



## **D7.3: Ethics Compliance Report**

### **Task 7.3: Ethics Compliance Management and Ethics Advisory Board**

### **WP7: Project Coordination and Management**

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ABSTRACT	The Ethics Compliance Report is a deliverable that offers an overview of the ethical considerations that the project will take into account in its deployment. It also details the tools and methodology to be adopted in order to guarantee compliance.

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## Document Revision Log

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1.0	Final Review and formatting	Rodrigo Sedano (ITCL)	Project Coordinator

## Executive Summary

This Ethics Compliance Report sets out a preliminary overview of the aspects relative to ethics in the project. It presents an overall roadmap on how to manage ethical issues that arise during the implementation of the project.

The document, also, outlines the establishment of the Ethics Advisory Board (EAB) and delineates upcoming actions and responsibilities essential for meeting ethics considerations. Through the establishment of an EAB and the enactment of thorough ethical monitoring policies and frameworks, the consortium will be poised to effectively tackle any ethical and legal challenges that may emerge during the project's implementation.

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## Acronyms

Acronym	Description
CA	Consortium Agreement
D	Deliverable
ECL	Ethics Compliance Log
ERC	European Research Council
EthAB/EAB	Ethics Advisory Board
GA	Grant Agreement
T	Task

## 1.0 Introduction

### 1.1 *Scope of ethics compliance*

iMERMAID's goal is to create inventive and reproducible strategies aimed at averting, monitoring, and mitigating chemical pollution. This endeavour is echoed in the European Union's mission to safeguard the well-being of our oceans, seas, and waters, aligning with the aspirations outlined in the Chemicals Strategy for Zero Chemical Pollution.

The project is funded by the European Commission via the Horizon Europe programme, it must therefore adhere to rigorous ethical considerations. D7.3 aims to preliminarily report on ethics compliance, while detailing the methodology and mechanisms that will be put in place in order to ensure that compliance.

Throughout its design and implementation, iMERMAID is dedicated to ensuring an optimal level of compliance with ethical standards.

The Ethics Summary Report of iMERMAID indicates that the project has obtained an ethics clearance. It was in this sense met with an "ethics ready" approval. This stems from the fact that the project has ensured that ethics questions are sufficiently addressed. Such engagement is also reflected in the wording of the Grant Agreement.

### 1.2 *Relation to other work packages, deliverables, and activities*

The project is set to comply with ethics requirements throughout its implementation. At this stage of the project, this deliverable will describe ethics compliance activities. It will also detail the work of the Ethics Advisory Board set out for iMERMAID.

This ethics compliance report is an overarching document, in this sense that all entities involved in the consortium are expected to comply, as much as possible, with the highest ethical standards while carrying out the work envisaged in their WPs and tasks. The report is elaborated in the context of WP7 and is therefore part of the overall management of the project.

In particular, the ethics compliance report is reflected functionally in T7.3, Ethics Compliance Management and Ethics Advisory Board. The report can also be linked to T7.4 Data Protection Compliance and Data Management Plan and D7.4 Data Management Plan, where aspects pertaining to data protection and open science are discussed.

The deliverable is also linked to the activity of the lead beneficiary, PN, that is presented as Legal and Ethics Manager.

### 1.3 *Structure of the deliverable*

The Ethics Compliance Report presents a structure split into two main sections, as well as an introduction, conclusion, and annexes.

The report first details the ethics considerations identified in the project. This signifies that the points of attention relevant to ethics will be enumerated in this section, with a cleared-out methodology pertaining to mechanism that will be put in place in order to deal with these points of attention. The section will also detail the mapping of the ethics points of attention through the Ethics Compliance Log, annexed to the deliverable, that will be used to track questions and mitigation measures.

The second section will be dedicated the Ethics Advisory Board. We will therefore detail its structure and role as well as the many ways the consortium will be engaging the Ethics Advisory Board throughout the project's progress. The NDAs signed by the Ethics Advisory Board members will be annexed to the deliverable.

## 2.0 Ethical considerations in iMERMAID

### 2.1 *Methodology of ethics compliance*

iMERMAID's ethics compliance has been highlighted at a first stage at the ethics approval of the project in the framework of Ethics Summary Report. This entails that the project was not met with specific requirements pertaining to ethics that need to be fulfilled. This, however, does not put aside the consortium's fundamental obligations in ensuring that ethics are taken into consideration throughout the progress of the project.

