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DIRECTORATE-GENERAL
ENVIRONMENT
Directorate D – Natural Capital
ENV.D.4 - LIFE Programme
Head of Unit

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ENV-D-4 IB/PR

Università degli Studi di Parma
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**Subject: LIFE13 NAT/IT/001129 BARBIE
Mid-term Report and third monitoring visit**

Dear Mr Nonnis Marzano,

I wish to thank you for your Mid-term report, which I received on 14 December 2016. I also thank you for having welcomed to your premises Iva Rossi of the Neemo Monitoring Team during the project visit of 12 and 13 December 2016.

Your Midterm Report is overall satisfactory and provides sufficient information on the state of art of the project which is still set to reach the expected objectives. Your statement of expenditure is also acceptable and consistent with the technical implementation. I have therefore authorised the midterm pre-financing payment for the project of an amount of **€ 434,010** which will be transferred to your bank account shortly.

I was pleased to learn that, notwithstanding the many difficulties encountered during the initial phase of your project and the delays accumulated due to unpredictable events, you still managed to start with the first ex-situ reproduction activities and with the restocking of one of the two target species, along with the installation of first artificial substrate in riverbeds. I was also satisfied to learn that progress is good as concerns the awareness raising and the dissemination actions and that your networking activity has set the base for some positives collaborations.

I remain concerned however about action C2 and the delays in the implementation of the fish passes along the Enza river. I was informed that you are confident to finalize the preliminary actions A3 and A4 in early 2017 so as to start the core action C2 as of summer 2017. I need to urge you to respect this deadline as any further delay will not allow reaching the expected project objective within the set project end date.

I also learned that based on the preliminary investigations only a reduced number of sites can be envisaged to carry out the expected restoration actions of the target species. I warmly encouraged you to do your utmost in order to successfully achieve the restoration objective in the sites selected and to make the best use of available resources so as to ensure an adequate cost/benefit ratio.

Your request to include the site SCI IT4020027 Cronovilla in the project area is accepted. Further I acknowledge that activities implemented in the additional site do not entail any modification to the budget. The extension of the project area is much welcome as it contributes to the achievement of the expected project results.

I thank you for having provided a reply to the issues raised in my letter of 22/02/2016. Your reply is overall satisfactory, but a number of further issues are to be clarified with the next report. Moreover, although reporting is overall satisfactory some improvements are needed. Please refer to the annex to this letter for further detail.

Please note that the mid-term technical report and the statement of expenditure might be questioned further by the Commission at a later stage and cannot be considered definitively approved. In annex you will find a description of additional financial information and justifying documents which must be annexed to the final report. Please note that your final report will not be considered as complete if any of these items are missing and therefore will not be accepted by the Commission. Any request for payment submitted with an incomplete report will be suspended from the day it is received meaning that the payment periods mentioned in the Common Provisions will not start running until you submit a complete final report. To help ensure the completeness and coherence of your final report, I strongly suggest that you provide a draft version to your monitor for comments prior to submitting the final version to the Commission.

Allow me to take the opportunity to inform you that this year we will celebrate 25 years of LIFE and of the Habitats Directive. A great milestone for which we need your help! I invite you to consider already how you will help us celebrate the 25th anniversary of the LIFE Programme, the Habitats Directive and Natura 2000 on the date of 21 May 2017 (or during the weeks before or after this date as most convenient), notably by organising local communication events and open days.

Yours sincerely,



Jean-Claude MERCIOL

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ANNEX

Reporting

Your midterm reporting is overall sufficient. However, progress expected for the next reporting period needs to be better detailed for each action. The financial chapter needs to include also an analysis of the costs breakdown per action. I would also like to encourage you to better develop chapter 5.4 since this allows us to assess the actual long term impact of the project. For the future reporting please do not enclose annexes already sent with the previous reports.

Technical issues

1. **Action A3 - Environmental characterisation of the study area:** The environmental characterisation of the study area was concluded by December 2015 (about one-year delay) and reportedly also the Minimum Vital Flow analysis is in the meantime finalised. With the next report please send the due deliverable *Technical report on environmental study of the target area including the Minimum Vital Flow analysis*.
2. **Action A4 - Recovery Plan of target species:** I urge you to speed up as far as possible all pending and ongoing procedures needed for the approval of the fish passes blueprints (second part of the Recovery Plan) in order to avoid risks of further critical delays for the project. Please send the full Recovery Plan with the next report.
3. **Action C1 - Refurbishment of the fish hatcheries of Monchio delle Corti, Corniglio, Selvanizza:** The hatchery of Selvanizza is no longer involved in the project. The budget originally allocated for its refurbishment was used for additional works in the hatcheries of Monchio delle Corti and Corniglio with the aim to improve the production of the expected number of barbels. With your next report please concretely explain why such works were needed and how the breeding capacity and efficiency of the two hatcheries has been improved. Please note provisions in relation to budget thresholds as set out in article 15.2 of Common Provisions.
4. **Action C2 - Defragmentation of Enza river:** In your Midterm Report you explain that savings originated by not building one of the planned fish passes will be used to improve the remaining six fish passes. Please be informed that a reduction of the foreseen quantitative targets usually entails a reduction of the eligible cost. Please clarify why the cost of fish passes will be higher than foreseen although only six fish passes will be built.
5. **Actions C3 - Installation of artificial substrates in the riverbed - C5 - Restocking activities:** The progress of this action was slowed down by delays under actions A4 and C2. Please speed-up implementation as soon as possible. Please provide a map, showing where the artificial substrates were installed and the releases of *Barbus plebejus* were carried out.
6. **Action C4 - Ex-situ reproduction of *Barbus plebejus* and *Barbus meridionalis*:** I was informed that the breeding activity of the target species met some technical difficulties and that the number of barbels released in the rivers was much lower than foreseen (2,000 Common barbels instead of 10,000 and no Southern barbels were released). I warmly encourage you to make all possible changes and improvement needed in order to avoid losses in the next round. Please be also advised to intensify efforts particularly as for the

canine barbel for which no juveniles could be obtained in the first round. I remind you that the eligibility of the incurred costs will be assessed at final report stage on the basis of the undertaken activities and of the achieved results.

