LIFE 2020 Integrated Projects

Helpdesk: Collection of questions and answers

NOTE: for questions repeatedly asked by several applicants, only one Q&A is presented here, to avoid unnecessary repetitions.

1 Submission of the proposal

Topic:	Submission of Full Proposal
Question:	How and when to submit the full IP proposal?
Answer:	Please use the email submission method stated in the notification letter sent on November 26, 2020. The full proposal submission deadline is 25/03/2021, 16:00 CET. Due to the COVID-19 situation, the full proposal submissions are fully electronic. Confirmation of receipt of the full proposal will be sent to the e-mail provided by you in the full proposal indicating the proposal reference number.

Topic:	Combined Template
Question:	Since the form templates for Full Proposal are integrated with the templates for Concept Note, is it allowed to delete the CN part and renumber the pages when submitting Full Proposal?
Answer:	Yes, it is recommended to delete the Concept Note part for the Full Proposal and to renumber the pages accordingly.

Topic:	Page numbering
Question:	How correctly should the pages be numbered if form (e.g. A3, A4 A5 forms) is a two-page form and it is submitted for multiple Associated Beneficiaries?
Answer:	The numbering should be continuous.

2 Project consortium

Topic:	Partnership
Question:	We want the project partner to be the European Grouping of Territorial Cooperation (name of partner). The partner consists of: Region (title), (title) governing Region and (title). Will this entity, registered in (country) but being an international grouping, be treated as a foreign partner's share in the project?
Answer:	Based on the information that you have provided, the proposed new associated beneficiary (title) appears to be legally registered in the EU, notably (country), and complies with the application guidelines. Administratively it will be treated as a national organisation; however, in technical terms the potentially good outreach to the Country A and Country B will be also considered and assessed. Should this potential transnational cooperation be assessed as essential to guarantee the achievement of the project's objectives and there is sufficient evidence for an added value of the transnational approach then additional points may be given under award criterion 6.

Topic:	Public body declaration
Question:	Does the public body declaration have to be signed only on behalf of the coordinating beneficiary or is it relevant for also associated beneficiaries whose legal status is listed as public body?

	Form A3a - Public body declaration
	The Coordinating Beneficiary that is a public body must fill in, date and sign the template provided. Accordingly, fill in the following fields:
	Full name of the coordinating beneficiary.
	 'Aton': Indicate the place and the date of the signature.
	'Signature': This form must be signed.
	 "Name(s) and status of signatory": The name and status of the person signing the form must be clearly indicated.
Answer:	Form A3a has only to be filled by the coordinating beneficiary. Each associated beneficiary has to fill forms A4 and A5.

Topic:	Form A4 – Associated beneficiary declaration and Mandate
Question:	We can see that this form has changed compared to 2019 call. Do we understand correctly that it is no longer needed to state activity numbers and partner's budget there?
Answer:	Yes, this is correct. The information to be filled in form A4 is specified in the Guidelines for applicants – LIFE Integrated Projects 2020 on p. 66.

Topic:	Language of supporting documents
Question:	The resolutions approving the Local Strategy for Adaptation to Climate Change are in the regional language, because it is the official language of the institutions. It's ok to send them in the regional language or it's necessary to translate them to English or the official language of the Member State? In case the translation is needed, does it have to be the whole document? Could it be only the decisive part or also the part of the basis/grounds is needed?
Answer:	The documentation of the adoption of the targeted plan/strategy can be submitted in an official EU language, or the regional language used by the respective institutions. However, it is highly appreciated to provide the summary and the table of contents of the documents in English, at least.

Topic:	NGO status
Question 2:	Is an NGO counted as a Public body (2% rule)?
Answer:	As per section 1.6 of the Guidelines for Applicants for LIFE Integrated Projects 2020, NGOs are considered as private non-commercial organisations. In this respect, the 2% rule is not applied to NGOs.

Topic:	Competent authorities
Question 1:	If the authority in charge of the implementation of the adaptation strategy/plan is not able to formally engage as an associated beneficiary at the full proposal submission stage, because their formal engagement has to be validated by an assembly vote, the timing of which is not aligned with our bid deadline, can they give their mandate to another relevant stakeholder to represent the authority in the LIFE IP bid? That stakeholder – an independent association funded by the authority – is explicitly mentioned in the strategy as one of its implementers for adaptation capacity building.
Answer:	As indicated in section 1.6 of the Guidelines for Applicants, "it is strongly recommended that the competent authority or entity responsible for the implementation of the plan or strategy implemented by the IP submits both the concept note and full proposal. In any case, the competent authority must take part in the project as a beneficiary (coordinating or associated).

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Topic:	Public body declaration (Form A3)
Question 2:	Please confirm whether A3a form is required only for Coordinating Beneficiary (if it is Public Body) or also for all Associated Beneficiaries that are Public Body.
Answer:	Form A3a must be filled if the coordinating beneficiary is a public body only. Public bodies being associated beneficiaries are not required to fill form A3a.

3 Eligibility

Topic:	Eligibility of project actions
Question:	Actions aimed at sharing knowledge are eligible, but is this the case for actions aimed exclusively at collecting data and improving knowledge on biodiversity (through field studies for example)?
Answer:	All actions must contribute to the full implementation of the targeted plan. The proposal must demonstrate the eligibility of those actions by demonstrating their function and role for the full implementation of the PAF, either because those actions are explicitly mentioned in the PAF, or by demonstrating their necessity for ensuring the PAF will be implemented.

Topic:	Eligibility of design costs
Question:	 a) Our project focuses on the implementation of a long-term renovation strategy and also includes some pilot renovations to be carried out as concrete actions. Preparation of the renovation design documentation includes a full set of designs (incl construction, insulation, special equipment designs etc.) and though energy performance is dependent only on a small share of the full design, then the design is all interlinked). Is it eligible for the project to cover the expenses of the full documentation (whilst of course being reasonable and not including interior design etc.)? b) If some demos of the project results are planned to be established by complementary funding, is it eligible for the project to cover the cost of design? And should these concrete actions in such case be presented still in C forms as separate actions, though funded externally from complementary?
Answer:	Point a) If the renovation design documentation is necessary for the demos and would be needed to mobilise the related complementary funding, and if this mobilisation of complementary funds would be hampered by the lack of such documentation, meaning that the designs have a key role and will facilitate the full implementation of the plan/strategy, then these costs would be eligible under the LIFE funding. Nevertheless, please note that the value for money of these documents (and corresponding expenses) should be well justified in the proposal. Point b) Depending on the justification provided in the text of the proposal, design costs for concrete actions that will be implemented by complementary actions can be budgeted under the LIFE actions. However, in principle the logical framework and links of actions and budget must be transparent. If the selected (complementary) funding sources would cover the design of the demos, these related costs should normally be covered by similar (complementary) funds.

