

Frequently Asked Questions about the LIFE Call for Proposals

Traditional Projects and Technical Assistance

(updated 27/06/2019)

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Questions linked to Preparatory projects shall be sent to the following email address: ENV-LIFESELECTION@ec.europa.eu

All the rest shall be sent to: EASME-LIFE-ENQUIRIES@ec.europa.eu

1. General

#	Question	Answer
1	Do national authorities have the possibility to comment on proposals, as in previous LIFE calls?	No, under the LIFE Regulation 2014-2020, this is not possible.
2	The application guides 'strongly recommend' applicants to write their proposals in English. Will applicants who write their application in their own languages be penalised.	No, applicants will not be penalised for submitting proposals in another official EU language. However, applicants are strongly encouraged to write their proposal in English. Please also consider that during the implementation of a LIFE project all communication with the Agency and main project deliverables will need to be in English.
3	For a project involving an Overseas Country or Territory, is it a requirement for the applicant (coordinating beneficiary) to be based in the EU territory.	Yes, for all projects the coordinating beneficiary must be based in EU territory where the EU treaties apply.
4	The model grant refers to the possibility to transfer up to 20% of the budget between budget lines. Is this 20% of the relevant expenditure type or 20% of the overall budget?	It is 20% of the overall eligible costs.
5	In some circumstances, the rules for awarding contracts to external suppliers foreseen in the grant agreement for integrated and traditional projects are different both from National and Regional laws; in these cases, what is the applicable rule?	The beneficiary awarding the contract must apply rules generally applicable to procurements as set out in the grant agreement Art. II.10 and 11. Beneficiaries should apply their own rules for as far as (1) they are not in contradiction with the previously mentioned articles and (2) they guarantee value for money and 'no conflict of interest'. Example: if the grant agreement stipulates that for private entities an open tendering procedure is required, then this entity cannot ignore this if their own rules would require a less strict procedure.
6	Which application package should I choose for a proposal that joins Nature & Biodiversity, Environment & Resource Efficiency and Information? May I choose any of them even if the project touches on more than one category?	There are different application packages corresponding to the various priority areas under the LIFE programme. In some cases a project may address objectives from more than one priority area, however, you must decide which is the central focus of your project and submit under that priority area. This " Orientation Document " may help you

		in making the choice.
7	Are individuals who act as freelance experts acceptable as partners for a LIFE programme? Freelance experts do not form part of any organisation.	<p>Article 23 of the LIFE Regulation states that LIFE may fund "public and private bodies". This article should be read in the context of the EU Financial Regulation which makes it clear that "private bodies" does not include private individuals. Therefore both the applicant and any partners (associated beneficiaries) must be "bodies" and not individuals (i.e. natural persons). Please note that 'sole traders' are also considered 'natural persons'.</p> <p>Individuals can be involved in projects as employees of beneficiaries, as natural persons or through external assistance contracts. As indicated in art. II.19.2 of the Grant Agreement, costs of natural persons working under a contract with the coordinating beneficiary or an associated beneficiary other than an employment contract may be assimilated to costs of personnel, provided that the following conditions are fulfilled:</p> <ul style="list-style-type: none"> (i) the natural person works under the instructions of the beneficiary and, unless otherwise agreed with the beneficiary, in the premises of the beneficiary; (ii) the result of the work belongs to the beneficiary; and (iii) the costs are not significantly different from the costs of personnel performing similar tasks under an employment contract with the beneficiary. In the case of external assistance, it should be recalled that it must be tendered so the proposal cannot name a specific individual or company as the provider of the external assistance.
8	Can a project include a partner in Switzerland and carry out activities outside the European Union?	Yes, according to article 6 of the LIFE Regulation, provided that the coordinating Beneficiary is based in the EU and that evidence is provided that concrete activities

