

## **FAQ updated on 28/05/19**

### ***LIFE operating grants to support NGOs active in the areas of environment and climate action***

#### ***Questions and answers relating to the 2019 call for proposals***

##### **1) Question:** how is the Call structured?

**Answer:** Since 2015, the LIFE Work Programme<sup>1</sup> as well as the financing decision<sup>2</sup> foresee a system of biennial Framework Partnership Agreements (FPAs) to ensure more continuity for the beneficiaries of operating grants. The selected NGOs will conclude, at a later stage, annual Specific Grant Agreements. The 2019 call is the third round of FPA calls.

##### **2) Question:** What is the planning of the call?

**Answer:** The call for NGOs comprises two steps: first the submission of proposals for the Framework Partnership Agreement (FPA) and then the application for the Specific Grant Agreement (SGA). Only those NGOs whose FPA proposal has been selected in the first stage and for who that there is enough budget will be requested to submit a proposal for an SGA, covering the financial year 2020 of the NGO. In 2020 another such SGA invitation will be sent to cover the financial year 2021 of the NGO (again only for those NGOs who have been successful in the FPA call).

##### **3) Question:** What is a Framework Partnership Agreement?

**Answer:** Resulting from this call, an FPA is a contract signed for 2 years between EASME and the selected NGOs. It establishes a partnership between the parties and lays down the general rules. In its Annex it includes a biennial strategic plan for the work foreseen by the NGO during the next 2 financial years. It may be followed by an SGA, in which concrete actions, timing, performance indicators, staffing and resources are specified for one financial year of the NGO.

An FPA does not imply any financial commitment. This is the reason why financial coherence is not one of the Award Criteria defined in the call for proposals, and why no detailed budget breakdown needs to be submitted.

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<sup>1</sup> LIFE Multiannual Work Programme for 2018-2020 (2018/210/EU)

<sup>2</sup> COMMISSION IMPLEMENTING DECISION of 12.02.2018 C(2018) serving as financing decision for 2018

**4) Question:** Do I have to provide financial information in relation to the total budget already in the Call for proposals for FPAs?

**Answer:** You need to provide a global estimated budget for 2020 and 2021, but without breakdown into cost categories or even single cost items. This will help EASME to determine the funding threshold when there are too many proposals of sufficient quality.

**5) Question:** What are the highest and lowest amounts for grants?

**Answer:** The maximum amount that may be awarded by the EASME per year is EUR 700,000 per NGO and 60% of the total eligible expenditure. For organisations that have been awarded an operating grant under the previous FPA call for funding in financial years 2018 and 2019, the maximum amount is limited to the one originally requested in 2017 (as long as it does not go beyond the maximum EUR 700,000 per year, as stated above). There is no minimum amount, but as a reference, the average grant for the years 2018 and 2019 was EUR 330 000.

**6) Question:** What is the difference between Framework Partnership Agreement (FPA) and Specific Grant Agreement (SGA) in relation to details to be provided?

**Answer:** For the FPA application you will need to provide a detailed description of your biennial strategic plan and support it with an outline of accompanying actions. The SGA application will include the objectives, activities and outcomes extracted from the FPA plan, plus the detailed budget.

**7) Question:** Can proposals be submitted in other languages than English?

**Answer:** It is recommended that applicants fill in the technical part of the proposal in English, although proposals may be submitted in any of the official EU languages. Note that the grant agreement, project management files and communication, and formal reporting will have to be in English.

**8) Question:** Can the reports from the auditors that must be attached to the proposal be presented in other languages than English?

**Answer:** Yes, all EU languages are accepted, but if English versions are available, attach them to the application as well. A translation does not have to be by a certified translator.

**9) Question:** Should the documents submitted with the proposal be stapled or not?

**Answer:** Preferably, the application forms should be submitted un-stapled, whereas the annexes can be stapled.

**10) Question:** Should audit reports be submitted in original or are copies accepted?

**Answer:** Audit reports can be submitted as certified copies.

**11) Question:** What is the legal basis of Operating grants? What is the budget for the current period?

**Answer:** The legal basis for this call for proposals is the LIFE Regulation (2014-2020) No 1293/2013 as further detailed by the Multi Annual Work Programme for 2018-2020 and by the Commission Implementing Decision of 12 February 2018 on the adoption of the LIFE multiannual work programme for 2018/2020 (2018/210/EU). The currently available indicative budget is 12M€ per financial year (2020 and 2021), subject to the conclusion of appropriate provisions in the post-2020 LIFE Regulation.

**12) Question:** How will the indicative budget of EUR 12 million be split?

**Answer:** There is no budget split related to themes covered by proposals. The decisions on the proposals to be funded will be made based on their quality and they will be ranked in one single list.

