

Questions & answers provided to Integrated Project applicants at the full proposal stage in previous LIFE Calls, which remain applicable in LIFE 2020 Call

NOTA BENE:

Please note that:

- There is another document that includes questions & answers relevant to Integrated Projects (IPs): the questions & answers document for the IP concept note stage. It complements this document and is recommended to consult it in <https://ec.europa.eu/easme/en/section/life/frequently-asked-questions-faqs#inline-nav-1> .
- Some questions are specific to either IPs Environment or to IPs Climate Action, depending on the IP applicant that originally posed the question. It is recommended read through the whole document, just ignoring those questions that may be specific for a strand not relevant to your project.
- The thresholds mentioned below for financial support to third parties (cascading grants) in e.g. pages 24 and 26, have changed in the 2020 Call. However the questions have been kept because the logic of que answers is still applicable, although the specific thresholds are not.

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1. Submission of the proposal

Call 2018

Topic:	Forms – A3a (PUBLIC BODY DECLARATION)
Question:	(1) At the EASME website where the Call for Proposals is published (https://ec.europa.eu/easme/en/2018-life-call-proposals-integrated-projects-environment-and-climate-action) under the heading “Application Package” links are provided for downloading the individual files of the Application Package, the last of these links being the “Technical forms – environment integrated projects”. This MS Word file (life18_ipe_technical_forms.doc) contains (among others) the form A3a on page 15, titled: “PUBLIC BODY DECLARATION”. However, on the above referred webpage under the heading “Application Package” there is a direct link to a separate Public Body Declaration as well life_2018_public_body_declaration_annex_2.doc). Comparing the content of these two versions of the Public Body Declaration, only minor differences can be found. Which of the two versions is to be used?
Answer:	(1) Please fill in and submit the version that can be downloaded from the direct link entitled “Public body declaration annex” at EASME website, which includes the “2018” reference.

Topic:	Supporting documents
Question:	(1) The Application Guide stipulates on page 22 in Chapter 1.8 (“How, where and when to submit a proposal?”) that “Additional documents/annexes, ... will not be evaluated and therefore applicants must not include any such material in the CD-ROM/DVD/USB”. However, the LIFE Team commented on our Concept Note: “Stakeholders participation needs to be more transparent and the full proposal should include a clearly defined list of stakeholders. It is recommended to engage stakeholders from the ... sector should be included.”. How can such stakeholder commitments presented if a Letters of Intent to cooperate, Letters of Support etc. cannot be included in the Full Proposal?
Answer:	(1) The mentioned limitation applies only to the submission of the Concept Note. In the Full Proposal you can provide all the necessary documents (including Letters of Intent, Letters of Support, etc.), that enhance/justify the quality of the proposal. For example, scanned documents at the end of the respective forms may be provided bearing a clear description / title and reference to the respective part of the proposal.

Call 2019

Question:	If sent by post, would the proof of delivery will be the date on the postmark, which must be no later than 06 March 2019? And if – as recommended – sent by express courier the proof of delivery will be the date of the deposit slip no later than 06 March 2019?
Answer:	Please note, that the deadline for submission of the full proposal is 06 March 2020. Evidence of submission is constituted by the postmark or the date of the deposit slip, as mentioned in the Guidelines for applicants on page 22.

Question:	The proof of the submission date for the Concept Note included option to submit it [...] by post [...], in which case the evidence shall be constituted by the postmark [...]. Please confirm whether our understanding is right that the same evidence relates to the submission of the full IP., if the date on the postmark is 6 March 2020, and the
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	date of the receipt in Brussels is some days later– this is a valid submission since the first formal date on the postmark is the decisive.
Answer:	Yes, your understanding is correct. If the postmark date in your country's/area's "courier" service is 6 March (submission deadline for IP full proposals) it is considered that the deadline has been respected. Please note that if you finally submit close to the deadline, you are encouraged to submit your proposal by fast courier, to facilitate an early reception and the subsequent evaluation process.

Question:	Our project partnership is composed of only national entities (no transnational partners involved) and the project (text) will have to be distributed to a large number of entities/actors. It is important that those actors/entities understand correctly the contents of the project. Could an application written in our language be accepted? Should it be necessary, we could provide you with an abstract in English of every single action.
Answer:	The Summary description of the project (form B1) must be submitted in English. Applicants are encouraged to also complete all other forms in English, although they may also be submitted in any of the official EU languages, except Irish. If you decide to finally submit all forms (except form B1) in your language, it would be indeed helpful to provide as a separate attachment an abstract of the actions in English.

2. Project consortium

Call 2018

Topic:	Presentation of beneficiaries being line departments / agencies of the same ministry
Question:	<p>Our Project involves several organisations (own Budget and Activities) that formally have the same VAT number (e.g. the Regional Government, including all its Departments and some kind of Executive Agencies). How should be reflected in terms of consortium?</p> <ul style="list-style-type: none"> • 1 single partner (1 A Form), although there is a split of actions/resources in the full description of the proposal. • Several partners (several A Forms) fully described and explained in the actions/resources used.
Answer:	Please provide a separate A-Form for each legal entity in the consortium independently from VAT numbers.

Call 2019

Question:	Will it be possible - during the project full lifetime - to involve new additional partners if it becomes necessary to achieve the project goals?
Answer:	As per point XIV. example (c) of the “Annex X – Financial and Administrative Guidelines” (page 31) the project partnership structure can be changed underway, but this would require a formal amendment to the Grant Agreement.

Question:	<p>We have revised our partnership in the last three months and made changes that were required to achieve our project goals. We decided not to go with several partners and identified new partners that would better contribute to the project, including civil society organizations and local stakeholders. We think that these organisations will be able to implement the project, while a broader partnership would complicate the organisation and management structure too much. Can you give any advice on the proposed composition of the partnership?</p>
Answer:	<p>As per the guidelines for applicants the partnership of a LIFE Integrated Project should demonstrate the following features and functions which must be presented in the full proposal:</p> <ul style="list-style-type: none"> - The composition of the project partnership is expected to facilitate and result in the building up of strategic capacities among the competent authorities and stakeholders to ensure long-term sustainability of project results and actions, and to ensure that they will be able to function as co-deliverers of the targeted plan or strategy after the end of the IP (Application Guide p. 7) - IPs shall ensure that the main stakeholders are actively involved in the design and implementation of the given project. This involvement is expected to be achieved by including them - where possible and reasonable - as associated beneficiaries of the IP, or through their active participation in the implementation of the IP itself and/or of the complementary actions. (Application Guide p. 6) - The composition of the project partnership (beneficiaries) should also take into account the long-term sustainability of the project results and activities as well as the requirement for capacity building ensuring the eventual implementation of the entire plan/strategy. While keeping in mind this expectation, the project applicants should avoid exceeding a reasonable number of beneficiaries so as to ensure that the activities of the project

	<p>can still be efficiently managed. In case the number of stakeholders is found to be beyond this reasonable level, a form of involvement other than as associated beneficiary needs to be sought. The coordinating beneficiary, when preparing the full proposal, may decide to change the composition or list of associated beneficiaries compared to the foreseen in the Concept Note. (Application Guide p. 20)</p> <ul style="list-style-type: none"> - Each associated beneficiary must contribute technically to the proposal and hence be responsible for the implementation of one or several project actions. An associated beneficiary must also contribute financially to the project. Furthermore, it must provide the coordinating beneficiary with all the necessary documents required for the fulfilment of its reporting obligations to the Contracting Authority. (Application Guide p. 20) <p>Thus, it is strongly recommended the Full Proposal</p> <ul style="list-style-type: none"> • justifies the substantial change in the partnership in relation to the Concept Note and the assessment provided by the contracting authority and • clearly demonstrates the role, function and contribution of each associated beneficiary in implementation and sustainability of the project, and the project management and coordination mechanisms and procedures are designed and presented in a way allowing and demonstrating smooth, efficient and timely decision making and management interventions.
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Question:	Is a state owned Ltd considered as public body in case of LIFE IPs?
Answer:	As a state-owned limited is constituted under private law, it is considered a Private Commercial Body, unless it has obtained the status of non-commercial. In this case it is considered Private Non-Commercial. However, according to Point IV.1 of the "Annex X – Financial and Administrative Guidelines" a private body can be considered as equivalent to public body in case all of the criteria listed under IV.1 are fulfilled. The status (public, non-public) will be determined by the documents submitted with the proposal.

Question:	IPs shall ensure that the main stakeholders are actively involved in the design and implementation of the given project. This involvement is expected to be achieved by including them - where possible and reasonable - as associated beneficiaries of the IP, or through their active participation in the implementation of the IP itself and/or of the complementary actions. However, the issue raises, if there is a comparatively - small input needed from a certain stakeholder. From the efficient project management point of view, it is cumbersome to involve too many partners, and it is certain administrative burden on potentially small partner, as he has to keep up with all the reporting requirements. The other option would be the External Assistance. However, the External Assistance would not ensure that the specific partner is necessarily the winner of the procurement. Is there any other option to design the small-scale activity with the partner for a limited duration of project?
Answer:	<p>Key stakeholder involvement is a core element of IPs.</p> <p>The key stakeholders shall be involved in the implementation of the targeted Union plan or strategy.</p> <p>Applicants shall foresee appropriate actions in the project to allow the involvement of well-identified and appropriate stakeholders in project implementation. Although it is strongly suggested to involve your project's key stakeholders, where and if possible, as associated beneficiaries, you are not requested to include them all in the partnership.</p> <p>The quality, expertise and competencies of your partnership and your stakeholders is part of the evaluation process; thus, given the strategic approach of such projects, a well-justified selection of the partnership and a well-established stakeholder list</p>

	<p>with clear engagement in the drafting and implementation of the project is strongly suggested. How and with what means and resources this will be achieved is project-specific and should be clearly described and justified in your proposal.</p> <p>Please note that if you would opt for External Assistance, and the partner would not win the procurement, it would mean that you found a better partner to carry out that activity. In general, subcontracts must be awarded in accordance with Articles II.10 and II.11 of the General Conditions of the IP Model LIFE Grant Agreement and the beneficiary's internal rules (for as far as they comply with the aforementioned Articles),</p> <p>A last option to cover costs of third parties with limited involvement is through cascade granting. But of course that involves implementing a call for proposals, respecting all the conditions stated in Article II.12 of the IP Model LIFE Grant Agreement available in https://ec.europa.eu/easme/en/section/life/2019-call-proposals-integrated-projects .</p>
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Question:	<p>The Integrated Project entails a greater number of partners than classical LIFE projects. In principle, each of Partners shall be responsible for at least one Action (or sub-Action).</p> <p>However, aiming to streamline and simplify the Integrated Project full application structure, we have grouped a number of subactions in separate Actions (of smaller number). We believe it adds to the clarity of project and is well justified.</p> <p>As a consequence, a number of our ten partners therefore will be responsible for sub-actions only. We would like to confirm with you that a partner in Integrated Project can be in charge for a subactions only, and there is no need to artificially create a separate action for every partner if the project structure with subactions is well justified.</p>
Answer:	<p>Indeed, it is confirmed that there is no obligation for every partner to lead at least one action.</p>