Topic:	Eligibility of NECP updates
Question:	The project aims at full implementation of the National Energy and Climate Action Plan (NECP) and will last for the whole duration of the current NECP. At the end of IP implementation, we plan to use the gained experience of partners and support of

Answer:	national energy and climate plan." Please explain if preparation of draft NECP in 2027 (to be submitted on 1 January 2028) is eligible for our IP. If the updating can be considered as integral part of the implementation of the targeted plan it would be eligible. Thus, the update should be adequately justified in
	the formed Stakeholders Network to renew the NECP for the next period (2031-2040) to ensure continuity of project results. The renewal will be done according to the requirement of the Regulation (EU) 2018/1999, Article 9: "By 31 December 2018, and subsequently by 1 January 2028 and every ten years thereafter, each Member State shall prepare and submit to the Commission a draft of the integrated

Topic:	Land purchase/lease
Question:	When reading the methodology, it seems like land purchase (or lease) is eligible only within NATURA projects. Is it possible even within CLIMATE orientated projects? If so, are the rules equal to NATURA projects (as mentioned in application guide page 49 et seq) or are there any differences?
Answer:	In general, land purchase, long-term lease of land, or one-off compensation payments are applicable, in well justified and exceptional cases, also within Climate-oriented projects; please see Guidelines for applicants p. 49-51. Also, as emphasised in the Guidelines for applicants on p. 91-92, the related provisions in the Grant Agreement (II.19.2 (i)) must be fulfilled.

Topic:	Delay in adoption of the targeted plan
Question:	We note in the guidance that a region's adaptation plan/strategy should be formally adopted by the final date of submission of the full proposal (25th March 2021). At present, the region's adaptation plan process has been delayed due to COVID-19 pandemic and the response measures the region has had to manage since last year. While the process is still ongoing as quickly as possible, it will not be completed (as per the LIFE IP guidelines) by the 25th March date and foresees formal adoption later in the year. Considering this, what scope there is, if any, to accept as eligible a proposal with the formal adoption of the regional adaptation plan still underway due to these delays? (Note also that the region in question does not have any previous (older) adaptation plan that is still valid.)
Answer:	The requirement for the valid plan or strategy to be officially adopted at the time of the full proposal submission remains one of the eligibility elements. The simple reason is the equal treatment of all applicants, also the fact that if the strategy or plan is not adopted yet, there is always a chance that it will not be signed soon or signed with amendments. To prepare the proposal based on strategy or plan draft is risky for you but also for the programme.

4 Project planning

Topic:	Project Actions
Question:	Question
	In our LIFE IP-project we intend to group Concrete Implementation actions (C actions), as proposed in the guidelines. We do this to show the relation between the LIFE IP-project and the National Waste Plan and we do it in order to avoid having an exhaustive amount of actions.

For example we will include an action dealing with "Reuse", as this theme is targeted in the National Waste Plan. This Reuse action, let us call it C1, will have a number of sub- actions, C.1.1., C.1.2, C.1.3 etc.

We do <u>not</u> intend to have one associated beneficiary being responsible for C1, Reuse, as a whole/overall. You could say we treat this main action, C1 as a kind of heading for a number of sub-actions.

Instead we intend to have one associated beneficiary being responsible for sub-action C.1.1., another associated beneficiary being responsible for sub-action C.1.2, a third for sub-action C.1.3 etc. etc.

Reading the Guidelines it is not quite clear to us whether it is possible to have a number of associated beneficiaries being responsible for each their own sub-actions, C1.1, C1.2. etc., and, at the same time, <u>not</u> having an overall responsible beneficiary for the action C1?

Answer:

The proposed approach aiming at the creation of thematic implementation actions, notably for Reuse, etc., that will include/ be broken down into sub-actions led by different beneficiaries based on their expertise, is acceptable. However, all actions must have a beneficiary responsible for implementation that will manage, steer and monitor the implementation of the respective sub-actions. Due to the fact that several sub-actions will be implemented under this action, it is necessary to have one beneficiary being overall responsible for the action, supervising its implementation, and reporting the progress achieved to the coordinating beneficiary.

If in practice the beneficiaries responsible for the different sub-actions were going to report directly to the coordinating beneficiary, who would supervise the implementation of those sub-actions, you may state as beneficiary responsible for the action the coordinating beneficiary.

Topic:	Project Actions and monitoring of environmental benefits
Question:	In the context of IPs, concrete actions (C) may correspond to capacity building actions (2.4.2 part of the guidelines). Precisely in the case of a Nature IP, can these capacity building actions be actions to improve knowledge on biodiversity and actions to raise awareness among stakeholders and the general public? The argument developed is that this improvement in knowledge would help integrate biodiversity into the decision-making process of policy-makers, professionals and the general public but it seems complicated to measure concrete and measurable environmental benefits.
Answer:	A capacity building element to allow an efficient and well-coordinated implementation of the targeted plan or strategy is indeed mandatory in all IPs. This set of capacity building activities should include knowledge sharing and awareness raising components, related to the proposal, whilst targeting all target groups that have a stake in the decision-making process and/or may be affected by these respective decisions.
	Please be also reminded that all actions (LIFE actions and complementary ones) must contribute to the full implementation of the targeted plan. As regards the monitoring of the actions' performance, it is requested to devise mechanisms that can inform about and measure the progress and impact of the
	proposed actions. For example, for capacity building, the proposal can establish a set of assumptions and proxy indicators which could help to validate the effects of the capacity building measures with adequate indicators in relation to the objectives and quantitative targets set in the targeted plan. It is also advisable to ensure that this performance is translated in measurable indicators (in values and in percentage, where relevant) reflected in the LIFE Performance Indicators table.

