



Co-funded by the European Union

Single Market Programme (SMP/SME Pillar)

“COVID-19 Recovery through Sustainable Tourism Growth and SME Support”

(SMP-COSME-2021-TOURSME)



TRACE

SMEs **TRANSITION** FOR A EUROPEAN
CIRCULAR TOURISM **ECOSYSTEM**

TRACE OPEN CALL FOR SMEs SUPPORT GUIDE FOR APPLICANTS

Disclaimer

Co-funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or EISMEA - European Innovation Council and SMEs Executive Agency. Neither the European Union nor the granting authority can be held responsible for them



Summary

1.	TRACE SUPPORT PROGRAMME OVERVIEW	4
2.	GENERAL INFORMATION	6
2.1	OPEN CALL PUBLICATION	6
2.2	SUPPORT PROVIDED	6
2.2.1	SERVICES SUPPORT FROM TRACE PROGRAMME	6
2.2.2	DIRECT FUNDING (FSTP)	7
2.2.3	NUMBER OF COMPANIES TO BE SUPPORTED	7
2.2.4	LIST OF ELIGIBLE ACTIVITIES	7
2.2.5	TYPE OF ELIGIBLE COSTS	8
2.2.6	ELIGIBLE PARTICIPANTS (eligible countries)	8
2.2.7	LANGUAGE	9
2.2.8	DOCUMENTS FORMATS	9
2.2.9	MULTIPLE SUBMISSIONS	9
2.2.10	ABSENCE OF CONFLICT OF INTEREST	9
2.2.11	ETHICAL ISSUES	10
2.2.12	DATA PROTECTION	10
2.2.13	FIXED DATES AND TENTATIVE DATES	10
3.	SUBMISSION PROCESS	10
3.1	OVERALL PROCESS	10
3.2	PROPOSAL PREPARATION AND SUBMISSION	11
4.	EVALUATION AND SELECTION	11
4.1	PROPOSAL ELIGIBILITY CRITERIA	12



TRACE

SMEs TRAnstition for a European Circular tourism Ecosystem

4.2	ADMISSIBILITY AND ELIGIBILITY CHECK	12
4.3	PROPOSAL EVALUATION	12
4.4	SERVICE AGREEMENT INVITATION	14
4.5	REDRESS PROCESS	14
5.	PROCEDURES	15
5.1	PROCEDURES RELATED WITH DIRECT FUNDING	15
5.2	RESPONSABILITIES OF THE BENEFICIARIES	15
5.3	CONFLICT OF INTEREST	15
5.4	DATA PROTECTION AND CONFIDENTIALITY	16
5.5	INTERNAL COMMUNICATION	16
6.	GLOSSARY OF TERMS AND DEFINITIONS	16
7.	ANNEXES	18



TRACE

SMEs TRAnSition for a European Circular tourism Ecosystem

1. TRACE SUPPORT PROGRAMME OVERVIEW

TRACE is a project co-funded by the European Commission under the Single Market Programme (SMP SMP/SME Pillar), which aims to provide sustainability services such as strategies, training activities and tools for tourism SMEs willing to innovate their business models and enhance their performance from a sustainability and circularity perspective¹.

To reach the project objectives, TRACE Consortium is launching this Open Call for SMEs Support that is a competitive process by which European tourism SMEs apply to have access to the envisaged services and financial support. The provided set of services and financial support shall boost tourism SMEs awareness, development, and capacity to integrate sustainable innovations in their business practice, adopting sustainability, resilience and circularity as drivers of their competitiveness in the rapidly changing global tourism market scenario.

This Guide for Applicants provides an overview of the programme's approach and detailed information on how to participate in the Open Call for SMEs Support.

Disclaimer: This guide aims to support potential applicants to apply for the Open Call of the TRACE Support Programme for tourism SMEs. It is provided for information purposes only and is not intended to replace consultation of any applicable legal sources. Neither the European Commission nor the European Innovation Council and SMEs Executive Agency (EISMEA) can be held responsible for the use made of this guidance document.

The TRACE Support Programme will involve directly at least 100 SMEs in 5 European countries (Italy, Belgium, Spain, Romania and Cyprus) that will be projected to become “champions” of sustainability and inspire other micro and small-sized enterprises in their local contexts.