3. Eligibility

Call 2018

Topic:	Forms - A6 (Co-financers) & A8 (Letter of intent from managing/competent authority/entity)
Question:	<p>(1) If the project does not have a Co-financer, is it OK not to include the Form A6 in the proposal, or should we include it and leave it empty?</p> <p>(2) Guidelines for Applicants, in its chapter 1.5 state that: "In order to demonstrate the availability of funds intended to be mobilised by the applicants for financing of complementary actions, letters of intent (A8 forms) signed by the managing authority/entity of the relevant funding source must be submitted with the full proposal..." Are partners (namely a foreign partner) obliged also submit a (at least one) letter of intent confirming the availability or the actual commitment of the complementary funding?</p>
Answer:	<p>(1) In case no co financers are envisaged to cover the cost of the project, A6 form should be left empty and included in the proposal.</p> <p>(2) The Guide for Applicants states, on page 65 under the instructions provided for "Form A8 – Letter of intent from managing/competent authority/entity", the following: <i>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. To be considered for financing, an IP should show that at least one additional fund has been mobilized for complementary actions. The corresponding letter of intent MUST unambiguously confirm the commitment to finance.</i> Considering that the minimum eligibility requirements, as stated above and presented in the relevant sections in the Guidelines for Applicants, are met, it is not necessary for a foreign partner, namely a partner from a different member state compared to the member state of the Applicant, to provide a letter of intent confirming the availability or the actual commitment of the complementary funding, unless they are responsible for the management of the given complementary fund.</p>

Topic:	Financing of more than one IP proposal per Member State
Question:	<p>We would like to participate in the written question and answer phase in order to clarify some aspects related to the preparation of a full proposal.</p> <p>The Concept Note evaluation letter mentioned a LIFE CLIMATE IP from our country is already been financed:</p> <p>(1) Does it mean that it is not possible to fund another LIFE CLIMATE IP from our country?</p> <p>(2) It expected a specific/special interaction with this already funded LIFE CLIMATE IP?</p>
Answer:	<p>(1) No, other several Climate IP proposals from the same Member State can be financed, provided their ranking, after the evaluation procedure is completed, is high enough. However, in case of similar scoring between different proposals and lack of budget for financing all of these, the evaluation committee will consider proposals from Member States not having received IP funding yet. An additional criterion for the decision will also be the additional value the proposal brings compared to the IP from the same Member State already being financed.</p> <p>(2) If the topic of the already financed IP is similar to the one of the proposed IP and there are strong regional links, such interaction would be definitely helpful.</p>
Question:	<p>When looking at the LIFE Project Database, we only find information about LIFE CLIMATE IP's from 2015 and 2016, LIFE ENVIRONMENT IP's from 2014, 2015 and 2016. Which projects (number, type, country) have been funded from 2017 call? (This information also looks relevant since there is a Projects distribution per countries and areas, but we don't find it in the LIFE Website)</p>

Answer:	Please see the links for the Climate IPs funded under the 2017 call: http://ec.europa.eu/environment/life/project/Projects/index.cfm?fuseaction=search.dspPage&n_proj_id=6999 http://ec.europa.eu/environment/life/project/Projects/index.cfm?fuseaction=search.dspPage&n_proj_id=6998 http://ec.europa.eu/environment/life/project/Projects/index.cfm?fuseaction=search.dspPage&n_proj_id=7001 http://ec.europa.eu/environment/life/project/Projects/index.cfm?fuseaction=search.dspPage&n_proj_id=7001
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Call 2019

Question:	<u>Relevant strategy/plan:</u> We have one question we would like to submit in relation to the version of the PAF that will be sent in annex to our proposal. With our Concept Note, we have sent the (approved) current PAF for the period 2014-2020, if we understand the guidelines well, we don't have to resubmit this document with the full proposal. The PAF for the period 2021-2027 will be complete and in its final stage by the time of submitting the full proposal, however it will not yet be formally adopted. Are we in compliance with the formal requirements if we send the complete (but not adopted) PAF for the period 2021 – 2027 with our full proposal?
Answer:	According to the guidelines for applicants, the adoption of the plan targeted by the IP must happen before the deadline for the submission of the full IP proposal. In this context, it is confirmed that the eligibility criteria are met given that you have submitted the formally adopted 2014-2020 plan, and assuming that either: (i) part of the IP targets this plan, or (ii) if the proposal only aims at implementing the 2021-2027 PAF, this new PAF builds upon the 2014-2020 PAF, with no large divergence in its approach (this should be demonstrated in your proposal). It is strongly suggested that the full proposal presents the logical links and the contribution to the full implementation of both, the current and the 2021-2027 PAF ensuring adequate links of measures with both plans. Note that if the new PAF follows a significantly different direction/approach, compared to the adopted one, and the IP aims only at the implementation of the new PAF, this might result in a weak logical link between actions proposed in the IP and measures foreseen in the currently adopted plan. Finally, you should in any case submit the latest version of the new "draft" PAF together with the Full Proposal in order to facilitate the assessment of the application.

Question:	<u>Territorial and sectoral coverage:</u> The IP includes many activities specifically concentrated in the two affected districts, where the targeted facilities, the related industrial and economic actors, most affected workers, the majority of the affected population and the main affected landscape are located. These districts are part of a wider, nationally determined Region. The reason is, that in the Application guide (page 41) it is explained that mitigation IP-s "shall support the implementation of greenhouse gas mitigation strategies, action plans or low carbon economy roadmaps and concern specific municipalities or regions (e.g. as announced in the Global Covenant of Mayors), industrial or agricultural (by analysing land use on a regional scale, in a social and economic
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	<p>context) sectors, or other economic sectors”.</p> <p>Based on your advice in the Notification Letter, the IP aims to focus on a specific sector, in the first place on the decarbonisation of its main emissions sources, in the second place on the emissions from residential heating, as one of the measures in the NECP. The IP aims to prepare plans and implement actions to help the economic, energy, environmental and social transition of the region. As complementary actions, the IP aims to catalyse actions in the wider, nationally determined Region, and also certain actions in the total area of the country. As we understood from the Application Guide, these can be considered as complementary actions. Even though the NECP covers more sectors than the targeted one, based on the abovementioned parts of the Application Guide, we aim to focus on the most carbon intensive sector and the region where it is most present and has fundamental impacts on the regional socio-economic systems, communities and the environment. Could you please confirm if this approach is correct?</p>
Answer:	<p>As per the evaluation of the concept note, considering the role of the targeted region on national GHG emissions and low carbon transition, the proposed territorial and sectoral coverage is considered adequate. This will further be evaluated at the full proposal stage based on the information provided at that time.</p>

Question:	<p><u>“Large territorial scale” criterion:</u></p> <p>The notification letter includes that the transfer of impacts resulting from the implementation of the actions in the target region to other national regions is not clear. We would like to clarify that the targeted industry is located only in the target region.</p> <p>Consequently, the IP or its complementary actions cannot decarbonize the target sector in other regions where this sector is not present. However, the decarbonisation of the target sector in the target region will have a significant impact on GHG emission on the national level. Other actions, for example the actions on decarbonisation of the residential (household) heating and energy poverty alleviation actions will be transferred to other regions, where affected population lives.</p>
Answer:	<p>Of course, only actions, approaches and results relevant to other regions can be transferred. Thus, e.g. the transfer of actions for decarbonising the household sector or tackling energy-poverty would be adequate in this respect. However, the proposal should clearly demonstrate which outcomes and results of the IP actions will be replicated or transferred, where and how.</p>

Question:	<p><u>The scale of the region to be targeted:</u></p> <p>One of the first important outcomes of the project will be a Territorial Transition Plan for the target region, and in this regard we would like to ask for your advice how the territory covered by the Plan should be delineated.</p> <p>As a first step, our geographic scope is defined by the impact of the target sector on the local economy and society, i.e. the territory where the related companies operate and where the direct employees and indirectly affected workers and entrepreneurs live.</p> <p>The Just Transition Mechanism considers NUTS III regions as the appropriate units for the transitional planning, however in our case the target region does not match to a NUTS III unit. In order to be relevant for the involved stakeholders we would like to target with the Transition Plan the actual impact area of the target sector, in spite of the fact that it may be a smaller and a different region than the NUTS III units. Do you consider this approach justified and acceptable?”</p>
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Answer:	<p>The approach to define the regional scope of the Territorial Transition Plan by the impact of the target sector on the local economy and society seems appropriate as a first step.</p> <p>However, the Territorial Transition Plan should also take into consideration the administrative territorial breakdown of local and regional authorities responsible for its implementation.</p> <p>Thus, the proposal needs to consistently explain the definition of the territorial scope of the Territorial Transition Plan and its differences to the approach recommended by the Just Transition Mechanism, including possible impacts on complementary financing by the Just Transition Fund, if any.</p>
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Question:	<p><u>Full implementation of the relevant strategy:</u></p> <p>The notification letter mentions that it is not clear how the full implementation of the NECP is achieved by the IP. However, it is clearly stated on the page 42 of the Application Guide, that “integrated projects should aim at achieving sectoral mitigation strategies and targets as outlined in a Member State’s National Energy and Climate Plan (NECP)”. Besides, it also states that “IPs to be financed by LIFE are expected to implement a chosen set of actions in the NECP” and that “...the transnational, national, regional or industry/sector strategy/action plan/roadmap in question is approved/adopted at the appropriate level and appropriately reported in the NECP”.</p> <p>Therefore, based on the Application Guide as well as on your advice in the notification letter we would like to clarify that the IP aims at implementing a set of measures outlined in the NECP. The IP aims to focus on the decarbonisation of the target sector and help its full transition in the region where it is most present and embodied in the regional socio-economic systems and has the most impacts on the environment. IP actions will focus on the two most affected districts, while complementary actions will focus on the wider, nationally determined region and in certain cases (such as energy poverty reduction) on the total national territory. Could you please clarify if this is a right focus? In this case, the IP does not aim to plan or implement measures in other sectors mentioned in the NECP, because these actions would not support the implementation of the sectoral strategy outlined in the NECP that the IP targets.</p>
Answer:	<p>The IP can address with its actions the implementation of a specific part of the targeted plan, such as the mentioned sectoral mitigation strategy, as explained on page 42 of the Application Guidelines.</p> <p>However, as stated in the definition of IPs on page 6 of the Application Guide “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.”</p> <p>Thus, as stated in the notification letter, it is recommended to duly demonstrate in the proposal (e.g. through a mechanism or respective actions) how the IP will support and achieve the full implementation of the NECP in terms of coverage of other sectors mentioned in the NECP.</p>