The ERC's Ethics Guidance<sup>1</sup> serve as a guiding document for compliance. In this sense, a set of questions ranging from data protection, involvement of humans, environmental impact, gender, need to be taken into careful consideration when partners carry out the activities, they are assigned with via the grant agreement.

Consortium partners are invited to liaise continuously with PN as a legal and ethics manager of the project. When an attention point is identified, project partners need to be able to discuss it with the legal and ethics manager as well as with the coordinator of the project. This allows for the suggestion of satisfactory mitigation mechanisms to be put in place in case serious risks are identified.

On a further level, questions regarding ethics will also be forwarded to the Ethics Advisory Board. This board, composed of internal and independent external members, will be able to discuss and suggest mitigation measures in case of an ethical risk to the project. This role of the EAB will be complementary to a general role of overview of progress and review of specific deliverables that will be further detailed in this deliverable.

### 2.2 *Identification of ethics points of attention*

Although iMERMAID did not present any noteworthy potential for breaches to ethical standards, it does present points of attention that the project needs to be aware of while carrying out the work described in the grant agreement.

For operational needs, iMERMAID needs to process personal data, both of data subjects involved in the consortium and outside the consortium, e.g., physical persons that are solicited in the framework of stakeholder engagement. In this case, data protection regulations need to be abided by rigorously. Namely, the General Data Protection Regulation will be respected. The laid down principles in Article 5 should guide the processing of personal data whenever necessary. Only relevant personal data will be processed, in a reflection of the principle of minimisation of data. Special attention will be accorded to the transfers of personal data that are envisaged outside of the European Union and to the countries benefiting from an adequacy decision by the European Commission. Specific information pertaining to data protection and the mechanisms put in place to comply with relevant data protection regulations will be detailed in the 'Data Management Plan' provided under D7.4.

The gender dimension is also an aspect that the project's consortium is aware of. Therefore, participation of female research will be taken into consideration while deploying the project's activities, such as the Open Call, thus contributing to a more equitable and inclusive research landscape. The consortium will

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<sup>1</sup> European Research Council, Ethics and data protection, 05 July 2021

also ensure that the project results will be based on approaches that take into account the gender aspects. In this sense, consortium members will be made aware of any risks pertaining to eventual discrimination against women. Overall, the iMERMAID consortium is encouraged to promote inclusivity by ensuring diverse and balanced representation in research teams, fostering a more inclusive and equitable research environment.

Considering its main objective in reducing pollution in the Mediterranean basin, iMERMAID is part of a responsible research and innovation effort that considers the long-term impact on the environment and strives for solutions that benefit present and future generations. In this sense, no major risks came up during the assessment of the technologies that are set to be used in the project. The project activities are thus thoroughly assessed, and the results of such assessments indicate that no adverse potential is to be mitigated; the results are expected to be rather positive.

The research results will also be as open as possible, as described thoroughly in the Data Management Plan, in accordance with the FAIR data principle. The consortium will also avoid any possible misuse of the data that will be generated during the project<sup>2</sup>.

### *2.3 Ethics compliance log*

To effectively oversee ethics compliance and systematically capture reporting and feedback, partner Privanova has presented the Ethics Compliance Log for the iMERMAID project. This log serves as a structured and comprehensive methodology designed to manage the identification, assessment, and resolution of ethical, data protection, and societal impact issues that may arise during or as a result of the project.

Through the Ethics Compliance Log, Ethics Advisory Board members can also systematically monitor tasks requiring risk assessment, focusing on identifying risks related to ethics, legal compliance, and data protection. Additionally, the EAB members are expected to propose resolutions to address these issues while Privanova will maintain a record of the implementation status. This process facilitates ongoing review and adjustment as needed.

The template of the ethics compliance log is annexed to this deliverable.

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<sup>2</sup> Potential misuse of research, V2.0 – 14.09.2021

### 3.0 The Ethics Advisory Board

Within iMERMAID’s framework, the Ethics Advisory Board functions as an independent entity comprising internal and external experts in ethics. Its primary role is to oversee the ethical execution of projects, offering insights to prevent issues and suggesting potential solutions. The EAB stands as a crucial organ, whose aim is addressing any ethical concerns that may surface during the course of the project. The board’s expertise and oversight contribute significantly to maintaining ethical standards and resolving challenges as they arise.