**13) Question:** What is preferable, staying in one objective (environment/nature or climate) or to cover both?

**Answer:** There is no preference in this regard; what is important is the quality of the proposal, be it focused on one area or covering several.

**14) Question:** Is it a problem for eligibility if the majority of the applicant member organisations are outside of Europe?

**Answer:** All applicants must fulfil all eligibility criteria as defined in section 5.2 of the call for proposals. Please note also the award criterion 1, which contains a subcriterion on EU added value. NB: members cannot charge any costs (see also Q/A 29).

**15) Question:** Which third countries are eligible for funding?

**Answer:** In accordance with Article 5 of the LIFE Regulation, the LIFE Programme shall be open to the participation of the following countries:

(a) European Free Trade Association (EFTA) countries which are parties to the Agreement on the European Economic Area (EEA);

- (b) candidate countries, potential candidates and acceding countries to the Union;
- (c) countries to which the European Neighbourhood Policy applies;
- (d) countries which have become members of the European Environmental Agency in accordance with Council Regulation (EC) No 933/1999.

Such participation shall be pursued in accordance with the conditions laid down in the respective bilateral or multilateral agreements establishing the general principles for those third countries' participation in Union programmes. At the moment (March 2019) there is no such agreement with any country outside the EU, and none is under elaboration.

See also the related question on the Brexit and its impact (Q/A 52).

**16) Question:** As for the obligatory Activity Report that needs to be submitted together with the application (for assessment of technical soundness) – can this be an Activity Report used for other donors?

**Answer:** The Activity Report should be a yearly report that describes the organisation's activities of the previous year. If the report used for other donors contains a good picture of the activities, it can be used. It can take various forms, and different formats are accepted as long as it gives a sufficient overview of the activities in order to assess the "operational capacity" (see the Call, Section 5.4.2 on this selection criterion). It should be the most recent available report, and it should preferably be in English.

**17) Question:** The last activity report is a mandatory annex to the grant application. For organisations that were benefitting from an NGO operating grant in 2018: is it acceptable to send the report produced for the purposes of the final payment of the preceding year?

**Answer:** Yes, it is acceptable, but the activity report should reflect the overall activities of the NGO as a whole – i.e. if the work programme co-funded by the NGO operating grant only represents a smaller proportion of the NGO's complete portfolio, it is preferable to attach the usual yearly activity report of the organisation.

**18) Question:** The call for proposals mentions that the 'annual activity report of the previous year' should be submitted. Does this imply that the applicant should exist for at least one year?

**Answer:** No. The applicant NGO must submit its latest activity report to allow the assessment of its eligibility. If the applicant is a newly created entity that has less than one year of existence, it is acceptable that the activity report covers less than 12 months. This applies also for an NGO that was created by another existing NGO as a new legal entity (see also Q/A 19).

**19) Question:** For newly established NGOs which have less than a year of existence, what kind of documents should we submit instead of the Annual Activity Report and the Audit certificate?

**Answer:** Exceptionally for new entities/networks, the following documents may be submitted (Call Section 5.4.1):

1.

- The NGO's business plan (or equivalent);

- In case of exceptional circumstances, notably regarding a new network created by pre-existing organisations, EASME may grant derogation of the requirement of supporting documents referring to the two previous years and request the applicants to demonstrate their financial capacity in any other way, by submitting for example:

- The NGO's provisional budget;
- Supporting documents such as an appropriate statement from a bank, a tax declaration, a certificate from national authorities stating that social charges were paid on time, etc.
- If the NGO cannot submit any of those, or the outcome of the analysis is not satisfactory, EASME could request the organisation to submit a financial guarantee provided by a bank or an approved financial institution. Alternatively, one or several of the founding member organisations could act as a guarantor, after acceptance by the Agency and verification of its financial viability (a financial guarantee would have to be submitted by this third party).

2. The table provided in the application form (Financial Capacity form – F), filled in with the relevant statutory accounting figures (or figures from the business plan). See section 5.4.1 of the Call, Financial capacity.

**20) Question:** Is the fact of having three offices in three different EU Member States sufficient to fulfil the eligibility criterion?

**Answer:** According to the rules of the current call for proposals, applicants must demonstrate a structure and activities covering at least three EU member states. This can be demonstrated by your statutes.

**21) Question:** In the context of the eligibility criteria, what is meant by “independent”?

**Answer:** It means independent, both financially and politically, from government authorities and from political parties or commercial interests. For instance, the national/local

authorities (or political parties) should not be part to the decision making process. This is normally proved by the organisation's statutes or visible from the board composition.

**22) Question:** How can we prove the EU dimension and independence of our NGO?

**Answer:** Applicants are asked to provide EASME with official documents, such as the statutes of the organisation, which will be analysed to check its compliance with the eligibility criteria. Other sources may be consulted, such as the NGO's website and activity reports.