The TRACE Support Programme activities will focus on sustainability aspects such as analysis of Greenhouse Gases (GHG) emissions, development of sustainability plans, support for application to EU eco-label and other certification processes, and monitoring of a set of key indicators for the level of sustainability and circularity. Particular attention will be given to the enhancement of skills and capacities of the involved SMEs internal staff, through training and capacity building activities, and a series of direct support services dedicated to certification processes, sustainable finance and innovation management. A step-by-step and learning-by-doing approach is prioritized in the programme to bring also the small enterprises with less qualified staff to manage a process of innovation and implement relevant measures to reduce their environmental impacts while increasing economic resilience. Thus, the whole TRACE Support Programme aims at supporting tourism SMEs in taking their first steps towards the sustainability journey, starting a process which has a large potential to bring benefits not only to the single enterprise but to the entire territory/society.

¹ Detailed description of project objectives is provided at the following link: <https://www.ispc.cnr.it/en/2023/02/21/trace/>



TRACE

SMEs TRAnSition for a European Circular tourism Ecosystem

The TRACE Support Programme for tourism SMEs is organized in four interconnected phases, the Phase 1: Capacity Building Support, the Phase 2: Assess & Recommend, the Phase 3: Circular Business Direct Support, and the Phase 4: Financial Support for selected tourism SMEs. 100 SMEs will participate through the whole project programme that spans from October 2023 to April 2025.

TRACE Support Programme is deployed through the launch of this Open Call on March 30th, 2023, until June 30th, 2023. After the selection is completed, the SMEs will be invited to sign the service agreement and enter the TRACE Support Programme for tourism SMEs.

An overview of the TRACE Support Programme for tourism SMEs can be found in Figure 1.

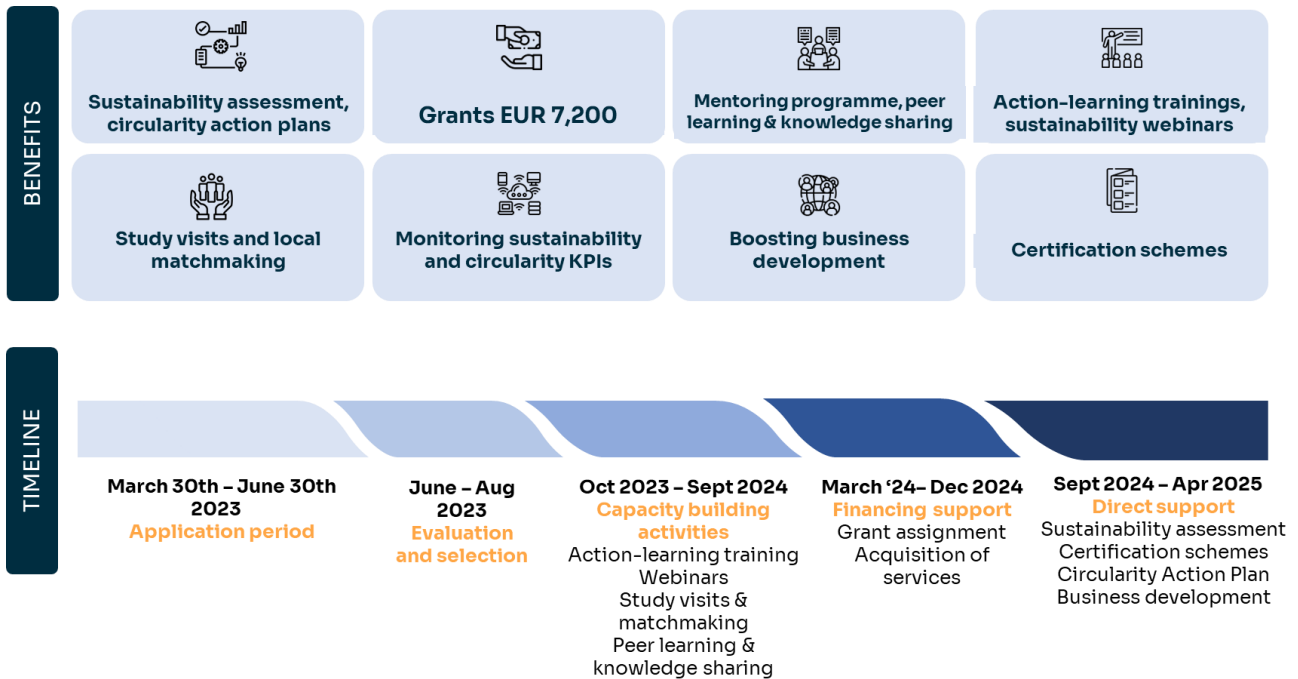


Figure 1 - Open Call and TRACE Support Programme for tourism SMEs

TRACE OPEN CALL OVERVIEW	
Opening of the call	March 30 th , 2023
Deadline	June 30 th , 2023, 17,00h CET
Eligible countries	Italy, Belgium, Spain, Romania and Cyprus
Max. Grant foreseen per SME	EUR 7,200
Open call application form	TRACE Application Form
Help desk	support@iniziativa.cc *
TRACE project webpage	https://www.ispc.cnr.it/en/2023/02/21/trace/

