserve (7+ 8)	333,424	-	333,424	308,182	303,396	98%	25,242	7.57%
10. Provision for contingency reserve (maximum 5% of 7, subtotal of direct eligible costs of the Action)			0.000				9,000	100%
the Action)	9,000	-	9,000	-	-	-	9,000	100%
11. Total eligible costs (9+10)	342,424	-	342,424	308,182	303,396	98%	34,242	10.00%
12 Taxes and Contributions in kind	-	-	-	-	-	-	-	-
13. Total accepted costs of the action (11+12)	342,424	-	342,424	308,182	303,396	98%	34,242	10.00%

We have verified the selected expenditure as shown in the above summary table and we have carried out, for each expenditure item selected, the examination procedures specified at point 3.1 to 3.7 of Annex 2A of the ToR for this expenditure verification.

We report our factual findings resulting from these procedures below.