**23) Question:** Can a non-profit organisation that is financed by "private commercial entities" apply for funding?

**Answer:** It would be eligible only if its independence can be proved.

**24) Question:** What are the requirements for the narrative reporting?

**Answer:** A form for the final activity report is available on the web page: <https://ec.europa.eu/easme/en/life-reporting>. The reporting should be based on the information that has been presented in the application and included in the signed contract. The activities carried out should be described, and in case some were not fully carried out, an explanation should be given. Furthermore, results and impacts should be reported.

**25) Question:** Is there any chance for a small NGO with an annual budget < 100 000 € to have access to the LIFE operating grants, or is it addressed only to larger organisations?

**Answer:** In principle there is no formal limit to the size or budget of NGOs that participate in the programme. On the NGOs funded so far, including the EU funding received, please consult the LIFE website: [http://ec.europa.eu/environment/life/funding/ngos/list\\_ngos.htm](http://ec.europa.eu/environment/life/funding/ngos/list_ngos.htm) However, it is a fact that quite some NGOs financed by LIFE operating grants are large networks or platforms with activities and structures that cover several EU countries (please see eligibility criterion 5 in the Call). Others are specialised on very focused topics, so it is also important to note that it is the quality of the application and not the number of thematic areas it covers that matters for the selection.

Being a small NGO, it may check its suitability with the award criteria, in particular 1 (EU added value), 2 (contribution to EU policy making) and 3 (implementation of EU policies), as the applicant organisation will certainly compete with larger ones. As a point of reference, the average amount of awarded grants last year was 330,000 €.

**26) Question:** How much time will we have to submit the SGA proposal?

**Answer:** around 4 weeks.

**27) Question:** How do we set and quantify performance indicators?

**Answer:** Performance indicators can be of two kinds: related to results or impacts – contributions to policies or directives, results of study quoted in policy paper, court cases triggered to enforce EU environmental/ climate law, etc. – and related to outputs – concrete deliverables such as stakeholder consultation participation (which ones?), contributions in expert groups (how many?), no. of position papers submitted, no. of participants (representing target groups xyz) attracted etc.<sup>3</sup> It is recommended to include both types of indicators in the proposal, possibly highlighting the link between them.

**28) Question:** It seems that with the Juncker priorities also in LIFE there is an emphasis on business dimension and social economic objectives, does this also apply for the NGO operating grants?

**Answer:** The NGOs operating grants are not particularly aimed at achieving growth and jobs as a priority. Nevertheless, there is recently more emphasis on results and impacts for all EU programmes. Like all other LIFE strands, NGOs are also expected to make a difference on the field, and these results must be quantified as much as possible.

**29) Question:** Can members be funded? What about subcontracting for members?

**Answer:** The NGO operating grant is a mono-beneficiary grant. Only the applicant NGO, if selected, will become the beneficiary of the grant and can claim the costs related to the approved work programme. Therefore, costs incurred by entities affiliated to the NGO or its members are not eligible. If in certain circumstances, the beneficiary NGO is sub-contracting tasks to its member(s) to implement a limited part of its work programme, this would need to be sufficiently justified. In particular, the procurement rules must be respected: the contract must be awarded to the bid offering best value for money or the lowest price, avoiding conflicts of interests, and this should be allowed / foreseen in its procurement procedure (see also point 8.9(c) of the call).

**30) Question:** Can we include activities that are not linked to environmental / climate policies?

**Answer:** Such activities are not relevant to the objectives of this call, therefore in principle they should not be inserted in the proposal.

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<sup>3</sup> See also Q/A n° 42.

**31) Question:** What do you mean by structure and activities covering at least three EU member States?

**Answer:** Applicants will have to demonstrate a structure and activities covering at least three EU Member States. To this end, partnerships, networks and memberships are eligible if they are formally established as a legal entity. Partnerships, networks and memberships must be represented by a management board or any other administrative forum that is mandated by its members to represent the entity at EU level and is responsible for the activities of the network. Statutes and/or activity reports of memberships, partnerships or networks will serve as evidence for the structure and activities covering at least three countries (section 5.2 of the Call, Eligibility criteria).

**32) Question:** If the NGO is also the beneficiary of an action grant, can it claim overheads for that project?

**Answer:** Where the operating grant covers only part of the usual activity of the beneficiary, indirect costs under the LIFE action grant may be considered eligible if the beneficiary is able to demonstrate clearly that the operating grant does not cover any costs (including overheads) that may be claimed under the action grant.

To demonstrate this beneficiary must:

- a. use analytical cost accounting that allows to separate all costs (including overheads) attributable to the operating grant and the action grant. For that purpose the beneficiary must use reliable accounting codes and allocation keys ensuring that the allocation of the costs is done in a fair, objective and realistic way.
- b. record separately: all costs incurred for the operating grants (i.e. personnel, general running costs and other operating costs linked to the part of its usual annual activities), and all costs incurred for the action grants (including the actual indirect costs linked to the action).