Question:	<u>Recurrent actions</u>
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	<p>Can a pilot site overlap with territory where the other EU co-financed project has been implemented.</p> <p>Could the pilot sites of the planned project, scheduled for testing of methods of invasive species eradication and management, overlap with <u>territories where another EU-funded project has been implemented earlier</u>, for invasive species eradication and testing of eradication methods (2012-2017 and 2016-2020)?</p> <p>The selected areas overlap because the activities carried out under the previous project have not produced sufficient results.</p> <p>The new project plans the use of new eradication methods. Moreover, in the case of large stands of invasive alien plant species, their eradication requires long-term action. Therefore, the recurrent eradication of stands in pilot sites with new methods would be a prerequisite for better results</p>
<p>Answer:</p>	<p>As stated in section 1.10.13. page 28 of the guidelines for applicants, only ongoing recurrent actions are generally ineligible. New recurrent actions (i.e. new eradication methods as proposed) are, in principle, eligible for funding in LIFE IPs. Please carefully read the said section and provide the necessary justifications/ description of your new recurrent actions in your proposal. Likewise, as stated in section 1.10.12 in page 28, the proposal should also explain why the new actions are different from the previous ones; otherwise, these could be considered ongoing; particularly the ones implemented from 2016 to 2020. Actions already ongoing before the start of the project are not eligible.</p>

4. Project planning

Call 2018

Topic:	Actions - How to conceive a LIFE Integrated Project proposal
Question:	<p>(1) Can the investments in privately owned decentralized waste water treatments plans and other decentralised solutions (like cesspools) be supported? The main idea is to demonstrate approach of coordinated improvement of decentralized systems in certain settlement to reduce their impact on the water body at risk.</p> <p>(2) Is it important (mandatory) that each partner is responsible of at least one Action of IP, or is it possible that some partners are responsible only for separate sub-actions?</p> <p>(3) Is it acceptable for 8-years-long integrated project to plan A (preparatory) activities for a period longer than 1 year only (for instance, can they be planned for the length of the first two years)?</p>
Answer:	<p>(1) In principle, actions included in the targeted plan or strategy may be included in the proposal, provided that all financial and legal requirements are met. To be considered eligible for funding, all actions must meet each of the following conditions: (a) the concrete implementation actions (C Actions) must be foreseen in the targeted plan or strategy; (b) the need of the action has to be well justified in view of the objectives of the project; and (c) the long-term sustainability of the results must be guaranteed.</p> <p>(2) Each associated beneficiary must contribute technically to the proposal and hence be responsible for the implementation of one or several project actions. The nature and range of beneficiaries should bring an added value to the project, strengthen the feasibility or the demonstration character of the proposal, its European added value and/or the transferability of its results and lessons learnt. Please note that, substantial technical contribution and concrete responsibilities can be justified, even in cases where the partner is not responsible for a whole action as per the structure of the project.</p> <p>(3) Preparatory actions, while normally being limited in their timeframe, do not have to commence or be completed during the first phase of the IP. Depending on their scope they may be implemented throughout the project period or may commence during a later phase of the project. Please see section 2.4.1 in the Guidelines for Applicants.</p>

Topic:	Innovation
Question:	<p>(1) How high should be the level of innovation of IP actions? Our actions are mainly intended to reduce impacts of different pollution sources (diffuse, point source and hydro-morphological alterations) on water objects at risk for improving status of these objects. Actions are mainly including green infrastructure solutions, increase water retention, removal of historical pollution, etc.).</p>
Answer:	<p>(1) LIFE Integrated Projects usually implement best practice but may also include demonstration and/or pilot actions or elements. Please refer to section 2.2 (Guidelines for Applicants). Note that the state of the art of the technique or method addressed should be described. Additionally, the technical description of the processes or methods and / or proposed innovation(s), new elements, improvements and their added value should be also included in the proposal.</p>

Topic:	Targeted Plan and complementary actions
Question:	<p>(1) As the validity of the present version of targeted RBMPs expires during the implementation period of the planned IP, is it possible to include the</p>

	<p>preparatory actions within the IP, which will include actions targeting the revision and update of the current plan?</p> <p>(2) Is it possible to include as complementary financing separate projects funded from EU funds and aimed towards implementation of measures of RBMP?</p> <p>(3) The validity of the present version of targeted RBMPs expires early during the duration of the IP; and the next phase of the RBMP, which is not yet in place, will be valid for the most part of the implementation period of the IP. Taking into account Commission recommendation to revise the delineation size of rivers and lakes water bodies, the current water bodies delineation is updated. Therefore, the numbers and sizes of rivers and lakes water bodies in the next phase of the RBMPs will differ from the water bodies in the RBMPs currently in force. What would be the best way to reflect these proposed changes in the project proposal?</p>
Answer:	<p>(1) In principle, actions targeting the revision and update of the targeted plan or strategy are considered eligible and relevant with the scope of the Integrated Projects. Please see section 2.4.1 in the Guidelines for Applicants.</p> <p>(2) One of the fundamental characteristics of Integrated Projects is that they have to mobilise other (EU, national or private) funds for the financing of complementary measures or actions within the targeted plan or strategy, but outside of the Integrated Project itself. Financing from other EU funds can - and is in fact expected - to be used for this purpose. Please see section 1.4 "Funding of Integrated Projects" of the Guidelines for Applicants.</p> <p>(3) All information related to the targeted plan or strategy should be clearly described in the proposal. This information shall be included under "Form B2c – Description of the strategy for the implementation of the overall plan".</p>

Topic:	Targeted plan and complementary actions
Question:	<p>When you say "the full proposal must convincingly demonstrate to what extent it will address the actions recommended in the targeted plan and contribute to its full implementation",</p> <p>a. The "the targeted plan" refers to the sub-plan identified in the concept note and not to the whole national strategy, right?</p> <p>b. So, the "complementary actions" should also focus on the sub-plan vs the broader national strategy, correct?</p>
Answer:	<p>a) The concept note identified the said sub-plan as targeted plan.</p> <p>b) Please refer to page 10 of the Guidelines for Applicants: <i>"Accordingly, applicants, should design the LIFE Integrated Projects by selecting from the targeted plan or strategy a coherent set of measures or actions for which LIFE is the most appropriate funding source. Other complementary measures or actions should be financed using funding sources and should be implemented in complement to the Life interventions"</i>.</p>
Question:	<p>a. We understand that we can pick the most relevant actions from the targeted sub-plan, and need to justify our selection, but there is no obligation (or extra points to get) if we cover all the actions of the action plan with the IP. Is our understanding correct?</p> <p>b. The targeted sub-plan is articulated / linked with a number of other policy items. We did not find specific guidance on how to deal with them. What is their status? Should we consider that they form part of the "package" we consider as the "the targeted plan"? And therefore, justify in the proposal how our actions related to these other items?</p>
Answer:	<p>a) Your understanding is correct. However, please note that 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.</p> <p>b) The policy items the targeted plan is linked to are not considered part of the targeted plan. If the project actions contribute to their achievement the applicants should elaborate on this to</p>

	demonstrate possible synergies and achievements with and into other policy areas outside the scope of the LIFE priority area addressed.
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Topic:	Targeted plan or strategy
Question:	<p>At the time of the Concept Note we were targeting a national plan that should have been adopted before the commencement of the IP. To avoid redundancy, the national government meanwhile has decided not to adopt a new plan but to rely on an already existing sub-plan of the respective national strategy. This sub-plan is still very ambitious and has the same scope as the national plan initially targeted in the concept note.</p> <p>Considering this situation, we have two questions:</p> <ol style="list-style-type: none"> (1) How flexible is the programme to take into account the evolution of national decisions? In other words, is it possible to modify the plan targeted by the LIFE IP in this full application compared to the one presented in the concept note? (2) Could you confirm that a part of a wide national strategy could be considered as a “Plan” according to the programme definition, considering that the IP project will combine LIFE activities and complementary ones to implement the whole sub-strategy considered?
Answer:	<ol style="list-style-type: none"> (1) As the concept note already referred to the said sub-plan of the national strategy and the government decided not to replace it with a new national plan, the full proposal can target the reported sub-plan. However, the full proposal must convincingly demonstrate to what extent it will address the actions recommended in the targeted sub-plan and contribute to its full implementation. (2) As described in your question, the plan targeted by the proposal can be considered as a sectoral plan under the related national strategy. As such, it would meet the requirements for the plans targeted by LIFE integrated projects as specified in the Guidelines for applicants (p. 4 f.). However, as emphasised above, the full proposal must convincingly demonstrate to what extent it will address the actions recommended in the targeted plan and contribute to its full implementation.

Topic:	LIFE Key Project Level Indicators and baseline
Question:	<p>LIFE18 IP Application Guide pages 48-49 state: “The proposal should therefore identify specific indicators to be used to measure the impacts of the project (or foresee action(s) to do so). These indicators should be coherent with the plan being implemented and its objectives, with the problems addressed in the IP and with the type of activities planned. The initial situation from which the project starts should be assessed (baseline) and progress should be regularly evaluated against it.”</p> <p>Question: We will identify the LIFE Key Project Level Indicators (on environmental/climate objectives, socio-economic impact) to be inserted in the respective .xlsx file of the Call 2018 as changes from the initial situation (= baseline).</p> <ol style="list-style-type: none"> a. Can the exact (numerical) determination of the baseline occur during the project execution, for example as part of a preparatory action? Or does it need to be developed (and included) with detail as part of the proposal? b. If quantitative presentation of the baseline is indeed needed inside the proposal, at which place in the Technical Forms this should appear (and refer to the above mentioned .xlsx)? In “C1c: D. Monitoring of the impact of the project actions (obligatory)”?
Answer:	<p>The exact numerical determination of the baseline can be implemented as part of a preparatory action. However, it is considered necessary, for understanding the intervention logic, to present a general overview on the current situation, including at least some semi-quantitative or quantitative data or estimations. Preliminary targets and reference levels can already be included in the Indicator table and/or the expected results section of the proposal (Form B1), which can be updated, if necessary, during the project duration.</p>

Call 2019

Question:	We would like to get the clarification regarding the "Preparatory actions": In some of the "Preparatory actions" planned in our proposal, the cooperation with the stakeholder is necessary and this cooperation requires to organise the workshops to work out solutions. Should we classify these workshops in the "Preparatory actions" category which would be advantageous from the point of view of coherency of the actions, or in "Public awareness and dissemination of results" category?
Answer:	As the purpose of the workshops is the preparation of stakeholder cooperation and involvement, these workshops could be included in the "preparatory Actions".

