



**Subject: Clean Energy Transition Sub-Programme within LIFE 2021-2027: recommendations from the European National Energy Agencies, European Energy Network (E<sup>n</sup>R)**

Dear Members of the European Parliament,  
Dear Members of the European Council,  
Dear Representatives of the European Commission,

We write on behalf of the European Energy Network (E<sup>n</sup>R) – a voluntary network of national energy agencies within Europe and in neighboring countries ([www.enr-network.org](http://www.enr-network.org)). Established in Strasbourg in 1991, E<sup>n</sup>R currently numbers twenty-four member agencies, each with national responsibility for planning, implementing, managing or reviewing research, development, demonstration or dissemination programmes in the fields of energy efficiency, renewable energy and climate change abatement.

As national energy agencies we represent a large number of energy stakeholders and sectors and we provide a channel for pan-European technical support on matters of energy policy, strategy, evaluation, programme design & delivery and marketing communications.

Over the past two decades, our members have benefited from European funding for projects relating to ‘building capacity for the energy transition.’ This funding enables us to collaborate with partners from across the EU to develop new approaches to improve energy efficiency in, and increase the uptake of renewable energy by, businesses, households and communities.

We acknowledge the potential benefits of moving funding for ‘energy transition’ projects, mostly market uptake projects, from H2020 to the new Clean Energy Transition Subprogram within the LIFE programme in the next multi-annual financial framework period (2021-27). However, we have serious concerns that the proposal in its current form, in particular the proposed changes to funding rules, **will prevent important stakeholders such as national, regional and local energy agencies, universities, technological institutes, SMEs, NGOs, cooperatives, associations, etc. from participating in cross-border EU market uptake projects.**

**Lower funding rates**

Unlike the current (Horizon 2020) funding programme, projects under LIFE 2021-2027 will be funded at a co-financing rate of 60%, so organisations will have to find the additional 40% from other sources. Also, under LIFE, organisations can only draw 7% of funding to cover their operating costs, compared to 25% under Horizon 2020.

This decreasing of the co-financing rates, will pose a significant barrier for potential beneficiaries at the time to participate in clean energy transition projects as it will be very difficult for them to provide the additional financing sources and also to justify such a low funding percentage of their overhead costs.



## European Energy Network

To fulfil with the EU policy objectives regarding climate and energy, we need to address the uptake of renewable and energy efficiency technology with the widest variety of organisations and companies involved in energy transition projects in the EU and beyond. Market uptake projects need a multidisciplinary and holistic approach that implies the participation of companies from both, the public and private sectors.

- **We call on the EU Commission, Parliament and Council to reconsider the proposed funding rules and commit to maintaining the criteria set for these kinds of projects under H2020.**

### Overall level of funding

Given the urgency of the climate challenge - and the increasing ambition of climate change and energy efficiency policies in the Member States – it's hard to see that that's going to achieve the transformative change required.

- **We urge the EU Commission, Parliament and Council to increase the overall allocation of funds to the Clean Energy Transition sub-programme.**

We welcome the opportunity to meet and discuss these issues further with a view to working together to ensure that the design of the Clean Energy Transition sub-programme ensures the maximum impact from the funds allocated.

The E<sup>n</sup>R Presidency and Troika on behalf of the network