Topic: Project Actions

Question:	Is it mandatory for each partner to be responsible for at least one Action in the project? To ensure the full implementation of the plan our Waste IP involves a large number of partners – over 20. However, each partner has their own role and each partner is responsible for at least several sub-actions. Would this meet the conditions?
Answer:	There is no obligation for every partner to lead at least one action. However, the rationale of the composition of the project consortium must be well demonstrated by the proposal.

Topic:	Project Actions
Question:	Can the C Concrete actions include dissemination and replication activities (with different focus than information and awareness raising actions in E actions) to disseminate specific results and then monitor them for waste reduction/recycling perspective?
Answer:	E-actions refer to public awareness and dissemination of results related to the LIFE project itself. C-actions (Concrete - conservation / implementation - actions) shall be designed and grouped taking as reference the structure of the targeted plan or strategy, notably, based on the way the objectives and indicators have been defined in the plan or strategy. If dissemination and replication activities are foreseen in the targeted plan, then these could indeed be grouped under the C-actions. Please refer to page 79 and 84 of the guidelines for applicants for further details.

Topic:	Obligatory actions
Question:	Is it necessary to dedicate separate activity within Waste Integrated Project for the assessment of ecosystem function restoration? Waste IP activities are not directly related to the restoration of ecosystem systems, however, the guidelines set out a requirement for an assessment of the socio-economic impact of project actions on the local economy and population, as well as the assessment of ecosystem function restoration is also mandatory and shall be included as separate actions.
Answer:	Indeed, both the assessment of the socio-economic impact of project actions on the local economy and population, as well as the assessment of ecosystem function restoration shall be included as separate actions. These can, e.g., be addressed by consolidating and interpreting data and results generated over the project lifetime. Those assessments are to be delivered with the Final Report at the latest. Ecological restoration is potentially relevant to waste-related approaches on the basis of improving the biological diversity on degraded landscapes due waste disposal, etc. In case that no relevance can be identified this should be duly explained in the proposal.

Topic:	Inactive phases of beneficiaries
Question:	When partners are only involved to certain stages of the IP and not full duration, what kind of workload is expected from them in the periods where their role is not that active (e.g., partners involved to only preparatory actions). The Coordinating Beneficiary is responsible for the reports, but how much effort is expected from partners for "0-reporting", meaning what should the partners submit for the period reports where they haven't had any actions.
Answer:	The rationale of the partnership should clearly demonstrate the added value each partner brings to the implementation of the IP as described on pages 19 ff. of the guidelines for applicants. Therefore, it is acceptable that some partners only contribute to a limited but still functional and substantial extent to the implementation of the project. It is not expected that those partners are actively involved in reporting etc., unless the logic and rationale of the project would require this.

Topic:	Partner involvement:
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Question:	Is it possible to let the project partner (associated beneficiary) participate in the project only for the limited time? It means not the whole 10 planned years but only first two phases (5 years). Or is it possible to split his participation? It means that during some time the partner will not participate on the project in any way (e.g., he will participate only in first and third phase).
Answer:	Project partners shall participate in the project/the phases as per the rationale of their contribution. If their contribution is split between different phases with major gaps, this should be duly explained and justified in the proposal. Further, it should be ensured, that the partners are involved in or informed about the progress achieved in activities they are not directly involved or during their absence from day-to-day project implementation, in case this progress/achievement would be relevant for their contribution.

Topic:	Overall implementation of the targeted plan or strategy
Question:	How ambitious you expect the concrete actions of the IP be? In terms of share of the project or overall impact to the strategy?
Answer:	As per the LIFE Regulation, the multi-annual work programme and the guidelines for applicants (page 6), an IP "shall aim towards the full implementation of the targeted plan or strategy. This does not mean that the IP will cover all actions foreseen in the plan or that the plan will be fully implemented during the lifetime of the IP. However, the IP shall include strategic actions to catalyse a process and mobilise supplementary commitments and funding that will lead, in due time, to the full implementation of the plan or strategy. The IP should therefore be designed in a way to address this long-term objective." This means, the proposal is expected to clearly explain the IP's strategy to achieve and ensure the full implementation of the targeted plan/strategy and to demonstrate, how the IP actions will initiate, promote, and catalyse the related processes and mobilise additional funding.

Topic:	Phasing of the IP
Question:	The IP is planned to start in 01.10.2021 with preparatory activities while full acceleration will take place as of 01.01.2022. Seeking easier planning, accounting and reporting, we would prefer the first phase to be one Quarter longer than the others (to be finished at the end of the year 2023): - I: 01.10.2021-31.12.2023 - II: 01.01.2024-31.12.2025 - III: 01.01.2026-31.12.2027 - IV: 01.01.2028-31.12.2029 - V: 01.01.2030-31.09.2031 Please confirm that this structure is acceptable.
Answer:	The structure is acceptable; however, the proposal should present the rationale behind the proposed scheme.

Topic:	Duration of the Project / Project Phases
Question:	We calculate our project for 10 years (4 phases, each 2,5 years). Is there a possibility to start some preparatory activities even before the start of the first phase? It means can be some costs considered as eligible even if they are incurred before the official starting date of the first phase?

	For example, personnel costs with administrating of grant agreement etc. will be for sure before the project starts. Or is it strict and first phase starts along with the start of the earliest activity?
Answer:	Section V. of the Annex X to the Grant Agreement clearly defines the provisions for eligibility of costs. It clearly states in section V.I that "to be eligible costs must be actually incurred within the duration of the project (see Art. I.2.2 of the grant agreement), i.e., the legal obligation to pay was contracted after the starting date and before the end date of the project, or after the signature of the grant agreement by the Agency/Commission in case this signature takes place before the project starting date."

5 Territorial Coverage

Topic:	Territorial Coverage - Replacing Pilot/Demonstration Areas
Question:	In order to avoid possible problems (eligibility of our activities) due to infringement procedure, can we omit the affected pilot area in this phase as it was subject to approval within the Concept Note?
	In case this conflict of our proposal with the ongoing infrigement is fundamental, we would rather focus on extending of our activities on the other two pilot areas which were subject to our Concept Note: (name of areas and territorial coverage) and on a small catchment of the (name of areas and territorial coverage). Is it possible?
Answer:	You may replace the pilot area under the following conditions: a) a pilot area with a similar scale replaces the (area) that is excluded from the actions directly funded by the IP (IP actions); b) the focus of the project i.e., the implementation of the targeted plan, is not altered; c) the proposal adequately demonstrates that the full implementation of the targeted plan in the (area) will be effectively promoted by complementary measures. Please note that the added value of the proposal, as well as the changes proposed compared to the CN phase, will be thoroughly assessed during the full proposal evaluation phase. Should the condition of the (area) not be adequately addressed (see point c) above), this might affect the scoring of the proposal. Similarly, if the (area) would be deleted from the proposal but no new pilot area would replace it, the score might be affected.