Question:	It is understood from the guidelines that the Transnational character of replication and/or transfer is encouraged. However, the classical IP in nature sector focuses on the Member State territory, therefore there is somewhat limited scope to provide for replication and transfer on transnational scale, especially as the administrative systems in different MS work differently. If replication and transfer is designed in the Project proposal basically in national scale – whether it means less points in the evaluation, or bearing in mind the specifics of Nature IP, if this action is well designed, it still can receive max points?
Answer:	A project with a well-justified transnational approach, showing the added value of the transnational approach, will receive a bonus of maximum of 4 points (evaluation guide, pages 15 and 25). If a proposal does not include such transnational feature, it will not receive those points, regardless of the topic covered. Please note that 60.5% of the €97 million IPE budget is allocated to Nature projects. So, in practice an IPE nature proposal competes only with other IPE nature proposals (not with water, waste and air quality IPs).

Question:	On page 26 of the application guide, paragraph 1.10.6, line 4, the sentence seems to miss a couple of words: <i>Very often a proper project management implies the involvement of a It is also strongly recommended ...</i> Please explain.
Answer:	The incomplete sentence should read: Very often a proper project management implies the involvement of a full-time project manager for a smooth coordination and implementation of the project. Thus, both parts express a strong recommendation for a full-time project manager.

Question:	In the application guide, both project manager/management and coordinator/coordination are terms used to indicate the coordination/management of the project. Do these terms mean the same, or do you see a difference between a coordinator/coordination and a project manager/project management?
Answer:	The tasks related to project management are specified in the Application Guide under point 2.4.5 on page 53 and 54. It is important that the proposal presents a clear structure and concept for project management as specified in the guidelines. Whether the project management is supervised and controlled by a project manager or a coordinator supervising a project management structure is depending on the requirements and needs of the specific project.

Question:	In the application guide, you strongly recommend that the project manager be full-time (p. 26 and 53). However, in the next sentences on p. 53 it is explained that the coordinator or project manager can also contribute directly to the implementation of certain actions. This would imply that the coordinator or project manager is not full-time available for project management/coordination. Also, the coordinator or project manager personnel can be employed on a part-time contract, which is very common in our country. In these cases, would you recommend to add other staff to the project coordination, to create a full-time project coordination team?
Answer:	As described in the Application Guide, the proposal should present a project management concept and structure allowing full control by the coordinating beneficiary and demonstrating adequacy for the implementation of the tasks specified in the guidelines and additional activities as necessary for a smooth implementation and supervision. The proposal should also demonstrate that personnel resources allocated to these tasks are adequately qualified and sufficient in terms of time allocated. It is strongly recommended to involve the project manager/coordinator on a full-time basis in the project. This can include contributions to specific implementation actions. However, in any case the proposal should demonstrate that the project manager/coordinator will have enough time for fulfilling his/her management duties.

Question:	Can you please explain the difference between the multipurpose delivery mechanism and the socio-economic impact and impact on ecosystem restoration? To us, they seem to be strongly related: the socio-economic impact and ecosystem restoration are elements of the multi-purpose delivery. Do you distinguish any other delivery next to socio-economic and biodiversity?
Answer:	The nature of a multipurpose delivery mechanism is explained in the application Guide on page 72. Such a mechanism consists of several elements, i.e. collateral benefits delivered by the project and related elements to ensure effective delivery, monitoring, validation and visibility. Further details are provided in the evaluation Guide on page 22. Further, the Application Guide specifies on page 9 synergies and related multipurpose delivery mechanisms typical for Climate Adaptation Integrated Projects. The assessment of the socio-economic impact and of the ecosystems function restoration of the project are obligatory elements of each LIFE Integrated Project and not considered as synergies or multipurpose delivery mechanisms awarded with additional bonus points unless extraordinary achievements are demonstrated by the proposal.

Question:	The partnership aims to facilitate and prepare a territorial just transition plan for two mainly affected NUTS-3 level regions and we are working on the content of the plan. What we found in the Just Transition Mechanism regulation proposal is that the territorial just transition plan should contain the following elements. (a) a description of the transition process at national level towards a climate-neutral economy, including a timeline for key transition steps which are consistent with the latest version of the National Energy and Climate Plan ('NECP'); (b) a justification for identifying the territories as most negatively affected by the transition process referred to in point (a) and to be supported by the JTF, in accordance with paragraph 1; (c) an assessment of the transition challenges faced by the most negatively affected territories, including the social, economic, and environmental impact of the transition to a climate-neutral economy, identifying the potential number of affected jobs and
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	<p>job losses, the development needs and objectives, to be reached by 2030 linked to the transformation or closure of greenhouse gas-intensive activities in those territories;</p> <p>(d) a description of the expected contribution of the JTF support to addressing the social, economic and environmental impacts of the transition to a climate-neutral economy;</p> <p>(e) an assessment of its consistency with other national, regional or territorial strategies and plans;</p> <p>(f) a description of the governance mechanisms consisting of the partnership arrangements, the monitoring and evaluation measures planned and the responsible bodies;</p> <p>(g) a description of the type of operations envisaged and their expected contribution to alleviate the impact of the transition;</p> <p>(h) where support is provided to productive investments to enterprises other than SMEs, an exhaustive list of such operations and enterprises and a justification of the necessity of such support through a gap analysis demonstrating that the expected job losses would exceed the expected number of jobs created in the absence of the investment;</p> <p>(i) where support is provided to investments to achieve the reduction of greenhouse gas emissions from activities listed in Annex I to Directive 2003/87/EC, an exhaustive list of operations to be supported and a justification that they contribute to a transition to a climate neutral economy and lead to a substantial reduction in greenhouse-gas emissions going substantially below the relevant benchmarks established for free allocation under Directive 2003/87/EC and provided that they are necessary for the protection of a significant number of jobs;</p> <p>(j) synergies and complementarities with other Union programmes and pillars of the Just Transition Mechanism to address identified development needs.</p> <p><u>Our first question is that:</u> Based on an initial stakeholder analysis, the best governance and facilitation model for the planning would be based on the partnership and collaboration between the National Sector Commission, the County Chamber of Commerce and Industry and the County Government Office. These two local actors would facilitate the planning process and eventually prepare the territorial just transition plan, as these actors would represent the region and the regional stakeholders properly and would have the necessary knowledge, experience and skills in the socio-economic environment and transition management, in terms of reskilling, economic diversification, job creation etc. We do not aim to give the facilitation role to central actors or the involved private companies, because they are not familiar the regional socio-economic processes. Could you please share your view on this?</p> <p><u>Our second question is that:</u> Beyond the above-mentioned points, could you please share your opinion on the content of the territorial just transition plan?</p>
Answer:	<p>The assessment of the proposed approach is subject to the evaluation of the Full Proposal.</p> <p>In any case, the full proposal should explain and justify the contribution to the full implementation of the overall plan, feasibility, applicability, and possible risks of the approaches chosen and include related contingency plans (the said list is not exhaustive), as described in the Guidelines for Applicants.</p>

Question:	Would it be possible to extend the phase 1 to up to 3 years in order to fully accomplish the planned actions within this phase (LIFE IP 2019 Guidelines advise the length of the phase to be between 1.5 – 2.5 years).
Answer:	<p>The Guidelines for Applicants provide orientation on the advisable duration of project phases. If technically required, the recommended duration can be extended. In any case, the technical proposal should adequately justify and explain such an extension.</p> <p>However, it should be considered that the project phases are the reference for the revolving programming mechanism applied for IPs. Thus, all the phases should, as far as possible, be of the same duration, and the duration of the phases should be determined in view of the total duration of the IP (see Guidelines for Applicants page 25). Further, it is not mandatory that actions must be completed at the end of a phase.</p>

Question:	<p>What would be the reporting requirements for a partner which would take a very small part in the project, say for 1 year whereas all the project would be 8 years long?</p> <p>Can that partner's contribution be reported with the Progress report, and no-need to involve him further in the Final report as a formal partner?</p> <p>And whether the partner can be planned to join in a later phase of Integrated project. If yes, shall it be specified already in the application phase?</p>
Answer:	<p>Please note the only reports in an IP are the Interim and Final reports (no Progress report). Naturally, certain partners, based on their role and competencies, may only contribute (i.e. technically and financially) for specific actions and deliverables. If e.g. the associated beneficiary A is active and only incurs costs in Phase 1, which are declared in Interim Report 1, then for subsequent Interim Reports there is no need to involve it. Instead, the coordinating beneficiary should state that in the corresponding reporting period the associated beneficiary A did not implement any activity nor incur any costs linked to the project. For the case of the Final Report, the coordinating beneficiary should consult the external monitoring team that monitors the project, to see to what extent the involvement of associated beneficiary A is required.</p> <p>Although the implementation of the IPs happens in several phases, the evaluation of the proposal is based on the partnership provided when submitting the initial proposal. The termination of the participation of any one or several beneficiaries or the inclusion of a new one in a later stage – although may be accepted in certain cases – might call into question the decision awarding the grant or would result in unequal treatment of applicants; thus, it is strongly suggested to finalize your partnership in the early stages of your proposal and before submitting your proposal.</p>