*Potential applicants can submit request for clarifications and FAQs will be published within the project webpage on a regular basis.



TRACE

SMEs TRAnSition for a European Circular tourism Ecosystem

2. GENERAL INFORMATION

2.1 OPEN CALL PUBLICATION

The Open Call is defined by the following documents:

- Guidelines for Applicants: this present guide aims to assist potential applicants. The document provides a full set of information regarding the Open Call for application to the TRACE Support Programme;
- Application Form template: a template with guidelines for the information to be provided by the applicants in coherence with the evaluation criteria;
- Service Agreement Template: a template of the service agreement that the successful applicants will be requested to sign, which will include:
 - Declaration of Honour: which declares that all conditions of the TRACE Support Programme are accepted by an SME provider legal representative and no conflict of interest with TRACE Consortium partners exists and
 - SME Declaration: which declares the status of the SMEs participating in the TRACE Programme.

2.2 SUPPORT PROVIDED

2.2.1 SERVICES SUPPORT FROM TRACE PROGRAMME

The services support under TRACE Support Programme for tourism SMEs will be delivered by the TRACE Consortium members and are divided in three interconnected phases, the Phase 1: Capacity Building Support, the Phase 2: Assess & Recommend and the Phase 3: Circular Business Direct Support. The support within Phase 1, Phase 2 and Phase 3 for SMEs provided by TRACE Consortium members under the form of services are valued approximately EUR 4,000 per SME.

TRACE tailored services will be delivered as follows:

Phase 1: Capacity Building Support

The aim of the activities under Phase 1 is to strengthen the capacity of the involved tourism SMEs to add value to modern business and society. TRACE Consortium will provide the SMEs with tools and methodologies aimed at recognizing and maximizing opportunities for tourism while putting sustainability, circularity, regeneration and positive societal impacts at the core of their business models. The main objectives are: enhancing skills and capacities of selected SMEs through action-learning training, workshops & peer learning; raise awareness and inspire SMEs through study visits & awareness raising activities; establish new cooperation activities of involved tourism SMEs through matchmaking, knowledge sharing, and best practices exchange.

Phase 2: Assess & Recommend

The involved tourism SMEs will be provided with a self-assessment questionnaire in order to map and assess their needs and challenges towards sustainable and circular tourism. Based on the self-assessment feedback, training, peer learning and knowledge exchange under Phase 1, the involved SMEs will be able, also with the support of the Trace mentoring programme, to develop their Sustainability Plan.



TRACE

SMEs TRAnSition for a European Circular tourism Ecosystem

Phase 3: Circular Business Direct Support

The aim of the activities under Phase 3 is to enhance sustainability strategies and practices related to circular and sustainable tourism for the SMEs involved in the programme, providing direct support to 30 individual tourism SMEs selected between those participating Phase 1 and Phase 2 activities. Direct support will be provided with a focus on the environmental assessments and certifications towards circular and sustainable tourism (e.g. EU Ecolabel, EMAS, PEF/OEF schemes or other); and strategic business development for sustainability and circularity, including business modelling, business planning, and investment strategies to enhance sustainability, resilience, cooperation and competitiveness of the SMEs.

2.2.2 DIRECT FUNDING (FSTP)

In addition to the services provided by the Consortium under Phase 1, 2 and 3 as described in 2.2.1, within Phase 4 beneficiaries will be awarded with direct funding of maximum EUR 7,200 to deploy their Sustainability Plan.

2.2.3 NUMBER OF COMPANIES TO BE SUPPORTED

- Phase 1 | Capacity Building Support and Phase 2 | Assess & Recommend – *at least 100 SMEs*;
- Phase 3 | Circular Business Direct Support – *at least 30 SMEs*;
- Phase 4 | Financial Support – *100 SMEs, 20 SMEs per each eligible country*.