		to be carried out outside the EU (i.e. Switzerland) are necessary to achieve EU objectives and to ensure the effectiveness of project interventions in the territory of the Member States. Simple know-how transfer or expertise support is not sufficient.
9	Are profits generated after the end of a Project by using the results of the Project considered income to the Project? Will they be deducted from the grant received?	Income received <u>after</u> the end of a project is not considered income to the project.
10	We are developing a Project that will develop a prototype. In the final stages of testing and demonstrating, we plan to charge users of the prototype (in order to offset some of the costs of its production). How should the resulting income be treated?	Any revenue generated by the project needs to be recorded and must be reported to the Agency/Commission at the latest in the final financial report. Further than this, in case of commercial use of the prototype it will have to be depreciated and considered as either equipment or infrastructure. In fact only if the prototype or any of its components are not used for commercial purposes during the lifetime of the project, then 100% of purchase costs are eligible for co-funding.
11	Can a potential applicant submit two applications, one under the ENV sub programme and another one under the CLIMATE sub programme?	An applicant can indeed submit under both sub-programmes, and each application will be evaluated, however if the projects are related, please note that this overlap should be indicated in "form A7 – Other proposals submitted for European Union funding" ¹ (please include the information in response to question 2). If both of the projects reach the 'revision' phase, the beneficiary would be requested to cut any overlap. Before submitting multiple projects, applicants should carefully consider the above mentioned issue of overlaps and limit them as much as possible.
12	How many countries must be involved in a project for it to be	A 'transnational' project involves more than one

¹ This does not apply to Capacity building and Technical assistance projects.

	'transnational'? Is it as long as there is more than 1? How do you get the maximum score for this during evaluations?	country. As per the application guidelines, transnational proposals shall be favoured and awarded extra points if there is sufficient evidence for an added value of the transnational approach. The maximum number of points is given to projects involving beneficiaries from other countries. Actions must take place in this/these other country(ies) and must considerably contribute to the solution of the problem addressed.
13	Must a public associated beneficiary receive a part of the EU co-financing awarded to a project? If they do not receive it, does the 2% rule still apply?	A public associated beneficiary is not obliged to receive a portion of the EU co-financing (although, on the other hand, each beneficiary must obligatorily make a financial contribution to the project.) The 2% rule applies anyway.
14	A project wants to build some infrastructure that will cost more than €500,000. Annex X (Financial and Administrative Guidelines) of the model grant agreement states that this makes this large infrastructure, which is generally not an eligible cost, but which is allowable in exceptional circumstances..	<p>A project is considered to be dedicated to the construction of large infrastructure if the actual² cost of a "single item of infrastructure" exceeds € 500,000. A "single item of infrastructures" means all elements as described in form F4a that are 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 if full technical justification is provided in the proposal demonstrating the necessity of the infrastructure for ensuring a direct and effective contribution to the objectives of the LIFE Regulation (Art. 10, 11 and 12) .</p> <p>The applicant should therefore set out in the application clear and substantiated arguments as to why the infrastructure has, for example,</p> <ul style="list-style-type: none"> • a high importance for the target species, and why the conservation of the species cannot be assured without it. • A crucial role in delivering a direct and essential

² Actual cost: Full cost of the infrastructure without applying any depreciation.

		contribution to the innovative solution proposed reinforcing its impact and potential for replication.
15	Is it possible to build infrastructure that will cost more than € 500,000, but part of the funding (€500,000) will come from the LIFE programme and the rest will be funded by one of the beneficiaries thus avoiding the limitation linked to large infrastructure?	The threshold of EUR 500,000 applies to the actual cost of the "single item infrastructure" i.e. full cost of the infrastructure without applying any depreciation. Please note that for any costs to be co-financed by the LIFE programme, the total cost must be considered an eligible project cost, regardless of whether part of the cost is covered by co-financing.
16	Is it correct that the matched funding would have to be received during the duration of the grant which would effectively rule out use of historic reserves?	Pursuant to the application guide, the coordinating beneficiary and any 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 (please refer to Award criterion 2 of the Evaluation Guidelines and to Application Guidelines on this point). A proposal cannot be submitted if the financial contribution of any of the beneficiaries to the proposal budget is EUR 0. However, the original source of the beneficiaries' contributions is irrelevant, provided that they do not originate from an EU financing programme. Therefore, in principle, historic reserves can normally be used to provide a financial contribution to the project budget. Please note that beneficiary's contributions may be complemented by co-financing from third parties
17	Can a company from a non-EU country be used as a sub-contractor?	In principle a company from a non-EU country may be used as a sub-contractor, provided that all of the LIFE rules on tendering are complied with, and provided that there are no specific EU constraints on trade with the