**33) Question:** Will the percentage of EU funding requested make a difference in the evaluation?

**Answer:** There are two instances where the requested percentage of EU funding is taken into account:

1. in the assessment of the proposal against award criterion 5 (organisational development), particularly in case of dependence of the NGO from the operating grant, to determine how the NGO is addressing its dependence;
2. in case of proposals on the funding threshold with the same score, second priority will be given to applications with a lower percentage of EU funding requested compared to their total eligible costs.

**34) Question:** How shall we structure the proposal, by theme or by type of activity?

**Answer:** This can be done at your best convenience.

**35) Question:** our organisation carries out a voluntary auditing which is not carried out by certified auditors. Can this be accepted as an audit under the call specifications or not?

**Answer:** This cannot be accepted. For grants over 100,000 €, the annual accounts submitted with the proposal must be certified by an audit report which must be performed by an approved external auditor (i.e. an officially registered auditor in accordance with the international auditing standards and codes of ethics). The auditor should be independent from the applying organisation and not involved in the management of the organisation. It should be listed in one of the registers of auditors approved by Member States to carry out statutory audits of accounting documents.

**36) Question:** I was not able to attend the information day but my NGO intends to submit an application for LIFE NGO funding this year. Is it possible to get the information (presentations, etc.) from the information day?

**Answer:** You can find the relevant information and files, including the info-day presentations and video on our website: <https://ec.europa.eu/easme/en/section/life/calls-proposals>

**37) Question:** If an applicant organisation does not have a network of members, but works with a number of partners through memorandums of understanding or other forms of agreement, is it then eligible for the NGO grant? And if so, do these partners need to be listed in form T1?

**Answer:** Only structured memberships or legally registered networks can be taken into account for the LIFE operating grants. According to the eligibility rules (Section 5 of the Call):

Applicants will have to demonstrate a structure and activities covering at least three European Union Member States. To this end, partnerships, networks and memberships are eligible if they are formally established as a legal entity. Partnerships, networks and memberships must be represented by a management board or any other administrative forum that is mandated by its members to represent the entity at EU level and is responsible for the activities of the network.

So-called "loose co-operations" or temporary partnerships are not eligible under this call.

Memberships comprise exclusively legal entities, i.e. not natural persons. All members must be listed in the application. Only the applicant NGO, if selected, will

become the single beneficiary of the grant and can claim costs. Therefore, costs incurred by entities affiliated to the NGO are not eligible. See also Section 8.9 (c).

Statutes and/or activity reports of memberships, partnerships or networks will serve as evidence for the structure and activities covering at least three countries.

If there is no structured relationship between the applicant and its partners, it would be difficult to prove that they are bound together. A memorandum is not as binding as the organisation's statutes. Therefore it seems that the organisation would not meet eligibility criterion 5.

**38) Question:** Please send us some explanation on the eligibility criterion 5 of this call. In particular, the paragraph:

"Applicants will have to demonstrate a structure and activities covering at least three European Union Member States. To this end, partnerships, networks and memberships are eligible if they are formally established as a legal entity. Partnerships, networks and memberships must be represented by a management board or any other administrative forum that is mandated by its members to represent the entity at EU level and is responsible for the activities of the network"

Can the request and approval of the foreign NGOs we work with (by the governing Council of our NGO) be considered as a proof that the foreign legal entities are members of the NGO?

**Answer:** As you can see in the Call text, the members of any applicant NGO must be proven by an official document as evidence that the NGO covers at least three EU countries. This could be for example the NGO's statutes, or the minutes of a meeting of the NGO's governing board establishing the membership, or even the membership fees paid by the members. The applicant NGO must be officially representing its members. A simple request and approval (for instance by email) would not be a sufficient proof as it does not constitute an official document. Please also note that in this context "member" does not refer to natural persons.

**39) Question:** Is the LIFE operating grants call addressed only to NGOs that have a partnership agreement with EASME or also to NGOs that are not part of the agreement?

**Answer:** The current call for proposals is open to all NGOs that meet the eligibility criteria. The ones that will be selected will sign a framework partnership agreement for the next two years (2020 and 2021). Therefore, the NGOs that will not be selected this year for signing a framework partnership agreement will also not be able to participate next year.

**40) Question:** What is meant by 'area' under section T4.2 in the technical forms? The title page of the T Section refers to policy areas, whereas the headings under T4.2 refer to "areas". Please can you clarify what is expected here?