Topic:	Change in the selection of regions targeted
Question:	We would like to make changes to our project as presented in the concept note. We are planning a multi-regional IP and would like advice on the eligibility of working on a different region/adaptation plan(s) to what was initially presented in the concept note (i.e., including or removing a region)? How significant can (this or other) changes be between the concept note and the full proposal?
Answer:	As highlighted in the evaluation report of the concept note, it is expected, that all plans targeted will be adequately adopted before the submission of the full proposal, which is a requirement for the eligibility of the proposal. If any of these plans would not be adopted until the submission of the full proposal, or if any other serious reasons occur, it would be acceptable to change the portfolio of plans, and thus regions targeted and the partnership, either by removing one region, or adding instead another appropriate one.
	However, the changes must be justified, and the general scope of the project must be retained and demonstrated. i.e., the added value of the multi-regional approach and of the synergies achieved by implementing various action plans simultaneously and in mutual cooperation. Please note that the added value of the proposal, as well as the changes proposed compared to the CN phase, will be thoroughly assessed during the full proposal

evaluation phase. If the changes are not adequately justified or not reasonable, this
might affect the scoring of the proposal.

Topic:	Additional regions entering the project at a later stage
Question:	Is there scope to design a work programme in the LIFE IP that enables two of the four regions (and their adaptation plans/strategies) to come into the bid during year one?
Answer:	As stated in section 1.5 of the guidelines for applicants (p. 17) the formal adoption of the targeted plans must happen before the deadline for the submission of the full IP proposal. If this provision is met, the targeted plan and strategy and the support of its full implementation by the IP would be eligible for funding under LIFE.
	It is not obligatory, that the implementation of all plans / strategies targeted starts from the beginning of the IP. However, the full proposal must present a coherent and convincing plan and strategy for their full implementation, including IP actions and complementary ones.

Topic:	Additional regions entering the project at a later stage
Question:	Would the two additional regions (and their adaptation plans/strategies) we plan to bring in during year one of the project need to be identified and named in our proposal now, or can they be named during the proposed amendment phase in year one?
Answer:	The associated beneficiaries must be specified in the Grant Agreement and formally give the mandate for representing them to the coordinating beneficiary by signing the from A4 each. In theory, the consortium could be amended during the project. However, no additional EU contribution for covering the eligible costs of the additional beneficiaries can be granted. Further, to be considered eligible, the plans/strategies targeted must be specified in the full proposal and fulfil the above-mentioned provisions.

Topic:	Geographical coverage
Question:	The geographical area where the project will be developed is different from the geographical area where the complementary actions will be developed. Which map should be included, the one of the scope of the project itself or the one of the scope of the complementary actions? Or both?
Answer:	As emphasised in the Guidelines for Applicants on p. 6, "IPs shall aim towards the full implementation of the targeted plan or strategy The IP should therefore be designed in a way to address this long-term objective." The proposal should demonstrate in the best possible way, how this aim will be achieved by the project. Thus, any maps demonstrating the rationale of the envisaged strategy will add value to the proposal.

6 Budget

Topic:	Project Budget
Question:	

	How many Nature Concept Notes were invited to submit full IP proposal? What is the available budget? Must the average EU contribution remain at 7 – 10 million?
Answer:	4 nature IPs Concept Notes were invited to submit the full proposal. 59 M€ are allocated for nature IPs.
	The EU contribution requested does not have to remain at 7 – 10 million. However, if a proposal would request e.g. 40 M€ grant, it would probably be requested to substantially reduce the amount if it would be selected for financing, in order to allow the financing of more proposals (assuming all proposals selected for financing would overall request more than 59 M€).
	In your full proposal you may deviate from the grant that you requested at the concept note stage, however if the deviation is substantial you should provide detailed justification.

Topic:	Project Budget
Question:	(Applicant) attempted to include (title) as a partner in the preparation of the project. This authority on the basis of the Waste Act is responsible for the development of a Waste management plan for the (area), which sets targets for the (spatial reference) in this area. Despite the development of the Plan, the (title) does not take a direct part in its implementation and does not have a control function over municipalities. Can the (applicant) submit the full application without a partnership from the (title)?
Answer:	If the (title) will not contribute to the project implementation and eventually will not have an impact on the overall plan or strategy implementation, then the (title) role in the project might need to be reconsidered. However, without proper justification, not having the entity that created the plan might be considered a weak point of the proposal. In this sense, the more you can prove that the (title) is engaged and supporting the project, the better. In addition, please pay attention to the following: Territorial scale: the plan covers the (territorial area), and in principle there should be a full implementation of the plan in the entire region, not just in the metropolis. Make sure there is explicit commitment of all concerned municipalities to cooperate with (applicant) in the project and agreement to have (applicant) as coordinating beneficiary. Explain in your proposal the following: how will (applicant) ensure that the plan
	will be implemented, what mechanisms/authority are in place for that? Related to the previous point, be clear on what is the competence of the (applicant) to implement the plan in (applicant's) territory.

Topic:	Procurement procedures
Question:	One of the beneficiaries is a head of a network of 30 local nature protection associations. For the construction of the regional action plans for species, this beneficiary would like not to go through external assistance but through targeted partnerships with its member associations specialized on these species. Is this possible and in what cost category would this fall? Another associated beneficiary is asking the same question in the context of a long-standing partnership with a university. Is there a possible financial scheme for this type of partnership? Can it be eligible?
Answer:	When the association is an established legal entity with members, then please verify if they fulfil the criteria to work with 'affiliates' in the project and to have this included in the grant agreement (see call document or Annex X to the grant agreement). Long-standing partnerships that have not been formalised in the legal entity do not have this possibility.

However, if there is a framework contract that was set-up in line with the 'award of
contract' rules of our grant agreement, then this can be considered for the purchase
of services if the value for money/no conflict of interest (and your own procurement
rules) were respected.