Depending on the quality of the applications, the TRACE Consortium may decide to select more applications than foreseen.

2.2.4 LIST OF ELIGIBLE ACTIVITIES

During the TRACE Support Programme, the SMEs will receive the direct equity-free funding under the form of grant for the following eligible activities:

- Fitness check for tourism SMEs as regards sustainability practices and strategies, and compliance check for upcoming regulations;
- Supporting tourism SMEs preparation and application for sustainability/environmental certification, such as EU Ecolabel certification and EMAS registration;
- Implementation of the Environmental Footprint Methods as part of the tourism SMEs sustainability strategy development (support the generation of Product Environmental Footprint, PEF, studies and Organisation Environmental Footprint, OEF, studies);
- Supporting the development of the tourism SMEs sustainability strategy and implementing the improvement measures following the recommendations of the PEF/OEF studies;
- Supporting upskilling and re-skilling of tourism SMEs on sustainability, digital innovation and data management;
- Boosting innovation in sustainable and resilient tourism through knowledge transfer and cross-sectoral collaboration;
- Increasing the competitiveness of tourism SMEs by improving their capacity and uptake of innovative sustainable solutions geared towards increased resilience;
- Developing sustainable business strategies in line with forward-looking market trends, to facilitate return of investment and the diversification of service offers;



TRACE

SMEs TRAnSition for a European Circular tourism Ecosystem

- Developing socially sustainable tourism models, considering the impact and participation of local communities and reducing problems of over-tourism.

If an applicant acquires services similar to the ones provided under TRACE Support Programme, those services will be deemed not eligible.

If an applicant participates in another Open Call funded/co-funded by EU funds on the same topic, the services acquired must be different.

2.2.5 TYPE OF ELIGIBLE COSTS

The eligible costs for TRACE financial support scheme are only those costs claimed for the activities under 2.2.3 and represented by:

- costs for advisory/experts services;
- costs for accommodation, travel or participation fees at events/training connected to the capacity building and networking activities of TRACE project. The maximum expense for travel, registration and accommodation costs is 20% of the total claimed costs;
- costs for access to sustainability certification.

2.2.6 ELIGIBLE PARTICIPANTS (eligible countries)

To be eligible, the applicants must:

- be a Small and Medium-sized Enterprise (SME):
 - An SME will be considered as such if complying with the [European Commission Recommendation 2003/361/EC](#) and the [SME qualification guide](#);
 - SMEs that do not have yet annual turnover or balance sheets are also considered eligible given that they fulfil the mentioned criteria of the SME definition;
 - In case an SME enters the TRACE Support Programme, it will remain eligible even if, at a certain point during the programme execution, it does not fulfil criteria of the SME definition;
- be SMEs working in tourism sector, ideally demonstrating or aiming for innovation in tourism, *preferably* within the following categories, in line with these Eurostat classes²:
 - I5510 — Hotels and similar accommodation
 - I5520 — Holiday and other short-stay accommodation
 - I5530 — Camping grounds, recreational vehicle parks and trailer parks
 - I5610 — Restaurants and mobile food service activities
 - I5630 — Beverage serving activities
 - N7710 — Renting and leasing of motor vehicles
 - N7721 — Renting and leasing of recreational and sports goods
 - SMEs in other sectors (e.g. R - arts, entertainment and recreation) can take part in the selection process, while they need to demonstrate that their activities are linked to the tourism sector
- be a legal entity established in one of the following countries:

²https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Tourism_industries_-_employment#Data_sources



TRACE

SMEs TRAnSition for a European Circular tourism Ecosystem

- o Italy
- o Belgium
- o Spain
- o Romania
- o Cyprus
- o Applicants that are legal entity SMEs established and based in the other European Union or EU Associated Countries³ are eligible to participate in TRACE Support Programme (e.g. action-learning trainings, awareness raising towards sustainability and circular tourism webinars, networking activities etc.) but are excluded from receiving funding support;
- not have had convictions for fraudulent behaviour, other financial irregularities, unethical or illegal business practices;
- not have been declared bankrupt or have initiated bankruptcy procedures;
- are not under liquidation or is not an enterprise under difficulty according to the [Commission Regulation No 651/2014](#), art. 2.18;
- are not excluded from the possibility of obtaining EU funding under the provisions of both national and EU law, or by a decision of either national or EU authority.

Please note that a signed version of the Declaration of Honour and the SME status will be requested during the contract preparation phase.

