

Fact sheet 6: Project Implementation

6.1 Implementing rules	1
6.2 Financial control system.....	3
6.3 Project communication(Updated in July 2018).....	14
6.4 Project changes	21
6.5 Project report	22
6.6 Indicators.....	24

6.1 Implementing rules

6.1.1 Advance payments

A mechanism of advance payments for projects partners will be in place. The pre-financing payment may amount to up to **5%** of the approved ERDF budget of the project and will be recovered in the first payment claims of partners concerned. The allocation of 5% ERDF advance shall be agreed among the partnership.

6.1.2 Ownership and Intellectual Property Rights

Intellectual Property Rights (IPR) refers to creations of the mind, such as inventions; literary and artistic works; designs; and symbols, names and images used in commerce. Intellectual property is protected in law by, for example, patents, copyright, industrial design and trademarks

Patent

A patent is a legal title that can be granted for any invention having a technical character provided that it is new, involves an 'inventive step', and is susceptible to industrial application. A patent can cover how things work, what they do, what they are made of and how they are made. Anybody can apply for a patent. It gives the owner the right to prevent others from making, using or selling the invention without permission. Patents encourage companies and entities to make the necessary investment for innovation, and provide the incentive for individuals and companies to devote resources to research and development. Patents also imply the disclosure of the protected invention. This fosters the dissemination of innovation.

Industrial Design

Industrial design rights protect the appearance of a product, which results from attributes such as its shape, colours or materials. The EU has harmonised industrial design protection across EU countries and introduced the Community design that offers unitary protection across the EU through a single procedure.

ETC (Interreg) fosters collaboration, joint results and joint activities, therefore outputs and results known as foreground Intellectual Property must be owned by the partnership as a whole. In addition, and as a general principle of serving general interest with ERDF public funding of project outputs (e.g. processes leading to new products or services, studies, policy recommendations, good practice guides), are expected to be freely available to the public. Outputs and results, especially studies and analyses, produced during project implementation must be made available to the general public free of charge and can be used by all interested persons and organizations, and the Atlantic Area stakeholders.

Projects should make use of the Partnership Agreement to make the necessary provisions for questions on ownership and IPR. The Partnership Agreement template already includes a paragraph that indicates shared ownership among all project partners. Questions on ownership and IPR should also be dealt with in the risks section of the application form. Access-rights to foreground will be granted on a royalty-free basis.

The ownership of outputs having the character of investments in infrastructure or productive investments realised within the project must remain with the concerned Lead Partner and/or project partners according to the timeframe as well as under the conditions set in Article 71 of Regulation (EU) No 1303/2013.

In case of revenues generated by the IPR, all applicable provisions in terms of revenue generating projects and State aid must be respected.

Please note:

- ✓ Projects should make use of the Partnership Agreement, Article 19.1 “Ownership - Use of Outputs” to make the necessary provisions for questions on ownership and IPR. The PA template includes in this paragraph the conditions of each particular case when there is a joint ownership between the project partners;
- ✓ IPR are governed by national rules.

6.1.3 Projects penalties

Taking into account the need of the programme to generate impact in the Atlantic Area to be measured through the programme results indicators, and the need to avoid the release of funds by projects, stricter rules will apply that foresee penalties for delays in the submission

of financial claims and reports. Provisions for such penalties will be laid down in the Subsidy Contract.

Experience shows that project spending is delayed in the first months and that an underspending of 10% can be considered within normal parameters. Projects whose implementation phase is half-way and their underspending equals or exceeds 30% compared to the spending plan in the Subsidy Contract, may be penalized. This will be done through a de-commitment specifically applied to the project resulting in adjustment of project budget.

The decommitment penalty decision - will be based on an assessment of the project's spending plan as set in the Subsidy Contract and the actual project spending rate.

6.2 Financial control system

All approved projects are selected based on their contribution to programme results.

Project monitoring generally refers to the ongoing collection, analysis and use of information about project progress. Approved projects must implement the PAF, which constitutes the main annex to the Subsidy Contract. The aim of the monitoring process is to check that the costs claimed by the partners are in line with the results achieved by the project. Or in plain English: 'does the programme get what it pays for?'

The Atlantic Area Programme has implemented a result-oriented approach to monitoring in order to check the extent to which projects contribute to the programme results. The project's intervention logic should be visible throughout its implementation. Actual impact and long-term results can only be measured *ex-post*. However, monitoring should explore the impact (i.e. the project's real contribution to the project objective), as well as the trajectory towards the long-term effects (i.e. the likelihood of a continued impact after the project's closure). The value for money (economy, efficiency and effectiveness) will be monitored throughout the project duration. Hence, reporting is an important information channel between your project partnership and the JS.

The reports present project achievements and spending against the targets set in the PAF. In addition, the projects are asked to report their success stories and results-to-date, which can be used for communication purposes.

Deviations from the approved project action plans may happen in exceptional cases, but only after approval from the programme authorities. Deviations which have not been approved by the programme and have a negative effect on the project's contribution to the programme goals may lead to (partial) project budget cuts.

The JS collects and analyses the information on project progress and performance. Payments will be made to projects that comply with programme standards and provide a complete progress report.