Topic:	Procurement rules and subcontracting
Question:	(name of company) deals exclusively with infrastructure activity and is not interested in participating in the project as a partner. They are willing to cooperate only as a subcontractor, but since (applicant) owns (name of company), this is not possible given by the tender conditions. (applicant) and (name of company) are legally two separate companies and cooperate in accordance with national legislation. The (name of company) activities are crucial for the implementation of the demonstration part of the project, as they are the only ones in (country) with the necessary construction machinery for works. Please advise us how to involve (name of company) and (applicant) in accordance with the set rules of Life projects?
Answer:	1) Beneficiaries of a LIFE grant need to follow the rules of the grant agreement, even if your internal rules are more flexible. Subcontracting to an affiliate that is controlled by a beneficiary can be seen as a conflict of interest. Of course, if you want to continue with the option of using a controlled affiliated company as subcontractor, then please note that you will be requested to demonstrate that the procurement rules of the grant agreement were respected (so value for money to be demonstrated/no conflict of interest, see Articles II.10 and II.11 of the General Conditions of the LIFE Model Grant Agreement). If you believe that you are in a monopoly situation for what concerns the purchase of services/goods, then you will need to demonstrate this upon request. Please also check Article II.21 of the General Conditions of the Model LIFE Grant Agreement — ELIGIBILITY OF COSTS OF ENTITIES AFFILIATED TO THE BENEFICIARIES.
	2) Please note that subcontractors should normally not be specified/ identified in the proposal, and even if it is, that does not result in an authorisation from EASME to use that supplier or subcontractor.
	3) In case (name of company)is proposed as affiliated entity to (applicant): Please also note that for private beneficiaries (assuming (applicant) is one), EASME may accept that affiliated entities (in this case it would be (name of company)) to a beneficiary participate in a project as long as all conditions listed in the Model Grant Agreement and its Annex X (Financial and Administrative Guidelines) are fulfilled. Please also refer to Annex X page 25 "frequent misunderstandings in subcontracting", and particularly the section about subcontracting to affiliates. Please note that the final decision to accept an affiliate will be taken by EASME.

Topic:	Short term lease
Question:	Is the short term (ca. 3 years) land lease for the case study eligable cost? The short term lease is the only way to start with case study as soon as possible.
Answer:	Land lease or compensation payments with a limited duration, within the project period, will only be eligible insofar as they are necessary for the demonstration of pilot actions favourable to the conservation status of the species, habitats or ecosystem targeted. In well justified cases, such costs are applicable within Environment-oriented (i.e., waste) projects; please see Guidelines for applicants p. 51. Also, as emphasised in the Guidelines for applicants on p. 91-92, if short-term lease would be appropriate for achieving the project objectives, those costs should be presented under external assistance and, where applicable, the related provisions in the Grant Agreement (II.19.2 (i)) must be fulfilled. In general, procurement/subcontracting rules will have to be fulfilled since the cost will fall under external assistance.

Note that appropriate justification for the cost-effectiveness of short-term lease payments (consistency with current market prices for the type of land and the region concerned) will have to be provided with the project's final report.
On this note, clear justification should be provided on three matters:
 the need for the land for the demonstration and pilot actions fulfilling a similar function for the project, as mentioned in the guidelines for the Nature-related projects. the adequacy, cost efficiency and value for money of the short-term lease (3 years). the demonstration that the lease of this land servers the implementation of
the selected plan/strategy in the best possible way.

Topic:	Beneficiaries / Co-financers
Question:	Can a beneficiary also be a co-financer in the project? Some beneficiaries planned to be included as beneficiaries are willing to contribute the co-financing of other beneficiaries (rate that exceeds their overall budget). How this should be dealt in the proposal?
Answer:	A beneficiary cannot be a co-financer as the term is defined in the application forms. However, a beneficiary can contribute beyond the expected contribution; thus, partly or fully covering the contribution of other beneficiaries.
	As an example, if A wants to cover some costs of B, A will increase its own contribution and lower the Union contribution received, B will receive a higher Union contribution and decrease its own contribution, whereby the Total eligible costs will always equal Own contribution+ Union contribution+ Co-financing (if any) at project's level. All this will be reflected in Annex 3/Financial annex
	The rationale of the consortium should in any case adequately demonstrate interest, contribution, and ownership of all beneficiaries. Always consider that a very low financial contribution may therefore be considered as an absence or lack of commitment. Also, note that a proposal cannot be submitted if the financial contribution of any of the beneficiaries to the proposal budget is 0 EUR.

Topic:	Total amount of the budget
Question:	Do you have any recommendations about the overall budget of the project? The notification letter indicates that the applied sum exceeds the funds ~4 times. We aimed to apply for ~10 million, can you give us initial guidance, whether do you recommend us to already cut the project budget proactively or this could be left for the evaluation-communication stage, so the cuts of the budget could be made accordingly to life priorities?
Answer:	As per the guidelines for applicants (section 1.4) the average amount of the EU contribution to the IP budget is around EUR 10 million. The number of proposals exceeds the available budget 4 times, but there is no intention to reduce or increase average project budget at this point.

Topic:	Budgeting of Staff

Question:	Some of the IP staff will work on many actions. We plan to indicate their involvement in all necessary actions, but to budget their activities only in main actions for easier planning, accounting and reporting. Please explain if this is acceptable.
Answer:	The technical proposal and the related budget are expected to adequately demonstrate the feasibility of the actions, i.e., to demonstrate adequate human resources and expertise for proper implementation etc. To allow adequate planning and accounting, minor contributions of individual staff members may be presented in the technical description only, and not be reflected in the budget. However, in any case, overall, the allocated budget and resources for every action must be coherent with their technical scope and duration.