**Answer:** In many cases, but not all, the work areas of NGOs are grouped by policies tackled. The application forms were deliberately left open for the NGOs to structure their proposal according to their usual work and convenience. Please choose the most suitable structure for your particular case. In both cases (work areas/policy areas), of course, the links of work programme/activities to EU policies should be described, as this is an award criterion for the selection of proposals (AW1).

**41) Question:** The members of our network are local municipalities. Are we eligible for the LIFE NGO grant?

**Answer:** If your network is composed of public authorities such as local, regional or national governments, the entity cannot be considered as independent from public authorities and as such it does not comply with eligibility criterion 2.

**42) Question:** Can you explain the difference between objectives, expected results, impact, deliverables, indicators... or better give a synthetic definition?

**Answer: Objectives** are overarching aims of the organisation, such as the elimination of sea litter, reducing GHG, halt biodiversity loss, working towards a circular economy, etc.

**Deliverables** are "products", e.g. a publication written to disseminate information, a policy brief aimed at influencing decision-makers, articles posted on the web site.

**Outputs** are immediate, short-term results of the implemented activities, such as raised awareness among population targeted by awareness raising activities or increased awareness about a particular environmental/climate change issue among targeted policy-makers. The outputs are short-term results that can be linked directly to the activities carried out by an organisation. For example, if you organise an event on harmful effects of plastics in oceans/seas that is attended by 100 participants, you can reasonably claim that you raised the awareness of those 100 people. If workshop attendees become active in raising awareness of their neighbours, friends, etc. or they change their behaviour and stop using plastic bags, then the result becomes an outcome.

**Outcomes** are medium-term results which take more time to achieve than immediate, short-term results. If policy-makers targeted by organisation's activities not only change their own stance on certain environmental/climate issues but adopt more environmentally/climate friendly positions, which are reflected in policies, then a medium-term outcome is achieved. Outcomes are related to objectives, e.g. increased number of MEPs supporting organic agriculture.

**Impacts** are long-term results that are rarely achieved during the SGA duration. Given the sustained work of NGOs supported by the operating grant on particular EU policy issues, sometimes organisations contribute to a wider, long-term results such as adoption of the Paris Agreement or actual reduction in GHG emissions. These long-term results are achieved by many actors such as decision-makers, businesses, research institutions, etc. and cannot be attributed only to one stakeholder group such as civil society.

**43) Question:** Is it possible for an NGO that got the LIFE NGO Operating grant to submit proposals under the LIFE action grants?

**Answer:** It is certainly possible for a beneficiary of an NGO operating grant to apply for an action grant. However, please note that in principle, the NGO receiving an operating grant shall not claim overheads under action grants. However, there could be some exceptions subject to conditions (e.g. some project-specific overheads not claimed under an operating grant) to be further verified with the service responsible of the action grant (see also question 32).

**44) Question:** How do we deal with activities that are overlapping with the work programme of an action grant?

**Answer:** Activities cannot be funded twice, therefore you must ensure that they are planned and declared only once (either in the operating grant or in the action grant agreement and reports).

**45) Question:** In order to apply for a grant for NGOs, we should submit among others the annual report and certified accounts of the last two years. However, our report and audit report for the last financial year (2018) will probably not be ready by the application deadline. Therefore, is it possible to include the report and audited accounts from 2016 and 2017 in the application?

**Answer:** If they are not finalised, you should include the activity reports, accounts and audit for the two last years for which annual accounts are closed (i.e. 2016 and 2017 in the case of your organisation).

**46) Question:** Is our Albanian NGO eligible to apply for funding under the call “LIFE-NGO- EASME-2019”?

**Answer:** The call is addressing NGOs established in countries that contribute to the LIFE programme. Therefore, it is de facto only open to NGOs that are registered in the EU Member States. Since Albania is not contributing to the LIFE programme (i.e. there is no

Memorandum of Understanding between Albania and the EU in place), its NGOs cannot benefit from these grants.

**47) Question:** The call differentiates the documentation needed for the application depending on the amount of the grant requested (<60.000, from 60.000 to 100.000, >100.000); does this amount refer to the two years covering the full duration of the FPA, or to the budget foreseen for the activities of one year (corresponding to the eventual Specific Grant Agreement)?

**Answer:** The thresholds refer to the annual requested grant.

**48) Question:** Should the “Declaration on honour” (exclusion criteria) be attached as a separate supporting document (as per the “checklist and list of supporting documents”)?

**Answer:** The declaration on honour is in fact Form A1 of the FPA administrative application forms and is part of the supporting documents to be provided. Please do not forget to date and sign it.

**49) Question:** Our association network is composed of cities, which means that all the members are municipalities undertaking to implement on their territories and communities the guidelines of the association. Is our NGO compliant with eligibility criterion 2 of the call: “Be independent, in particular from government, other public authorities, and from political or commercial interests”.