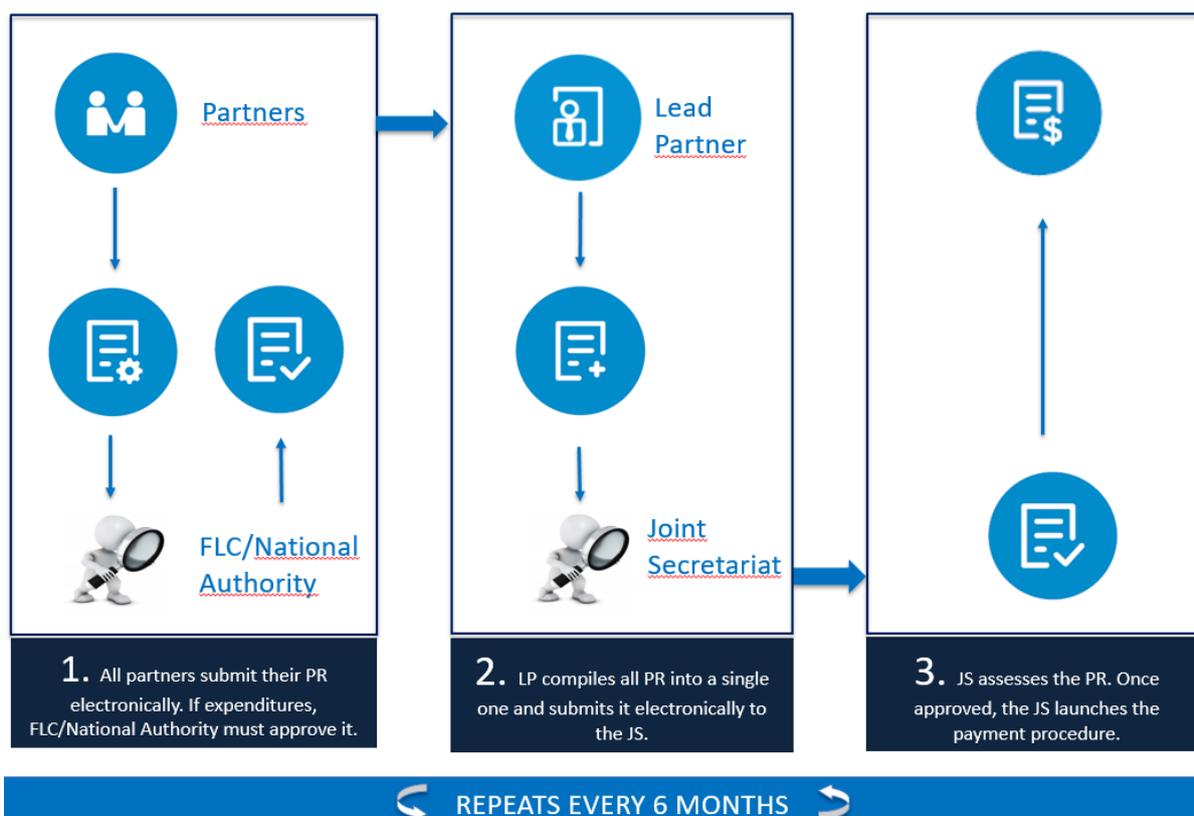
The progress report is composed by an activity report and a financial report. It describes the progress of the project and serves as supports for payment requests. Lead Partners have to submit two progress reports in each twelve months period to the MA through the JS. The submission dates of progress reports are March/April and September/October of each year.

During the 2 months period, the online platform (integrated management information system - hereinafter called SIGI) will be open for the whole process: the progress report submission by each partner, the control of expenditures works from the FLC and If applicable by the National Authority (NA), and the consolidated project report by the Lead Partner. The final report has to be sent to the MA via JS at the latest three month after the project end date.

Indicative calendar for 2018

1 st Project Report 2018	SIGI	
	Opening	Closure
	12 March	11 May
	This period includes following steps: <ol style="list-style-type: none"> 1. Progress Report submission from each partner 2. FLC/NA control of expenditures 3. Progress Report consolidation from the Lead Partner and submission 	
	Atlantic Area assessment and payments	
	<ol style="list-style-type: none"> 1. JS/MA assessment: 35 working days 2. Certifying Authority payment to partners: Maximum 90 days* 	
2 nd Project Report 2018	SIGI	
	Opening	Closure
	After 1 st Project Report submission	October 2018
	This period includes following steps: <ol style="list-style-type: none"> 1. Progress Report submission from each partner 2. FLC/NA control of expenditures 3. Progress Report consolidation from the Lead Partner 	
	Atlantic Area assessment and payments	
	<ol style="list-style-type: none"> 1. JS/MA assessment: 35 working days 2. Certifying Authority payment to partners: Maximum 90 days* 	

*Article 132 of EU Regulation 1303/2013.

Payment claim - summarized procedure:

1. Each partner prepares the progress report based on the activities it is participating, as defined in the project work plan. The paid expenses with the related evidences corresponding to the activities are introduced on the SIGI (www.atlanticarea.eu), a similar tool to the one used for the submission of the application form and the project approved form. It is advised to register the expenditures in the SIGI on an ongoing basis (as expenditures are paid) to facilitate the report workload. SIGI will allow working on the following progress report after submitting the current one.
2. First level control: the partner's FLC verifies and certifies the declared expenditures, having also access to the SIGI and producing the associated, standard certificates and lists of controlled documents. (FLC will use the templates available on the website, will fill them, sign and the upload them into the SIGI).
3. The National Checks (if applicable): receives the controlled expenditures and proceeds with its own certification.
4. The Lead Partner makes a consolidation of the information collected through the partners' reports available on SIGI. The Lead Partner checks the consistency of the information and the evidence provided; checks the evidence regarding the certification process respecting the specifications of the partner's country.
5. The Lead Partner submits to the MA/JS the activity report and the related ERDF reimbursement claim, according to the calendar set up by the MA.
6. The JS and MA have 35 working days to proceed to various checks and issue a payment

order to the Certifying Authority. (Note: the amount of the advance payment received by the partnership will be deducted from the first payment claim).

7. The Certifying Authority, after checking, proceeds with the payment to the partners within a period of time of 90 days maximum depending on the financial capacity of the programme.

In accordance with Article 122 of Regulation (EU) no 1303/2013, all exchanges of information between the Lead Partner and the programme authorities shall be carried out by means of electronic data exchange systems. Accordingly, the submission of financial claims and progress reports changes shall be done by using the electronic data exchange system of the programme: SIGI (www.atlanticarea.eu), without prejudice to the utilization of an alternative instrument as a contingency solution in exceptional circumstances.

A user-friendly manual will be available on how to use the SIGI project area.

Each project partner may only claim, through the Lead Partner, payments of the ERDF contribution by providing proof of the project's progress. For this purpose, each project partner commits to provide the Lead Partner with complete and accurate information needed to draw up and submit progress and final reports and, where possible, the main outputs and deliverables obtained in line with the PAF.

The Lead Partner may only request payments of the ERDF contribution on behalf of the project by providing proof of progress of the project towards the achievement of the outputs and results as set in the PAF, in compliance with the principle of sound financial management (as determined by the principles of economy, efficiency and effectiveness) when purchasing supporting goods and services.