2.2.7 LANGUAGE

English is the only official language of the TRACE project. Submissions done in any other language will not be eligible and will not be evaluated. English is also the only official language during the whole execution of the TRACE Support Programme. This means that all official communications will be in English, and all deliverables and reports will only be accepted if in English.

2.2.8 DOCUMENTS FORMATS

Unless otherwise stated in specific questions of the application form, any document requested in any of the phases must be submitted electronically in PDF format without restrictions for printing.

2.2.9 MULTIPLE SUBMISSIONS

Only one proposal will be accepted per SME. In case an SME submits more than one proposal, only the application submitted last will be considered. Later applications after the Call deadline will be deemed ineligible.

2.2.10 ABSENCE OF CONFLICT OF INTEREST

Applicants shall not have any actual or/and potential conflict of interest with the TRACE selection process and during the project implementation. All cases of conflict of interest will be assessed case by case by a review committee.

³ https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/smp/guidance/list-3rd-country-participation_smp_en.pdf



TRACE

SMEs TRAnSition for a European Circular tourism Ecosystem

TRACE Consortium partners, its affiliated entities, employees, and permanent co-operators cannot become a recipient of support via the Open Call. This would be in breach of the European Commission's rules.

2.2.11 ETHICAL ISSUES

TRACE complies with the fundamental ethical issues particularly those outlined in the "European Code of Conduct for Research Integrity"⁴. All applicants must comply with the above-mentioned European fundamental ethical issues. Applications that fail to properly address ethical issues or inadequately deal with privacy aspects will be rejected.

2.2.12 DATA PROTECTION

To process and evaluate applications, TRACE members will need to collect Personal and Organisation Data. Iniziativa Cube S.r.l., as the TRACE Open Call Coordinator, will act as Data Controller for data submitted through the EU Survey platform for these purposes. The EU Survey platform's system design and operational procedures ensure that data is managed in compliance with the General Data Protection Regulation (EU) 2016/679 (GDPR). Each applicant will accept the Privacy policy terms to ensure coverage of GDPR provisions.

2.2.13 FIXED DATES AND TENTATIVE DATES

The TRACE project has planned the Open Call and the TRACE Support Programme activities in a way to ensure that enough time has been allocated to each phase for successful completion. The project recognizes that unforeseen events might occur.

To keep transparency and fairness among applicants, the Open Call closing dates are fixed dates and will only be updated in case of unforeseen events.

All other dates mentioned in this document are tentative and may be updated to accommodate specific needs of the SMEs and the Consortium.

3. SUBMISSION PROCESS

3.1 OVERALL PROCESS

Timeline for applications is as follows:

- **Application period opens: Thursday March 30th, 2023**
- **Application period closes: Friday June 30th, 2023, 17h00 Central European Time**

Applications are submitted by the SMEs through the dedicated electronic Application Form on the EU Survey platform: <https://ec.europa.eu/eusurvey/runner/CALLSMPTOURSME>.

The application form includes questions related to the TRACE Support Programme and specific acknowledgment to the conditions of the programme.

⁴https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/horizon/guidance/european-code-of-conduct-for-research-integrity_horizon_en.pdf



TRACE

SMEs TRAnSition for a European Circular tourism Ecosystem

After the Open Call closing date, the programme management committee will select successful evaluated applications and invite the SMEs to submit the documents for contract preparation.

If an SME fails to meet the deadline to submit the documents as listed in section 4.4 below, the invitation is cancelled, and another SME, who was placed on the reserve list, will be invited to participate.

3.2 PROPOSAL PREPARATION AND SUBMISSION

The electronic Application Form through EU Survey portal will be the entry point for all proposals that will be submitted to TRACE Support Programme. Interested applicants, represented by legal representatives of tourism SMEs, are requested to apply online and answer all mandatory questions (with no exception) at: [TRACE Application Form](https://ec.europa.eu/eusurvey/runner/0db7b63e-e7f1-7874-2930-0e8f292844e4) (<https://ec.europa.eu/eusurvey/runner/0db7b63e-e7f1-7874-2930-0e8f292844e4>).

If the applicant discovers an error in the proposal, and provided the call deadline has not passed, the applicant may request the INIZIATIVA CUBE team to re-submit the proposal (for this purpose please contact at support@iniziativa.cc). However, TRACE members cannot guarantee resubmission will be done in time if requested shorter than 2 working days before the deadline.

