



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

Brussels, 29/10/2019

EASME.B.3/AS/CS

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Subject: **Your application for funding under LIFE 2019 Integrated Projects call for proposals, reference nr LIFE19 IPE/BE/000008, “The Flemish Plastics Action Plan At-Large”**

Dear Applicant,

I am pleased to inform you that the European Commission has completed the evaluation of the concept notes submitted for the LIFE Integrated Project (IP) proposals 2019 Environment sub-programme. Your concept note (referred to above) is considered to comply with the criteria laid down in the corresponding *Guide for the evaluation of LIFE Integrated Project proposals 2019*. You are therefore invited to submit your full Integrated Project proposal by **16:00 on 6 March 2020**. Please **send your proposal by express courier**, to ensure it arrives before this deadline. Please see chapter 1.8 of the *Guidelines for applicants LIFE Integrated Projects 2019* for the relevant instructions.

Please note that 5 Environment concept notes have passed this stage successfully and have been invited to submit their full IP proposal, with a total requested EU contribution of EUR 56.9 million. In this context, I would like to draw your attention to the fact that the total indicative budget available for Environment Integrated Projects under the 2019 Call for proposals is about EUR 38 million. This indicative budget would allow us to finance only a limited number of IPs, based on the average contribution of EUR 7-10 million indicated in the application guide. It is therefore unlikely that we would accept an EU contribution significantly exceeding the average indicated.

As foreseen in the *Guide for the evaluation*, you will have the opportunity to participate in a **written question and answer phase**, during which you can submit questions related to the preparation of a full proposal. You may submit your questions via e-mail to EASME LIFE ENQUIRIES EASME-LIFE-ENQUIRIES@ec.europa.eu **until 6 February 2020**. It would be appreciated if you could group your questions and send them in batches. Questions should mainly - but not exclusively - concern clarifications of the guidelines or the related processes.

We cannot, in general at this stage, provide you with specific guidance to help you orient or improve your proposal.

At the end of this phase, the Commission will render public the questions and answers in an anonymous manner, to assist equally all applicants. This information will be available on the LIFE 2019 call for proposals page under "FAQ IPs":

<http://ec.europa.eu/environment/life/funding/>.

You will find in the annex to this letter our general comments together with specific comments on your concept note.

Yours sincerely,

e-signed

Angelo Salsi

Annex

1. General comments to all applicants

1.1 Complementary actions, mobilisation of funds

With a view to the fact that the adoption process of all RDPs and OPs was still ongoing at the time of the submission of the CNs (and is still ongoing now) but are expected to be finished shortly, all applicants should revisit the issue of available complementary funding sources and include in the full proposal those funds that can be genuinely mobilised as foreseen in Chapter 1.4 of the Application guide.

In this respect, note has been taken of the large difference in the amount of complementary funds included in the concept notes, indicating that the applicants may have different understanding of the complementary funds and their mobilisation. We therefore draw the attention of all applicants to the provisions of the above-mentioned Chapter 1.4, with particular attention to the requirements that:

- *"Complementary actions shall always implement **the same large-scale plan or strategy that the Integrated Project is targeting.**"* Note that actions not meeting this condition will not be taken into account during the assessment and scoring of the proposal.
- *"The quality of the coordination with other funding mechanism(s) and the level of mobilisation of complementary funds as well as the likelihood of their actual mobilisation and their functional link to the plan to be implemented will have an impact on the evaluation of the **EU added value** of the IP."* The applicants should pay attention to this criterion and provide well substantiated arguments especially in case none of the IP beneficiaries are involved in the management and/or granting of the funding mechanism in question and hence have no actual influence on the use of those funds.

1.2 Project period

In order to ensure a sufficient time frame to implement all actions, applicants are encouraged to foresee sufficient buffer periods, in particular in relation to all necessary administrative procedures and to actions with innovative and demonstrative elements. Please note that the starting date can be set as early as 9 March 2020 but the grant agreements with the successful applicants will be concluded in November – December 2020.

1.3 Implementation of the targeted plan

Applicants are reminded that the IP must be clearly designed with the aim of creating the conditions for the full implementation of the Plan. The IP shall include strategic actions to catalyse a process and mobilise supplementary commitments and funding that will lead, in due time, to the full implementation of the plan/strategy. The IPs should therefore be designed in a way to address this long-term objective. Under these conditions, applicants are invited to verify whether LIFE 'traditional' grant funding is not a more appropriate funding source for their project.

1.4 Key Project Indicators

A specific action to monitor and measure the impact of the project (that will feed the online dynamic indicator database), should be part of the proposal with a defined budget. Each project will have to report on the outputs and impact of the project taking into account the LIFE Key project level indicators. These indicators will contribute to evaluating the impact of the LIFE project. Each proposal must include an action to compile the information needed to regularly report on project indicators and enter data related to those indicators in the dynamic indicators database.

