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CEEWEB FOR BIODIVERSITY'S POSITION ON THE DRAFT PROPOSAL OF THE NEW LIFE PROGRAMME (2014 – 2020)

CEEweb for Biodiversity welcomes the continuation of LIFE programme as the single financial mechanism of the European Union devoted exclusively on environmental issues. The draft of the new LIFE Programme regulation released in December 2011 includes a number of logical and important new elements like allowing organisations from non-EU countries to participate in LIFE projects or easing the administrative burden. Including climate aspects in the LIFE Programme is also a much needed change.

Taking note of the extensive consultation process CEEweb, however, is concerned that the proposal could be improved in order to reach more efficiently the referred EU targets. According to CEEweb, some parts of the proposal should be amended to ensure for all organisations equal access to the LIFE Programme; and new elements should be added to ensure that the focus remains on the most threatened habitats and species in case of Biodiversity priority area. CEEweb, therefore, makes the following comments and recommendations to the draft proposal:

- 1) CEEweb considers biodiversity issues especially halting the loss of biodiversity as one of the most pressing environmental problem to be solved in the European Union. In order to implement existing EU regulations and fulfill the international obligations, (a) **LIFE budget** (which is now 0,2% of the entire EU budget) and (b) **the share of 'biodiversity' budget within the overall LIFE budget** (now 50%), allocated solely to nature conservation and biodiversity projects, **must be increased** to at least 1% and 75% respectively.
- 2) In order to use LIFE funding in the most efficient way; and considering that conservation of existing natural values is always cheaper than artificially re-creating lost natural habitats; LIFE Programme must ensure proportionality among countries applying for funding considering the level of biodiversity richness. It is important, therefore, to include explicitly in the new LIFE legislation that **population sizes and conservation status of the targeted habitat/species** (as it is defined in the Habitat/Bird Directive and/or international red lists) **as well as proportion of Natura 2000 sites** of EU Members States (and conservation areas in non-EU



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countries equal to Natura 2000 areas, like sites of Emerald network) **must be considered at first place** when (a) criteria for the 'geographical balance' and (b) the set of criteria for project selection under Biodiversity priority area of sub-programme LIFE Environment are being elaborated. 'Geographical balance' based on biodiversity criteria, in addition, should be applied to all projects in Biodiversity priority area, and not only to integrated ones.

- 3) While focusing on Natura 2000 network, supported project actions (especially those targeting such mobile animal group as birds, or large mammals) should not be restricted solely on Natura 2000 sites, as major threatening factors (e.g. electric power lines, roads, railways) may occur between the Natura 2000 sites. Also some endangered species prefer agricultural areas (often not subject to agri-environmental subsidies) that are currently ineligible for LIFE funding in general. In those cases, LIFE Programme should support well-justified conservation measures **outside of Natura 2000 sites** in order to ensure the favourable status of the targeted species.
- 4) The introduction of 'integrated projects **should not lead to phasing out smaller, but more focused bottom-up projects** proposed by stakeholders. It must be ensured that smaller projects can be implemented whether within or independently from the integrated projects. Phasing out smaller projects – that have been proved very successful and efficient in the previous years – may lead to the exclusion of small but biodiversity rich, therefore important habitats, as well as certain stakeholders that will not be able to apply for or participate in the LIFE Programme under the planned conditions.
- 5) The Commission should ensure that the LIFE applicant consortium, when applying for an integrated project, **should explicitly seek for the partnership of expert organisations** (NGOs or other organisations) on the field.
- 6) While we understand that funding from the LIFE programme should be spent exclusively on the project costs, and it must be ruled out that organisations spend it on basic tasks not related to the specific programme, **CEEweb thinks that permanent staff is essential** for implementing LIFE projects, as valuable experiences and knowledge is accumulated within the institutional framework of



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eligible applicants (NPs, NGOs) and many cases the easiest, the cheapest and sometimes the only possible way to implement a project action is to involve the permanent staff (e.g. national park rangers). Excluding those staff would have negative impact on number of application, and the quality of future LIFE projects. In addition, in many cases, part time of permanent staff was calculated as own contribution to the LIFE project. Considering permanent staff costs as ineligible, will result in less financial tool for providing own contribution, which will lead less project applications or/and smaller project size. Costs of permanent staff, therefore, must remain eligible in all LIFE projects. A central, online registration form that should be filled in regularly during the projects could help to better control the use of LIFE funding for permanent staff.

- 7) **VAT-costs must remain eligible** for all LIFE projects; otherwise in case of beneficiaries not subject to VAT reimbursement, in countries with high VAT rate co-funding rate will hardly reach even 50%; thus, it will not be worth applying for LIFE funds even with higher overheads/lump sums.
- 8) LIFE Climate sub-programme should also emphasize the importance of biodiversity conservation, acknowledging the importance of **ecosystem based mitigation and adaptation efforts** in fighting climate change. In this regard biodiversity conservation and fighting climate change are mutually reinforcing at the same time.
- 9) In the recent economic situation, it is especially important to calculate funding and project costs in a realistic way. It is impossible, however, to make that in countries not being members of the euro zone, if the euro/national currency exchange rate is fixed by the LIFE Programme for a year; and cannot be adjusted according to the changing rates. It is important, therefore, **to create possibility in the LIFE legislation to adjusting the exchange rates** to the monthly changes.

CEEweb for Biodiversity is a network of non-governmental organizations in the Central and Eastern European region. Our mission is the conservation of biodiversity through the promotion of sustainable development.