Requests to postpone the reporting deadline may be granted only in duly justified cases. They shall be requested by the Lead Partner to the MA through the JS at the latest two weeks prior to the established deadline.

Expenditure incurred by the associated partners shall be ultimately borne by any of the project partners or by the Lead Partner in order to be considered as eligible and on condition that this is allowed by national or programme rules.

In order to proceed with the progress and final reports analysis, each project partner must provide additional information if the Lead Partner or the MA/JS deem that necessary. Additional information requested by the MA/JS is to be collected and sent by the Lead Partner within the agreed time frame previously set up, which must not exceed 15 working days.

In compliance with Article 65 (11) of Regulation (EU) No 1303/2013 the Lead Partner ensures that expenditure items included in requests for reimbursement do not receive support from the same or any other EU Programme, EU fund or Union instrument.

The Lead Partner and the project partners must install either a specific project bank account

or an adequate accounting code specifically for the project and must safeguard that the eligible costs as well as the received subsidies can be clearly identified.

6.2.1 Partners not reporting expenditure

In cases where project partners do not report any expenditure after 2 semesters, having been in an Atlantic Area project and in the absence of justified reasons for this non-reporting, they will receive a warning from the programme. The warning will be issued to the Lead Partner after the submission of the relevant progress report. In case the concerned project partner does not report expenditure in its third progress report and cannot provide evidence that this is due to circumstances outside its control, the budget of the project partner would be reduced in relation to its spending plan.

6.2.2 Expenditure validation or first level control verification of expenditures

Before the submission to the JS, each progress report has to be verified and confirmed by an independent controller compliant with the first level control system set up by each MS (in accordance with Article 125 of Regulation (EU) No 1303/2013 and Article 23 of Regulation (EU) No 1299/2013).

This verification is carried out by a first level controller, i.e. somebody who has the qualifications (usually auditors or certified public accountants) to verify that the expenditure connected to the project implementation was incurred in compliance with the relevant EU, national, regional, institutional and programme rules, as well as with the provisions of the subsidy contract and the project approved form (PAF). The main aim of the controls is to provide a guarantee for the MA, the Certifying Authority and, most importantly, to the project itself that costs co-financed under the Atlantic Area Programme are fully accounted for and are eligible in compliance with applicable programme/national/EU rules.

6.2.3 Designation of the First Level Controller

The Lead Partner must ensure that the FLCs of each partner are chosen by each beneficiary and validated by the respective MS, before the submission of the first progress report and expenses claim.

It is the responsibility of each MS to designate the FLCs for partners located on their territory and participating in a project. In practice, this means that each partner needs a controller that is authorised by its MS.

First level control systems:

Centralised (Ireland)	Decentralised (France, Portugal, Spain, United Kingdom)
Appointed by the MS	Short list/chosen by partner and approved by approbation body

For further information, on FLC appointment process partners should contact their designated national approbation body (www.atlanticarea.eu).

Without an approved FLC it is not possible for the JS to approve a partner's progress report.

The requirements that must be fulfilled to become a FLC are set by each MS. The main principle is that controllers have to be independent and qualified to carry out the control.

In order to be considered independent, the controllers must fulfil certain criteria: an internal controller, if authorised by the MS, must belong to a unit that is organisationally separate from the units dealing with project activities and finances. An external controller can only be considered independent if there is a clear separation between the first level control task and any other contractual relationships with the beneficiary.

Regarding the qualification of the first level controller, the partners should bear in mind that the task of controlling project expenditure co-financed under the Atlantic Area Programme goes beyond checking the accounts: it also involves a judgment on compliance with ERDF, national and programme rules. The controllers are therefore expected to have good knowledge of controlling project expenditure under the structural funds regulations. The programme and/or the MS involved will provide training for controllers. They are also expected to have a good command of English (since all programme documents and reports are in English). The procedure for the selection and appointment of a FLC is set by a MS and is binding on partners that are based on their territory.

If an external controller is selected by the project partner, this controller must be selected in accordance with the applicable procurement rules for each MS.

The Lead Partner should also ensure, to partners located in a country not covered by the Atlantic Area (inside or outside the European Union), the existence of a protocol signed between the MA and the competent authorities of the countries concerned, which defines, in particular, the provisions on financial control of expenditure. The protocol should be signed before the signing of the Subsidy Contract between the Lead Partner and the MA.

Changes of address, changes of account number and changes of control authority/institution or name of controller(s) have to be duly notified following the procedure laid out in the programme manual for project changes.

6.2.4 First level control systems in the Member States

Contact details for the FLCs and the approbation bodies in the Member States can be found on the website.

Country	National Authority
France	Préfecture de la région Pays de la Loire
Ireland	Northern & Western Regional Assembly
Portugal	Agência para o Desenvolvimento e Coesão, I.P
Spain	Ministerio de Hacienda y Función Pública
United Kingdom	Ministry of Housing, Communities & Local Government

Project partners from countries having set a decentralised control system ensure that FLCs are selected in accordance with the system set up by each MS. Still, the MA reserves the right, after agreement with the national responsible institution, to require that the controller directly selected by the Lead Partner or project partners is replaced if considerations, which were unknown when the contract was signed, cast doubts on the controller's independence or professional standards.

Lead Partner acknowledges and agrees that the French project partners will have to follow the specific control system set up by their National Authority: the *Préfecture de la région Pays de la Loire*. Once the approved controller by the national framework agreement, has checked and confirmed the reported expenditure, the first level control certificate has to be validated by the National Authority.

Lead Partner acknowledges and agrees that the Irish project partners will have to follow the specific control system set up by their National Authority: the Northern & Western Regional Assembly. Once the approved controller by the national framework agreement, has checked and confirmed the reported expenditure, the first level control certificate has to be validated by the National Authority.

Lead Partner acknowledges and agrees that the Portuguese project partners will have to follow the specific control system set up by their National Authority, the *Agência para o Desenvolvimento e Coesão, I.P. (AD&C)*. Once the approved controller has checked and confirmed the reported expenditure, the first level control certificate has to be validated by AD&C.

Lead Partner acknowledges and agrees that the Spanish project partners will have to follow the specific control system set up by their National Authority, the *Ministerio de Hacienda y Función Pública*. Once the approved controller has checked and confirmed the reported expenditure, the first level control certificate has to be validated by the Ministry.