5. Budget
Call 2018

Topic:	Financial issues – Eligibility of expenses
Question:	<p>(1) Is it possible for an Associated Beneficiary of LIFE IP to cover the part of the cost associated with the involvement and work of municipalities, even if these municipalities will not be the associated beneficiaries?</p> <p>(2) Regarding the Form A2, the beneficiary has a VAT number but it cannot have the VAT expenses reimbursed. Can you please confirm that under “VAT reimbursement” section, the correct option should be “No”?</p> <p>(3) Is a partner (associated beneficiary) entitled to implement part of their activities through a network of Local Action Groups (having their own legal identity), i.e. they would use part of the partner’s budget (they would generate some cost but they would not be associated beneficiaries). What are the conditions so that their costs are eligible?”</p>
Answer:	<p>(1) The Guide for Applicants states, on page 25 under the paragraph “1.10.8. May I give financial support to third parties as part of a LIFE IP?”, the following: <i>Under specific conditions laid down in the Grant Agreement the beneficiaries of the LIFE IP may provide financial support to third parties in order to finance specific actions that for objective reasons cannot be implemented by one of the beneficiaries of the IP but are considered instrumental for the implementation of the targeted plan. Such actions should be aimed, in particular, at supporting local initiatives by e.g. non-profit organisations, local authorities or citizens groups.</i> Additionally, please note that the Guide for Applicants states, on page 19 under the paragraph “1.7 Who may participate in an Integrated Project”, the following: <i>According to Public undertakings whose capital is publicly owned and that are considered an instrument or a technical service of a public administration, and are subject to the public administration's control, but are in effect separate legal entities, must become beneficiaries if a public administration intends to entrust the implementation of certain project actions to these undertakings.</i></p> <p>(2) The Guide for Applicants states, on page 61 under the instructions provided for “Form A2 - Coordinating beneficiary”, the following: <i>If your organisation is unable to recover VAT paid (for public entities it can only concern VAT related to activities that do not match the concept of sovereign powers) you can opt to include the reimbursement of VAT in your costs submitted under this proposal, in that case then please tick the box 'YES', otherwise tick the box 'NO'. In this context, if your organisation cannot recover VAT paid, please tick “YES”.</i></p> <p>(3) For specific tasks of a fixed duration, a proposal may foresee the use of sub-contractors. Sub-contractors provide external services to the project beneficiaries who fully pay for the services provided. Beneficiaries (including their affiliated entities) may not act as sub-contractors. Sub-contractors should normally not be identified by name in the proposal; if they are, the conditions on external assistance set in the Grant Agreement must still be respected. Additionally, on page 24 under the paragraph “1.10.7. Is outsourcing of project activities possible?” it is stated that <i>beneficiaries should have the technical and financial capacity and competency to carry out the proposed project activities. It is therefore expected that the share of the project budget allocated to external assistance should remain below 35%. Higher shares may only be accepted if an adequate justification for this is provided in the project proposal.</i> Also, the Guide for Applicants, on page 19 under the paragraph “1.7 Who may participate in an Integrated Project?” states the following: <i>for private beneficiaries, the Contracting Authority may accept that affiliated entities to a beneficiary participate in a project as long as all conditions listed in the Model Grant Agreement and its</i></p>

	<p><i>Annex X (Financial and Administrative Guidelines) are fulfilled. However, the association of entities as affiliates may complicate the project structure and thus have a negative impact on the technical and financial coherence of the project. It is therefore entirely in the Contracting Authorities administrative discretion to accept affiliates, and in no case will affiliated entities be accepted for public beneficiaries. See also answer to question 1 above.</i></p>
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Topic:	Financial Forms – Financial issues
Question:	(1) If one of the beneficiaries is planning a (natural water retention) measure to be implemented on a land owned by someone else, who is not a beneficiary but agrees to adopt the planned measure, then are the costs associated to the measure eligible for funding by the LIFE IP project?
Answer:	(1) To be considered eligible for funding, all actions must meet each of the following conditions: (a) The concrete implementation actions (C Actions) must be foreseen in the targeted plan or strategy; (b) the need of the action has to be well justified in view of the objectives of the project; and (c) the long-term sustainability of the results must be guaranteed. Additionally, as regards the allocation of the relevant costs in specific cost categories, the beneficiary can either opt to include the costs for the lease of land use rights under "external assistance" if it concerns a short-term lease that expires prior to the project end date or for longer-term leases under the long-term lease of land cost category (Form F5) . If none of these options apply to the issue that has been raised, given that the intervention areas should normally be secured during or shortly after the submission of proposals (depending on the specificities of each proposal), it is suggested that a letter of intent/support should be requested and provided by the property owner. Finally, please also note that the eligibility of costs related to land purchase and land lease are defined in detail in section II.19.2 (i) of the Model Grant Agreement. The provisions listed in this section have to be met for considering costs for land purchase / lease of land as eligible under a LIFE contract.

Topic:	Costs for land purchase/land lease
Question:	Form F5 - Costs for land purchase/long-term lease of land/one-off compensations for land use rights: We foresee that an action maybe needs to make some land expropriation (land purchase is likely to fail because of excessive claims): (1) Are expropriation costs eligible? If yes, under which category? (2) Which are the conditions that an expropriation cost need to fulfil in order to be eligible?
Answer:	Expropriation of land related costs could be eligible. From the question it is not clear what activities could be undertaken, but for example, the costs of a lawyer could be one of them. Then the question would be if it is an in house lawyer or external contract. Depending on this the cost category should be determined. Then further questions and answers would dictate the conditions: whether the proposal can clearly and unquestionably demonstrate, that the said land is (a) essential for the success of the project, (b) no other lands would serve the same purposes, (c) all provisions given in the Model Grant Agreement are duly fulfilled, (d) expropriation follows the national rules.

Topic:	Civil works execution by a Public Body
Question:	The execution of civil works by a Public Body in the frame of an action: (1) Are they considered as Subcontracting or as Infrastructure? (2) If it is the second case, which part is eligible in the project? (since the Public Body has an accountancy system to register the infrastructure depreciation and the investment is a cost divided in the different years of execution)

Answer:	<p>Items constructed in the framework of the IP which will be registered in the infrastructure registry of the Public Body are eligible as such, provided meeting the provisions for infrastructures under the LIFE Programme. Under the LIFE Programme investments in large-scale infrastructure are considered ineligible. The actual costs for the infrastructure, if not a large-scale one, are eligible. However, only the total value of depreciation as per internal accounting rules of the beneficiaries will be covered by the project.</p> <p>As per the 2018 guidelines for Applicants (p. 87) all costs related to an infrastructure, even if the work is carried out under a sub-contract with an external entity, should be reported under the heading “infrastructure”. Further, the tendering/contracting procedure for infrastructure must be clearly specified.</p>
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Call 2019

Question:	<p>One of the beneficiaries of the project is a company made up exclusively of working members who therefore usually divide the company profit at the end of the year and have no payroll or invoices to report. How can they report on the activity carried out by the working members?</p> <p>Is it possible for instance considering them as personnel if:</p> <ol style="list-style-type: none"> we consider the per capita company profit as their actual annual gross salary including obligatory social charges and any other statutory costs they fill in the timesheets we use the default value of 1720 productive hours as actual total productive hours.
Answer:	<p>Profit is not considered an eligible cost. If members are paid based on splitting the profit at the end of the year (= same as dividends) then they cannot declare this payment/ corresponding cost under staff costs (or any other cost category). Only ‘costs incurred’ can be declared as project costs; for example, based on an employment contract or equivalent (consultancy contract, civil contract, etc.). If there are no personnel ‘costs’ registered in the accounting system of the organisation, it is not possible/acceptable to charge any relevant costs to the project.</p>

Question:	<p>Specific comments of the concept note stated the need to further develop the project’s partnership. As a consequence, five new project partners are planned to be actively involved in the whole project implementation cycle including project preparation stage. Therefore, it requires additional funding and project budget increase. As declared in the guidelines for traditional LIFE projects the applicants admitted to stage two (2) will be allowed to introduce changes to the total requested EU contribution within margin of 10%. We would like to clarify if similar conditions could also be applicable to the integrated projects?</p>
Answer:	<p>There is no set limit for IPs for the changes allowed.</p> <p>As a general rule, the proposal technical part should be consistent with the financial part. Some deviations in budget from the Concept Note are allowed, but they should not change the concept of the proposal presented in the Concept Note.</p> <p>Also, please bear in mind the indicative budget for IPs (10€M, EU contribution) indicated in the Application Guide.</p>

Question:	<p><u>Own (financial) contribution:</u></p> <p>We are aware of the rule of “Annex X – Financial and administrative guidelines” regulating that the own contribution of each Beneficiary shall be more than 0 EUR. However – according to a Government Decree adopted in 2017 - the future Coordinating Beneficiary being a National Ministry has the possibility to cover even 100% of the necessary own contribution (on behalf of the other partners, as well). In this case what is your suggested amount and/or rate for “own” (not co-financed) contribution from the side of the Associated Beneficiaries? Do we understand correctly from the text of Annex X that it can be a symbolic contribution, as well?</p>
Answer:	<p>The contribution of the coordinating and associated beneficiaries is specified under point 1.10.3 of the Application Guide (page 24): “The coordinating beneficiary and the associated beneficiaries are each expected to provide a reasonable financial contribution to the project budget. A beneficiary's financial contribution is considered as a proof of its commitment to the implementation of the project objectives. A very low financial contribution may therefore be considered as an absence or lack of commitment.</p> <p>A proposal cannot be submitted if the financial contribution of any of the beneficiaries to the proposal budget is 0 EUR.</p> <p>Section 3.4.1 of the Application Guidelines states on page 85, for public body personnel: “The salary costs of public body personnel may be funded only to the extent that they relate to the cost of project implementation activities that the relevant public body would not have carried out had the project concerned not been undertaken. The personnel in question, irrespective of whether they are working full or part time for the project, must be specifically seconded/assigned to a project; the individual assignment shall either take the format of a contractual document or that of a letter of assignment signed by the responsible service or authority of the relevant beneficiary.</p> <p>Moreover, the overall sum of the public bodies' contributions (as coordinating beneficiary and / or associated beneficiary) to the project budget must exceed (by at least 2%) the sum of the salary costs of their non-additional staff charged to the project. The applicants have to ensure that compliance with this 2% rule is reflected in the detailed costs for the first period in the financial forms and they have to be aware that this compliance will have to be ensured in the subsequent phases and will be checked at time of any relevant payment claims in each phase, including in particular the final payment.”</p> <p>In this respect, their contribution cannot be replaced by co-financers. For details, please refer to section 3.4 of this document.”</p>

Question:	<p>According to our estimates in the Concept note, the EU LIFE financial contribution requested by our project amounts to approximately 10.000.000 €. Must we reduce it below 10 million the maximum EU contribution accepted as indicated in your letter? It is advisable to reduce it so as to make the resources available (59 mill) sufficient for all the proposals?</p>
Answer:	<p>Historically, an expected average of around EUR 10 million co-financing rates and amounts (EUR) of LIFE contribution is expected for the IP projects selected for funding. However, this is not an obligatory rule or request. Please note, that you are not requested specifically to reduce your budget to EUR 10 million or below.</p>

Question:	<p><u>Infrastructure costs:</u></p> <p>Could you please advise on what the suggested optimal ratio of infrastructure (durable goods) costs is in case of a CCM IP? The IP aims to implement pilot or best practice infrastructures. Obviously, large infrastructures are planned to be</p>
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	implemented from mobilized (complementary) funds, but we aim to show good examples.
Answer:	In general, it is highly welcomed and strongly recommended that Integrated Projects include the implementation of demonstration activities on the ground generating a direct impact on e.g. reduction of GHG emissions by installing pilot or best practice demonstrators such as mentioned in your question. There is no suggested optimal ratio for infrastructure costs. However, it is expected that the added value of the demonstrators to the achievement of the IPs goals, and their value for money are well demonstrated in the proposal.