		country in question.
18	Can I submit an application without confirmed co-financing beyond the first year of the project? And, what happens if a confirmed co-financer withdraws after the start of a project?	<p>Your application needs to show a balanced budget over the entire lifetime of the project. In case some of the co-financing is not confirmed at this stage, you can submit the A6 marked 'to be confirmed', but still the potential co-financer must sign it. A 'confirmed' form A6 is required before any grant agreement is signed.</p> <p>In case a co-financer withdraws after a project has started, it will be the responsibility of the coordinating beneficiary to find replacement co-financing.</p>
19	<p>1. Is it possible to implement similar activities in a LIFE project and in a project funded by another EU financial programme, but in different target countries?</p> <p>2. Can partners from another EU funded project participate in a LIFE project provided that the activities foreseen in LIFE are not double financed by the other programme?</p>	<p>Provided there is no double funding, similar activities can be financed under different EU financial programmes, provided of course that the actions are otherwise eligible.</p> <p>Partners from the other project can also participate in the LIFE project, as long as costs are clearly separated.</p>
20	May I be the coordinator of the project without having a permanent contractual relationship or even not having any employment contract with the coordinating beneficiary, including my salary as project manager in the section of personal as additional staff?	<p>Please refer to Faq 7 above and, further to this, note that there is no obligation for a project coordinator to be a permanent employee of the coordinating beneficiary. Even if it is expected that the project management is carried out by the staff of the coordinating beneficiary, outsourcing of project management is possible on the basis of an appropriate justification, provided the coordinating beneficiary retains full and day to day control of the project and must establish an appropriate</p>

		<p>mechanism to ensure adequate oversight. If the coordinating beneficiary wishes to subcontract the work of project management, all provisions regarding external assistance must be respected including regarding the tendering procedure.</p> <p>The coordinating beneficiary could also hire a project coordinator on a temporary staff contract for the duration of the project. For further details please refer to the 'Who should manage life a project?' of the Guidelines for Applicants.</p>
21	When should I tick the box "VAT reimbursement" in form A2-A3 in eProposal?	The Application guidelines should read: "If your organisation is unable to recover VAT paid (...) you can opt to include the reimbursement of VAT in your costs submitted under this proposal, in that case then please tick the box." The current version of the Application guidelines wrongly mentions presence of YES and NO boxes for "VAT reimbursement" in eProposal. Apologies for the mistake.
22	Can entities recognized by the Italian Supreme Court as "soggetti di diritto" (and having their own assets and the rights to stand in Court and subscribe to agreements with third parties) apply for LIFE grants, even if they do not have a legal personality according to Italian legislation?	Art. 131 of the EU Financial Regulation stipulates that Grant applications may be submitted by legal persons including "entities which do not have legal personality under the applicable national law, provided that their representatives have the capacity to undertake legal obligations on behalf of the entity and offer guarantees for the protection of the Union's financial interests equivalent to those offered by legal persons". Clear evidence must be provided that all criteria listed above are fulfilled
23	We have seen project with multiple beneficiaries but where all the actions are headed by the coordinating beneficiary. However, the guidelines state (old and new regulations) that the ABs should be responsible for the implementation of one or several project actions. Is it OK (eligibility wise) for an AB to be	The ABs need to be actively involved in one or more project action, they do not need to have the lead however.

	just involved in an action or must they always be named as the lead beneficiary on at least one action.	
24	Are there national allocations? How are they calculated in the Multi-annual Work Programme 2018-2020	No, starting from the Call 2018 proposals are ranked based solely on quality in line with the Call award criteria.
25	Can owners of companies not receiving a salary or not invoicing their time to the company declare costs to the LIFE project ?	No. Only if the owners incur costs in relation to the project that are registered in the accounting system of the company, costs can be declared under the personnel cost category. Please note that dividends are not considered a cost.