Lead Partner acknowledges and agrees that the project partners from the United Kingdom will have to follow the specific control system set up by their National Authority: the Ministry for

Housing, Communities and Local Government (MHCLG).

6.2.5 Role of the First Level Controller

The FLCs' task is to verify that the expenditure reported by the partners in each progress report fills the following conditions:

- ✓ The costs are eligible, incurred and paid (for simplified costs as lump sum/preparation costs and flat rate costs, no verification is needed);
- ✓ The programme's conditions, the project approved form and the subsidy contract have been observed and followed;
- ✓ The invoices and payments are correctly recorded and sufficiently supported by evidence;
- ✓ The related activities, sub-contracted supplies and services are in progress or have been delivered or carried out;
- ✓ Community rules have been respected, especially with regard to information and publicity, public procurement, equal opportunities and protection of the environment.

The controllers must be familiar with the content of the following documents to be able to confirm the compliance with the provisions laid down in the EU regulations and directives, i.e. in particular with:

- ✓ Regulation (EU) No 1303/2013 (Common Provisions Regulation);
- ✓ Regulation (EU) No 1301/2013 (ERDF Regulation);
- ✓ Regulation (EU) No 1299/2013 (European Territorial Cooperation Regulation);
- ✓ Regulation (EU) No 481/2014 (Eligibility of expenditure for Cooperation Programmes);
- ✓ EU Directives on public procurement;
- ✓ Further national rules and guidance (e.g. national public procurement rules);
- ✓ Programme Manual;
- ✓ Project Approved Form;
- ✓ Subsidy Contract;
- ✓ Partnership Agreement.

If there are amendments to the project application form, Subsidy Contract and Partnership Agreement, both the Lead and other partners need to ensure that the latest version is made available to the FLCs.

The programme provides standard documents (available in SIGI) that give guidelines for the

controllers for their control work, to ensure the consistent application of quality standards and to document the control steps properly. The text of the documents may not be amended or extended. Those documents have to be filled and completed for each progress report by the FLC. Additional documents if required (e.g. checks against national rules) guidelines will be provided by each MS control system for use by the first level controller, but are not required by the programme.

6.2.6 Role of the Lead Partner in the control process

Following the Lead Partner principle as indicated in the Regulation (EU) nr. 1299/2013, Article 13 (2), the organization acting as Lead Partner bears the overall responsibility for ensuring the implementation of the project. When submitting a progress report, the Lead Partner must:

- ✓ Ensure that the expenditure reported by the partners has been incurred for implementing the project and corresponds to the activities agreed between all the partners, i.e. is in line with the PAF and Subsidy Contract. Any deviations from the PAF, should they exist, have been properly described and justified in the progress report;
- ✓ Check that amounts and activities reported are correctly integrated in the joint progress report and that they give a correct description of the implementation and present status of the project;
- ✓ Ensure that the expenditure reported by partners has been verified by a controller in line with the Programme rules and any country-specific requirements for FLC's;
- ✓ Check that the control documents (i.e. independent FLC certificates and control reports (incl. control checklist) and list of expenditure are correct and complete.

This verification by the Lead Partner does not imply re-performing the checks already carried out at partner level. However, it is still up to the Lead Partner, due to their role and knowledge of the project as a whole, to apply due diligence by screening the information available (partners report and outputs, independent FLC certificate, FLC certificates). In cases of doubt, the Lead Partner has to seek justification/clarification from the partner (and the relevant first level controller) before the cost item is actually included in the joint progress report submitted to the JS.

The MA, through the JS, may request relevant information at any time. That information must be supplied by the Lead Partner within the demanded time frame. The Lead Partner will also provide information and/or requested documents to other programme authorities, courts of auditors or other control institutions acting within their respective sphere of responsibility.

6.2.7 Timing of first level control

In order to ensure timely submission, the controls at project partner and Lead Partner levels have to be scheduled carefully in relation to the submission deadlines. It is up to the partnership to decide on those deadlines taking into account the availabilities of the controllers.

In this context, it is important to keep in mind that:

- ✓ Expenditure must be reported regularly (after 2018 1st Progress Report submission);
- ✓ The project partner's controller can only carry out the control after receipt of all the documents from the partners;
- ✓ Some project partner's controllers have fixed time limits for carrying out the control, which must be respected when the documentation is submitted (and limits the time for potential clarifications);
- ✓ The Lead Partner can only submit the progress report after receiving and having checked the control documents from the partners reporting expenditure.

In light of these points and the complexity of reporting procedures, it is crucial that projects establish a clear timeline for the reporting procedure. As foreseen in the Partnership Agreement, the project partners should have their payment claims validated and submitted to the Lead Partner level 10 working days (indicative) before the deadline for submitting the progress report. This gives the Lead Partner an additional time for questions and to do the additional checks.

6.2.8 First level control costs

Control costs for the verification of expenditure are considered eligible. Projects should therefore earmark a budget for these controls, depending on the control arrangements applicable in the relevant MS for each of the project partners (National control system must be by each partner).

Points of attention:

- ✓ Internal independent control should be included under the budget line 'staff', in accordance with applicable rules for staff costs, because the person(s) carrying out the verification is (are) on the payroll of the partner institution;
- ✓ The expenditure for an external independent first level controller should be reported under the budget line 'external expertise and services', as this first level controller is not directly employed by the partner institution, in compliance with the relevant public procurement regulations;

- ✓ In order for the control costs for the final progress report to be eligible, the activity (first level control) and the payment must be made before the official end date of the project.

6.2.9 Payment procedure

Once the progress report is approved by the JS/MA, the payment procedure can be launched. Payments will be made by the Programme Certifying Authority (AD&C).

The MA reserves the right not to accept – in part or in full – certificates of expenditure of this contract if due to the results of its own checks and/or controls or audits performed by another authority such a certificate or the facts stated therein prove to be incorrect or if the underlying activities are not in line with the legal framework.

In such a case, the MA will either reduce the claimed certified amount, demand repayment of funds already paid out unduly or set them off against the next payment claim submitted by the Lead Partner, if possible. In compliance with Article 132 of Regulation (EU) 1303/2013, payments to the project can be suspended partially or in full in cases of suspicion of an irregularity. The MA (or Certifying Authority) is entitled to withhold any ERDF payment to a particular beneficiary (Lead Partner or project partners) or the project as a whole until all unclear issues related to the implementation, management and reporting are clarified.