If a proposal is re-opened and re-submitted, the time stamp considered is the one of the final submissions.

It is strongly recommended not to wait until the last minute to submit the proposal. Failure of the proposal to arrive in time for any reason, including network communications delays or working from multiple browsers or multiple browser windows, is not acceptable as an extenuating circumstance. Late submissions are not permitted. The time of receipt of the application as recorded by the submission system will be definitive.

Only proposals submitted through the EU Survey Log In of the legal representatives will be accepted. Proposals submitted by any other means will not be considered nor evaluated. A full list of applications will be drafted containing basic information for statistical purposes (in accordance with GDPR), and clarity (which will also be shared with the European Commission for transparency).

The application reception will close in the date and time mentioned in Section 2. There will not be any deadline extensions unless there is a Force Majeure situation (e.g., a major problem caused by the EU Survey platform and not by the applicants, which makes the system unavailable for a long period).

4. EVALUATION AND SELECTION

The applications will be collected, analysed and assessed by an Evaluation Board composed of TRACE Consortium members. Applications will be sorted and selected following three main steps:

- Admissibility and Eligibility check
- Proposal evaluation
- Ranking and final selection



TRACE

SMEs TRAnSition for a European Circular tourism Ecosystem

4.1 PROPOSAL ELIGIBILITY CRITERIA

The following proposal eligibility criteria apply:

- Proposals must be compliant with all eligibility criteria set in Section 2.2.;
- Each SME may submit only one (1) proposal. In case an SME submits more than one proposal, only the last application will be accepted;
- The SMEs that participated in the Open Call and were not selected for the funding support, could be qualified to participate for free within selected activities of the TRACE Support Programme to benefit of capacity building and networking opportunities.

4.2 ADMISSIBILITY AND ELIGIBILITY CHECK

A manual filtering process will be used to discard ineligible proposals. The admissibility/eligibility criteria check will verify:

- The proposal was submitted before the call deadline electronically via EU Survey portal [Y/N]
- The proposal is completed and contain all the requested information in the Application Form [Y/N]
- The proposal is written in the English language [Y/N]
- The applicant is a legal entity established in the eligible countries described in Section 2.2 [Y/N]
- The applicant is an SME as defined in Section 2.2. [Y/N]
- The applicant SME is operating in the tourism sector as described in Section 2.2. [Y/N]

A Proposal is admissible/eligible if the ALL answers to the previous criteria are Yes.

After the call closes, proposals being marked as ineligible will get a rejection letter including the reasons for being considered as ineligible. No further feedback on the process will be given. Applicants are entitled to use the redress process defined in section 4.5.

4.3 PROPOSAL EVALUATION

A team of experts of TRACE project will be defined to evaluate the applications: two (2) experts will evaluate remotely the proposals and will assign individual and final scoring.

Experts will rank each criterion with marks between 0 and 5. Half point scores are not given. Score values will indicate the assessments as defined in Section 6. All criteria have the same weight.

In the end of the evaluation period the Consortium will review the scores provided by the different experts to assess the following items:

- Significant discrepancies in the scores of specific proposals;
- Consistent significant deviations in scoring from specific evaluators.

The Consortium will hold consensus meetings to consolidate the scores taking into consideration also the geographical distribution of the proposals in order to achieve the expected SMEs targets.



TRACE

SMEs TRAnSition for a European Circular tourism Ecosystem

Award criterion	Score
Award criterion 1: Alignment to TRACE project circular tourism objectives and expected impacts <i>Applicants must demonstrate a clear set of objectives aligned with the definition of the TRACE goals and with the general objectives of the project</i>	<i>Minimum threshold 3/5</i>
Award criterion 2: Impact <i>Applicants must demonstrate the expected outcomes and impacts of the TRACE Support Programme and its contribution to SME circular development</i>	<i>Minimum threshold 3/5</i>
Award criterion 3: Feasibility of transition towards sustainability <i>Applicants must provide credible evidence that the project team is committed to learn/grow and has the necessary skills and management experience to be able to implement the circular economy transition</i>	<i>Minimum threshold 3/5</i>
Remarks	Overall score <i>Minimum threshold 9/15</i>

At the end of the evaluation process all applications will be ranked in 5 country-based lists (refer to list of eligible countries in Section 2.2). The criteria for the ranking for each list will follow the rules:

- Rule 1: The Applications will be ranked based on their overall score (sum of the criterion 1 to 3);
- Rule 2: In case following Rule 1 there are Applications in the same position, priority will be given to Applications that have higher scores in the award criterion 1 TRACE project circular tourism objectives and expected impacts;
- Rule 3: In case following Rule 2 there are Applications in the same position, priority will be given to Applications that have a higher score in the award criterion 2 Impact;
- Rule 4: In case following Rule 3 there are Applications in the same position, priority will be given to the one submitted earliest.