Topic:	Financial audits
Question:	 Do I understand correctly that: 1. In terms of audits, is it necessary to obtain 1 certificate for the whole project, or those partners who received more than 325 000 EUR, they have to obtain the audit certificate their own? 2. Or each beneficiary who receives altogether during the project more than 750 000 EUR have to obtain their own audit certificate?
Answer:	As per the Life 2020 Model Grant Agreement for integrated projects, section I.4.4 (d) on page 9, (d) a certificate on the financial statements and underlying accounts ('certificate on the financial statements') for each beneficiary and for each affiliated entity, if: (i) the cumulative amount of payments the beneficiary requests as reimbursement of actual costs as referred to in Article I.3.2(a)(i) (and for which no certificate has yet been submitted) is EUR 325,000 or more; (ii) the maximum grant amount indicated for that beneficiary and its affiliated entities in the estimated budget as reimbursement of actual costs is EUR 750,000 or more. This certificate must be produced by an approved auditor or, in case of public bodies, by a competent and independent public officer and drawn up in accordance with Annex VII. The certificate must certify that the costs declared in the final financial statement by the beneficiary concerned or its affiliated entities for the categories of costs reimbursed in accordance with Article I.3.2(a)(i) are real, accurately recorded and eligible in accordance with Agreement. In addition, the certificate must certify that the revenues generated by the project referred to in Article II.25.3 have been declared for the beneficiaries and the affiliated entities other than non-profit organisations. Thus, • Point (i) refers to all beneficiaries receiving an accumulated EU reimbursement of €325,000 or more with the respective payment and previous ones, excluding all previous payments already been certified. • Point (ii) refers to all beneficiaries receiving an EU reimbursement of €750,000 as per the estimated budget.

Topic:	Tasks assigned to an employee
Question:	If an employee is specifically assigned to the project full time or for a fixed
	percentage of his time, do we need to divide this time into individual activities, which

	he will be devoted to? Or is it sufficient just to provide a list of activities without further specification how much working time each of the activities will take?
Answer:	The provisions for the calculation of project costs are given in the Guidelines for applicants – LIFE Integrated Projects 2020 under section 3.4 Financial application forms, Form F1 – Direct personnel costs on p. 86 ff. On page 87 it is specified, how the workloads for the staff assigned shall be presented in the budget: "For each beneficiary, per category of staff only one or maximum two rows (if there is "additional" and "non-additional" staff) should be presented. If e.g., for beneficiary A the staff category "project manager" will work under several actions, the number of days should be added into a single line. There should be no mention of actions or different lines per action."

Topic:	Proof of time
Question:	Employee is specifically assigned to the project full time or for a fixed percentage of his time: will any audit or managing authority require any working time evidence or the work contract with the specific assignment to the project is sufficient and there is no need to fill (even simplified) any timesheets?
Answer:	The provisions for time registration of project staff are given in the Annex X to the Model LIFE Grant Agreement – Financial and Administration Guidelines, section II.1 Time Registration System.

Topic:	Pricing method:
Question:	Is there somewhere stated the way of pricing method (especially services and goods/infrastructure)? Or does exist any price range from which it is necessary to be more precise while pricing? Moreover, we do count with costs which will be known after performing of another project activity which sets its full range. In that cases we would like to price it just based on previous experience. Is it possible?
Answer:	By the nature of the process, it is in most cases not possible to present the final price for the purchase of goods and services in the financial proposal. Thus, the budget presented is indicative and only the actual costs will be reimbursed, and the reimbursement will not exceed the EU contribution to the indicative costs presented in the financial proposal. It is the applicant's responsibility to present a transparent and well-conceived budget. In case of integrated projects, a detailed budget plan is only presented for the first phase of the project. The assumptions made for calculating the costs shall be presented in the cost estimations section for each action. These assumptions and their rationale will be considered when evaluating the quality and coherence of the financial proposal.

Topic:	Permanent staff, 2% rule
Question:	What to do with permanent staff that shift from one function to a new function in the same company, after an internal job application. Are they counted as additional staff, concerning the 2% rule? Is it enough if they - start in their new function /job on or after the start date of the project or on or after the date of signature of the grant agreement (if this takes place before the project start date), and -are specifically seconded/assigned to the project (i.e., personnel file must contain a written instruction to work for the project, e.g., for ten hours per month?

Answer:	As mentioned in the Guidelines for Applicants LIFE Integrated Projects 2020 under Form F1 on page 86, the 2% rule is only applicable for public bodies. Public bodies
	usually have clear rules on their regular and additional / temporary staff positions
	independent from internal job rotations. Illustrating examples for the application of
	the 2% rule are provided in the Annex X to the Model Grant Agreement - Financial
	and Administrative Guidelines on page 9.

Topic:	2% rule
Question 3:	We take all budget categories (of public bodies in one phase) except costs of non-additional staff? It means including overheads? And than we calculate: TOTAL COSTS(-NA)/NA*100 - If it is larger than 102, it is OK, right?
Answer:	As per section IV.2 of Annex X to the Grant Agreement, "the rule of 2% is assessed at the level of Consortium, meaning that the sum of the own contributions to the project budget of all public bodies must exceed (by at least 2%) the sum of the salary costs charged by them to the project for personnel not considered 'additional'." This means: Total contributions of all public beneficiaries / total costs on non-additional staff of all public beneficiaries >= 1,02.

Topic:	Budget – expert costs:
Question 4:	How to deal with personnel which will be hired to do some specific work but we cannot estimate the duration. One of our partners told us that on some LIFE training they were told to use Other costs. Is it right? Or how to proceed?
Answer:	If the related personnel will be hired by one of the beneficiaries, it must be budgeted as additional staff under Form F1. In case, the respective personnel will not be employed by one of the beneficiaries it must be budgeted under External Assistance (Form F3). In both cases, the budget allocated must be based on an estimation of the workload assigned.

7 Complementary funds and measures

Topic:	Form A8 – mobilization of other funds
Question:	The IP application should have at least 1 formal letter of intent signed by the competent body representing the funding source. We will most likely have several letters as we indicated already in the CN phase quite significant amount of potential complementary processes and single projects. For the single projects which financial commitment has already been committed, is it ok to ask for the formal letter directly from the project or should the letter in any case come from the funding body (i.e. Interreg)?
Answer:	The formal letter should come from the funding body (e.g., Ministry or competent authority managing the funds).

Topic:	Complementary actions
Question:	Our Waste IP includes several pilot projects with "close to market" or future commercialization potential. However, piloting and testing such projects to ensure proven practices and replication from Complementary financing is essential for the implementation of the plan. How will the implementation of such pilots under LIFE IP be assessed and what additional information needs to be provided on such projects?