1.1 General

1	Concerning the 102% rule applicable to public bodies, we understand that this rule does not apply for personnel recruited or for whom their contract is specifically renewed for the duration of the LIFE project, regardless of their statute. Is this correct?	Yes, this is correct. It should be noted that this exemption concerns contract renewals, but not reassignments. Therefore if a staff member already has a permanent contract before the start of the project, their staff costs must be taken into consideration for application of the 102% rule.
2	How do we interpret the phrase 55% co-financing, does this mean the EC will contribute 45% or 55%?	The EU co-financing rate is maximum 55% of the total eligible project costs, which means that the EU will contribute maximum 55% of the total eligible project costs.
3	When does the 75% EU co-funding rate apply under LIFE?	A co-financing rate of up to 75% of the total eligible costs may be granted only to LIFE Nature and Biodiversity proposals that focus on concrete conservation actions for priority species or habitat types of the Birds and Habitats Directives. This higher financing rate will only be applied

		to projects allocating 50% or more of the total estimated cost for concrete conservation actions, to activities directly benefitting priority habitats or species. See Guidelines for Applicants 2018 Section 1.6.4.
4	Will there be a flat 7% overhead contribution? The guidance says 'Any organisation receiving an operating grant from the EU for the period of the project or parts of the period cannot claim the flat rate for the period in question.' If this applies to the whole University then we would not be eligible. Can you confirm?	<p>Please note that you should make a distinction between 'operating grants' and 'action grants'. Operating grants are provided to finance the functioning of a body and in that sense the organisation is already receiving a contribution for the general operating costs (overheads). Action grants are intended to help achieve a Union policy objective (i.e. grants that contribute to the financing of specific projects) If your university receives an 'operating grant' which in principle finances your overheads already, then you cannot claim a flat rate for overheads for the period in question. Double funding is not permitted.</p> <p>It is not a problem if your organisation receives other unrelated action grants (i.e. for specific projects).</p> <p>Also note that the overhead rate will be set in your grant agreement at a fixed rate which may be up to 7% (per beneficiary) depending on the type of activities in your project.</p>

2. Traditional Projects

1	What do you mean by replicability and transferability in the context of a LIFE project?	<p>It is essentially a set of substantial activities (not just generic declarations of intents) included in the project, that are aimed at making tangible use of project results in other contexts than the specific one of the project.</p> <p>Replicability and transferability go beyond dissemination, transfer of knowledge and networking. They concern activities and approaches, integrated in all relevant</p>
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		<p>project actions, which aim to facilitate the replication and/or transfer of the project's results and experiences beyond the project, including in other sectors, entities, regions or countries.</p> <p>From this year all Guidelines for applicants include some illustrative examples and impose the obligation to include replicability and transferability activities and compulsory deliverable under project actions.</p>
2	What is the difference between the concept of sustainability and the one of replicability and transferability?	<p>Sustainability is the capacity to maintain project results after its end, it presupposes a strategy including tasks to ensure the continuation of necessary project actions and the related funding after the end of the project.</p> <p>Replicability and transferability goes further and makes sure that project results will not only continue in the context of the project after its end, but are also tangibly used in other contexts and multiplied.</p>
3	Is it compulsory to attach the LIFE Key project level Indicators table at full proposal stage? Will this be considered in the evaluation?	Yes it is compulsory and it will be used in the evaluation process to assess the extent and quality of the contribution to the specific LIFE objectives. This will be reflected in Award Criterion n.3.
4	Can you give me your opinion on the following idea for a traditional project?	Sorry, the Agency/Commission is unable to provide any opinion regarding a specific project idea as this would distort competition in the call. However, you may contact your national LIFE contact person for their support and advice. The list of national LIFE contact persons can be found on the main LIFE web site.
5	What can we base ourselves on to show that a method is a 'best practice'? Can we base that on our own reasoned judgment or what does the Agency/Commission use as a measure to assess the 'best practice' nature of something?	In your application, you should provide a reasoned justification for why you consider that the methods you use is best practice providing solid arguments on appropriateness of the solution proposed including its cost-efficiency and why it is state-of-the-art. You could refer to manuals of best practice, scientific literature, etc. The evaluation committee will consider whatever justification you provide and assess its merit.

