



RRF VISIBILITY

Collection of questions and answers

November 2022

Disclaimer: This document collects a series of questions, received from different Member States on the implementation of Regulation (EU) 2021/241 establishing the Recovery and Resilience Facility (RRF) from 2021 to November 2022, alongside the answers provided by the Commission services at technical level. The aim of this document is to gather the answers provided to various specific questions by the Member States in order to facilitate the implementation of the plans and encourage good practices among Member States. It should under no circumstances be perceived as stating the official position of the Commission. Questions and answers have been anonymised and edited for better readability.

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LOGO/FUNDING STATEMENT

1. ***Would it be in line with the official requirements to put a small sticker on each renovated family house that would consist of the Next Generation EU emblem (together with the funding statement) and a QR code? This QR code would redirect citizens to the website with more detailed information about the project.***

Information stands or tables that were used for ESIF projects especially by the broad public unfortunately do not have a very good image in our country (sometimes they are too large or not comprehensive). We would therefore appreciate if new approaches could be taken into account in relation to the RRF visibility.

- On visibility requirements in relation to interventions where the final beneficiaries are natural persons and the implementation sites are private buildings and estates, please see the respective Q&A in the [guidance document](#) on visibility requirements, p. 40. There are several compliant options for final recipients.
- We recommend ensuring visibility requirements via plaques, billboards or posters. These can be produced via the [online generator](#) in a way that meets the requirements set out in the RRF Regulation and the financing agreement.
- What exact type of sticker (size, material, etc.) is referred to here is not fully clear to us and it is difficult to provide a clear answer, but we would not have a general objection to the use of stickers of a reasonable size (A4-A5). The stickers would have to show the EU emblem and the funding statement (we understand this would be the case). They should be of a reasonable longevity (to be visible generally at least 5 years) and/or placed in a protected location (e.g. so it will not be destroyed/washed off with the first rain) visible to the public.
- As regards the use of web links or QR codes, this is fine as long as the NGEU funding statement is displayed alongside it so that the funding is immediately apparent in any case. We would however caution that when providing web links or QR codes the authorities should assure that the link provided remains available for at minimum the expected display time of the funding statement to avoid a situation where 'dead links' are displayed. It might thus be wise to link e.g. to a general national page on NGEU or the national RRP for which the authorities can ensure longevity, rather than to very specific pages that might not be available in the long term.

2. ***Is it possible to translate "NextGenerationEU" to the national language, for example, in the sentence "Funded by the European Union – NextGenerationEU"?***

- Yes, as set out in Article 10(2)(b) of the financing agreement: 'Where applicable, correctly and prominently display in all communication activities at project and Member State level the EU emblem with an appropriate funding statement that reads (translated into local languages where appropriate) "funded by the European Union – NextGenerationEU".'
- We suggest to use the translations provided by the [download centre](#).

3. ***On the use of the national emblem for the recovery strategy, Art.34 of the Regulation and Art.10 of the financing agreement state that "when displayed in association with another logo, the EU emblem must be displayed at least as prominently and visibly as the other logos. The emblem must remain distinct and separate and cannot be modified by adding other visual marks, brands or text. Apart from the emblem, no other visual identity or logo may be used to highlight the EU support".***

Would Member States be allowed to have, apart from the NextGenerationEU emblem, also the emblem of their own country and the logo of their national campaign?

- Yes, the Member State may add its own logos (e.g. ministry, funding programme), provided the EU emblem is distinct and displayed with equal prominence.
- The EU emblem and the funding statement are available on the [download centre](#) for visual elements.

4. Is there an option for a “Co-funded by the European Union –Next Generation EU” statement in case the project (or part of it) is also financed from the national budget?

- For the EU financed part, the RRF Regulation only provides for a funding statement that reads (translated into local languages where appropriate) “funded by the European Union – NextGenerationEU”.
- If there is financial support and involvement from the Member State and/or other partners, their logos can of course be displayed in order to highlight their respective support and involvement.
- When displayed in association with other logos (e.g. of beneficiaries or sponsors), the EU emblem must be displayed at least as prominently and visibly as the other logos and be at least the same size as the biggest of the other logos.
- The Commission’s [download centre](#) for visual elements also contains templates with blank spaces for such complementary logos.

5. If it is not possible to place the funding statement in a document (e.g. “Local Housing Strategy”), would it be sufficient for a mention to be placed on the website of the municipality that is implementing the strategy, making reference to the document being drawn up with RRF funding?