TRACE

SMEs TRAnSition for a European Circular tourism Ecosystem

4.4 SERVICE AGREEMENT INVITATION

After the TRACE Open Call final selection, the Open Call coordinator will start the contract preparation in collaboration with the proposals' coordinator that have been invited. The Contract preparation will go via an administrative and financial checking (and potentially into technical or ethical/security negotiations). On a case-by-case approach, a phone call or teleconference may be needed for clarification.

The objective of the contract preparation is fulfilling the legal requirements between the TRACE Consortium and every beneficiary of the call.

It should be emphasized that each SME must provide at contract preparation time a valid VAT number. Failure to provide the VAT number will automatically result in proposal rejection.

The sub-project negotiation must be concluded within two weeks since the first communication sent by the Consortium to the selected SME. In case an SME fails to provide all information within the above period, the application is automatically rejected and the next application on the reserve list is invited.

At the end of the negotiation phase, the Service Agreement will be signed between the TRACE Open Call coordinator and the beneficiary SME.

Please note that the Service Agreement/contract will cover the complete TRACE Programme.

4.5 REDRESS PROCESS

Within 3 working days of the delivery of a rejection letter considering the proposal as ineligible, the proposer may submit a request for redress if they believe the results of the eligibility checks have not been correctly applied.

In that case, an internal review committee of the TRACE Consortium will examine the request for redress. The committee's role is to ensure a coherent interpretation of such requests, and equal treatment of applicants.

Requests must be:

- Related to the evaluation process or admissibility/eligibility checks;
- Clearly describe the complaint;
- Received within the time limit (3 working days) from the reception of a rejection letter considering the proposal as ineligible or the Selection Report information letter delivered;
- Sent by the SME legal representative that has also submitted the proposal;

The committee will review the complaint and will recommend an appropriate course of action. If there is clear evidence of a shortcoming that could affect the eventual funding decision, it is possible that all or part of the proposal will be re-evaluated.

Please note:

- This procedure is concerned only with the evaluation and/or admissibility/eligibility checking process. The committee will not call into question the scientific or technical judgment of appropriately qualified experts;
- A re-evaluation will only be carried out if there is evidence of a shortcoming that affects the final decision on whether to fund it or not. This means, for example, that a problem relating



TRACE

SMEs TRAnSition for a European Circular tourism Ecosystem

to one evaluation criterion will not lead to a re-evaluation if a proposal has failed anyway on other criteria;

- The evaluation score following any re-evaluation will be regarded as definitive. It may be lower than the original score;
- Only one request for redress per proposal will be considered by the committee. All requests for redress will be treated in confidence and must be sent to the Open Call coordinator via email to support@iniziativa.cc

5. PROCEDURES

5.1 PROCEDURES RELATED WITH DIRECT FUNDING

The Financial Support programme (Phase 4) is expected to **start in March 2024 and close in December 2024** and will last **9 months for the beneficiary SMEs in this timespan**.

The granted SMEs will be called to deliver Inception and Final reports where they will describe respectively the services to be acquired and their results. The costs must be incurred within the duration of the Financial Support programme.

The Inception report is due by the end of month 1 from the start of the Financial Support programme.

The Final report is due within 30 calendar days after the end of the Financial Support programme. Monitoring of the progress of the Financial Support programme implementation will be made at mid-term and at programme closure.

Payments will be made after positive assessment of the reports. The Consortium commits to evaluate all reports within one month of delivery and complete payment procedures within three weeks after the acceptance of the report.

Payment scheme will be as follows:

- **40% as pre-financing after contract signature and submission of the Inception report;**
- **60% as final payment after the acceptance of the Final report and costs incurred.**

If the SME fails to deliver a report within ten working days after the due date, the Consortium will take measures to ensure verity that the work foreseen was performed and eventually terminate the project.

5.2 RESPONSABILITIES OF THE BENEFICIARIES

The selected SMEs are indirect beneficiaries of European Commission funding. As such, they are responsible for the proper use of the funding and ensure that the recipients comply with obligations under Single Market Programme specific requirements.

