



EUROCITIES statement on the Commission proposal for a regulation on LIFE (2021-2027)

September 2018



It is at the urban scale that the most innovative and green solutions to environmental and climate challenges can be found. LIFE provides an important source of funding for city authorities to test and deploy them in various fields such as biodiversity conservation, water management, urban adaptation to climate change, governance, or awareness-raising. It is essential that the new proposal includes provisions that support the environmental action of city authorities to maximise the funding's uptake and its capacity to significantly enhance the quality of our living environment.

The LIFE programme should

1. set a minimum co-financing rate of at least 60% and broaden the eligibility of staff costs in order to remain an attractive funding source for city authorities.
2. maximise the benefits of LIFE for city authorities by increasing the budget for clean energy transition; covering implementation of the Covenant of Mayors' Sustainable Energy and Climate Action Plans; noise; and information and governance.
3. systematically involve multipliers and facilitate combined funding to amplify the impact of projects.
4. improve cities' access to technical assistance, by supporting large city authorities to undertake integrated projects.

Increased co-financing and flexibility in grant management

The new proposal should set a minimum co-financing rate of at least 60%. Tackling the environmental challenges in the EU is urgent and the level of financial support should reflect this. Also, co-financing rates should not be modified with each multiannual work programme. We need an increased and stable co-financing rate to improve the accessibility of funding to city authorities and help unlock environmental solutions. Ideally, co-financing rates should be aligned with Horizon Europe, at least for the issue of energy efficiency, which the Commission is proposing to move from the current Horizon 2020 programme to the future LIFE+ programme.

The new proposal should include provisions on the eligibility of staff costs. City authorities should have the option to use permanent personnel who have not been recruited specifically for the implementation of a LIFE project. This would alleviate recruitment constraints, improve the integration of projects in city planning and policies, and ensure capitalisation on results.

Maximising the benefits of LIFE for city authorities

We agree with the new focus of the LIFE programme on the circular economy and quality of life, and the continued prioritisation of climate change mitigation and adaptation. But to fully match the environmental priorities of city authorities and contribute to a better quality of life in cities, the proposal should:

- Increase the budget for the Clean Energy Transition sub-programme

The €1 billion budget foreseen for the sub-programme on energy transition is clearly not sufficient and needs a significant boost considering the ambitious targets set by cities in the field of energy transition, and the efforts needed to deliver the Union's 2030 energy targets, acknowledged in recital 9.

- Clearly mention that LIFE funding is applicable to the drafting and implementation of the Sustainable Energy and Climate Action Plans of the European Covenant of Mayors

In 2016, those plans had already delivered a 23% reduction of CO₂ emissions in cities and are predicted to reach a reduction of 27% by 2020. They would therefore be an impactful investment for LIFE.

- Include a priority on tackling noise pollution

It is crucial to wellbeing and health in urban areas, where noise is the second largest environmental cause of health problems, just after air quality¹. Noise should be added to the list of indicators (annex II).

- Maintain 'Information and governance', one of the four streams of projects in the current regulation

This would mirror the output indicators listed in annex II, and allow transversal actions, e.g. sustainable food and citizens engagement. Climate and energy transition as well as environmental management require major efforts in terms of multi-level and multi-stakeholder governance, coordination, awareness-raising, and public participation.

More synergies with other funding programmes and multipliers

We support the acknowledgment of the complementarity between LIFE and the demonstration projects expected to be funded under Horizon Europe, and in particular the necessity for capitalisation on data and results from Horizon projects. The new proposal should also highlight the necessity of working with multipliers, such as the Covenant of Mayors for Climate and Energy, the Smart Cities Information System or the OPPLA platform² on nature-based solutions. Those multipliers play an important role in promoting good practices and are catalysts for change.

The proposal should require synergies to be made between capacity building for clean energy transition and its financing (e.g. project development assistance), ICT and mobility across EU funding programmes, notably within the future Horizon Europe programme. Europe will only succeed its energy transition by taking a holistic approach, fully recognising that integrating/connecting actions across energy, ICT and mobility is vital. Moving clean energy transition away from Horizon Europe to LIFE should not jeopardise this effort.

¹ http://ec.europa.eu/environment/noise/health_effects_en.htm

² <https://www.oppla.eu/>

We support the provisions on complementarity of different funding sources with the LIFE programme (article 15). However, we suggest that concrete commitment should be taken by the Commission on simplifying and streamlining the application process, project management and reporting, particularly with centrally managed funding programmes. Additionally, we need a common methodology between centrally managed funds and funds with shared management, which should ensure harmonised application of the ‘seal of excellence’ mechanism³ and the provisions outlined in article 15, for all stakeholders throughout Europe. At the moment the integration of different sources of funding, especially necessary for integrated projects remains a challenge for city authorities.

Improve cities’ access to technical assistance

While the use of integrated projects is expected to be supported further in the period 2021-2027, integrated projects and the technical assistance offered under LIFE to prepare such projects, are currently mainly targeting national and regional authorities. The plans, programmes and strategies developed at city or metropolitan level make a key contribution to the European environmental and climate efforts. The new proposal should support the capacity of large city authorities to implement large integrated projects. At the same time, the strengthening of integrated projects should not undermine the continuation of traditional projects.

Although the pilot projects Natural Capital Financing Facility (NCFF) and Private Finance for Energy Efficiency instrument (PF4EE), which provide technical assistance, have seen a slower uptake than desired, local authorities are increasingly aware and prepared for using them. We support the continuation of those instruments.

³ As argued in our statement on the future of research and innovation in the EU framework programme 9, <https://bit.ly/2wcGk8r>