Dear Members of the European Parliament,

Subject: Recommendations for the vote in ENVI Committee, on the proposal for a regulation establishing a Programme for the Environment and Climate action (LIFE) 2021–2027

In view of the Environment Committee vote on the European Commission’s proposal on the LIFE Programme for 2021–2027, EUROCITIES, FEDARENE, Energy Cities, CEMR, Climate Alliance and ICLEI would like to request your support for the provisions highlighted below.

1. Minimum and differentiated co-financing rates securing the participation of local and regional authorities

Cities and regions rely on LIFE funding to catalyse and upscale actions on environmental protection and climate mitigation, with substantial co-benefits beyond their own boundaries. We support having substantial, minimum co-financing rates and recommend that a minimum support level be set in the regulation which ensures that the work programmes cannot set lower rates. Considering the differences of targets and support needs between sub-programmes, a differentiation of co-financing rates by sub-programmes is justified and would enable the LIFE programme to effectively reach a larger variety of stakeholders including smaller organisations.

➢ Recommendation: Support amendments 17 and 39

2. The Clean Energy Transition – A new direct objective in the LIFE programme

As clean energy related market uptake and capacity building activities are being moved from Horizon 2020 to the LIFE programme, LIFE becomes a key support instrument for the energy transition. This should be reflected in the programme’s objectives and funding allocation. Ambitious commitments of local and regional authorities such as the ones mobilised in the European Covenant of Mayors for Climate and Energy need to be backed by appropriate financial support. Any increase in the envelope should keep the same proportional distribution between fields and sub-programmes as in the Commission proposal, without missing the urgency of funding the clean energy transition where investment gaps remain considerable, and needs to effectively transfer solutions from R&D into reality are substantial. The transition to clean, renewable energy and improved energy efficiency is an essential driver for the mitigation of climate change with co-benefits for the environment and in line with the LIFE framework.

➢ Recommendation:
  - ENVI Draft Report : Support amendments 32, 92, 93 : Oppose amendment 20
  - REGI Opinion : Support amendment 34

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1 Recital 9 of the Proposed for a Regulation for LIFE reminds us: “The impact assessments of the Clean Energy legislation estimate that the delivery of the Union's 2030 energy targets will require additional investments of EUR 177 billion annually in the period 2021-2030. The biggest gaps relate to the investments in buildings decarbonisation (energy efficiency and small-scale renewable energy sources), where capital needs to be channelled towards projects of highly distributed nature.”
3. **Awareness-raising and inclusive governance – Drivers for a successful socio-economic transformation**

The LIFE programme needs to focus in its development and implementation on a multi-level and multi-stakeholder participation in order to achieve its objective of transforming the European Union into a clean, circular, energy efficient, low carbon and climate resilient society. LIFE can facilitate Multilevel Climate and Energy Dialogue as encouraged by the Energy Union Governance Regulation, specifically by supporting better environmental and climate governance at all levels, by improving awareness-raising, and by reinforcing the involvement of civil society and local and regional stakeholders. This type of mobilisation needs to be enshrined in the programme’s objectives and to become part of its work programmes’ development and monitoring processes.

➢ **Recommendation:**
- ENVI Draft Report: Support amendments 12, 45, 78, 190
- REGI Opinion: Support amendments 3, 6, 8, 13, 14

4. **Alignment between LIFE and Horizon Europe lightening the administrative burden and encouraging synergies**

Aligning the administrative procedures of LIFE (at application and implementation stages) with Horizon 2020 would lead to reduced administration costs for beneficiaries as well as economies of scale for the Executive Agency managing the programmes. The administrative burden for beneficiaries remains prohibitively heavy in the LIFE programme and calls for simplification by following the model of the Horizon 2020 rules and procedures. Such alignment would be particularly beneficial for the Clean Energy Transition activities where beneficiaries had become accustomed with the Horizon 2020 processes. This would also be consistent with the LIFE programme’s role as a catalyst for the deployment of research and innovation results from Horizon Europe.

➢ **Recommendation:**
- ENVI Draft Report: Support amendments 80, 98, 136, 250
- REGI Opinion: Support amendment 7

5. **Granting access of metropolitan areas to strategic integrated projects**

Strategic integrated projects implement national environmental/climate strategies with the involvement of stakeholders. They are currently defined as projects at regional, multi-regional, national or transnational scale. Still, the actions developed at metropolitan level make a key contribution to national and European environmental and climate efforts, such as the National Climate and Energy Plans (NCEPs) required by the Energy Union governance Regulation. Including actions developed at metropolitan scale in the definition of strategic integrated projects will allow metropolitan areas to apply for such projects and support their capacity to undertake transversal, integrated environmental and climate action.

➢ **Recommendation:** Support amendments 138 and 168

6. **Broadening the scope of LIFE to noise reduction**

In urban areas, noise is the second largest environmental cause of health problems, just after air quality. It is a crucial factor of health and well-being in municipalities. It is therefore important to secure LIFE funding for projects aiming at reducing noise.

➢ **Recommendation:** Support amendments 114, 159, 353

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EUROCITIES is the political platform for major European cities. Founded in 1986, we network the local governments of over 135 of Europe’s largest cities and over 40 partner cities that between them govern some 130 million citizens across 35 countries. We engage in dialogue with the European institutions across a wide range of policy areas affecting cities, which include economic development, environment, transport and mobility, social affairs, culture, the knowledge society, and public services.

FEDARENE (European Federation of Agencies and Regions for Energy and the Environment) is the primary European network of regional and local organisations, which implement, coordinate and facilitate sustainable energy and environment policies. Regional and local agencies, ministries and departments working in these fields are represented in FEDARENE.

Energy Cities is the European network of local authorities in energy transition, representing over 1,000 cities across Europe.

The Council of European Municipalities and Regions (CEMR) is the broadest organisation of local and regional authorities in Europe. Its members are over 50 national associations of municipalities and regions from 41 European countries. Together these associations represent some 150,000 local and regional authorities. CEMR’s objectives are twofold: to influence European legislation on behalf of local and regional authorities and to provide a platform for exchange between its member associations and their elected officials and experts. Moreover, CEMR is the European section of United Cities and Local Governments (UCLG), the worldwide organisation of local government.

Climate Alliance - For more than 25 years, Climate Alliance member municipalities have been acting in partnership with indigenous rainforest peoples for the benefit of the global climate. With some 1,700 members spread across 25 European countries, Climate Alliance is the world’s largest city network dedicated to climate action and the only one to set tangible targets: each member city, town and district has committed itself to reducing greenhouse gas emissions by 10 percent every 5 years. Recognising the impact our lifestyles can have on the world’s most vulnerable people and places, Climate Alliance pairs local action with global responsibility.

ICLEI - Local Governments for Sustainability is the leading global network of more than 1,500 cities, towns and regions committed to building a sustainable future. Through our collective efforts, we impact more than 25 percent of the global urban population. ICLEI Europe provides its members in Europe, North Africa, the Middle East and West Asia with a voice on the European and international stage, a platform to connect with peers and tools to drive positive environmental, economic and social change. ICLEI Europe works closely with an extended network of local and regional governments and partners on a broad range of topics.