Following the approval of the progress report by the MA/JS, the respective corresponding share of ERDF funds are transferred directly to each of the project partners accounts by the Certifying Authority in Euro (EUR; €). Any exchange rate risk or costs will be borne by the partners.

The subsidy will be transferred to the bank accounts as indicated by the Lead Partner and project partners in the PAF, detailing total expenditure and income from the project and shall provide for registration in Euro (EUR; €) of total expenses and the return (income) related to the project. These should either be a specific project related bank account or an adequate accounting code used for all transactions relating to the project should be used. They must be verified by a first level controller in accordance with Regulation (EU) no 1303/2013, Article 125(4). Changes of the accounts numbers shall be duly notified to the MA/JS.

Payments not requested on time and in full or not in compliance with the payment schedule, as indicated in the project report and the overview table of reporting targets and deadlines, may be lost.

Payment of funds is subject to the condition that the legality and regularity of activities underlying the expenditure declared can be sufficiently demonstrated as stipulated in the ESI Funds Regulations, Delegated and Implementing Acts or the programme rules based thereon and that all supporting documents and certificates necessary for the assessment of the JS are submitted in due time.

In case of observations and/or reservations raised during the programme designation process as provided for in Article 123 of Regulation (EU) No 1303/2013, delays in the said procedure, or in case of system errors detected within audits, the MA and Certifying Authority also have the right to temporarily withhold payments. Payment suspension(s) shall be lifted as soon as observations and/or reservations raised by the relevant bodies have been withdrawn.

The Certifying Authority, after the request made by the MA, ensures that the Lead Partner and the project partners receive payments of the approved contribution from the programme in time and in full. No deduction, retention or further specific charges which would reduce the amount of the payment shall be made, without prejudice of provisions. Opposite, the ERDF contribution paid by the Certifying Authority shall not exceed the share of ERDF resulting from the eligible amount validated by each responsible control authority.

The disbursement of funds by the Certifying Authority is subject to the provision by the Lead Partner and project partners of all the statements needed.

6.3 Project communication

Communication is a strategic tool for the Atlantic Area projects and their communication activities shall raise awareness about the investments made by the Interreg Atlantic Area programme through the ERDF. It is also part of the obligations of an approved project to ensure transparency and visibility of their activities and results, and demonstrate their impact on the citizens and regions of the Atlantic Area.

Projects are therefore ambassadors of the Interreg Atlantic Area programme and are able to influence policies and instigate changes in behaviours to have a positive impact on the programme area.

This factsheet provides guidance on how this should be done and how to comply with the Commission regulations and the programme requirements on this matter.

6.3.1 Implementation of the communication process

Projects are required to outline the communication activities to be implemented at each step of the project cycle.

In the application process

The application form foresees a work package dedicated to Project Communication. In this section projects must demonstrate how they will communicate the project activities and results, identifying the main communication actions, target audiences, deliverables, calendar and budget.

In the implementation phase

After the approval, projects have to abide by the regulatory obligations relating to the EU communication and information requirements (see point 6.3.3. Legal requirements).

6.3.2 Communication plan

A communication plan will be useful for the partnership to achieve the project main goals, disseminate results and inform audiences about their achievements, success and benefits through the project lifetime.

Planning, implementing, evaluating are the three main phases of a communication plan, always focusing on the project benefits and tailoring communication to different target groups. The main aim is always to acknowledge the value of the project.

The activities outlined in the plan must run alongside project activities and reflect the input and activities of all partners. The structure of a communication plan gives an overview of at least the following main elements:

Communication objectives: they are a mechanism to deliver the project aim and they need to be clearly defined, detailed, achievable and measurable. It is the outcome of an activity, as for example:

- ✓ Raise awareness about the project mission or the partnership involved;
- ✓ Raise awareness about the project benefits to citizens or a specific population;
- ✓ Dissemination of the projects outputs;
- ✓ Change the perception about a solution for a common problem;
- ✓ Change the behaviour of a specific population.

Target groups: the plan should clearly identify whom it wants to address the communication activities - it should consider the external audience but also the internal audience, i.e., the project partnership. The lead partner in particular has an essential role to play in promoting a good communication flow within the partnership, crucial for the project success. This will contribute to a better involvement of the team and promote the delivery of a common message.

Messages: what does the target group needs to know/ learn? Deliver 2 or 3 main messages about the project; a message sums up the main aims of the project with focus on specific aspects.

Tactics: which concrete activities will be implemented to reach the audience and then communicate the project achievements? For example: websites, social media, events, publications, videos, documentaries, communication with the media.

Time plan: it can be based on the project's overall milestones and defines when activities will be carried out.

Budget: indicative budget with breakdown of activities, for implementation of the plan/work package.

Evaluation: how the communication plan will be evaluated in order to monitor and review the achievements of the project and if necessary readjust the communication tactics during the project lifecycle.

6.3.3. Legal requirements

- ✓ Section 2.2 of Annex XII of the Common Provision Regulation (EU) N°. 1303/2013, establishes the responsibilities of the beneficiaries with regards to information and communication measures for the public.
- ✓ Articles 4, 5 and Annex II of the Commission Implementing Regulation (EU) N°. 821/2014 establishes the rules to comply with EU visibility and ERDF support.
- ✓ The Subsidy Contract establishes the beneficiaries' responsibilities and obligations in terms of publicity, communication and branding of projects.

If projects do not comply with the legal responsibilities regarding the implementation of visibility and publicity requirements in communication materials, any related expenses may be considered as ineligible and it could lead to the recovery of the funds unduly paid.

6.3.4 Project responsibilities

Each project should appoint a **communication manager** who will develop and implement a communication plan and also set up processes to involve all partners in communication activities. He/she will liaise with the JS for communication purposes.

The following list of the main project responsibilities in terms of communication do not replace the careful reading of the mentioned documents and regulations.

1. All information, communication and branding measures provided by the project, including presentations at conferences or seminars, shall acknowledge the financial assistance from ERDF funds of the Interreg Atlantic Area programme (see point 6.3.6 Communication requirements).

