



Con il contributo dello strumento finanziario
LIFE della Comunità Europea



EUROPEAN COMMISSION
Executive Agency for Small and Medium-sized
Enterprises (EASME)
Department B - LIFE and H2020 Energy,
Environment & Resources
Unit B3 - LIFE and CIP Eco-Innovation
Head of Unit
Mr. Manuel MONTERO RAMÍREZ

Subject: EASME.B.3 MM/at D(2016) 4692217 LIFE14NAT/IT/000209 LIFE EREMITA –
REPLY TO TECHNICAL AND FINANCIAL ISSUES

Dear Mr Manuel Montero Ramirez,

hereafter the reply to your note “Ref. Ares(2016)4205908 - 08/08/2016”.

Technical issues

<u>Ref. Annex</u>	<u>Reply</u>
<p>1. Action A6 (questionnaire): I consider acceptable your request of sharing a questionnaire through students in schools, instead of performing telephone interviews, with the aim of obtaining more answers and more attention to the survey. Anyway, I remind you that the eligibility of costs for this action will be evaluated at Final Report stage on the basis of the results obtained.</p>	<p>We acknowledge. Until now, we shared about 18.000 questionnaires and 1.952 of these have been analyzed.</p>
<p>2. Action C4: about the changes that you requested to perform in this action (your e-mail of 19 April 2016), as already indicated in my e-mail of 18 July 2016; I found acceptable that the activities related to the “ex-situ” farming of target aquatic species (<i>Graphoderus bilineatus</i>) are developed by the staff of the association “Aquaemundi”, considering their wide experience. This could be an added value for the implementation of this project’s action. However, I feel that a possible risk for this decision could be the fact that the “know-how” and expertise acquired in the meanwhile could not remain of property of the LIFE project’s staff. Consequently, the transferability and replicability of these activities could be difficult to be implemented in the future, either within the project area or somewhere else. Moreover, the fact that the LIFE project’s staff will use an</p>	<p>After sharing text of the agreement with Project Officer of EASME, on 15 December 2016 agreement with the association “Aquaemundi” has been signed.</p>



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<p>already existing infrastructure lets me some doubts on the chance of performing the same activities in the future because the facility could not be available to be used by any public administration.</p> <p>In this sense I would suggest to sign a formal agreement with the association “Aquaemundi” in order to keep the facility available for any future activities, as well as a managing protocol, promoted in cooperation with “Aquaemundi”, that will include a detailed explanation on how the activities have been performed and could be replicated and transferred to other public bodies in the future. I suggest you to add a specific deliverable to action C4.</p>	
<p>3. Action E1 (project website). In relation to the project website, at the time of the first monitoring visit, the following deficiencies were detected and I ask you to improve them accordingly:</p> <ul style="list-style-type: none"> ☐ the English version does not contain two important sections that instead are present in the Italian version: "Documents" and "Glossary"; ☐ there is not a photographic gallery on the website (only a few photos are available); ☐ there is no link to the Natura 2000 page on the European Commission's website. 	<p>The project website has been updated as required.</p>
<p>4. Action E1 (project website): considering your decision to implement the project website with your internal staff instead of contracting an external company, I remind you the importance of developing a website with the aim of advertising the project and spreading its goals and activities. In particular, a dedicated domain would facilitate the dissemination of the website address. In this sense, I remind you that the eligibility of the costs for this action will be evaluated at Final Report stage on the basis of results obtained. I ask you to provide quantitative data on the visits to the website on the occasion of the next Progress Report.</p>	<p>We acknowledge of your considerations.</p> <p>Until now we have recorded 2.743 visits to the website.</p>
<p>5. Action E4 (notice boards): in relation to possibility to install only part of the 44 notice boards foreseen in 2016, I ask you to provide information on your new planning on the occasion of the next Progress Report, and to clearly indicate what benefits the new planning could provide to the project.</p>	<p>The specifications for tender are ready. The commitment and installation of the all notice boards is expected for the 2017 end.</p> <p>With the new planning, we are able to have a framework of the localization of the actions under</p>



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	Action C4.
6. Action F1 (identification of the scientific supervisor): I consider acceptable your decision of identifying two scientific supervisors instead of a single one since the four target species are very different in the ecology and biology. I remind you to provide information on the appointment of the second supervisor on the occasion of the next Progress Report.	Both scientific supervisors have been appointed. They are: Gianmaria Carchini Marco Uliana