5.3 CONFLICT OF INTEREST

Tourism SMEs beneficiaries must take all measures to prevent any situation where the impartial and objective implementation of the programme is compromised for reasons involving economic



TRACE

SMEs TRAnSition for a European Circular tourism Ecosystem

interest, political or national affinity, family or emotional ties or any other shared interest ('conflict of interests').

They must formally notify the TRACE Coordinator without delay of any situation constituting or likely to lead to a conflict of interests and immediately take all the necessary steps to rectify this situation. The TRACE Coordinator may verify that the measures taken are appropriate and may require additional measures to be taken by a specified deadline.

5.4 DATA PROTECTION AND CONFIDENTIALITY

During implementation of the TRACE Support Programme and for five years after the end of the programme, the parties must keep confidential any data, documents, or other material (in any form) that is identified as confidential at Service Agreement signing time ('confidential information').

If a beneficiary SME requests, the Commission and the TRACE Consortium may agree to keep such information confidential for an additional period beyond the initial four years. This will be explicitly stated in the Service Agreement.

If information has been identified as confidential during the programme execution or only orally, it will be confidential only if this is accepted by the TRACE coordinator and confirmed in writing within 15 days of the oral disclosure. Unless otherwise agreed between the parties, they may use confidential information only to implement the Agreement.

5.5 INTERNAL COMMUNICATION

Formal and informal communications channels will be agreed with SMEs selected on onboarding to the TRACE Support Programme. Indicative rules are as follows:

- formal communications, all that may have an impact on the contract performance and evaluation will be performed via email. Beneficiaries will need to notify the project coordinator of updates in contact persons and email addresses;
- informal communications, day-to-day communications, will be performed via an instant messaging system, to be designated (e.g. Teams).

6. GLOSSARY OF TERMS AND DEFINITIONS

Term / Expression	Definition
TRACE (support) programme	Set of services and direct funding provided by the project to support tourism SMEs in the sustainability transition
Eligibility Criteria	Criteria used to assess if an application can be considered for the programme. Possible values (Yes/No)
Application Eligible or Non-Eligible	Application that is or is not compliant with eligibility criteria
Application Time stamp	Time stamp of the final submission of an application. If the application is re-opened and re-submitted the last date will be considered



TRACE

SMEs TRAnSition for a European Circular tourism Ecosystem

Term / Expression	Definition
Contract Deadline	Date and time until when the selected SMEs need to provide contractual information
Application Form	Application form available on EUSurvey Platform
FSTP	Financial support to third parties. Payments made to tourism SMEs that are not members of the Consortium
Open Call	Competitive process to access the TRACE Programme
Open Call Deadline	Date and time when applications close
Open Call Selection Prioritization	Rules used to order applications and select for funding
Reserve List	Eligible SMEs that will wait, per country, in case selected SMEs do not provide contractual data
Service Agreement	The contract to be signed between the third-party beneficiary (FSTP support to tourism SMEs) and TRACE member managing FSTP
SME	An enterprise that complies with the rules defined by the European Commission to be qualified as an SME ⁵
Score, Expert	<p>Unless otherwise stated, experts will rank each criterion with marks between 0 and 5. Half point scores are not given.</p> <p>Score values will indicate the following assessments:</p> <p>0: Fail. The application fails to address the criterion under examination or cannot be judged due to missing or incomplete information.</p> <p>1: Poor. The criterion is addressed in an inadequate manner, or there are serious inherent weaknesses.</p> <p>2: Fair. There are serious inherent weaknesses.</p> <p>3: Good. The application addresses the criterion well, although improvements would be necessary.</p> <p>4: Very Good. The application addresses the criterion very well, although certain improvements are still possible.</p> <p>5: Excellent. The application successfully addresses all relevant aspects of the criterion in question. Any shortcomings are minor.</p>
Sub-project	The initiative to be implemented by tourism enterprises under TRACE project.

⁵ https://ec.europa.eu/regional_policy/sources/conferences/state-aid/sme/smedefinitionguide_en.pdf



TRACE

SMEs TRAnstition for a European Circular tourism Ecosystem

7. ANNEXES

ANNEX I: Application Form template

ANNEX II: Pre-assessment questionnaire template

ANNEX III: Beneficiary Service Agreement model including Declaration of Honor and SME Declaration Form (to be signed within the Service Agreement after the evaluation process)