#### 3.1 Structure of the EAB

The Grant Agreement details in framework of D7.3 that: *“[The task will] establish an independent Ethics Advisory Board for the project by bringing onboard experts with relevant background in EU Ethics Appraisal Scheme, Privacy and Data Protection. The Ethics Advisory Board (EthAB) will comprise three external ethicists as well as three consortium partners led by PN. PN will invite the CO and relevant partners to provide a briefing on the status of the project and its current perceived ethical and data protection issues. The independent board members will be invited to review any of the deliverables of interest to them during each year’s reporting period and to offer their views on ethical and societal issues concerning the project and/or to which they may offer some ideas for solutions.”*

Advisors are set to play a crucial role in iMERMAID, their responsibilities will cover the oversight and contextualization of the ongoing research endeavours from the lenses of needed ethical measures<sup>3</sup>. The external members of the EAB are set to bring new perspectives and offer a comprehensive understanding of the project's compliance with best ethical practices.

The EAB is particularly expected to address specific ethical challenges anticipated by the consortium. The members should be, as per the GA, knowledgeable about EU Ethics Appraisal Scheme as well as in matters of Privacy and Data Protection. Their ability to assess, and mitigate ethical risks, ensures a robust accompaniment for the iMERMAID project.

Diversity is also a cornerstone in the selection of advisors. They are expected to bring an array of viewpoints from various relevant fields and geographical distribution. The advisors represent a diversity of sectors, they thus represent the law sector, business, as well as academia. Two female experts are part of the Ethics Advisory Board, which contributes to achieving gender balance.

The EAB is compromised of the following individuals:

Table 1. Internal Ethics Advisors.

Name	Occupation	Organisation
Rodrigo Sedano	European Project Manager	ITCL
Esther Gómez Herrero	Project Manager	SOCAMEX
Djordje Djokic	Partner	PN

<sup>3</sup> Ethics Advisors and Ethics Advisory Boards Roles and Function in EU-funded Projects, Version 2.0 15 February 2023

Table 2. External Ethics Advisors.

Name	Occupation	Organisation
Meltini Christodoulaki	Deputy DPO	FORTH (Greece)
Ghasan Bhatti	Project Manager	Capgemini (France)
Gvozden Tasic	Researcher	University of Belgrade (Serbia)

### 3.2 Engagement strategy of the EAB

As showcased, the composition of the EAB adheres to the stipulated criteria for Ethical Advisory Board membership selection. Subsequently, invitations were extended to these candidates, who were then approached to join the board. The external advisors were required to execute a non-disclosure agreement (NDA) to gain access to iMERMAID deliverables and relevant documentation.

Given the nature of the iMERMAID project, the EAB members commit to the NDA. This non-disclosure agreement has been formally signed by each external EAB member. Consequently, any information shared with the EAB is held under a stringent obligation of confidentiality in strict adherence to the provisions outlined in the NDA attached to this deliverable.

### 3.3 EAB reporting and feedback

The EAB will continuously monitor the project’s progress. The advancement made by consortium members will be showcased to the EAB members during the trimestral meetings. Questions and ethical considerations that arise during the deployment of the project will be collected and transferred to the EAB by ITCL as well as PN. The consortium members can also be invited punctually to the EAB meetings in order to present relevant task advancement and deliverables. Points of attention and comments of the EAB are documented continuously in the Ethics Compliance Log and any relevant information in this regard shall be communicated to the interested consortium partners.

To ensure ongoing oversight and adherence to ethical principles, trimestral meetings are required, and are expected to provide a platform for continuous evaluation and discussion of ethical considerations associated with iMERMAID’s evolving nature. This will allow partners to review the ethical implications of project activities and provide timely guidance to address any ethical concerns. Regular meetings will also facilitate ongoing communication with project stakeholders, fostering a dynamic ethical framework. Whenever an EAB meeting is held, an agenda as well as meeting minutes shall be uploaded to the common repository and accessed by all members.

## 4.0 Conclusions

Ethics stand as a matter of paramount importance in any research initiative and possess a cross-cutting nature that influences all aspects of iMERMAID's activities, work packages, and tasks. The robust strategy for incorporating ethical principles into practical implementation and the broader research context underscores the project consortium's commitment to realizing the project in accordance with ethical standards. While principles are commonly perceived as abstract and overarching guidelines, their effective translation into tangible organizational measures necessitates overview by specialised professionals and bodies, such as the project's Legal and Ethics Manager and the Ethics Advisory Board. This translation is imperative to ensure the ethical dimension of the project, introducing a heightened quality layer to both the project implementation and outcomes.