- If there is any indication of national funding, it would be obligatory to ensure that the EU emblem and funding statement is shown on equal grounds in this document. It may also be feasible to add a cover page to an existing document.
- If it is not at all possible to modify an existing document, the document should clearly be accompanied by the funding statement, e.g. in places where it may be downloaded. We note that for the mentioned example it should be clear that not just the document has been “drawn up with funding from the RRP”, but it should be clear that the actual housing funds are coming from the RRP.
- Other communication on the funding programme should also reference the EU funding, e.g. the website describing the project, information sheets, or any other relevant communication.

6. Do the EU visibility requirements (notably, the requirement to use the EU emblem and the statement „Funded by the European Union – NextGenerationEU“) also apply to communication actions carried out by Member States and its implementing bodies (meaning, not only final recipients)?

- Article 10.2(b) of the Financing Agreement is clear in stating that “in order to respect its obligations under Article 34(2) of the RRF Regulation” the Member State shall, among others, correctly and prominently display in all communication activities at project and Member State level the EU emblem with an appropriate funding statement that reads (translated into local languages where appropriate) “funded by the European Union – NextGenerationEU.” Article

10.2(d) of the Financing Agreement further clarifies that Member States shall also ensure that the final recipients of EU funding under the RRF acknowledge the origin and ensure the visibility of the EU funding.

- The first two paragraphs of Article 10 in particular make it clear that MS have an obligation to put in place general communication activities.
- As the question notes, this interpretation is confirmed by the [Guidance to Member States on the Recovery and Resilience Plans](#) (point 6) and by the [Guidance for Member States on the “Communication and visibility rules for the EU funding programs 2021-27.”](#)

7. The national Recovery Plan introduces new textbooks that should be bought by schools for students. The Ministry of Education is in charge of this investment, however the process is more complicated – the Ministry gives a certain amount of money to the schools and they decide how many textbooks should be bought in the end. This means that we don’t know the final number of the books yet. These textbooks are already published and printed and do not include an EU funding statement.

In this case, do you think it is necessary to procure stickers with EU emblem to be attached to every textbook separately or will it be possible to print out a poster with the information about RRF funding that would be placed on a visible spot somewhere at the school?

- In general, when it comes to acknowledging the origin and visibility of Union funding, communication and visibility measures should be proportionate to the operation. Based on the information provided, the option of having a poster with information about the RRF funding (including the NGEU logo and funding statement) that would be visibly placed in the school seems to be a reasonable approach.
- We would just add that, in those cases where the schools provide a custom sticker or other markers of the book’s provenance (such as “property of school x”; “funded with national textbook programme X”; ...) then these stickers/markers should also include/be accompanied by the NGEU logo and funding statement. When these markers are not foreseen, the solution of having posters seems indeed to be fine.

8. Our national RRP includes measures to improve the digital skills of seniors and the distribution of technological equipment (tablet or alternatives) to these seniors. The line ministry responsible for this measure has asked us whether the installation of the NextGenEU emblem as a screen saver on all tablets is in line with the rules.

In our opinion, this would save a lot of paper and costs for the stickers or something else being printed and put on tablets, and thus would be more ecological as well as innovative.

Would you consider this idea to be in line with the official requirements linked to the usage of the EU emblem?

- It is difficult to answer on our end on the specificities of how to ensure the visibility of EU funding for each project. In practice, we would invite you to look at the horizontal guidance document (available [here](#) in the different EU languages) and as much as possible follow this approach.
- There is no specific rule as regards screensavers vs stickers, but as a first reaction we would consider that as these are physical devices of significant value (and ecological impact) we would also consider it reasonable that at minimum physical stickers are attached. Notably, if there is any indication of the national funding programme, authority or other body/programme which provides these devices, it would be obligatory to ensure that the EU emblem and funding statement is shown on equal grounds. So if a sticker is provided, the EU

emblem should also be provided as a sticker; if a screensaver is included with the national programme, then the EU funding should also be clearly mentioned on this.

- If these tablets are handed out through a website, in public spaces or in the course of an event, visibility should be ensured via the usual instruments such as emblems, physical posters, banners and flags.

9. How and where does the EU logo have to be displayed on items like electronic devices for telemedicine, an electric car, or solar systems that are (partly) funded via the RRF?