2. These measure shall be carried out in accordance with the aforementioned legal regulations, the latest version of the Project Approved Form (PAF), the Programme Manual and any other guidelines that could be issued by the programme on this matter.
3. Any notice or publication relating to the project made in any form and by any means, including the Internet, must state that it only reflects the author's view and that the programme authorities are not liable for any use that may be made of the information contained therein.
4. Each partner also takes the full responsibility for the content of any notice, publication and marketing product provided to the managing authority (MA) and is liable in case a third party claims compensation for damages. The partner will indemnify the MA in case the MA suffers any damage because of the content of the publicity and information material.
5. The lead partner shall ensure that the project partners comply with all publicity, communication and branding obligations (e.g. on the use of the programme logo, information requirements, organization of events etc.).
6. The programme authorities shall be authorized to publish in any and by any means, the following information about the project: projects contacts (lead partner and partners), name of the project, activities and objectives, geographic location of undertaken activities, project dates, ERDF funding and total eligible cost, abstracts of the progress and final reports..
7. The lead partner shall inform the JS about any communication campaign, media appearance or other publicity of the project for potential website updates or showcases.
8. The lead partner shall provide the JS with project statistical information, promotional items, publications, newsletters, content for digital or print material, photographs and videos necessary to carry out the programme communication activities.
9. The MA on behalf of the monitoring committee and of other programme promoters at national level are entitled to use the outputs of the project in order to guarantee a wide spreading of the project deliverables and outputs and to make them available to the public.

6.3.5. Support to projects

Once the project is approved, the JS will provide guidance and training to help projects undertake effective communication activities.

The JS will also provide a communication toolkit with templates and practical advice on how to deal with communication through the whole project lifecycle, as for example:

- ✓ Guidelines for projects' communication;

- ✓ Visual identity guidelines;
- ✓ Editable logotypes;
- ✓ Template poster A3;
- ✓ Tips for the use of social media, event organisation, digital and print publications, relations with the press.

This early and regular engagement will help ensure EU funds are not put at risk of being returned to the Commission through penalties and publicity coverage reaches wider audiences, including the general public.

6.3.6. Communication requirements *(updated in July 2018)*

The Interreg Atlantic Area programme has a logo in line with the Interreg common brand to promote European Territorial Cooperation. This logo combines the Atlantic Area brand (symbol and colours), the European Union emblem and the reference to the ERDF.

This programme logo was updated in July 2018 increasing the size of the EU flag, allowing therefore projects and partners to have higher visibility when displaying their logos in the communication supports developed, while acknowledging the EU support (see b) Combination of the EU emblem with other logos). The updated version of the programme logo is the following:



Please note: the previous programme logo (with smaller EU emblem) is still valid and the communication materials already produced are still eligible, provided they are in compliance with the relevant Regulation.

The Brand Design Manual for the application of the programme logo and symbols of thematic priorities is available on the [website for download](#).

a) Project branding

Project logos can be based on the programme logo by adding the project acronym in the colour of the matching thematic priority (**integrated project logo**) – this option is strongly recommended by the Joint Secretariat. The editables of integrated project logo for each thematic priority is available on the website for download. This measure strengthens the identity and support of the programme and of the European Union.



Projects can also develop their own brand identity and logo. In those cases, **the Interreg Atlantic Area logo must always be displayed** in all communication supports materials (printed or digital, e.g. publications, newsletters, flyers, publication, manuals, presentations, promotional material, videos, small materials...). It must be placed in a visible position and it can never be smaller than any other logo included in the same material. The Atlantic Area programme logo already assures the acknowledging of the EU support and ERDF co-financing.

In cases where it is not possible to display a logotype, projects shall use the sentence:

“This project is co-financed by the Interreg Atlantic Area Programme through the European Regional Development Fund”.

b) Combination of the EU emblem with other logos

Article 4, point 5 of the EU Commission Implementing Regulation (EU) N° 821/2014 states that “If other logos are displayed in addition to the Union emblem, the Union emblem shall have at least the same size, measured in height or width, as the biggest of the other logos.” i.e. the project logo or other institutional logos cannot be bigger (higher or wider) than the UE flag.

Below an example on how to apply this rule.



Exception: A logo with no clear institutional, political or economic link, which is merely a design element as part of a communication action, may be bigger than the EU emblem. For more information, see the [Brand Design Manual](#), section '2.5 Combination with other logos'.

c) Projects on the web

Projects are strongly advised to **develop a website** or use the website of the lead partner organisations to promote their activities, results, tools or products. This website has to provide an **evolutionary description** of the project, including its aims and results and must also highlight the European financial support by displaying the **Interreg Atlantic Area logo**, which assures the information of the ERDF funding and the European Union support and also a link to the programme website.

Please note: Article 4, point 3 of Regulation 821/2014 states that when the Union emblem is displayed on a website, it shall be visible when landing on the website, inside the viewing area of a digital device, without requiring a user to scroll down the page.

The Interreg Atlantic Area website (www.atlanticarea.eu) provides one page per approved project, displaying the following information:

- ✓ Project overview (acronym, name, priority/objective, budget, partnership, contacts);
- ✓ Project description, aims and results.

Projects are also advised to disseminate information about their activities and results on social networks as Facebook, Twitter, Youtube, Instagram or others related. The Atlantic Area programme has a [Facebook page](#) and a [Twitter account](#). You can follow us to learn more about the thematic and activities related with the programme and the projects implementation.

d) Project events

A launch event should be organised at the beginning of the project and a final event at the end of the project implementation. The audience of both events should not be limited to the project target groups, but should be as wide as possible.

To ensure the visibility of the programme, the **integrated project logo** or the **Interreg Atlantic Area logo** shall be used in all documents addressed to the events participants (e.g. agendas, list of participants, presentations, exhibition stands, etc.). Projects are encouraged to place the EU flag in the meeting rooms of all events.

e) Poster A3

Each project beneficiary must display a poster (minimum size A3) at a location readily visible to the public, such as the entrance area of a building. It should contain information about the project and the Interreg Atlantic Area logo. The poster must remain visible for the whole duration of the project.

The programme provides a template of a poster for each thematic priority, [available for download on our website](#).