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Answer:	Complementary actions play an important role for the full implementation of the targeted plan. Their contribution to this objective will be evaluated under Award Criterion 3. Additional points can be granted under Award Criterion 5.
	The respective evaluation criterion is the expected level of implementation of the targeted plan as a direct consequence of the actions foreseen in the IP or through complementary actions financed by other means mobilised in parallel to the IP. (Guide for the evaluation of LIFE Integrated Projects 2020, explanation of Criterion 3, p 16 ff.)
	Please also note that the quality and structural link of the complementary actions to the LIFE IP and the respective targeted plan will be evaluated under Award Criterion 1 focusing on their inter-relation and inter-dependence. The reporting requirements for complementary actions are laid down under point 5 of the reporting template for LIFE Integrated Projects that can be found on the LIFE website (https://ec.europa.eu/easme/en/section/life/life-reporting#inline-nav-3). The respective table specifies the information on complementary actions to be presented in the interim and final reports. Thus, the monitoring approach must ensure that this information is available for each of the complementary actions presented in the proposal or the updated plans for the subsequent phases of the project.

Topic:	Undefined private investments as complementary actions/funds
Question:	The implementation of the long-term renovation strategy is much dependent on private investments. In the round of consultation for the Concept note, we already asked you and understood that when implementing the project, then the private investments for renovation (which we could derivate from the renovation notices processed in the building registry) can be included later as complementary actions. But we presently struggle how to list this kind of complementary in the proposal (can't be proven with A8), can we still list these under Financial plan based on the current trends in private renovations, or it should not be done?
Answer:	With regard to complementary funding, the proposal has to present at least one secured and eligible complementary funding (see. Guidelines for applicants p. 11) to be considered eligible. Complementary actions have to be described on Form B1 and Form B2c, and the related expected funding under Form FP. The achievements and contribution to full plan implementation expected by the respective complementary actions should be supported by a clear and feasible strategy and realistic indicative figures. However, these funds will still be recognised as indicative when evaluating Award Criterion 5: Extent and quality of the mobilisation of other funds (Evaluation Guide page 33).

Topic:	Complementary actions
Question:	Please explain if the Full Proposal should provide details about complementary measures linked to the IP implementation.
Answer:	Complementary actions have to be described on Form B1 and Form B2c, and the related expected funding under Form FP. In this context, the description of the complementary measures linked to the IP implementation must be transparent and must allow the assessment of their link to the targeted plan. Furthermore, the achievements and contribution to full plan implementation expected by the respective complementary actions should be supported by a clear and feasible strategy and realistic indicative figures. In other words, if the project is able to implement the strategy on it's own, then the complementary actions might not be needed. From the strategy, it looks that it will take more than this IP to implement it, thus the description of complementary measures should be provided.

Topic:	Complementary actions
Question:	 In your response to the concept note, EASME stated that the more complementary actions, the more credible the proposal would be. But you also have to report on the progress these (external) actions make, what would mean a lot of work. To find the best balance in the number of complementary actions we would like to know what you expect to be monitored and reported of the complementary actions, how often, how extensive
Answer:	Question 1: The Guidelines for Applicants LIFE Integrated Projects 2020 state on page 6:
	"IPs shall aim towards the full implementation of the targeted plan or strategy. This does not mean that the IP will cover all actions foreseen in the plan or that the plan will be fully implemented during the lifetime of the IP. However, the IP shall include strategic actions to catalyse a process and mobilise supplementary commitments and funding that will lead, in due time, to the full implementation of the plan or strategy. The IP should therefore be designed in a way to address this long-term objective.
	The actual full implementation of the given plan or strategy would then happen through complementary measures or actions financed outside of the IP, using other available funding (Union, national or private). Some of these complementary measures or actions are expected to be linked to the IP implementation, while others might be carried out after its end. It is in general expected that beneficiaries of grants for LIFE IPs – together with other relevant actors in charge of the complementary actions – commit to implement the targeted plan and in particular that the relevant actors undertake to implement at least those complementary actions that are foreseen in the IP proposal as actions closely linked to the IP itself."
	Complementary actions play an important role for the full implementation of the targeted plan. Their contribution to this objective will be evaluated under Award Criterion 3. Additional points can be granted under Award Criterion 5. The respective evaluation criterion is the expected level of implementation of the targeted plan as a direct consequence of the actions foreseen in the IP or through complementary actions financed by other means mobilised in parallel to the IP. (Guidelines for Applicants LIFE Integrated Projects 2020, Explanation of Criterion 3, p 16 ff.) Thus, the decisive parameter is the full implementation of the plan, which is not a direct function of the number of complementary actions foreseen. In consequence, the number of complementary actions is not a parameter for the evaluation of the contribution of the proposal to the full plan implementation. This has to be demonstrated by the strategy and concept for the mobilisation of additional funds / complementary actions under the IP. Please also note that the quality and structural link of the complementary actions to the LIFE IP and the respective targeted plan will be evaluated under Award Criterion 1 focusing on their inter-relation and inter-dependence.
	Question 2: The reporting requirements for complementary actions are laid down under point 5 of the reporting template for LIFE Integrated Projects that can be found on the LIFE website (https://ec.europa.eu/easme/en/section/life/life-reporting#inline-nav-3). The

respective table specifies the information on complementary actions to be presented in the interim and final reports. Thus, the monitoring approach must ensure that this information is available for each of the complementary actions presented in the proposal or the updated plans for the subsequent phases of the project.

Topic:	A8 forms
Question:	The applicants received a comment on the financial plan about complementary funds last year. AW 5: The financial form relating to complementary funding is not correctly completed as the authority/entity managing the fund does not link back to the national managing entities but to the granting authorities. Hence, a clear link with project partners is not illustrated to demonstrate possible coordination links." This raises questions about the meaning of MANAGING/COMPETENT AUTHORITY/ENTITY in the A8 forms. That form should be signed by the organization that grants the funds, isn't it? We presume that we filled in the A8 forms correctly last time, making use of the grant agreements of the granted complementary funds. Or do we need to send the A8 forms to Interreg, EASME for Horizon, and to other competent authorities to be signed?
Answer:	For funds "to be granted" there is of course no other option. The Guidelines for Applicants LIFE Integrated Projects 2020 describes under section 3.3.1 on page 68 in detail who must sign forms A8 or other adequate documents to proof mobilisation of complementary funding sources. "Clear and unambiguous letters of intent are expected from each of the other complementary funding sources that are intended to be mobilised by the applicant. The letter has to be provided separately for each authority or entity that manages public or private funds intended to be mobilised by the applicant to finance actions complementary to the IP itself." Thus, the authority granting the funds for the complementary actions has to sign the form A8. This has also to be reflected in Form FP.