- As outlined in Art. 34(2) of the RRF Regulation and Art. 10(2)(b) of the Financing Agreement, the final recipients of funds (i.e. those ultimately benefitting from the RRF funding), are obliged to acknowledge and ensure visibility of the EU funding, and it is an obligation for the Member States to assure recipients are aware of and follow this requirement.
- Article 10(2)(b) of the Financing Agreement requires the use of the EU emblem “where applicable” in “communication activities”. It is considered a good practice to display EU support on the supported item itself, but there is no strict requirement if the beneficiary can ensure via other means that the support is acknowledged in a way visible to the public.
- The Member State must also assure that the recipients are well aware that they have benefitted from EU support, e.g. through a clear and visible indication on application and approval documents, information leaflets, etc.

10. In our national RRP, we have a measure where the authorities send out text messages/SMS to the population to give warnings of for instance the threat of a forest fire.

The text messages come from the Civil Protection authority and will contain information relating to the emergency in question, including a description of the situation, foreseeable effects and measures designed to prevent or cope with the event in question.

The question raised now is whether these text messages need to include the RRF funding statement, given that there is a character limit to text messages and the authorities are concerned that this will impede the usefulness of these messages.

- Given the nature of the RRP supported project that consists of sending text messages from the Civil Protection authority we understand the constraints regarding the inclusion of the RRF funding statement in the text message.
- Nonetheless, the visibility of the Union funding should be ensured. In this respect, for example, the RRF funding statement and the EU emblem could be included on the national website where the project is described. If appropriate, a link to this website could even be included in the SMS text in cases where it also serves other purposes, such as providing additional information about the emergency in question.

11. Is there a threshold for the financing share via the RRF from which the EU logo has to be displayed?

- All measures included in the recovery and resilience plan need to acknowledge the origin and ensure the visibility of the Union funding.
- There is no minimum threshold, but communication and visibility measures should be proportionate to the operation.

12. Does the EU logo also have to be printed on the business cards of executing agencies?

- As set out in the financing agreement, the emblem and funding statement shall be displayed prominently in all communication activities at project and Member State level.
- Unless the executing agencies receive RRF funding for their operating costs, it is not necessary to display the EU emblem on their business cards.

POSTERS/BILLBOARDS*

**For questions on posters when final beneficiaries are natural persons or when projects include private houses, please refer to the section further below on “Final beneficiaries”.*

1. Do we need to place a poster at events, e.g. networking meetings?

- As set out in the financing agreement (Art. 10.2(b)), the Member State shall “where applicable, correctly and prominently display in all communication activities at project and Member State level the EU emblem with an appropriate funding statement that reads (translated into local languages where appropriate) “funded by the European Union – NextGenerationEU”.
- As networking events would normally count as communication activities, we would expect a poster to be placed.

2. Can the public administrations continue to use the minimum A3 sizes for public works in buildings? That is to say, in the absence of technical specifications, can they be guided in terms of size and type of poster by what is specified in Annex IX of Regulation (EU) 2021/1060?

- The RRF financing agreement stipulates that Member States shall, where applicable, correctly and prominently display in all communication activities, at project and Member State level, the EU emblem with an appropriate funding statement that reads (translated into local languages where appropriate) ‘Funded by the European Union – NextGenerationEU’.
- Member States shall also ensure that the final recipients of EU funding under the RRF acknowledge the origin and ensure the visibility of the EU funding. When displayed in association with another logo, the EU emblem must be displayed at least as prominently and visibly as the other logos. The emblem must remain distinct and separate and cannot be modified by adding other visual marks, brands or text. Apart from the emblem, no other visual identity or logo may be used to highlight the EU support.
- All measures included in the recovery and resilience plans need to acknowledge the origin and ensure the visibility of the Union funding. There is no minimum threshold, but communication and visibility measures should be proportionate to the operation.
- As you correctly point out, the [Guidance for Member States](#) provides that, where beneficiaries are natural persons and the implementation sites private buildings and estates, it is suggested to use smaller posters (A4 or A5) showing the emblem of the EU and the statement acknowledging the origin of the EU funding, provided in particular that the above mentioned provisions of the financing agreement (e.g. on the size of the EU emblem in relation to other logos, etc.) are complied with.

3. How long do Final Beneficiaries have to keep the permanent plaque on site?

- Generally any funding statements should be of a reasonable longevity, also in relation to the funding amount and the period of time in which the relevant physical object, infrastructure or construction physically exists (or if not the works itself are financed, for as long as it is used for the purpose for which the funding was provided).