## 5.0 References

- European Research Council, Ethics and data protection, 05 July 2021
- Potential misuse of research, V2.0 – 14.09.2021
- Ethics Advisors and Ethics Advisory Boards Roles and Function in EU-funded Projects, Version 2.0  
15 February 2023

## Annex 1: Non-Disclosure Agreement template

### Non-Disclosure Commitment for Ethics Advisory Board Member



**IMERMAID**

**Innovative solutions for Mediterranean Ecosystem Remediation via Monitoring and decontamination from Chemical Pollution**

**Background:** A consortium has been formed to implement the EU funded Horizon Europe Project entitled IMERMAID (the "**Project**") which is governed by a Consortium Agreement, dated 01/06/2023 (the "**Consortium Agreement**"). An Ethics Advisory Board has been nominated and it shall include expert Ethics Advisory Board Members not representing any of the parties of the consortium.

**Now therefore in consideration of the aims and objectives set out herein the undersigned hereby agree to the following:**

[Name of the employer organisation of the Ethics Advisory Board Member, if any] shall appoint [Name of the Ethics Advisory Board Member] as the Ethics Advisory Board Member and [Name and contact information of the Ethics Advisory Board Member] is willing to participate as such.

The Ethics Advisory Board Member shall assist the consortium parties when implementing the **Project by providing information, advice and feedback when requested ("Tasks")**. The consortium may decide to terminate the participation of the Ethics Advisory Board Member and therewith this commitment at any moment, immediately, without cause and without liability by giving a notice of termination to the Ethics Advisory Board Member. The consortium parties are entitled to freely use the contribution, information, advice and feedback provided by the Ethics Advisory Board Member for any purpose, including for the purpose of implementing the Project. The Ethics Advisory Board Member is not entitled to any re-imburement.

The Ethics Advisory Board Member understands that he/she may receive Confidential Information when implementing his/her Tasks. Such Confidential Information may be used solely for the purpose of performing the Tasks. The terms of Confidentiality are identified in Annex 1 attached hereto and the undersigned hereby accepts and agrees to adhere these rules as a Recipient.

This Commitment shall be construed in accordance with and governed by the laws of Belgium excluding its conflict of law provisions. All disputes arising out of or in connection

with this Commitment, which cannot be solved amicably, shall be finally settled by the competent courts of Brussels, Belgium.

This Commitment shall enter into force on the date of the signature and be enforceable by any of the parties of the consortium.

**Signatures:**

Place and date: \_\_\_\_\_

Signature:

\_\_\_\_\_

Name: \_\_\_\_\_

Place and date: \_\_\_\_\_

Name of the employer organisation, if any:

\_\_\_\_\_

Signature:

\_\_\_\_\_

Name and title of the signatory:

## Annex 2: Ethics Compliance Log template

Deliverable	Description of the deliverable	Month of the deliverable	Identified risks regarding ethics, data protection...	Implementation/review of ways to address the issues	Comments of the EAB
D1.1	Report on societal actions	30			
D1.2	Final report on EU policy recommendations	36			
D1.3	Toolkit for social impact	12			
D1.4	Sustainability impact assessment	30			
D2.1	EC sensor box dedicated to organic micropollutants	24			
D2.2	EC sensor box dfor heavy metal monitoring	24			
D2.3	Bioaccumulation and potential for biomagnification of CoEC in Mediterranean Sea waters	24			
D2.4	Reccomendations on the use of the iMERMAID monitoring sensors for the purposes of the WFD and MSFD Directives	33			
D3.1	Microfluidic remediation poilot module for remediation of organic CoEC	24			
D3.2	PDP pilot module for remediation of organic CoEC	24			
D3.3	4DS Pilot equipment for heavy metal removal from demonstration sites	24			
D3.4	RO membrane conversion to NF and UF pre filtration membranes	24			
D3.5	Evaluation of the different techniques	36			
D4.1	Requirements and design of the use cases	13			
D4.2	Benchmarking report on water remediation	8			
D4.3	Report on the demonstration activities	36			
D5.1	White paper on uupstream solutions; strategic foresight	12			
D5.2	Modelled Scalability of Solutions	18			
D5.3	Roadmap	34			
D5.4	Final release of multi-stakeholder web interface	32			
D6.1	Communication, dissemination strategies	6			
D6.2	Exploitation Plan of Project's results and IPR protection; Initial versions and final reports	24			
D6.3	Initial Innovation management Report	24			
D6.4	Material for the Open Call for Third Parties	13			
D6.5	Results of the Open Call	36			
D6.6	Exploitation Plan of the project's results and IPR protection report	36			
D6.7	Innovation management report	36			
D7.1	Quality assurance Risk contingency plan updated	6			
D7.2	Project Handbook	36			
D7.3	Ethics Compliance Report	6			
D7.4	Data Management Plan	6			