**Answer:** If your network is exclusively composed of cities (or regions), it is impossible in principle to prove that it is independent from public authorities. Therefore it does not comply with eligibility criterion 2.

**50) Question:** In Form A2, under “Statutory registration number”, should we provide the company number (“numéro d’entreprise”) as identification number in Belgium?

**Answer:** Yes, for NGOs registered in Belgium the "numéro d'entreprise" is the registration number requested in the documents.

**51) Question:** What is the difference between partnerships, networks and memberships in the meaning of the Call for Proposals? Can networks have natural persons as members?

**Answer:** As long as the applicant organisation meets all the eligibility criteria, including criterion 5 (be operating at EU level with a structure and activities covering at least three EU member states), it does not matter if it also has individual members (natural persons). However, at least three official members should be legal entities established in three different EU countries. Please note that the structural coverage should be proved, for instance through the organisation's statutes or governing board. The applicant can be either an umbrella-type organisation with affiliates in different countries or a member of a network composed of peer NGOs.

**52) Question:** Can in kind contributions be considered eligible as co-funding sources – e.g. could we waive part of the salaries?

**Answer:** In-kind contributions cannot be used to co-finance the grant. They would be considered as a non-eligible part of the applicant's budget.

**53) Question:** Can organisations based in the UK take part in this Call?

**Answer:** Eligibility criteria must be complied with for the entire duration of the FPA. If the United Kingdom withdraws from the EU during the period of the Framework Partnership Agreement without concluding an agreement with the EU ensuring in particular that British applicants continue to be eligible, British beneficiaries will cease to receive EU funding under any specific grant agreement on the basis of Article II.17.2.2 of General Conditions to the Framework Partnership Agreement.

**54) Question: Question:** Do we have to cover both environmental and climate policies in our application?

**Answer:** No, you may cover only one.

**55) Question:** Is an organisation that is part of a network without being its coordinator compliant with the eligibility criteria?

**Answer:** Please note the following eligibility requirement (Section 5.2 of the Call): “Partnerships, networks and memberships must be represented by a management board or any other administrative forum that is mandated by its members to represent them at EU level and is responsible for the activities of the network”. If you have a doubt on the eligibility of your organisation please send us an email with the relevant information / documentation and we will try to assess the eligibility of your organisation.

**56) Question:** For eligibility requirements does the NGO need to have a membership structure?

**Answer:** Yes, the NGO's members must be officially established and registered as legal entities.

**57) Question:** President Juncker has presented five scenarios for the future of the EU. We wish to draft a sixth scenario, would it be welcome in the proposal?

**Answer:** Yes, it would. This could be a good example of new/emerging policy issues.

**58) Question:** If the SGA for 2020 is signed between February and April of 2020, are activities implemented since January 2020 eligible for funding?

**Answer:** Yes, if the NGO's financial year starts in January. The operating grants cover the same period as the NGO's financial year.

**59) Question:** Is it possible to carry out activities outside the applicant's country?

**Answer:** Yes it is, but activities can be planned outside the EU only if they are compliant with Art. 6 of the LIFE Regulation, which states that activities which take place outside of the EU borders are only eligible for funding if they provide direct added value in one or more of the EU Member States for the implementation, updating or development of EU environmental and/or climate legislation.

**60) Question:** Can we include activities that will take place in the UK?

**Answer:** For now, as long as the UK is part of the EU, they can be included, but if the UK leaves the EU then they may be ineligible as the UK would become a third country (in this case Art. 6 of the LIFE Regulation would apply, see previous question). Please note that by the time of the submission of the SGA applications the picture should look much clearer. If you would need to change actions from the FPA application to the SGA application due to the Brexit, this would be justified and would not be sanctioned in terms of consistency with the FPA proposal (award criterion 1 of the SGA invitation for proposals).

**61) Question:** Is there any partnership requirement in terms of number and type of partners?

**Answer:** It is a mono-beneficiary grant, therefore consortia are not allowed to apply. However, applicant NGOs must have a membership structure that covers at least three EU countries.

**62) Question:** There is some overlapping between form T.4.1 (Summary) and form T.4.2 (Strategic plan), e.g. on objectives, means, activities... This may lead to repetitions and we may not be able to keep to the limit of 50 pages for the T.4 section.

**Answer:** You may decide to emphasize one or the other point, either in the summary or in the description. In principle the summary contains the main objectives and outputs while the strategic plan is more detailed about activities (see also the Application Guide and instructions in the T forms). You don't need to repeat the same information twice.

**63) Question:** For currently funded organisations, is the budget limitation referring to the amount or to the percentage of EU funding?

**Answer:** It refers to the amount. The percentage of EU funding can vary, as long as it remains below 60% of total eligible costs.

**64) Question:** One of the award criteria of the last Call for LIFE operating grants was about urban development and the commitment of the EU to address global policies. Has this been canceled?