6	<p>Regarding the budget per project under both sub-programmes, can we have an idea as to a maximum budget for 'traditional projects'?</p>	<p>Concerning the budget, see section 1.6.3 of the application guides in the Environment sub-programme (1.5.3 in the Climate sub-programme): There is no fixed minimum size for project budgets. While large ambitious projects (i.e. over 5,000,000 Euro total costs) have been financed several times in the past, very small projects (i.e. below 500,000 Euro total costs) have seldom succeeded due to the limited output and consequently the low added value.</p> <p>In other words, it is up to the applicant to define the budget.</p>
7	<p>When is a financial guarantee required?</p>	<p>During the financial selection phase a financial viability check will be performed to assess whether a financial guarantee would be required to cover fully or partially the EU pre-financing payment to the project. For further details see the related Section 5 of the Evaluation guide. The requirement of a financial guarantee will be notified (if needed) during the revision phase.</p>
8	<p>Is land purchase an eligible expense for Biodiversity projects? For projects in the climate sub-programme?</p>	<p>Both land purchase and compensation are eligible under both sub-programmes. However, in all cases the criteria described in section II.19.2 of the General Conditions of the Model Grant Agreement apply.</p>
9	<p>Do we understand well that 100% of the costs of a state of the art prototype are eligible in a LIFE project?</p> <p>Articles I.13 of the Special Conditions of the Model LIFE Grant Agreement says that the prototype or any of its components should not be used for commercial purposes the project. Could you please help us understand how the Applicant can fulfil this requirement if the prototype will be providing services for citizens?</p>	<p>First you should recall that state of the art technology is not used for prototype applications since state of the art technology has already been tested and its technical and cost efficiency been demonstrated. As stated in the application guide, 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 and its technical feasibility needs still to be demonstrated.</p>

		If the technology can be considered a prototype, it may not be used for commercial purposes during the LIFE of the project as stipulated in Art. II.19.2 of the LIFE Model Grant Agreement. If the technology is used in a commercial context, as it appears to be in your case, the prototype would not be eligible for 100% co-funding. In this case, it would have to be depreciated in accordance with the rules applicable to the purchase of new or second-hand equipment and infrastructure.
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2.1.1 Environment and Resource Efficiency priority area

1	I would like to propose a Demonstration project that in my opinion is new Union wide. Will I get the additional 5 points foreseen under Award criterion 5?	You will only get the additional 5 points if the project fully complies with at least one of the priority project topics and if you are able to provide clear evidence of such novelty as compared to similar existing best practices in form B2 of eProposal. For further details please refer to the Guidelines for applicants and the Guide for evaluation of sub-programme Environment.
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2.1.2 Nature and Biodiversity priority area

1	<p>Section 2.4.3 of the guidelines for LIFE Nature & Biodiversity says that “any land purchase payments, compensation payments or lease payments to public bodies are not eligible, with the exception of compensation payments or short-term lease payments to local authorities”.</p> <p>Does the term “compensation payments” in the second part of</p>	<p>The second part of the sentence refers to cases where a public body gets a temporary compensation (for the duration of the project). Therefore, one-off compensation payments are not allowed when the land belongs to a local authority.</p> <p>In any case, land purchases/lease and compensatory payments are always carefully checked when assessing</p>
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	this sentence cover both “one-off compensation payments” and “temporary compensation payments” or only the latter?	the LIFE project proposals and are expected to be fully justified.
2	Should all nature projects be developed in Natura 2000 areas?	<p>For LIFE Nature projects, actions targeting bird species must take place within SPAs³, actions targeting habitats or species of the Habitat Directives must take place within pSCIs/SCIs/SACs⁴. However, in case the investments foreseen contribute to an improvement of the ecological coherence and connectivity of the Natura 2000 network (conditions are listed in Section 2.4.3 of the Guidelines for Applicants), actions may be implemented outside Natura 2000 areas. Moreover, LIFE Nature projects may include actions for improving the conservation status of species listed in Annex IV, but not in Annex II of the Habitats Directive. Costs for site-based conservation actions for the conservation of Annex IV species not listed in Annex II is not conditional upon a Natura 2000 site status of the lands targeted.</p> <p>For the two cases above, a guarantee must be provided for the sustainability of any such investments, in the form of a commitment for giving these sites the most appropriate legal protection status before the end of the project.</p>
3	Land purchase outside Natura 2000: Could you explain when it is possible?	<p>Land purchase outside Natura 2000 sites is possible as long as it contributes to improving, maintaining and restoring the integrity of the Natura 2000 network, including through improving connectivity by the creation of corridors, stepping stones, or other elements of green infrastructure.</p> <p>However, land purchase is not allowed in case of site-based actions for the conservation of Annex IV species</p>

³ SPA: Special Protection Areas.