4. In the case of purchases on which there is no work, i.e. where buildings are bought, are final beneficiaries exempt from the fitting of the temporary plaque?

- All measures included in the recovery and resilience plan need to acknowledge the origin and ensure the visibility of the Union funding. There is no minimum threshold, but communication and visibility measures should be proportionate to the operation. This includes purchases if they are financed with Union funding.

5. *Are the final beneficiaries exempted by the rules for placing the temporary plaque because there is no work/intervention on the site and exempted from the requirement to place a permanent plaque for the investment value of less than 0,5M. What to do in these cases?*

- All measures included in the recovery and resilience plan need to acknowledge the origin and ensure the visibility of the Union funding. There is no minimum threshold, but communication and visibility measures should be proportionate to the operation. This includes purchases if they are financed with Union funding.

FINAL RECIPIENTS

1. In the case of a direct beneficiary — family, whose transaction value is less than EUR 0,5 million, will the permanent panel/poster not be required to be placed?

All measures included in the recovery and resilience plan need to acknowledge the origin and ensure the visibility of the Union funding. There is no minimum threshold, but communication and visibility measures should be proportionate to the operation.

Unlike for other funds, no ‘cut off’ amount was foreseen in the RRF Regulation, therefore the visibility requirement applies generally to all recipients.

2. The RRP will also finance projects for which the applicants are predominantly natural persons and Ministry colleagues are of the opinion that this should be taken into account and therefore the mandatory publicity rules cannot be fully applied to all applicants.

- We understand this question refers to ensuring compliance with RRF visibility requirements for projects that promote energy-renovations and similar activities and the beneficiaries are natural persons. We can confirm that unlike for other funds no ‘cut off’ amount was foreseen in the RRF Regulation, therefore the visibility requirement applies generally to all recipients.
- On visibility requirements in relation to interventions where the final beneficiaries are natural persons and the implementation sites are private buildings and estates, please see the respective Q&A in the [guidance document](#) on visibility requirements, p. 40. There are several compliant options for final recipients.

3. Please provide further guidance regarding the requirement for final recipients to “acknowledge the origin and ensure visibility of Union funding”. What does this mean in practice, e.g. in the case of training measures or a measure concerning a tax refund for part of the cost for green/digital investment?

- Article 34(2) of the RRF Regulation sets out that ‘the recipients of Union funding shall acknowledge the origin and ensure the visibility of the Union funding’. Where applicable, recipients (i.e. Member States and final beneficiaries) shall display the emblem of the Union and an appropriate funding statement that reads ‘funded by the European Union – NextGenerationEU’. They shall also provide coherent, effective and proportionate targeted information to multiple audiences, including the media and the public.
- Art. 34(2) is further operationalised in Art. 10 of the financing agreement. It sets out, inter alia, that Member States shall have a communication strategy at Member State level to raise awareness and ensure recognition of the RRF’s contribution to Europe’s recovery and, in particular, the twin green and digital transitions. The communication strategy would define the relevant target audiences, key messages and activities to meet the objective of acknowledging the origin and ensuring the visibility of Union funding.
- When it comes to acknowledging the origin and visibility of Union funding for concrete measures in the plan, communication and visibility measures should be proportionate to the operation. In the examples cited above of trainings or a tax refund, the visibility requirements could be met by ensuring that the documents relating to the implementation of the measures (e.g. the website of the activity, information material and brochures, training textbook, dedicated events, stakeholder meetings ...) acknowledge EU support and include the funding statement and EU emblem. The RRF support should be acknowledged in relevant public announcements.

4. Do funding beneficiaries also have to be informed retroactively (i.e. in the case of funding that has already been completed) that their funding is now being financed from EU funds? If yes, how?

- The RRF Regulation provides for the possibility to include projects as of February 2020 in the recovery and resilience plan.
- However, it does not grant a derogation for these measures from the minimum visibility and communication requirements, which apply (also retrospectively) as of the entry into force of the financing agreement.
- As such, should projects that started before the entry into force of the financing agreement still be on-going at the time of its entry into force, beneficiaries shall be informed that their project is financed by the Recovery and Resilience Facility.
- In general, communication and visibility measures should be proportionate to the operation. Therefore, the exact way and nature of how recipients are informed should be determined by the Member State, as suitable for the specific measure. Taking the nature of the project financed into account, Member States should also invite the beneficiaries to clearly communicate the support in an appropriate manner.