7. **Action C6 - Round table with stakeholders for the sustainable management of water resource and to contrast poaching:** I am pleased to learn that a Memorandum of Understanding "For a sustainable, joint management of fishing and the protection of fish heritage in the Po river" was signed by four different regions in collaboration with the LIFE 11 NAT IT 000188 CONFLUPO project. Please explain the process that will lead to its implementation (meetings are held, by whom etc.) I am also pleased to learn that Memoranda of Understanding were signed to counteract the poaching in the Trebbia, Parma, Taro, Po, and Enza rivers. However, please explain how the stakeholders were selected and invited, who signed the agreement insofar (did the relevant authorities sign them?) and which further activities will be implemented following the signature of the Memorandum of Understanding. Please provide the supporting documentation related to the meeting of June 2016 (only the signatures sheet was attached to the Report) and the minutes of the meeting of 24/09/2015 (only a draft of it was attached to the Report).
8. **Action E2 - Project website :** The project website seems to be used mainly as a show window. Navigation, contents and lay-out should be improved and made more appealing, user friendly and/or relevant.

Financial issues

During the mission the CB announced that the Department of Bioscience will change its name at the end of December 2016 but no further reference details will change. I have taken note that the coordinating beneficiary will send a specific note on this issue.

General

10. Università di Parma, Autorità di Bacino del Fiume Po, Ente di gestione per i Parchi e per la Biodiversità and Ente Parco Nazione dell'Appennino Tosco-Emiliano: Thank you for providing the requests sent to the tax authority. Please be reminded that the valid VAT certificates should be provided with the Final Report at the latest.
11. Gen Tech: Please describe in detail your accounting system and explain how the project costs were separated from the other costs to ensure their traceability.

Personnel

12. I encourage you to avoid that the same person signs and also countersigns the timesheets: a supervisor should validate the timesheets.
13. Università di Parma: In spite of your general explanation of the exceeded time unit rates, I noticed that the time unit rates of Simona Fontana and Cecilia Ferrari are higher than the average hourly rates used by Italian beneficiaries for the similar positions. Moreover, the reported rate of Cecilia Ferrari is twice higher than her budgeted rate. Please provide detailed explanation for hourly rates that exceed those foreseen in the budget with the Final Report.

14. Ente Parco Nazione dell'Appennino Tosco-Emiliano: I noticed that the hours assigned to the project indicated in the timesheet of August 2014 in case of Francesca Moretti (26 hours) do not correspond with the hours declared in financial statement (39.5 hours). Please correct the reported figures.
15. Ente di gestione per i Parchi e per la Biodiversità: I noticed that different names of positions were reported in the financial statement than those foreseen in the amended budget. Moreover, I noticed that also the daily rates reported as “foreseen in the budget” do not correspond with the daily rates foreseen in the amended budget. Please revise the financial statement and ensure there is a clear link to the budget. If you decided to involve different positions than were foreseen in the budget, please provide a detailed justification.
16. Autorità di Bacino del Fiume Po: I noticed that you reported the costs for two administrative positions which were not foreseen in the amended budget. The explanation provided with the Mid-term Report was not accepted as you did not provide any specific information about the need to involve them in the project. Therefore, I considered these costs as overheads and they should be removed from the Personnel category.
17. With the Final Report, please provide the supporting documentation for the following personnel for the full project duration:
 - Università di Parma: Simona Fontana and Federica Piccoli
 - Autorità di Bacino del Fiume Po: Farioli Christian
 - Ente di gestione per i Parchi e per la Biodiversità: Anelli Sonia
 - Gen Tech: Armando Piccinini
 - Ente Parco Nazione dell'Appennino Tosco-Emiliano: Francesca Moretti

The documentation should contain at least the following:

- a) A detailed calculation of the annual personnel costs detailing the salary elements included in the annual gross salary and social/pension charges;
- b) For salary elements beyond the basic salary, justification of each element and the regulatory and/or contractual reference;
- c) Employment contract, including secondment letters where required by the Common Provisions for civil servants;
- d) Documentation for the annual gross salary in the form of salary slips (if the salary slip contains accumulated yearly amount the December salary slip is sufficient) or authentic extract from the pay roll register;
- e) The annual report to the tax authorities of the annual taxable income;
- f) The supporting documentation for the obligatory social charges;
- g) Copy of the timesheets or time registration records.

Invoices

18. I encourage you to convince your suppliers to introduce both the project number and short name on the invoices. Please remember that the actual dates of payment are to be indicated in the financial forms.

Equipment

19. Please apply the LIFE and Natura 2000 logos on the project durable goods installed in the hatcheries, in compliance with the Common Provisions (article n. 13.8), and provide a complete photographic documentation with next report.
20. For verification purposes, please provide the details on the selection of Illumina Italy s.r.l. along with the supporting documentation within the Final Report. At least the following documents should be submitted (if relevant):
 - a) Copy of invoice(s) and the corresponding payment;
 - b) Description of the tender procedure employed;
 - c) Complete tender documentation;
 - d) Proof of publication of the procurement (OJEU, website of the beneficiary, etc.) or proof that potential subcontractors were contacted (letter, e-mail, proof of delivery, etc.);
 - e) The offer of the selected subcontractor;
 - f) Extract from the other offers submitted showing the offered price;
 - g) Report on assessment and evaluation of tenders;
 - h) The contract concluded with the selected subcontractor.