Question:	<p><u>Other cost categories related to infrastructure:</u></p> <p>Could you please advise how the costs should be planned and reported in the case if a beneficiary builds the small-scale infrastructure in the project by its own means (workforce, machinery)? Under which cost categories should the cost of this personnel, the fuel and maintenance of machinery, materials, etc. be planned in this case?</p>
Answer:	In any case, as highlighted under section 3.4.1 of the Application Guide (page 89): "All the costs related to infrastructure, even if the work is carried out under sub-contract with an external entity, should be reported under this heading."

Question:	<p><u>Infrastructure costs:</u></p> <p>The Application Guide states on page 29 that the limit of 500,000 EUR of infrastructure cost may be exceptionally exceeded if full technical justification is provided in the proposal demonstrating the necessity of the infrastructure for ensuring an effective contribution to the objectives of articles 10 or 11 of the LIFE Regulation. In the LIFE regulation the mentioned articles only refer to Environment and Resource Efficiency and Nature and Biodiversity. The objectives related to Climate Change are set in article 14 and 15. Does it mean that the possible exception cannot be applied in the case of Climate Action IPs?</p>
Answer:	The same principles, as regards the limits and exceptions of the 500,000 EUR of infrastructure cost, apply for Climate Action IPs as defined in articles 14 and 15 of the LIFE Regulation.

Question:	<p><u>Infrastructure costs:</u></p> <p>In the project, we plan to develop and implement retrofit measures for demonstration purposes of residential buildings. Retrofitting would include measures contributing to the decarbonization of the target sector, as a decentralized decarbonisation model. Most of the residential buildings are privately owned and the project plans to cover the costs of the retrofit investments for them. Our question is how the costs of the low carbon retrofit programme should be planned in the budget, as it is not realistic to include all targeted households as associated beneficiaries. Is it possible that one of the project beneficiaries cover these small-scale investments, if they do not own the targeted buildings? Is it an appropriate solution that agreements are concluded with the carefully chosen house owners, who benefit from the programme, in which they commit to the conditions set by the LIFE programme and the demonstration purposes of the LIFE IP? Under which conditions can the infrastructure costs of the retrofit programme be fully eligible?</p>
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Answer:	<p>The budget for implementing the pilot/demonstration actions at household level should be allocated to the beneficiaries responsible for these actions. Agreements specifying the measures and the demonstration purpose of the household-specific activities should be concluded between the IP and the single households as described in your question. As the costs for the retrofit programme will be distributed between several households, they are not considered assigned to a single large infrastructure; however, please note that this will be assessed based on the descriptions and specifications that will be provided in your proposal. Further, you may also consider engaging a complementary fund (e.g. a national/ regional fund focusing on private building's upgrade) to finance the said building improvements.</p> <p>Please also consider the information provided in the Application Guide, p.26. This seems to relate to what you want to do in the project.</p> <p>1.10.8. May I give financial support to third parties as part of a LIFE IP?</p> <p>Under specific conditions laid down in the Grant Agreement the beneficiaries of the LIFE IP may provide financial support to third parties in order to finance specific actions that for objective reasons cannot be implemented by one of the beneficiaries of the IP but are considered instrumental for the implementation of the targeted plan. Such actions should be aimed, in particular, at supporting local initiatives by e.g. non-profit organisations, local authorities or citizens groups.</p> <p>These costs are eligible only if:</p> <ul style="list-style-type: none"> a) This type of support is foreseen in the project – the different types of activities that may receive such financial support should be listed in the project proposal (in particular they should be clearly identified in the C forms); b) The Contracting Authority is informed about the allocation procedure and gives its prior approval; c) The criteria for allocation and financial support are transparent, non-discriminatory and clearly documented; d) The support is provided to private, non-profit, educational/research or public local entities and regulated by specific contracts or agreement based on a model agreed by the Contracting Authority; e) The maximum amount allocated to any third party involved may not exceed EUR 15,000¹ and the total amount of such costs overall may not exceed EUR 100,000 during the lifetime of the IP.
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Question:	Due to the specific conditions in the energy sector, some infrastructure projects may cost more than 500 000 EUR even at the scale of a pilot for demonstration. Is it possible that such an infrastructure pilot is part of the LIFE IP and its costs are included in the LIFE budget only up to the limit of 500 000 EUR, while the rest is covered by other funds?
Answer:	As per the Guideline for Applicants page 88, 'all the costs related to infrastructure, even if the work is carried out under sub-contract with an external entity, should be reported under this heading'. Thus, all costs related to one single piece of infrastructure have to be considered with the perspective of the given maximum of EUR 500,000. In this context, to avoid potential eligibility issues you are strongly advised to channel the financing of large-scale infrastructure, linked to the project activities, through complementary funds.

Question:	Regarding the development of prototypes, how should the criterion of not being used for commercial purposes be assessed? If the functioning of a prototype of a specific technology is demonstrated through using it for balancing the own consumption of the site, and therefore it is not part of the commercial energy
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¹ LIFE 2020 Call: EUR 60,000 , and the total amount threshold EUR 200,000

	<p>production line, does it meet the condition of not being used for commercial purposes?</p> <p>In case of a prototype of, for example, an energy storage technology or an innovative use of a renewable technology, the objectives of creating the prototypes include the assessment of meeting the technological and market criteria (i.e. being compatible with the working system, improving efficiency). If the prototype is integrated into the production system of the facility for testing the operation, it may have an impact on the income or expenditure of the company. Will it then be considered a use for commercial purpose?</p>
<p>Answer:</p>	<p>According to the Application Guide, page 89, 'a prototype is an infrastructure and/or equipment specifically created for the implementation of the project and that has never been commercialised and is not available as a serial product'.</p> <p>This means the technology you intend to apply must not be available on the market and not been commercialised before. For example, if you use a technology which is available on the market but has to be adjusted to the specific conditions of its utilisation, it cannot be considered a prototype.</p> <p>Further, a prototype may not be used for commercial purposes during the period set out in Article I.2.2 (Grant Agreement). Should the prototype or any of its components be used for commercial purposes (i.e. sold, leased, rented or used to produce goods or services) during the project, this shall be declared. The costs of creating the prototype shall then be depreciated in accordance with the rules applicable to the purchase of new or second-hand equipment and infrastructure. Any related income should be declared. In this context, should the prototype generate direct income (not reducing current operational expenses), this should be declared.</p>

<p>Question:</p>	<p>We plan to include in the project implementation of demonstration activities on the ground that will generate direct impact on GHG emission and the share of renewable energy. They will be prototypes and their main goals are the demonstration of the effective usability of these solutions in the country's socio-economic system and technological environment.</p> <p>We plan to implement the following pilot activities, and we would like to ask your advice whether these are in line with the expectations of LIFE regarding the criteria of prototypes:</p> <ol style="list-style-type: none"> 1. Development of an Open Innovation Platform 2. Alternative approaches to the recultivation of brown-fields 3. Artificial Inertia Project 4. Energy Community, Decarbonization of Households and Energy Efficiency Investment 5. Energy Storage integrated PV 6. Small scale solar power plant investment 7. Cooling energy of Battery Facilities 8. House Load supply from integrated PV and energy storage facility
<p>Answer:</p>	<p>The criteria for prototypes are defined in the Application Guide, page 89/90, and Article I.13 of the Grant Agreement. On page 46 of the Grant Agreement a prototype is defined as equipment or infrastructure specifically created for the implementation of the project and that has never been commercialised and/or is not available as a</p>

	<p>serial product. The prototype must play a crucial role in the demonstration activities of the project.</p> <p>Thus, the full proposal should clearly and convincingly demonstrate the extent to which the prototypes foreseen fulfil these criteria. Likewise, the assessment of the prototype's eligibility is part of the full proposal assessment that requires the assessment of all forms in relation to the corresponding plan/strategy.</p>
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Question:	<p>We would like to ask how to deal with state aid rules in IP LIFE project.</p> <p>In the Commission Notice on the notion of State aid as referred to in Article 107(1) TFEU in art. 60 is said: <i>'By contrast, if such resources are awarded directly by the Union, by the European Investment Bank or by the European Investment Fund, with no discretion on the part of the national authorities, they do not constitute State resources (for example funding awarded in direct management under the Horizon 2020 framework programme, the EU programme for the Competitiveness of Enterprises and Small and Medium-sized Enterprises (COSME) or the Trans-European Transport Network (TEN-T) funds).'</i></p> <p>Does it mean, that project financed from LIFE (the European Programme for the Environment and Climate Action) is not under state aid rules?</p> <p>In the project, there will be activities, which could increase the value of estate. Some parts of the land owned by private company will host activities from LIFE. After realisation of these land parts could be used on a commercial basis for an economic activity by undertakings. Will be these activities from LIFE the subject to state aid rules? Or not, because they will be financed from LIFE which is awarded directly by the Union?</p>
Answer:	<p>Indeed, as said under article 60 of the said Commission notice, LIFE funds are directly awarded by the Union, and thus do not constitute State-aid resources.</p> <p>Please consider that LIFE grants may not produce a profit for the beneficiaries unless specified in the Special Conditions of the Grant Agreement (Article II.25 of the Grant Agreement). Thus, possible revenues generated by the project should already be identified to the extent possible in the full proposal. These will be calculated at the end of the project and be deducted from the final EU-contribution if applicable.</p>

Question:	<p>Can budget items allocated for project documentation elaboration be considered as eligible costs when projects' realization costs are supposed to be financed by complementary sources?</p>
Answer:	<p>Any budget items must be allocated to specific activities and tasks thereunder. If the full proposal convincingly justifies the need and added value of such a documentation in the framework of the Integrated Project and its objectives, the related costs can be considered eligible.</p>