Task	Description of tasks	Start month	End month	Identified risks regarding ethics, data protection...	Implementation/review of ways to address the issues	Comments of the EAB
T1.1	Formulate policy recommendations and regulatory proposals for policy-makers and decision makers to encourage, influence and support policy changes to tackle CoEC	12	36			
T1.2	Pollution mitigation via influencing social perception	4	30			
T1.3	Sustainability impact assessment (LCA and Water footprint)	12	30			
T2.1	Optimise, demonstrate and deploy electrochemical based sensors for the effective monitoring of organic CoEC in demonstration sites with extrapolation to Mediterranean Sea	2	33			
T2.2	Optimise, demonstrate and deploy sensors for the effective monitoring of oil in 2 demonstration sites with extrapolation to Mediterranean Sea	1	24			
T2.3	Optimise, demonstrate and deploy sensors for the effective monitoring of heavy metals in demonstration sites with extrapolation to Mediterranean Sea	4	24			
T2.4	Evaluate bioaccumulation and biomagnification potential of CoEC in Mediterranean food webs	6	24			
T2.5	Develop Framework for Sensing, Data Collection, Storage and Visualisation	1	32			
T2.6	Develop recommendations for the applicability of the iMERMAID monitoring sensors in the monitoring programmes of the WFD and MSFD Directives with focus on the Mediterranean Sea	12	36			
T3.1	Microfluidic systems integrated with photocatalysts for upstream organic CoEC pollution remediation	1	24			
T3.2	Plasma enabled systems for the effective remediation of organic CoEC: Module design and optimization for each demonstration site	1	24			
T3.3	4D Scavenger systems for the effective removal and recovery of heavy metals	1	24			
T3.4	Reclaimed RO membrane conversion to NF and/or UF prefiltration membranes	1	24			
T3.5	Life cycle cost, cost-benefit analysis and anthropogenic noise pollution evaluation	24	36			
T4.1	Framework requirements & Use case design	1	12			
T4.2	Technical Specifications	1	8			
T4.3	Coordinate work between technical and demonstration work packages and align findings from the demonstration sites	20	36			
T5.1	Assessment and recommendation of chemical and non-chemical alternatives	1	6			
T5.2	Strategic foresight	2	7			
T5.3	Scalability analysis with SD-modelling	1	6			
T5.4	Creating roadmap/action plan	1	6			
T5.5	Multi-stakeholder web interface with solutions' Showcase	6	36			
T6.1	Communication, dissemination and outreach activities	1	36			
T6.2	Open Call and FSTP Management and Open call promotion	10	36			
T6.3	Innovation Management, Exploitation and Sustainability	6	36			
T6.4	Synergies and liaisons with other Mission Initiatives	1	36			
T6.5	Capacity-building and Training programme and one-stop-shop solution Marketplace	1	36			
T7.1	Communication and dissemination strategy & materials	1	36			
T7.2	Scientific & Technical Coordination	1	36			
T7.3	Ethics Compliance Management and Ethics Advisory Board	1	36			
T7.4	Data Protection Compliance and Data Management Plan	1	36			

The Mediterranean Sea and its surrounding regions support a diverse variety of essential socioeconomic activities. It is one of the highly exploited water ways and the influence of anthropogenic activities on its marine habitats and ecosystems has grown significantly since the industrial revolution. Because of this, the Mediterranean Sea basin is very vulnerable to chemical contamination and build-up. To safeguard the Mediterranean Sea basin from contaminants for emerging concerns (CoEC), iMERMAID will integrate, coordinate, and synergize innovative preventive, monitoring, and remediation solutions. iMERMAID will build an evidence-based multidimensional framework that will guide policymaking and transform societal perceptions to reduce CoEC usage, emissions, and pollution. Furthermore, next generation sensor and remediation solutions will be developed within iMERMAID to monitor and remove prioritized chemicals from its source while reducing upstream pollution. iMERMAID builds an ideal interdisciplinary team by bringing together prominent SMEs, researchers, regulators, and innovation professionals who have been essential in improving the knowledge and awareness of CoEC. Beyond state-of-the-art techniques, iMERMAID will strive to strengthen regulations against CoEC, expand economic possibilities and competitiveness, improve the standard of living for EU residents, while preventing the accumulation of chemical pollution in the Mediterranean Sea basin. iMERMAID will empower the efforts to create a zero pollution, contaminant free waters by enabling the Chemical Strategy's goals to become a practical reality.



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