



Con il contributo dello strumento finanziario
LIFE della Comunità Europea



Project LIFE14 NAT/IT/000209

Bologna, 20/12/2018

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 B3/MMR/AT D(2017) 5094392 and EASME
B3/MMR/hm/D(2018)4243625 LIFE14NAT/IT/000209 LIFE EREMITA – REPLY
TO TECHNICAL AND FINANCIAL ISSUES

Dear Mr Manuel Montero Ramirez,

hereafter the reply to your notes “Ref. EASME B3/MMR/AT D(2017) 5094392 – 15/09/2017” and
“Ref. EASME B3/MMR/hm/D(2018)4243625 – 17/07/2018”.

EASME B3/MMR/AT D(2017) 5094392 – 15/09/2017

Technical issues

<u>Ref. Annex</u>	<u>Reply</u>
1. The report has to be more accurately revised to avoid mistakes (i.e. in the submitted report, the numbering of chapter 3, the totals reported in the table of the incurred costs).	I apologize for the mistake. In the review of the Mid Term Report more attention was paid
2. The quality of English must be improved for the next reports. I recommend that you entrust the translation to a proven translator; in this case, the costs (initially not foreseen in the estimated budget) may be accounted for in the project by adjusting the budget as foreseen in article II.22 – Budget Transfers of the grant agreement. Budget shifts shall be reported to EASME and reflected in contract amendment if foreseen in the future	An assignment has been entrusted for the translation of the reports and other documents required by the project. The costs of translation (8.780,80 Euro) are covered by savings realized under the same budget line in the action E2 and E4.
3. The Gantt chart of the chapter 5.4 describes the current progress of the project and not the envisaged progress until next report. Please fill in accurately the table in the next reports.	I apologize for the mistake. In the Mid Term Report the Gantt describes the progress until next report.
4. During the next monitoring visit, the deliverables that were not transmitted with the first progress report and the other due deliverables will be checked. Please make sure that a copy of them is available.	During the last monitoring visits (12-14 June and 4-6 December 2018) a copy of the deliverables was available. To date all deliverable archived are send with



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Project LIFE14 NAT/IT/000209

	this Mid Report.
5. The updated tables of the LIFE Project Specific Indicators were not provided. Please, provide them in occasion of the next monitoring visit.	During the last monitoring visits was available.

Financial and administrative issues

Ref. Annex	Reply
6. I note that only the partnership agreement between you and the associated beneficiary PNATE was signed, whereas in the other partnership agreements the signatures are missing. Please resubmit a copy of the partnership agreements signed by the coordinating beneficiary and by the associated beneficiary.	All partnership agreements which have been signed with digital signature, except that of the PNATE. Attached to the Mid Term Report we send you all partnership agreements signed.
7. As indicated in the agreement signed between the AB MAR and the Association Acquemundi, the contract foresees a budget of 30.000 € for the implementation of part of action C4. This is to be considered as a budget shift from Personnel to External Assistance and not the shift reported in the excel file "R2 modified.xlsx". Due to the several shifts from each beneficiary, the budget cost category External Assistance increases to 1.011.482 € (+ 109.977 €). I acknowledge the necessity to cover unforeseen costs such as the genetic analysis of Graphoderus, which are indispensable for the implementation of the alternative plan (as reported at page 20 of the PR1). However, in the light of the insufficient information and quantification of the extra works necessary to justify such increase, I suspend the evaluation/approval of this issue for the time being, while waiting to obtain further justification.	The CB, following a comparison of cost estimates from other universities, commissioned to the University of Padua a study on the genetic variability of <i>G. bilineatus</i> using samples from Croatia (multiple sites), Hungary, and Lithuania, with the aim of identifying the closest genetic population to the one historically present in Lake Pratignano. The cost of the study (€ 6,322) borne by the CB, was paid for using other actions' savings (realized under the same budget line). The survey on genetic diversity observed in the gene for mitochondrial COI has revealed that the population of Lake Pratignano has an extremely reduced genetic diversity. The other European populations have a greater diversity, none of the other populations has shown the haplotype equal to that of Pratignano, and there is no significant relationship between genetic distance and geographical distance between populations. On 7/06/2018 a skype meeting took place with Dr. Genovesi and Prof. Audisio and Prof. Congiu of the University of Padua, due the results of the genetic investigations, the alternative program with founders from other European sites has been approved. The genetic analysis of <i>Graphoderus</i> allowed to prepare the alternative scenario proposed in the request of amendment.
8. Regarding the unit rates exceeding the rates indicated in the estimated budget, the provided reply does not clarify the issue and the requested supporting documents	In the Mid Term Report, chapter 8, more information are provided. Attached to the report supporting documents for the calculation of the staff cost are provided. For each beneficiary, as an example and as



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<p>were not attached to the report. In this respect for the staff whose unit rates exceed the rates foreseen in the estimated budget more detailed explanations and copy of following supporting documents (timesheets, monthly payslips, staff costs calculation tables based on the payroll) are requested and shall be provided.</p>	<p>agreed with the external monitor, the employee who has worked the most on the project was chosen.</p>
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Ref. EASME B3/MMR/hm/D(2018)4243625 – 17/07/2018