Question:	<p>We have learned from FAQ in 2018, the Question Nr 17:</p> <p>17. Could the cascading grants be included in the Integrated Project? Can you please clarify the following sentence from the guidelines: "The maximum amount allocated to any third party involved may not exceed EUR 15,000 and the total amount of such costs overall may not exceed EUR 100,000 during the lifetime of the IP".</p>
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	<p>The cascading grants are possible eligible costs under LIFE in the following format: 15.000 EUR per third party up to the ceiling of 100.000 EUR for all the grants. This means that 6 such grants for 15.000 EUR could be considered as eligible costs or possibly 10 grants for 10.000 EUR or any other configuration that will allow you to meet the limit of 15.000 EUR per grant without exceeding the total cost of 100.000 EUR for all of them.</p> <p>If the cascading grants that are envisaged do not meet the above-mentioned criteria, they cannot be considered as eligible project costs. In such case the applicant could perhaps consider if they could be covered under IP complementary measures.</p> <p>-----</p> <p>Please advise what type of small-scale grant scheme can be included in 2019 Integrated projects? What are the considerations to design small-scale grant scheme we shall be aware of?</p>
Answer:	<p>As mentioned in section 1.10.8. page 26 in the guidelines for applicants, there are specific eligibility rules that must be followed for an IP to provide financial support to third parties in order to finance specific actions (i.e. supporting local initiatives by e.g. non-profit organisations, local authorities or citizens groups).</p> <p>Please read article II.12 of the IP model grant agreement in https://ec.europa.eu/easme/en/section/life/2019-call-proposals-integrated-projects to be aware of all conditions applying to cascading grants within an IP.</p>

Question:	<p>It is understood that costs of organising seminars, workshops, conferences are in principle budget category "Other Costs" (unless a subcontract has been concluded with a service provider, in which case these costs should be charged under "Subcontracting"). However, it is not so clear in what specific and well justified cases and on what conditions the use of partner's meeting rooms can be considered as their co-financing.</p> <p>Indeed, in view of the scale of Integrated project, there is a need to organise numerous workshops and seminars in order to hold a proper consultation process for a number of strategic policy implementation documents elaborated in the scope of Integrated Project with all the stakeholders. For instance, for the development of several habitat action plans and setting of several Favourable Reference Values, it is estimated that within our project's lifetime, there will be a need for 5 larger seminars and 50 smaller scale thematic workshops. The indicative costs of the use of meeting rooms of one of Partner of the Integrated Project will be 41 200 EUR. There is an order of the said partner to define these costs, and a list of meeting rooms and the rent cost.</p> <p>On what conditions these (indicative) 41 200 EUR can be considered as a co-financing from the said associated partner to the project? Can an Order from the CEO of the partner for the use of these rooms for required number of workshops and seminars be the evidence that these costs are actual (as per Annex X to the Model LIFE Grant Agreement Financial and Administrative Guidelines, section V.2).</p>
Answer:	<p>According to Article II.19.1 which refers to the conditions for the eligibility of costs, eligible costs of the project are costs actually incurred by the beneficiary (and several additional criteria, as reported under this article, must be met for the eligibility of expenses). Thus, the indicative costs for the provision of the meeting rooms of the beneficiary would not be eligible as the partner's financial contribution to the project.</p>

Question:	<p>Guidelines for applicants LIFE Integrated Projects 2019, section 2.4.2 states:</p> <p>ac) Short term land lease or temporary compensation payments 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</p>
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	<p>or ecosystem targeted. 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.</p> <p>In our project, it is planned to develop and test in pilot-action the potential of a contractual (voluntary) approach for the achieving biodiversity conservation goals.</p> <p>In practice, this means conclusion of 3-5 year contracts with private landowners which undertake certain habitat management activities on a contractual basis, in return for compensation payments during this period. In this pilot action, it will be studied (both from a nature conservation and socio-economic point of view) how effective this contractual approach is in the situation in our country, and it will be compared with the traditional nature protection approach in our country (regulatory approach). On the basis of the obtained results, a proposal for the integration of contractual nature protection mechanisms into the nature conservation system of our country will be developed.</p> <p>Further, GRANT AGREEMENT FOR INTEGRATED PROJECTS https://ec.europa.eu/easme/sites/easme-site/files/life_model_ga_ip_2019_vs01.2020.pdf defines in section II.12.1: Where the implementation of the project requires giving financial support to third parties, the beneficiaries shall give such financial support in accordance with the conditions specified in Annex II, which shall at least contain: (a) the maximum amount of financial support, which shall not exceed EUR 15 000 for each third party and a total of EUR 100 000 for the project period.</p> <p>Question: In this case, is the EUR 100 000 limit mentioned in II.12.1 of GRANT AGREEMENT FOR INTEGRATED PROJECTS also applied to the contractual compensation payments to individuals?</p>
Answer:	<p>In this case, the conditions applicable for the short-term land lease or temporary compensation payments are not related to the financial support to third parties as reported under section 1.10.8.</p> <p>In particular, expenditure related to financial support to third parties are expected to be made in order to finance certain actions that for objective reasons cannot be implemented by one of the beneficiaries of the IP - themselves or via external assistance - but are essential for the implementation of the targeted plan. On the other hand, your proposed pilot-action, that describes a contractual (voluntary) approach with farmers, falls under the "Short term land lease or temporary compensation" category, which in line with article II.19.2 of the model grant agreement, is considered as subcontracting.</p>

Question:	<p>Is there a limit how many small-scale Grant Agreements can be within one Integrated Project?</p> <p>It is noted that section II.12.1 of grant Agreement for Integrated Projects sets a total limit 100 000 EUR:</p> <p>Where the implementation of the project requires giving financial support to third parties, the beneficiaries shall give such financial support in accordance with the conditions specified in Annex II, which shall at least contain: (a) the maximum amount of financial support, which shall not exceed EUR 15 000 for each third party and a total of EUR 100 000 for the project period.</p> <p>Question: Can there be two or three small scale grant agreements in one Integrated Project, totalling 100 000 or 150 000 EUR respectively?</p>
Answer:	<p>The conditions applicable for the provision of financial support to third parties in order to finance specific actions, as reported under section 1.10.8, foresee that the maximum amount allocated to any third party involved may not exceed EUR 15,000</p>

	and the total amount of such costs overall may not exceed EUR 100,000 during the lifetime of the IP. Thus, each small-scale grant agreement can have a grant of maximum EUR 15,000 (so two or three will amount to a total of maximum EUR 30 – 45,000).
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Question:	<p>Could the project include the purchase of the building and its subsequent reconstruction or rehabilitation?</p> <p>There is a small hydroelectric power plant on one of the rivers located in the project area, which the owner is willing to sell for EUR 300,000e. The hydroelectric power plant does not stand directly on the river, but on a side plot. However, in order to ensure water drainage, a weir is placed on the river to prevent fish migration. In the absence of an hydroelectric power plant (HPP), it would not be necessary and could be demolished, which would have a very positive effect on the migration of fish and thus the state of their stocks.</p> <p>Would it be possible to include in the project budget the costs of purchasing and possibly rebuilding the HPP and demolishing the weir?</p> <p>Are we right, if we think that if the purchase of the building was followed by its demolition together with the weir, it would be possible to give external assistance? There is a limit of 35% of the budget, but if things are well explained, there is a higher percentage?</p> <p>If the purchase of a building is followed by its repair and the establishment of an Ecocentre, it would have to be ratified as infrastructure. We think that the costs of buying, repairing and equipping the Ecocentre would count together. It is questionable whether we can fit under the € 500,000 limit that LIFE has. In our opinion, the costs of demolishing the weir would go to External assistance, because the result is not part of the infrastructure, but its destruction. It could also be resolved that only the purchase of a building would be put into the LIFE project.</p> <p>Does it need to be treated as two separate things, would the weir be classified as one project or it has to be the separate things? Therefore, the question is what could be recognized as a justified case in the case of single piece of infrastructure in this case?</p>
Answer:	<p>The expenses for the purchase/ acquisition of buildings, and in this case for a hydroelectric power plant including the local weir, are not considered eligible costs. As regards land-related purchases, please carefully read Article II.19.2 Eligible direct costs (Grant Agreement) and the corresponding eligibility requirements (pages 48 and 49).</p> <p>Projects dedicated to the construction of large infrastructure do not fall within the scope of the LIFE Programme and are therefore not eligible. A project is considered to be dedicated to the construction of large infrastructure if the cost of a "single item of infrastructure" exceeds € 500,000. A "single item of infrastructures" means all elements physically bound to ensure the functionality of the infrastructural investment (e.g. for an eco-duct the bridge, barriers, signposting, etc.). Such amount may be exceptionally exceeded upon agreement with the Agency/Commission.</p> <p>The information provided in your inquiry can only be assessed in relation to the full description of the project, the corresponding action and the actual requirements as set out in the adopted PAF. The assessment whether the proposed solution demonstrates the necessity for acquiring the said infrastructure - for ensuring an effective contribution to the objectives of articles 10 or 11 of the LIFE Regulation and achieving the full implementation of the PAF - is subject of the Full Proposal evaluation.</p> <p>As regards the external assistance costs, please note that these costs refer to sub-contracting costs: i.e. services / works carried out by external companies or persons, as well as to renting of equipment or infrastructure. Thus, based on the provided description, demolition services, if deemed necessary, could be allocated under this cost category. The purchase of buildings cannot be allocated under this cost category.</p> <p>The refurbishment of the building including the corresponding infrastructure-related equipment could potentially fall under the cost category "durable goods/infrastructure".</p>

	Finally, from the information and description provided, these type of actions (i.e. those including large infrastructure costs, purchase of buildings, etc.) could be actually listed under the “complementary actions” of the project, which can be financed from complementary funds (outside the IP).
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6. Complementary funds and measures

Call 2018

Topic:	Complementary actions
Question:	The page 11 of the application guide said « <u>Accordingly, applicants, should design the LIFE Integrated Projects by selecting from the targeted plan or strategy a coherent set of measures or actions for which LIFE is the most appropriate funding source. Other complementary measures or actions should be financed using funding sources and should be implemented in complement to the Life interventions</u> ». Can you explain what scope should be taken to include these complementary measures?
Answer:	<p>Integrated Projects 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.</p> <p>The question refers to evaluation question 3 under Award Criterion 5 (EU added value: extent and quality of the mobilisation of other funds) listed on page 33 of the Guide for evaluation of LIFE Integrated Project proposals– Environment and Climate Action sub-programmes: <i>Is the functional link between these complementary funds and the IP clear and logical?</i></p>
Question:	The page 65 of the 2018 application guide describes in which cases the complementary actions would be accepted. Is it correct to understand that if the financial commitments of the given funding source are not sure at the time of submission of the full proposal, we can still present the letter and it will count for the evaluation?
Answer:	<p>The 2018 Guide for Applicants states, on page 66 under the paragraph “Status of the financial commitment”, the following: <i>The letter should also provide information about the status of the financial commitment from the given funding source. Please indicate if applications from beneficiaries/stakeholders involved in the IP have already been received or funds are already granted or when they can be expected to be granted.</i></p> <p>Further, on top of page 12 the Guide for Applicants states: - <i>in the absence of an actual commitment/confirmation by the time of the full proposal, a formal letter of intent has been signed by the competent body representing the funding source referred to by the applicant, confirming the potential eligibility of the actions proposed by the applicant for funding from this source and indicating the timing and likelihood of a future funding commitment.</i></p>
Question:	Is it correct to understand that any complementary action taken after the launch of the 2018 call for applications and the end of the IP is eligible for all project beneficiaries? (page 11 of the 2018 Applicant’s Guide “was not granted to or spent by one of the beneficiaries of the IP <u>before the launch of this 2018 call for applications.</u> ”). If we understand correctly, does this mean that this rule applies to project beneficiaries only.
Answer:	All indicated complementary funding that has not been granted or spent by any beneficiary of the IP before the launch of the 2018 call will be considered in the evaluation. In exceptional cases and having explicit justifications from the applicants, funds granted before that date can also be accepted, but under no circumstances will funds granted or spent before the launch of the LIFE2016 call (19/05/2016) be accepted as mobilised (page 11 of the Guide for Applicants). As pointed out in the Guide for Applicants on page 66 (see answer to question 2 above), also stakeholders can receive complementary funds.
Question:	Just to be sure, to answer my questions (1) and (2) you mentioned the point 6.2 of the mid-term/final report, this helps me to understand what the reporting requirements for

