

European Commission

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Datum	Onderwerp	Referentie	Bijlage(n)
12 december 2023	COPRO	Horizon 2020	

Doorkiesnummer
T 088-4960301

Dear Sir, Madam

At the end of 2020 the European Commission adopted the Horizon Europe grant programme. The programme, which replaced the Horizon 2020 programme, refers to the European budget period 2021-2027.

As was also the case with the Horizon 2020 programme, a 'Certificate on the Financial Statements' (CFS) must be provided with the financial statements for a Horizon Europe project, to be issued by a qualified independent (external) auditor, as set out in Article 393 section 1 of the Dutch Civil Code 2 (DCC 2).

The website of the European Commission contains a model for the CFS (V1.1 – 15.03.2023) that is prescribed for this purpose. It prescribes that the auditor must perform specific agreed activities, under application of international standard ISRS 4400 (Revised) *Agreed-Upon Procedures Engagements*.

The current model (V1.1 – 15.03.2023) has been analyzed by the Royal Netherlands Institute of Chartered Accountants (NBA). This analysis was carried out by the NBA Subsidy Audits Community with the assistance of the NBA Audit Protocols working group (COPRO). The NBA Subsidy Audits Community includes subsidy audit specialists of numerous public audit firms. The COPRO includes representative from public audit firms and the State Audit Service (ADR). COPRO examines grant schemes and audit protocols used in the public and private sector.

At the end of 2022 this resulted in an advice that was published on the NBA's website, we refer to: <https://www.nba.nl/themas/controleprotocollen/uitkomst-copro-beoordelingen/europese-subsidies/horizon-europe/>. Due to technical objections the NBA advises not to use the model for the CFS, as published in December 2021 and revised in March 2023, in its present form. These technical objections are set out in more detail in the annex to our previous letter, send to you dated 26th of April 2023.

As a result of these objections, auditors have not accepted or performed engagements on the basis of this CFS. The number of participants facing deadlines for submitting their Financial Statements increases. Your respond to our previous letter mentioned that an updated version of the CFS will be published. Could you inform us in what timeframe we can expect an updated version of the CFS which includes a follow-up on our arguments?

Koninklijke Nederlandse
Beroepsorganisatie
van Accountants



NBA

We would welcome the opportunity to discuss with you how we may come to a solution that meets the technical objections and your need for a clear and transparent reporting by auditors.

This letter will also be published on our website.

With kind regards,

The Royal Netherlands Institute of Chartered Accountants

George Straatman
Chairman NBA COPRO

Robert Mul
MT-member NBA