⁴ pSCI: proposed Sites of Community Importance. SCI: Sites of Community Importance. SAC: Special Areas of Conservation.

		not listed in Annex II of the Habitat Directive. The eligibility of any costs for land purchase is subject to the conditions listed in Section 2.4.3 of the Guidelines for Applicants. The applicant must address each of the conditions explaining how each condition is met or will be met during the project.
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2.1.3 Environmental Governance and Information priority area

1	The Guidelines for Applicants states Notice Boards describing the project shall be displayed at strategic place accessible to the public. As our project involves awareness raising across Europe, rather than in a specific location, we cannot see how to comply with this obligation. Please advise us on this.	In such cases the usual practice is that the notice board is placed outside the premises of the coordinating beneficiary, normally at a location where it can be seen by passers-by.
2	What do you mean by replicability and transferability in the context of a LIFE GIE project?	It is essentially a set of substantial activities (not just generic declarations of intents) included in the project, that are aimed at making tangible use of project results in other contexts than the specific one of the project. Replicability and transferability go beyond dissemination, transfer of knowledge and networking. Some illustrative examples: transferability strategy and action plan identifying area for replication, actors and actions; ensure funding for such activities after the project ends; commitments for applying the method elsewhere etc.
3	Are GIE projects supposed to achieve measurable impact only on attitudes and behaviours of target audiences?	The GIE Guide for Applicants for 2019 specifies that GIE projects should achieve measurable impacts on attitudes and behaviors and as much as possible on the state of environment (GIE Guidelines for Applicants 2019, Section 2.3).
4	How an information project's impact can be measured in quantitative terms?	Project impacts can be measured in quantitative terms by defining appropriate indicators to measure the contribution of the project to tackle the identified problem/challenge. The impact of the actions at the end of the project needs to be measured in relation to the defined baseline. Even if

		the contribution of the project is only indirect, appropriate indicators can still give an idea of the trends. Examples of possible indicators: raise in % of awareness of target audience in relation to baseline (quantified through surveys), market share of greener products, increase of collection/recycling rates of certain waste stream, update of legislative/ governance framework, provision of further (economic) incentives, additional green public purchases, additional prosecution cases on environmental crimes etc.
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2.2 Traditional Projects, Climate sub-programme

1	Where should the action "networking with other projects" be put?	Activities related to "Networking with other projects" should be presented under E action "Communication and dissemination of results".
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2.2.1 Climate Change Mitigation priority area

1	Under the CCM priority on the Energy Intensive Industries (EII), are EII defined somewhere? Is there a limited list of EII?	The priority on energy intensive industries remains the same as in previous years. There is no defined list but we consider industries with high energy consumption and with high saving potentials as EII. This includes steel, aluminium, glass, ceramics, cement and chemical industries. This does not limit it to big industries, on the contrary, we would like to target SMEs which have high energy consumption and which could have a transformative impact in their respective sectors.
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3. Technical Assistance

1	How much time can there be between the submission of a proposal for TA and the submission of the proposal for the corresponding IP?	Generally speaking, the duration of a Technical Assistance project should not exceed two years. It is expected that a Technical Assistance project aims to prepare either a full proposal for an Integrated Project based on the same call or a proposal based on the following call.
2	Can an applicant submit a proposal for a Technical Assistance Project related to an Integrated Project, who may be different to the final applicant for the IP itself?	As the objective of a Technical Assistance project is the submission of a proposal for an Integrated Project, "it is expected that the applicant of a Technical Assistance project is the intended applicant of the future Integrated Project" http://ec.europa.eu/research/participants/data/ref/other_eu_prog/life/wp-call/call-fiche-life-ta-2019_en.pdf ; Section 5. Eligibility conditions). However, if this is not the case, an explanation needs to be given providing the reasons and justifications, including the link of the IP applicant with the Technical Assistance project.