**Answer:** No, those are horizontal priorities of the 7<sup>th</sup> EAP, which have been included in the 1<sup>st</sup> award criterion.

**65) Question:** Does it have to be a new project or is a project that has already started eligible for funding under this scheme?

**Answer:** Operating grants don't fund projects but foresee co-financing of the operating costs of NGOs related to the eligible activities provided for in the framework partners' 2020 and 2021 Work Programmes. Please note however that NGOs can also apply for action grants, which fund projects and have less stringent eligibility rules (any legal entity legally registered in a EU Member State can apply for action grants).

**66) Question:** In the check list of the guideline for applicants there is a request to submit a list of members of the executive board or administration...-> is this Form T1? Or an Extra list requested?

**Answer:** No, form T1 is the list of official members, not of the executive board members. You may send us this list in any preferred format (Word, Excel, PDF).

**67) Question:** Our organisation signed a Framework Partnership Agreement with the European Commission, within the European Union Programme for Employment and Social Innovation (EaSI). We submitted the application for the Specific Grant Agreement 2019 but we have not received a reply yet. If we participate in the call for LIFE with different voices of cost, are we still eligible? Or the fact that we already received (and hopefully will receive) an operating grant make us not eligible in general?

**Answer:** Please note that, according to the financial conditions detailed in the Call, there is a rule (non-cumulative award) which states that “Applicants may receive only one operating grant per financial year from the budget of the European Union.” Therefore if you receive EU funding in the form of another operating grant, you can’t receive the LIFE operating grant simultaneously.

**68) Question:** We see that in the new form you have made a split between first financial year and second financial year. We understand that this will help to get a better understanding of what will happen in year 1 and what will happen in year 2. However, we also believe it will lead to a lot of duplicate text and to exceeding the page limit since the following are not likely to change between the two years:

1) Context

2) Objectives

4) Channels and means used

We were therefore wondering whether if it’s ok that we structure our application for the different areas as follows instead

1) Context and specific European policies addressed for financial years 2020 and 2021

2) Objectives for financial years 2020 and 2021

3) Activities:

- First financial year 2020
- Second financial year 2021

4) Channels and means used for financial years 2020 and 2021

5) Expected outputs:

- First financial year 2020
- Second financial year 2021

6) Qualitative and quantitative indicators first financial year 2020

- 7) Qualitative and quantitative indicators second financial year 2021
- 8) Medium term results/impacts (beyond first and second financial year)

Concerning section T4.3 about organisational development the text in this section is likely to be more or less identical for the first and second financial year – the needs analysis is not something that changes or can be solved in a year. Thank you for clarifying and providing guidance.

**Answer:** There is no need to repeat this information along the proposal. We suggest that when deviating from this structure you explain in the beginning why these headlines are not repeated for each year, i.e. that Context and specific European policies addressed, Objectives, Channels and means used, Medium term results/impacts as well as organisational development are the same for both years.

However, please keep in mind that the main reason for structuring the template in two separate years was to allow applicants to extract the information for each SGA application, in case they are selected after the FPA evaluation. Therefore you may wish to structure your proposal in a way that it will allow you such extraction.

We will take your feedback on board for the next Call.

**69) Question:** how do I determine what to fill in for “[countryXX]/[allocated code]” in the header of the T1 form?

**Answer:** You don’t have to fill in the country codes and references in the forms headers. This will be done by the administration in case the proposal is successful and the T forms become an annex to the FPA.

**70) Question:** In relation to 'external co-funding', can this include funding contributions from other EU programmes, such as Horizon 2020, or does it have to be exclusively non-EU sources?

**Answer:** Other EU funds cannot co-finance the LIFE operating grant.

**71) Question:** Is a European federation of companies or cooperatives eligible for the LIFE operating grants?

**Answer:** It is difficult to establish ex ante the eligibility of such a federation, especially in terms of independence from commercial interests, if members are economic entities, even though the applicant itself might be a non-profit NGO. The evaluation experts only can

decide if the applicants are compliant with the Call criteria, once they examine the application files.

**72) Question:** As a current beneficiary of the LIFE operating grants, we are now drafting the report covering the year 2018. Would it possible to submit a draft of this report with the application? We can also submit the reports for 2017 and 2016.

**Answer:** Please submit the draft report of 2018 plus the report of 2017. It is also acceptable to submit the operating grant report (SGA 2017) provided that it reflects the overall activities of the NGO – i.e. if the work programme co-funded by the NGO operating grant only represents a smaller proportion of the NGO's activities, it is preferable to attach the draft yearly activity report.

**73) Question:** Do we need to provide CVs of all the persons involved or can we provide a short description (i.e. one paragraph of 10-20 lines?). We are asking as there are about 15 people directly implementing the activities in our organisation and printing all their CVs would require a lot of paper.