6.4 Project changes

During its implementation, Atlantic Area projects might face the need to modify the application form in order to adapt it to the actual needs. Any modification should be targeted at ensuring the best project performance.

In accordance with article 20 Decision of DL 159/2014, that lays down the general rules for the implementation of the operational programmes and rural development programs financed by the ESI funds for the 2014-2020 programming period, and with article 8 (Project Changes) of the Subsidy Contract, the following modifications are allowed in the project decision:

- (a) ID elements of the beneficiary (administrative data);
- (b) Identification of the priority, specific objective of the project and the corresponding European codes;
- (c) The identification of the approved project, results and achievements;
- (d) The summary description of the project and workplan with output and result indicators;
- (e) The financial plan, with breakdown of the approved budget headings and respective amounts;

- (f) The project start and end dates;
- (g) The identification of the guarantees or conditions required to safeguard the proper execution of the project;
- (h) The project total cost;
- (i) The eligible cost of the operation, justifying the difference between the total cost and the eligible cost;
- (j) The amount of the beneficiary's participation in project eligible cost and its participation rate;
- (k) The annualized amount of public support and its co-financing rate, specifying the sources of European and national funding.

The JS can approve minor project modifications, but major project modifications need to be approved by the PMC.

Changes mentioned in a), b), i), j) and k), as well as changes in the project partnership, changes in budget (except for budget changes of less than 10 000 euros that do not modify the total approved budget) and changes in results or outputs are considered as major modifications and require the prior approval of the PMC. The JS will advise projects on whether their modification will need PMC approval or not.

The JS may decide to seek PMC approval for minor modifications when they feel this is necessary. In general, In line with article 8 of the subsidy contract, approved modifications are valid retrospectively from the date a written request was submitted to the JS.

6.5 Project report

Projects must give evidence on their progress through reports that allow to monitor their implementation compared to the approved application form.

The aim of progress reports is also to allow partners to support and evidence delivery to allow claim payments and reimbursement of eligible expenditures. The Lead Partner may only request payments of the ERDF contribution on behalf of the project by providing proof of progress towards the achievement of the outputs and results, in compliance with the principle of sound financial management.

The Lead Partner has to present two progress reports in each twelve month period on dates to be determined by the MA. At least one of those two reports must include financial data and payment claim.

Reports are submitted to the JS through the online management system and the specific tool available. All project partners have access to their own sub-reports, as well as financial

controllers. The Lead Partner collects all sub-reports as one compiled project report, adding details and information on the overall project implementation.

Each project partner must report on the progress made compared to the PAF. Modifications are allowed (subject to agreement by the JS/PMC) if duly justified and in compliance with Programme rules, as previously mentioned.

The report of activities report is structured per work packages and costs are reported in expenditures control.

The FLC confirms the eligibility of activities and costs also through the online system. Each partner uploads all relevant documents (original invoices, proofs of payments, deliverables, etc.) needed by the FLC to perform its checks. Only certified expenditures can be reported.

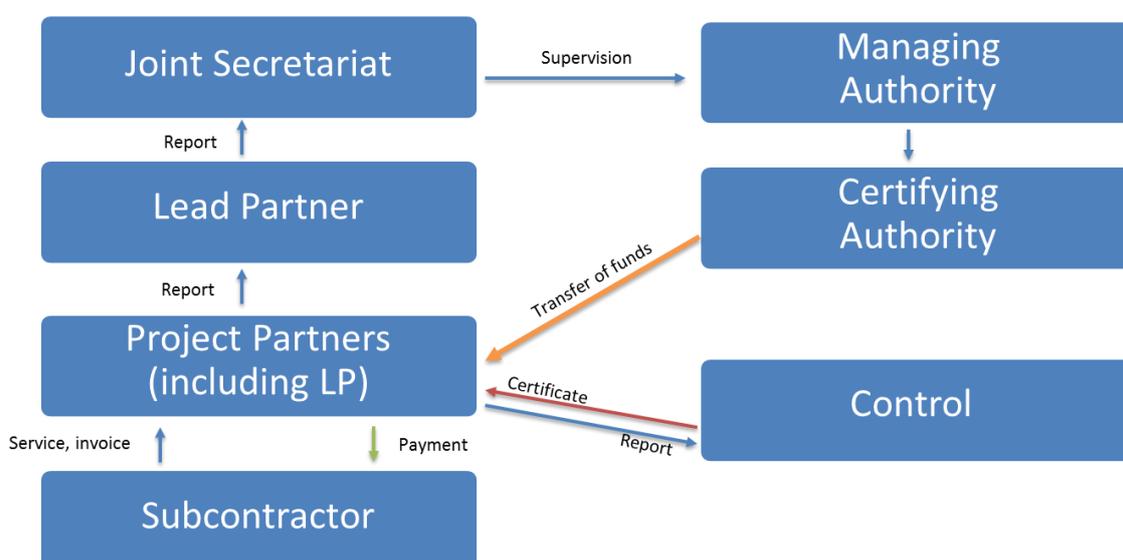
Once the project partner sub-report is concluded, the Lead Partner can integrate it to the project report.

In exceptional and duly justified cases, a project partner may not be able to include expenditure in its report; still the partner is requested to report on the activities delivered within the reporting period.

As stated in the Subsidy Contract, the Lead Partner is responsible to submit the project report on the behalf of all partners to the JS through the online managing system. The Lead Partner compiles all the information from partners, as well as global information on project progress.

Upon receipt, the JS will analyse and check the project report. The JS can ask for clarifications or further information that the project can arise, with a given deadline.

Once the project report meets the programme requirements, the JS will inform the Lead Partner that the project report is accepted. The MA is responsible for instructing the Certifying Authority to proceed to the ERDF payment directly to each project partner.



6.6 Indicators

The Interreg Atlantic Programme aims to achieve a number of programme objectives. Progress towards achieving these objectives is measured in the form of indicators, regular monitoring and assessment, which help to identify programme successes and to ensure the programme is on track to achieving its goals.

Objectives, results, outputs: definition

All partnerships applying for Interreg Atlantic Area funding are required to identify their project objectives, envisaged outputs and results, and to quantify these.

At the application stage projects commit themselves to achieving targets against the programme indicator framework. Partnerships will be held accountable for these and must therefore make genuine and realistic commitments.

