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OUR RECOMMENDATIONS FOR THE CLEAN ENERGY TRANSITION SUB-PROGRAMME WITHIN LIFE 2021-2027

LIFE has been a valuable funding instrument for local authorities to fund best practice, pilot and demonstration projects in the field of energy and climate. The proposed changes to the LIFE programme for the next funding period, in particular the creation of the new sub-programme on the clean energy transition and the significant budget increase, present key opportunities to further support local energy and climate action.

Moreover, it will be essential to ensure a smooth carry-over of the Horizon 2020 coordination and support projects on clean energy market uptake and capacity-building projects into the new LIFE sub-programme on the clean energy transition

These projects have brought a quintessential added-value for local authorities, by enabling them to stimulate local development, empower citizens and local initiatives, implement and upscale renewables, improve their energy efficiency, tackle energy poverty and develop adaptation strategies.

- SUPPORT GOVERNANCE CHANGES THROUGH UPSCALING INNOVATIVE DISTRICTS TO THE ENTIRE CITY
- SET CITIZEN ENERGY COMMUNITIES
 AS OVERARCHING STRATEGIC
 DIRECTION
- MINIMUM 80% CO-FUNDING RATE
- CUT ADMINSTRATIVE BURDEN & ALIGN LIFE WITH HORIZON RULES

Thanks to the funding provided for these projects, European local authorities could further drive the energy transition on their territories and create mutually reinforcing and long-lasting partnerships with each other and their citizens.

Bearing this in mind, it is critical to keep this momentum going through the next LIFE programme and its sub-programme on the clean energy transition. Energy Cities therefore recommends to:

- Focus the clean energy transition on supporting governance changes through upscaling innovative districts to the entire city;
- > Set Citizen Energy Communities as overarching strategic direction:
- Ensure that the transfer of successful Horizon programme innovation is not blocked by inadequate rules;



Real market uptake: from few to 10 districts to change the entire city

Smart cities and communities projects financed by the Horizon 2020 programme have allowed great transformation in the cities participating. But even in those cities, it was enough to test new district developments with the objective to be as climate neutral as possible, but it was not enough to transform the way the city takes its decisions on any new urban development schemes. For a city to change its practices and its organisation, it requires that at least 10 different districts are renovated or developed with new processes, new technologies, crosssectoral design, innovative governance and participative approaches. For enterprises and cities involved in the Smart cities and Communities, the noncontinuation of heavy human and financial investment is a real failure of the current EU programmes.

Set Citizen Energy Communities as new strategic direction for the programme

The new provisions of the EU Electricity Market Design and the Renewable Energy Directive on citizen and renewable energy communities offer a whole new set of perspectives for local authorities to enter new energy market segments.

In addition, community energy projects are multiplying across Europe. As part of this momentum - which will benefit from the enabling environment provided by the Clean Energy for all Europeans Package local authorities are keen to team up with their citizens to test new forms of innovative public-civic partnerships. However, this often requires carrying feasibility studies, finding the appropriate legal structure and setting up sometimes complex partnerships, an expertise which local governments often have to subcontract at very high costs. When it comes to tendering energy capacity, cities not only strive for green energy, but also local and participatory projects. Designing adequate public procurement rules with specific bidding criteria also requires sound legal, economic and technical expertise, which is not always available in smaller local administrations

The LIFE sub-programme on the clean energy transition should boost this momentum, by setting the delivery of citizen and renewable energy communities across the EU as its



overarching strategic direction. Through funding coordination and support projects that contribute to building the legal, economic, technical and governance capacities of local authorities to translate these new provisions into concrete projects, it would ensure the successful implementation of a key objective of the Clean Energy Package, and more importantly increase support and buy-in for the clean energy transition from citizens

Ensure that the transfer of successful Horizon programme innovation is not blocked by inadequate rules

Set a minimum co-funding rate of 80% for coordination and support projects

A co-financing rate of at least 80% must be introduced by the EU Commission and the LIFE Committee in the clean energy transition sub-programme for the actions covered under Article 10.2e of the proposal for the LIFE regulation, which are "other actions needed for the purpose of achieving the general objective set out in Article 3(1), including coordination and support actions aimed at capacity-building, dissemination of information and knowledge, and awareness raising to

support the transition to renewable energy and increased energy efficiency". This level of support is indispensable to respond effectively to the needs of market uptake actions and entities. Moreover, local authorities require this amount of co-funding in order to be able to access and engage in these projects. The ability of local authorities to self-finance their participation in EU projects is very constrained.

Moreover, recital 7a of the proposed LIFE regulation explicitly recognizes that coordination and support actions "typically engage small and middle-size stakeholders, multiple actors including local and regional public authorities".

Alleviate the administrative burden by aligning LIFE with Horizon Europe rules

It is vital that the shift of the coordination and support projects from Horizon 2020 to the new LIFE clean energy transition sub-programme is used as an opportunity to align administrative procedures and rules between the LIFE and Horizon Europe programmes. This would ensure multiple advantages: economies of scale for the EU Executive Agency managing the programmes,



overall reduced administrative costs for applicant local authorities, and also continuity for local authorities that have been Horizon 2020 beneficiaries.

Alongside this necessary alignment between the LIFE and Horizon programmes, the following steps have to be taken to significantly reduce the often prohibitively heavy administrative burden for European local authorities in the LIFE programme:

Reduce number of documents to be collected for financial reporting in projects:

Currently, the coordinator of a LIFE project needs to gather from each project partner e.g. work contracts, proof of salary/charges payments, printouts of accounting systems, VAT certificates, declaration of social charges and pension schemes, payslips, timesheets, as well as all original invoices for all cost categories, for the financial reporting. This is an issue in particular for local authorities, which have sometimes difficulties in gathering these required documents. Moreover, all this detailed information for the financial reporting has to be not only submitted on an online platform, but also printed, signed,

stamped and sent by post, which amounts to a very time-consuming and not climate friendly process. This immense volume of documents should be reduced, by following the Horizon rules on financial reporting instead, and would free up valuable time for project coordinators and partners to work more on project implementation.

<u>Decrease approval time for project</u> <u>reports:</u>

Oftentimes, it takes a long time (up to a year) for a final project report to be approved and the final payment to be made to the project partners.

Remove outdated forms of submission for proposals:

In the case of some project proposals, the submission still has to be done using a CD-rom or diskette, which is completely outdated, considering the technologies available today.

Monitoring & evaluation should be more result-orientated:

LIFE reports are currently not enough result-orientated, contrary to Horizon projects, which should be remedied under the future programme.



One of the current requirements is the <u>Translation of laymen report in all</u> project languages. We believe it is not always useful and if so, it should be covered by the project funding.

Replicate the Horizon National Contact Point system for the future LIFE programme:

The national contact points for LIFE are mainly public servants of the national environmental ministries, which accumulate this function on top of their current functions. From the experience of many local authorities, the LIFE national contact points often cannot provide the necessary support to applicants nor project consortia. In contrast, the Horizon National Contact Points are only hired for this function, and have proven to be very skilled and highly knowledgeable about the entire Horizon programme and the whole project life cycle process, thereby providing critical support to Horizon applicants and project consortia. This effective system should be replicated for the future LIFE programme.

Recent Energy Cities publications:

- the city-citizen partnership to generate more renewable energy (May 2019)
- investment needs for local energy transition (April 2019)
- local energy and climate 2050 roadmaps
- our manifesto