Please note that you are requested to attach to your full proposal Excel table included in the application package (LIFE Key Project Level Indicators Call 2019.xlsx)

2. Specific comments on your concept note

Technical reliability of the beneficiaries
<ol style="list-style-type: none">1. The project is coordinated by the Public Waste Agency of Flanders (OVAM), the competent authority and responsible for the implementation of management of waste, materials and soil, which seems to be technically reliable and competent. Likewise, it includes as associated beneficiaries the main relevant waste umbrella organisations (Go4Circle, Fost Plus, Valipac), and the Inter-Regional Packaging Commission (IRPC) to ensure coordination with and uptake by the Brussels and Wallonia regions of the actions and results of this IP. The associated beneficiaries have substantial responsibilities in the main project region (Flanders), and at national level for the household waste and the industrial waste/packaging, as well as the responsibility for Belgian legislation on packaging waste and for waste transit.2. There is no evidence that the coordinating beneficiary has been an unreliable manager in previous LIFE or other European Union-financed projects. The coordinating beneficiary is currently involved in 20 EU financed projects.
1. IP territorial coverage
The project covers a large territorial area; it is implemented in a multi-regional scale, covering 3 regional governments; the Walloon Region, the Flemish Region and the Brussels Region. The general objective is to reach the waste reduction objectives defined in the different regions' waste management plans; however, activities and results seem to be mostly focused and quantified for Flanders. The full proposal should clarify exactly what, where and when tasks will be implemented, and provide more information for the regions of Brussels and Wallonia on the expected results at the end of the project and afterwards, including the extent to which the project will contribute to the implementation of the corresponding waste-related plans/strategies of those regions.
2. Mobilisation of funds for complementary activities
There is a substantial list of complementary activities covering the integration of plastics strategy into policies for climate, the thematic sectors of bioeconomy and circular economy, textile, hygienic products, festivals and events, eco-design, construction, hazardous substances, sorting, collection and recycling and creating a sustainable recycling market etc. There is confirmed and expected financing from Interreg and Horizon 2020 (approx. €12 M, not including the funds still in proposal stage), as well as already granted national and private funds (approx. €66 M). Approximately 90% of this amount has already been committed, while the rest is still to be granted in the form of grants for projects. The proposed complementary activities seem to be likely to support the implementation of the IP. They are

in line and supporting the Flemish Plastics Action Plan and are (partly) included and referred to in the first annexed table of the 'Activities Listing'.

3. Involvement of key stakeholders

The CN shows a clear multi-stakeholder cooperation. A substantial number of key stakeholders are included covering the fields of collection, recycling, packaging, textile, construction, chemistry, research institutions and a series of governmental organisations and municipalities/intermunicipal organisations. The beneficiaries are part of the key stakeholders. Industrial partners (over 400) are included via green deals initiatives and innovative SMEs through Circular Flanders Calls. The description of the key stakeholders, as well as the annexed table of the 'Activities Listing' secures clear cooperation with the key stakeholders, considering their area and sectors of competence. However, no clear mention is made to the involvement of civil society (through e.g. NGOs), which may be relevant depending on the actions carried out; this involvement should be strongly considered at full proposal stage. For the regions of Brussels and Wallonia, although several key entities like the Interregional Packaging Commission (IRPC) and the technical commission for the construction sector (TCB) are mentioned, further explanations should be provided at full proposal stage, as regards which stakeholders would ensure the uptake and replication of project results, and why.

4. Implementation of one of the listed and adopted environmental/climate plans

The project targets the implementation of the following plans/strategies:

- Flemish Materials Decree 23 December 2011. – Decree on the sustainable management of material cycles and waste (implementing the Waste Framework directive (EU 2008/98)),
- Flemish Plastics Action Plan,
- Belgian cooperation agreement on prevention and management of packaging waste.

The project focus is on plastics and packaging waste, aiming to transfer and replicate the approaches developed to other waste streams (EEA, ELV, textile, construction, biomass, diapers and contingency material), and envisaging to meet the targets of halting the marine plastic litter.

The applicant is the principal authority in Flanders for sustainable management of waste, materials and soil, and is designated explicitly to be the driving force for the implementation of the Flemish Plastics Plan. The design of the IP is aiming at creating the conditions to implement the Flemish Plastics Plan and its interregional transfer. This transfer is supported by the associated beneficiaries, which are national-level organisations for the collection, sorting and recycling of household and industrial waste) and the 'Belgian cooperation agreement on prevention and management of packaging waste' (formally published in 2008). The annexed table of the 'Activities Listing' is indicating the links with the Flemish Plastics Plan (main reference plan) and other Flemish Action Plans such as the Flemish Plan for Household Waste and similar Industrial Waste, the Flemish Action plan for Marine Litter and the Flemish Action Plan Biomass waste streams; however, a more detailed description of these links, namely of the actions/results with the respective targets within the plan or strategy, should be provided at the full proposal stage. The relevant EU and/or international framework directives or policies are stated. However, the Flemish Plastics Plan seems to be a draft plan at the moment, not yet formally approved and adopted at the appropriate level, a requirement that should be met at the full proposal stage.

5. Additional recommendations for the full proposal

- It is not clear if the 'Flanders' Plastics Action Plan' is still a draft Programme of the Ministry of Environment (June 2019). It must be formally approved by the time of the full proposal.

- Apart from the capacity building aspect, the long-term sustainability should include the outreach and upscaling of actions, with the interregional to international ‘transfer’ and replication.
- The listed constraints/risks and the related mitigation strategy is rather generic and should be more detailed with respect to stakeholder engagement and complementary activities.
- A clearer description of the actions at full proposal stage is expected, including timing and budget allocation. The beneficiaries should be reminded that by default actions already ongoing before the start of the project are not eligible (e.g. mention is made to continue with the development and monitoring of circularity indicators).
- A clear table should be provided at full proposal stage showing to which extent the IP will contribute to the targets of the corresponding plans, and which targets will be subject of complementary actions.
- The following aspects should be also considered in the full proposal:
 - Please provide information regarding what elements in the product legislation impede the use of recycled materials in new products (i.e. for using waste in products), and what solutions could be proposed at this respect.
 - The action on marine litter should remain a focus, but please also note that littering in general also needs action.
 - Please clearly explain what activities are considered to enhance recycling capacity, eventually linked with innovative business models, as regards, collection, treatment and marketing of recycled materials. Rethinking business models in waste management itself should contribute to the whole creation of a sustainable market of recyclable products.