**Answer:** Yes, you can submit a simplified version of the CVs. The format is not one of the formal requirements that would make your application ineligible.

**74) Question:** Does the policy area of fisheries qualify as a policy domain, as it is not listed under the Thematic Priorities in Form T3?

**Answer:** Fisheries and maritime issues are certainly relevant policy areas. They are included in the thematic priority “Water”. If your activity domain is fisheries, we would recommend that you select “Water” and “Biodiversity” as thematic priorities. However, please note that these key words are only an entry point. In fact the policy match assessed in award criterion 1 is much more than that, therefore you should identify the right EU policies and connect to them with appropriate objectives.

**75) Question:** What is the difference between the Statutory Registration Number, the VAT registration number and the Legal Registration number that are requested in the Declaration on Honour for the FPA. In our country there is only one registration number. We are in doubt whether there is some other registration number, besides the registration number that we already have, that is required or we can use the same one.

**Answer:** Registration/VAT numbers can vary from one country to the other, however if they coincide in your case, you can certainly insert the same number in the three places. In case we have questions or need to request any missing document, we will contact you.

**76) Question:** What information do we have to provide on organisations, which are affiliated members beyond their name, their role within IEEP governance and the description of joint activities in the work program? Shall we present any specific documents of affiliated members (balance sheets, activity reports, other administrative documents)?

**Answer:** The requested information is in the application forms. You do not need to provide further evidence, as long as you can show that members are represented by a management board or any other administrative forum that is mandated by them to represent them at EU level.

**77) Question:** Our NGO's financial year starts in June – Nevertheless for this operating grant we would like to present our activities starting in January and receive funding from January onwards because it makes more sense politically. Is it possible?

**Answer:** The period covered by LIFE operating grants always corresponds to the NGO's financial year. Therefore, if the NGO's financial year starts in June, the operating grant SGA (if granted) will cover the period June 2020 - May 2021.

**78) Question:** We currently have members in two EU countries and establishing a registered member in a third country. As this process takes time due to legal requirements in Belgium, would we need to have finalised the changes necessary before June 3rd or would it be sufficient to show the decisions from our board and then provide the necessary finalised paperwork during the evaluation period?

**Answer:** To be eligible, you will have to demonstrate a structure and activities covering at least three European Union Member States. This criterion has to be met by the date of submission of your proposal.

**79) Question:** Do we need to fully align the thematic priorities we have chosen in Form T3 with the areas we describe in form T4.2?

**Answer:** There is no direct link between the thematic priorities of form T.3 and the work areas of form T4.2. Therefore you can feel free to develop the work areas of your proposal as you find suitable.

**80) Question:** In the application guide regarding T section it is written that T4 should not exceed maximum 50 pages - page 4. However, in the same document in the 'Specific Recommendations for Each section of the Application Forms- Specific Grant Agreement 2019' paragraph, page 16, it refers that the whole T section should not exceed a maximum of 20 pages.

**Answer:** Please note that these instructions refer to different applications:

- on p. 5 it refers to the FPA technical forms, which must be filled in by all applicants and submitted with the full application by 3rd June 2019
- on p. 16 it refers to the SGA technical forms, which will be requested only to the applicants that pass the first selection phase (FPA evaluation)

**81) Question:** We have a doubt regarding the compatibility between the Operating Grant and overheads or indirect costs funded under other contracts. Are there any similar incompatibilities to be taken into account with any call for tenders coming from the EU Budget? This doubt comes from the fact that Prices of Service contracts de facto cover also indirect costs of an organisation. In particular we refer to the case of non-profit organisations who tender for research contracts with the EC and the EP and who would like to use Life to cover their core activities and costs in areas not covered by its tendering activities.

**Answer:** Please note that we might consider as ineligible the costs declared by the partner under another action receiving a grant (not a tender) financed from the Union budget. Such grants include grants awarded by a Member State and financed from the Union budget and grants awarded by bodies other than the Agency for the purpose of implementing the Union budget. In particular, if the partner receives an operating grant financed by the EU or Euratom budget, it may not declare indirect costs for the period(s) covered by the operating grant, unless it can demonstrate that the operating grant does not cover any costs of the action.

Those rules apply to grant management, not for tenders.

**82) Question:** Can the total eligible costs be different in different years as long as we keep the LIFE contribution amounts the same?

**Answer:** Yes, you can have different eligible costs, while keeping the same EU requesting funding (then the % EU funding will change in the specific grant agreements).

**83) Question:** We understand that the total grant requested should not be higher than our previous grant. However, does this refer to the grant amount requested or approved?

**Answer:** For NGOs beneficiaries of current operating grants, the total requested amount should not exceed the amount requested in 2017.