	<p>complementary actions are. But regarding the chapter 2.4.3 of the Application Guide for LIFE Integrated Projects, it is said that “Each project will have to report on the outcomes and impact of the project taking into account the LIFE integrated project performance indicators” and that “IP project actions, and in particular the concrete implementation actions (C actions) must lead to a measurable increase in the rate of implementation of the targeted plan or strategy.”</p> <p>Does it mean that the reporting requirement for complementary actions are only the elements mentioned at the point 6.2 of the mid-term/final report and that the impact of complementary actions is not measured through the indicators/that we don't have to identify specific indicators for complementary actions in our proposal?</p>
Answer:	<p>Indeed, in case of successful proposal, the applicant will be asked to fill in the KPI online forms. Please take a look at the further explanation of the process: https://ec.europa.eu/easme/sites/easme-site/files/detailed_approach_for_clarifying_life_and_complementary_funding_kpi_impact_in_ips-f.pdf</p> <p>In summary, if you foresee some complementary actions and funding in the project, we will want to know about them throughout the project and you will be asked to report on them.</p>
Question:	<p>Actions of the IP itself will be the subject of a regular and complete monitoring through reporting obligations (interim reports). What are the monitoring requirements for the complementary actions? It is the same modalities?</p>
Answer:	<p>The reporting requirements for complementary actions are laid down under point 6.2 of the reporting template for LIFE Integrated Projects that can be found on the old LIFE website (http://ec.europa.eu/environment/life/toolkit/pmtools/life2014_2020/tech_report.htm). 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.</p>
Question:	<p>Will stakeholders leading complementary actions be requested to report on the implementation of the complementary actions throughout the whole IP?</p>
Answer:	<p>See answer to question 1 above. As emphasized in chapter 2.4.3 of the Application Guide for LIFE Integrated Projects the project must monitor its impact on the implementation of the targeted plan. The contribution of the complementary actions has to be reported under point 6.2 of the mid-term/final report and refers to the specific reports delivered by the complementary actions, which are delivered as per requirement of the respective financing mechanism.</p>
Question:	<p>Can you confirm that it is possible to add new complementary actions at this stage (that were not mentioned in the concept note)?</p>
Answer:	<p>It is possible to add additional complementary actions at the Full Proposal stage. Please consider, that complementary funding can only be considered as “mobilised” if such funding:</p> <ul style="list-style-type: none"> - has not been granted to or spent by one of the beneficiaries of the IP before the launch of this 2018 call for applications. In exceptional cases and having explicit justifications from the applicants, funds granted before that date can also be accepted but under no circumstances will funds granted or spent before the launch of the LIFE2016 call (19/05/2016) be accepted; and - has been committed/confirmed by the relevant funding source by the time of the submission of the full proposal and evidenced by a formal letter of intent (i.e. A8 form) signed by the competent body representing the funding source clearly confirming the availability or the actual commitment of the complementary funding; or - in the absence of an actual commitment/confirmation by the time of the full proposal, a formal letter of intent has been signed by the competent body representing the funding source referred to by the applicant, confirming the potential eligibility of the actions proposed by the applicant for funding from this source and indicating the timing and likelihood of a future funding commitment (see Guide for Applicants page 11/12).

	All other complementary funding presented will be considered as an additional information that might be beneficial to the project success, even though it will not be considered as “mobilized”.
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Call 2019

Question:	Regarding the complementary funds that have to be approved by the time of the submission of the Full Proposal: Could you please clarify if the completed Form A8, signed by the responsible authority, is appropriate and enough to fulfil this criteria?
Answer:	A Form A8 signed by the authority responsible for the management of the respective fund is considered sufficient. However, the respective form must fulfil all requirements listed in section 3.3.1 Form A8 of the Application Guide pages 67 and 68; in particular on the status of the financial commitment.

Question:	We aim to mobilize the Just Transition Fund as complementary fund for reskilling the pre-existing workers linked to the target sector and economic diversification of the supply chain, but the timing of the available funds from the Just Transition Fund is not clear yet. Can we mark the financing from the Just Transition Fund as confirmed complementary fund in our IP?
Answer:	<p>The criteria for considering a complementary fund as mobilised are listed in section 3.3.1 Form A8 of the Application Guide pages 67 and 68, referring in particular on the status of the financial commitment. If these criteria are met, the respective fund is considered confirmed.</p> <p>Please be aware that to be considered for financing, an IP should show that at least one additional fund has been mobilised for complementary actions. The corresponding letter of intent MUST unambiguously confirm the commitment to finance.</p>

Question:	Who will be the responsible managing authority of the Just Transition Fund? If we need a signature from them for the corresponding A8 Form, where should we turn?
Answer:	The EU Just Transition Fund is still under discussion. Please follow it to be on track with the implementation decisions to be taken in the coming months. The commitment letter has to be provided 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, it is strongly suggested to contact with the said fund and make sure that they are able and willing to sign the A8 form, and that they will be able to comply with the requirements as set in the said form.

Question:	Should the complementary activities be completed during the implementation period of the IP or can they continue to be implemented after the IP ends? We understand that they can continue - and possibly build on the results of the IP - but please confirm.
Answer:	Implementation of complementary actions can continue after the end of the Integrated Project. However, please consider, that the IP and complementary actions presented in the full proposal are expected to demonstrate that full implementation of the targeted plan/strategy is secured.

Question:	Since the EU budget negotiations are still on-going the country allocations are not finalized yet. At present stage the availability of EU funding allocations dedicated to the energy transition (e.g. 10c Mechanism) is likely and we expect that the national responsible body will be able to mobilize them for the complementary actions, however they are not signed yet by the EU Institutions. Our question is what happens if at a later stage it turns out that our country does not receive the expected funds, what would be dedicated by the national authorities to the complementary actions?
Answer:	<p>Please be aware that to be considered for financing, an IP should show that at least one additional fund has been mobilised for complementary actions. The corresponding letter of intent MUST unambiguously confirm the commitment to finance. In this context, as only a minimum of one additional fund has to be mobilised, you can add the funds expected from the Ministry and indicate the status as “to be mobilised”. As long as one additional fund included in Form A8 is confirmed as “mobilised”, this will not cause a fail/ineligibility issue for your proposal.</p> <p>However, extent and quality of the mobilisation of other funds, in particular EU funds will be awarded under Award Criterion 5 with bonus points. According to the Evaluation Guide (page 22) ‘IPs which are likely to mobilise Union funds with a functional link to the plan to be implemented and which foresee a satisfactory coordination mechanism will receive a higher score. The proposal should not only identify the funds that will be mobilised but should also provide a summary description of all complementary actions that will be carried out during the project time by using these additional funding sources’.</p>

Question:	<p><u>Regarding the financial commitment of complementary funds:</u></p> <p>If a funding line that is managed by the responsible ministry and is dedicated to the implementation of the targeted plan is distributed to projects through an open application procedure for grants, and therefore it cannot be told in advance which projects will obtain the grants, can be marked as a confirmed/committed complementary fund?</p>
Answer:	<p>The criteria for considering a complementary fund as confirmed or committed are listed in section 3.3.1 Form A8 of the Application Guide pages 67 and 68, referring in particular on the status of the financial commitment. If these criteria are met, the respective fund is considered confirmed.</p> <p>Please be aware that to be considered for financing, an IP should show that at least one additional fund has been mobilised for complementary actions. The corresponding letter of intent MUST unambiguously confirm the commitment to finance; this rule must be strictly followed, and there is no “caveat” or “remark” that could waive this obligatory requirement given that IPs represent a considerable investment, and the European Union attaches great importance to the long-term sustainability of these investments.</p>

Question:	<p>At the moment the negotiations on next budget financing period have just started. The authorities in charge of the investment is therefore reluctant to provide a signature on Form A8 regarding complementary financing as many issues are unclear. However, we believe the situation is the similar in all Member states. Yet the guidelines provide for “ The corresponding letter of intent MUST unambiguously confirm the commitment to finance”</p> <p>How to proceed as obviously complementary financing is the core of any Integrated project application?</p>
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	<p>Would you please clarify or – if possible- provide an example what type of “caveat”, “remarks” in the form A8 regarding complementary financing would still be accepted/considered and -what remarks would be too weak to consider the complementary financing.</p> <p>The examples of remark/comment next to the confirmation of the complementary financing could be:</p> <ul style="list-style-type: none"> • The financing X is planned (but not yet guaranteed) • When deciding on the financial allocations we will take into account the activities listed in LIFE IP project, however, this letter does not guarantee the allocation of the potential funding • These are funding intentions <p>This is crucial clarification. And the confirmation/or additional examples of formulation comments could be very useful for us today in the process of discussion with the national authorities in charge of next MFF budget allocations.</p>
Answer:	<p>The criteria for considering a complementary fund as mobilised are listed in section 3.3.1 Form A8 of the Application Guide pages 67 and 68, referring in particular on the status of the financial commitment. If these criteria are met, the respective fund is considered confirmed.</p> <p>Please be aware that to be considered for financing, an IP should show that <u>at least one</u> additional fund has been mobilised for complementary actions. The corresponding letter of intent MUST unambiguously confirm the commitment to finance; this rule must be strictly followed, and there is no “caveat” or “remark” that could waive this obligatory requirement given that IPs represent a considerable investment, and the European Union attaches great importance to the long-term sustainability of these investments.</p>