Topic:	Complementary activities
Question 5:	a) We would like to add implementation of the Territorial Just Transition Plan (TJTP) in our region as a main complementary activity. TJTP is necessary for using JTF. It reacts on Green deal, regional topics and specifies the transition of region. We assume, that strengthening of climate resilience and low carbon approach will by one of important principles for individual projects preparation. If yes, what information about this plan and its implementation should be mentioned in the proposal?
	b) We would like also to add an additional complementary actions (projects), but the duration of the IP project is too long to specify details of this projects. It is possible list them as general types of the complementary projects (for example projects on rainwater management, green infrastructure features realization etc.). How detailed information is needed for these projects?
	c) Is it possible to include the results of complementary projects in project indicators (project impacts)? If yes, is it possible to report them as a part of summary of impact of the project (IP activities plus complementary activities)?

Answer:

- a) The IP aims at implementing a specific Plan/Strategy. Complementary actions shall always implement the same large-scale plan or strategy that the IP is targeting (p. 11 of the Guidelines for Applicants). If the implementation of the TJTP targets and contributes to the full implementation of the regional adaptation strategy it constitutes an essential complementary action for the implementation of the IP. In case, an IP action may depend on the implementation and results of a complementary action, such links should be well presented and considered in the risk analysis for the IP. This function of the TJTP, its link to the regional adaptation strategy and its contribution to its full implementation should thus be presented in the full proposal. Further, as mentioned in the Guidelines for Applicants on page 6, relevant actors in charge of complementary activities should "commit to implement the targeted regional strategy and in particular that the relevant actors undertake to implement at least those complementary actions that are foreseen in the IP proposal as actions closely linked to the IP itself".
- b) As indicated in Section 1.10.10 of the Guidelines for Applicants, a phase model will be applied for the implementation of an IP, which means that full technical and financial details are to be provided for all actions foreseen during phase 1, whilst for the subsequent phases the applicants are expected to demonstrate the technical and financial coherence of the project and its EU added value. This includes the concept for complementary actions as well. Thus, the applicants are expected to present a concise and coherent overall concept for the complementary actions of the project and their contribution to the full implementation of the regional strategy, whilst more detailed information is only expected for complementary actions implemented or commencing during phase 1. Further details on the expected presentation of complementary actions in the proposal are provide in section 3.3.2 of the Guidelines for Applicants.
- c) As indicated in section 2.4.3 of the Guidelines for applicants, impact monitoring of the IP should include the project's contribution to the implementation of the targeted plan, its impact on climate objectives, and its socio-economic impact. The obligatory D-action focuses on evaluating the impact of the LIFE project itself. Expected results of complementary actions Section 3.3.2 of the Guidelines for Applicants includes recommendations for the presentation of the results of complementary actions and their linkage to the objectives of the targeted plan and their contribution to its implementation. Integrated projects are not expected to monitor the results and impacts of complementary actions. This has to be done under the complementary actions and be financed by the complementary funds as per their provisions. However, IPs are expected to report on the progress and results achieved by the complementary actions based on the reports issued by the latter.

8 Synergies

Topic:	Synergies: Multipurpose and integration/complementarity
Question:	In line with article 19.4, the Commission shall ensure geographical balance for Integrated Projects by indicatively allocating at least three Integrated Projects to each Member State, ensuring at least one IP under the sub-programme for Environment and at least one IP under the sub-programme for Climate Action. We already have two Integrated projects under Environment sub-programme, and we are planning to submit a third one for implementation of Waste Management plan. As we are planning, within the Waste IP to include the evaluation of climate effects and

	respective indicators within the project, will this be taken into account in consideration of the Waste IP.
Answer:	Although your Waste IP may include some climate action-related activities, it will still be considered a Waste IP within the sub-programme for Environment.
	The inclusion or not of climate action-related activities will not affect the "geographical balance" assessment of your proposal, in case that there would not be enough budget available to finance all passing proposals.
	However, the inclusion of climate action-related activities will be considered when assessing the inclusion of a high-quality multi-purpose delivery mechanism (e.g., aiming at environmental and climate benefits and capacity-building) that make it possible to achieve results in other policy areas, to create synergies with these policies and to integrate environmental and climate action objectives into them. This, multipurpose, integration and complementarity mechanism, if any, is assessed under award criterion 6. Examples for expected synergies are provided in the Evaluation Guidelines LIFE Integrated Projects 2020, Criterion 6, p 22 ff.

9 Monitoring

Topic:	Impact of activities only measurable after the end of the project
Question 1:	The real impact of some activities can be measured only after a very long time, e.g., the suitability of certain tree species in changing climate, impact is feasible to measure ~after 20 years. However, the Climate IP is of course within a shorter timeframe. In such case, which type of monitoring activities can be foreseen within the project under D actions, if the impact itself can be seen only after the end of the project?
Answer:	It is understood that the final benefits of such measures will only be visible and measurable after approx. 20 years. However, to facilitate the monitoring of the performance and impact of the actions proposed, it is recommended that the proposal should present at least the following: • an adequate analysis of the current knowledge in the respective matter; • a feasible and convincing concept and a selected set of indicators for verifying the progress in the achievement of the targets until a) the end of the IP and b) after its end; • design the project schedule in a way that such progress would be visible until the end of the project.

Topic:	Impact monitoring
Question 1:	Taking into account that Integrated Project with complementary actions implement the regional strategy, are the Life Key Project Indicators to be related to the results of the strategy targeted or strictly to the actions within the IP?
Answer:	The approach for monitoring is specified in section 2.4.3 of the Guidelines for applicants. Impact monitoring of the IP should include the project's contribution to the implementation of the targeted plan, its impact on climate objectives, and its socio-economic impact. Thus, the proposal is expected to demonstrate, how the project will monitor and evaluate its own impact, and its contribution to / impact on the implementation of the targeted regional strategy.
	On a similar note, expected results of complementary actions Section 3.3.2 of the Guidelines for Applicants includes recommendations for the presentation of the results of complementary actions and their linkage to the objectives of the targeted plan and their contribution to its implementation. Integrated projects are not

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