A project objective is a qualitative description of the desired change that the partnership would like to implement on the Atlantic territory in the course of the project.

The objective:

- ✓ Explains how things would work if the challenge tackled by the project was to be effectively solved;
- ✓ Defines the benefits or improvements that the partnership expects to achieve;

A well-formulated project objective:

- ✓ Is clear and concise;
- ✓ Provides a concrete description of the project's outcome;
- ✓ Is developed in a participatory process by the project partner;
- ✓ Addresses the project target group and stakeholders and is accepted by them.

In the application form, the description of the objective should leave no room for misinterpretation. The use of technical jargon and acronyms should be avoided; the objective should be easy to understand by external readers who are not necessarily experts in the themes tackled by the project. The project objective should fit with and be relevant to the Specific Objective of the programme.

A project objective should not describe what the project plans to do, how it plans to do it, or what it plans to produce. These elements are related to the project result, activities and outputs. What needs to be measured in a project in terms of results and what should be done in its course in terms of activities and outputs will naturally fall out of the definition of good project objectives.

A project result measures the ultimate change that the partnership aims to accomplish by the end of the project. The project result is tied to the project objective and quantifies the degree to which the objective has been achieved in the project timeframe. A project result is the effect taking place in the Atlantic area owing to the implemented project.

The effect would not happen if the project did not exist. The result provides an answer to one of the following questions:

- ✓ Is anyone better off?
- ✓ Has anything improved in the Atlantic Area?

The desired result needs to be measurable and have a baseline (for the project outset) and target value (for the end of the project). A project result clearly shows the additionality of a project to the programme territory.

In order to measure the change, a partnership needs to envisage the trends it would like to influence in the course of the project. A robust analysis of the context or situation that the project wants to tackle will help the partners establish a result baseline describing the starting point for the situation addressed by the project, as well as the target in a measurable manner.

Apart from the project objective and result, the applicants for programme funding need to define the **main project outputs**. These:

- ✓ Are the main tangible products of the project activities that can be physically counted;
- ✓ Should directly contribute to the achievement of the project result;
- ✓ Need to contribute to the specific programme output indicators listed below.

Project results are perceived as the effects of the application of the outputs.

Output indicators: what projects need to report on?

The Interreg Atlantic Area Programme has defined a list of output indicators per Specific Objective. These will help the programme to measure its success and effective change achieved on the Atlantic territory. In the application form, projects have to refer to all output indicators of their selected Specific Objective and specify the targets. Please note that all projects are obliged to contribute to the indicators. The definitions of each indicator can be found at the end of the programme manual.

Specific objectives 1.1 and 1.2 - Output indicators

Indicator	Unit
Number of enterprises receiving support	Number
Number of enterprises supported to introduce new to the market products	Number
Number of enterprises supported to introduce new to the firm products	Number
Number of enterprises participating in cross-border, transnational or interregional research projects	Number
Number of research institutions participating in cross-border, transnational or interregional research projects	Number
Number of case studies and pilot actions implemented	Number
Number of technical and scientific publications produced	Number
Number of policy, strategy and operational instruments produced	Number
Number of actions for the dissemination and capitalisation of results	Number
Number of participants in actions for the dissemination and capitalisation of results	Number

Specific objective 2 .1 - Output indicators

Indicator	Unit
Additional capacity of renewable energy production	Mw
Greenhouse gas reduction	Tons of CO2 equivalent
Number of case studies and pilot actions implemented	Number
Number of technical and scientific publications produced	Number
Number of policy, strategy and operational instruments produced	Number
Number of actions for the dissemination and capitalisation of results	Number
Number of participants in actions for the dissemination and capitalisation of results	Number

Specific Objective 2.2 - Output indicators

Indicator	Unit
Number of case studies and pilot actions implemented	Number
Number of technical and scientific publications produced	Number
Number of policy, strategy and operational instruments produced	Number
Number of actions for the dissemination and capitalisation of results	Number
Number of participants in actions for the dissemination and capitalisation of results	Number

Specific Objective 3.1 - Output indicators

Indicator	Unit
Population benefiting from flood protection measures	Number
Population benefiting from forest fire protection measures	Number
Number of case studies and pilot actions implemented	Number
Number of technical and scientific publications produced	Number
Number of policy, strategy and operational instruments produced	Number
Number of actions for the dissemination and capitalisation of results	Number
Number of participants in actions for the dissemination and capitalisation of results	Number

Specific Objectives 4.1 - Output indicators

Indicator	Unit
Total surface area of rehabilitated land	Hectares
Surface area of habitats supported in order to attain a better conservation status	Hectares
Number of case studies and pilot actions implemented	Number
Number of technical and scientific publications produced	Number
Number of policy, strategy and operational instruments produced	Number
Number of actions for the dissemination and capitalisation of results	Number
Number of participants in actions for the dissemination and capitalisation of results	Number

Specific Objective 4.2 - Output indicators

Indicator	Unit
Increase in expected number of visits to supported sites of cultural and natural heritage and attractions	visits/year
Number of case studies and pilot actions implemented	Number
Number of technical and scientific publications produced	Number
Number of policy, strategy and operational instruments produced	Number
Number of actions for the dissemination and capitalisation of results	Number
Number of participants in actions for the dissemination and capitalisation of results	Number

=O==O==O==O==O==O=

Abbreviations used in the Programme Manual

AA	Audit Authority
AD&C	Agência para o Desenvolvimento e Coesão
CA	Certifying Authority
CCDR-N	Comissão de Coordenação e Desenvolvimento Regional do Norte
CPR	Common Provisions Regulation
DCLG	Department for Communities and Local Government
EOI	Expression of Interest
ERDF	European Regional Development Fund
ESI	European Structural and Investment Funds
ETC	European Territorial Cooperation
EU	European Union
FLC	First Level Controller
GBER	General Block Exemption Regulation
GoA	Group of Auditors
IGF	Inspeção Geral de Finanças
IPR	Intellectual Property Rights
JS	Joint Secretariat
MA	Managing Authority
MS	Member State
NC	National Correspondents
NCP	National Contact Points
PAF	Project Approved Form
PMC	Programme Monitoring Committee
SIGI	Integrated management information system
SME	Small and Medium Enterprises
WP	Work Package