Financial and administrative issues

<u>Ref. Annex</u>	<u>Reply</u>
<u>Rif. nota</u>	<u>Risposta</u>
1. VAT. Please be reminded that, according to the General Conditions (article II.19.25), for VAT charges to be considered eligible, all beneficiaries must prove with documents issued by the responsible authorities or included in legal acts that they must pay and may not recover the VAT for the assets and services required for the project. In lieu of such legal documents, our offices may accept as proof of VAT eligibility, an explicit declaration in the certificate on the financial statement.	All beneficiaries have sent a request of certificate to the responsible authority (Agenzia delle Entrate). Some beneficiaries have not received any response yet. To the Beneficiaries "Ente di Gestione per I Parchi e la Biodiversità Emilia Orientale" and "Ente di Gestione per I Parchi e la Biodiversità Romagna" the Agenzia delle Entrate asked more clarification. The Beneficiary "Parco Nazionale delle Foreste Casentinesi" obtained by Agenzia delle Entrate a general certificate for LIFE projects.
2. Separate cost account for the project. I was informed that the Associated Beneficiary "Ente per la gestione dei parchi e della biodiversità Emilia Occidentale" has not established an analytical accounting system for the project yet. I invite you to clarify with the first Progress Report if a separate cost account for the project has been put in place by this Associated Beneficiary. I remind you that for the sake of traceability of expenditure and income, an analytical accounting system (cost centre accounting) shall be put in place for all the beneficiaries (Annex X to the LIFE Grant Agreement - article II). Furthermore, on that occasion,	All Beneficiaries, including "Ente per la gestione dei parchi e della biodiversità Emilia Occidentale", have established an analytical accounting system for the project. The details for all beneficiaries are included in the file "14-000209 LIFE EREMITA General info Cost centres" delivered to Alberto Cozzi during the last monitoring visit (18-19 April 2017).



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<p>please send the print-outs of sample pages of the accountancy system showing the cost centres associated with the project for that beneficiary.</p>	
<p>3. Timesheets. Please note that signatures of the employers/supervisors are often not readable. I suggest you to add a stamp with the name of the supervisor when this occurs, or to indicate clearly name and function of the supervisor.</p>	<p>All Beneficiaries are informed and encouraged to add on the timesheets a stamp with the name of the supervisor when this occurs, or to indicate clearly name and function of the supervisor.</p>
<p>4. Invoices and Travel costs documents. Please make sure that both the project number and acronym are included in all the invoices and travel costs documents, and not only one of the two.</p>	<p>All Beneficiaries are informed and encouraged to make sure that in the invoices and travel documents are included the project number and acronym. Generally this is compliant. In the past sometimes several invoices were missing of the project references, because the communication between internal offices was not guaranteed and the within the statutory terms of payment. For these isolated cases a declaration of the supplier about the project references of invoice was requested.</p> <p>For the future, all Beneficiaries warned their accounting office to reject the invoices that do not include number and acronym of the project.</p>
<p>5. Travel - Accounting of car costs. Please refer to the following guidelines for a proper accounting of costs linked to travel by car: <input checked="" type="checkbox"/> For personnel travelling on a company car, only direct costs are eligible (fuel, highway tolls, parking). I remind you to keep a logbook in the car on which to annotate the start/end mileage seen on the odometer, for each trip. Furthermore, I remind you to: i) note the project reference, the reason for the trip, the destination, and the persons travelling; ii) have the filled-in pages signed by the project supervisor; iii) keep the proofs of the costs incurred for fuel, highway tolls, parking, etc. over the period of the logbook;</p>	<p>We acknowledge of your guidelines. All Beneficiaries are informed and encouraged to follow these directions.</p>



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<p>iv) prepare a calculation table for the total costs incurred/total kilometers driven, to be shown to the Technical Monitor on the occasion of her visits or provided to our offices if requested.</p> <p>☑ For personnel using their private car, the normal company rules shall apply. For public bodies the allowance rates are those laid down in dedicated national regulations. The application of internal rules does not mean that the Agency accepts any amount. The amount applied needs to be reasonable and possibly acknowledged by the tax authorities or the external auditor.</p>	
<p>6. Travel. All the beneficiaries must provide the Coordinating Beneficiary with their internal rules for the reimbursement of travel costs and their internal procedures for the selection of suppliers and subcontractors. These documents will be checked on the occasion of the next monitoring visit.</p>	<p>The internal rules for the reimbursement of travel costs and internal procedures for the selection of suppliers and subcontractors of all Beneficiaries are included in the project documentation.</p> <p>However the internal procedures for the selection of suppliers and subcontractors are dated after the approval of the law D. Lgs. 50/2016 (national public procurement code).</p>

Yours sincerely,

Monica Palazzini