Technical issues

Ref. Annex	Reply
<p>A2 [Ex-ante monitoring] 1. Based on the results of the ex-ante monitoring, several Natura 2000 site forms should be updated. The procedure has to be completed by the end of the project.</p>	<p>Our comment are that the procedure of updated of the Natura 2000 site forms will be completed by the end of the project. To date the Natura 2000 site forms to update are: IT4080002 (for the presence of <i>R. alpine</i> and <i>O. eremita</i>), IT4030002, IT4030005, IT4030003, IT4050004, IT4070016, IT4090003 (for the presence of <i>O. eremita</i>), IT4050002 (for the presence of <i>R. alpine</i>).</p>
<p>D1 [Ex-post evaluation of the ex-situ reproductive activities], D2 [Ex-post evaluation of the reintroduction and reinforcement activities] 2. Please, start as soon as possible the actions, avoiding to accumulate further delays.</p>	<p>The action D1 takes place in parallel with the activities of C4. It has been started only for <i>O. eremita</i>.. The action D2 is in delay and hasn't started yet. It is planned to start after restocking activities that will begin in May 2019.</p>
<p>E1 [Project website] 3. The web site should be updated in the sections "Documenti/Altri documenti", "documenti/risultati". A special section dedicated to the other LIFE projects on the same themes should be opened.</p>	<p>The url of the project site is changed. The new url is https://progeu.regione.emilia-romagna.it/it/life-eremita The sections are updated and a section "Altri Life e siti utili" added.</p>
<p>KPI database 4. Please do not forget, when preparing the Mid Term Report, to update the indicators tables on the KPI platform.</p>	<p>It is not possible to update the indicators tables on the KPI platform because the link is not available, this is the message: "Error 500--Internal Server Error"</p>



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LIFE della Comunità Europea



	<p>From RFC 2068 Hypertext Transfer Protocol -- HTTP/1.1: 10.5.1 500 Internal Server Error The server encountered an unexpected condition which prevented it from fulfilling the request.”</p>
<p>Deliverables 5. The following deliverables have been postponed again: Blueprint for the recovery of basins and rivers for <i>C. mercuriale</i> and <i>G. bilineatus</i>(C2); Web-technology application (C6), Technical publication on the creation and management of habitats (E2), Print of stickers and album (E7), DVD with Video clip on project (E7). No other delay will be accepted, otherwise the relevant costs could be cut off at the final stage.</p>	<p>The deliverables of C2, C5, E2, E7 (Print of stickers and album), E7 (video clip) are annexed in this Mid Report. The last video, documenting the restoration and environmental improvement interventions for aquatic insects (C2), will be produced in the spring, when these interventions will be carried out. Only once the last video has been made will the DVD containing the 8 video clips be produced. 3 video clips have not yet been produced due to delays in conservation actions. I apologize for this delay.</p>

Financial and administrative issues

<u>Ref. Annex</u>	<u>Reply</u>
<p>6. From the financial reports handed over to the monitor during the visit, it emerged that the daily rates of several persons are substantially higher than those foreseen in the provisional budget. In Chapter 8 of the Mid-term report, please provide detailed explanations for each of the members of personnel having a daily rate higher than foreseen. If the hourly/daily rates are assessed as too excessive, then this cost may be ineligible.</p>	<p>In the Mid Term Report, chapter 8, more information are provided. Attached to the report supporting documents for the calculation of the staff cost are provided. For each beneficiary, as an example and as agreed with the external monitor, the employee who has worked the most on the project was chosen.</p>
<p>7. From the discussion during the administrative / financial session of the monitoring visit, it emerged that the payslips of Mr Massimiliano Costa and Mr Fiorenzo Rossetti are issued by Regione Emilia Romagna, but no document was available to prove that the Associated Beneficiary Ente di Gestione per i Parchi e la Biodiversità Romagna reimburses Regione Emilia Romagna for these costs. Keeping in mind the conditions for the eligibility of costs (Article II.19.1 point d of the General Conditions),</p>	<p>Personnel of MAR, has emerged during the third monitoring visit, is paid from Emilia- Romagna Region. After further in-depth analysis it emerged that the separation of regional personnel must be intended as a regional financing form for Management Body of Romagna. For this reason,</p>



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clarifications are needed, together with concrete proofs that the salary of the involved persons represent an actual cost for the Ente di Gestione per i Parchi e la Biodiversità Romagna (reimbursement to the Region).

the personnel costs of 2016, 2017 and 2018 has not been effectively sustained by MAR, for this it will not be accounted. Starting from 2019, instead, the separated personnel will assume the command position among other Bodies. This means that the RER personnel in charge to MAR will be paid by Emilia – Romagna Region and the same costs will be reimbursed by the Management Body of Romagna towards the Region, at the end of each year. So, from 2019 it could be demonstrated that, even if the payroll are paid by the Region, the MAR personnel is a cost for them, compared to the costs reimbursement sustained by the Region.

Yours sincerely,
Project coordinat
Monica Palazzini