5. This question concerns interventions in social housing and/or energy efficiency in private homes. In both cases, there is either a great dispersion of the intervened properties or difficulty in including RRF posters in all dwellings, either because they are private (in the case of energy efficiency, for which we will not control, nor can people place them), or because (in the case of social responses) there are many dwellings. So, we suppose the following:

- ***In the case of Social Housing***
 - ***When the intervention is in several dwellings of a neighbourhood, there can be only one sign at the entrance of the same, with the indication of the interventions (number of houses, among others).***
 - ***Whether it can be communicated simultaneously on the intermediary beneficiary's website;***
- ***In the case of energy efficiency for individuals (this includes replacing windows, insulation in individual houses etc)***
 - ***It can be communicated on the beneficiary's website, indicating the number of interventions and possibly geographic areas.***
- In general, when it comes to acknowledging the origin and visibility of Union funding, communication and visibility measures should be proportionate to the operation. Specifically, on visibility requirements in relation to interventions where the final beneficiaries are natural persons and the implementation sites are private buildings and estates, please see the respective Q&A in the [guidance document](#) on visibility requirements, p. 40.
- Generally speaking, in these instances, we recommend ensuring visibility requirements via plaques, billboards or posters. These can be easily produced via the online generator in a way that meets the requirements set out in the RRF Regulation and the financing agreement.
- While we are not in a position to provide a firm assessment based on the limited information provided, it would appear that the final recipients of the funding should be at least provided with posters or equivalent materials and be encouraged to use them. The inclusion of the reference on the beneficiaries/intermediaries' website does not appear to be sufficient to ensure the fulfilment of the visibility requirements. In the case of larger amounts of funding (the amount involved is not mentioned in the information provided) and publicly or

commercially owned buildings, it would be more appropriate to make the display of such posters mandatory.

- When it comes to the format, it would be suggested to use smaller posters (A4 or A5) showing the emblem of the EU and the statement acknowledging the origin of the EU funding. For these, the provisions of the financing agreement (e.g. on the size of the EU emblem in relation to other logos, etc.) must be complied with. The posters would have to show the EU emblem and the funding statement. They should be of a reasonable longevity (to be visible generally at least 5 years) and/or placed in a protected location (e.g. so it will not be destroyed/washed off with the first rain) visible to the public.
- As regards the indication of the EU funding on the intermediaries/beneficiaries' websites, this indeed should be foreseen. It should display the NextGenerationEU funding statement, so that the funding is immediately apparent in any case. We would however caution that, the authorities should assure that the link provided remains available for at minimum the expected display time of the funding statement to avoid a situation where 'dead links' are displayed.
- The Member State should also ensure that the beneficiaries themselves are clearly aware of the source of funding, for instance by making this clear in their own communication on the programme/scheme and in their interactions with and communication to the beneficiaries.

6. Are A4 and A5 plates and temporary posters (regardless of the value of the operation) to be used exclusively by the Final Beneficiaries/households?

- [Please see other answers on general requirements]
- In the case at hand, where the beneficiaries are natural persons and implementation sites private households, it is suggested to use smaller posters (A4 or A5) showing the emblem of the EU and the statement acknowledging the origin of the EU funding, provided in particular that the provisions of the financing agreement (e.g. on the size of the EU emblem in relation to other logos, etc.) are complied with.

RRF AND ESIF 2021-2027 (COMMUNICATION CRITERIA/CO-FINANCING)

1. Can Member States apply the same minimum communication/visibility criteria both for the RRF and ESIF 2021-2027 projects, e.g. a) Publication of the project on the website and social networks; b) displaying a project poster during the project; c) for projects exceeding EUR 500,000, a permanent information stand / table must be hung; d) for projects over EUR 10 million, it is necessary to organise a communication event or other communication activity and invite the EC, FM, etc. representatives?

- We encourage using synergies between cohesion funding and the RRF, especially since the communication and visibility requirements are similar. However:
 - i. Please note that under the RRF, there are no such detailed requirements as under ESIF and there are no differentiated requirements based on the total amount of the project. Nevertheless, while such differentiation is not legally required, the approach described above appears in line with the rules applicable to the RRF and may therefore be followed also for RRF-financed projects.
 - ii. Please note nonetheless that the RRF also has no cut-off amount as the ESIF funds, i.e. generally the communication requirement applies to all investments and reforms and their recipients, even those with smaller budgets, within the limits of what is reasonable and possible.
 - iii. Please note also that in some instances (e.g. the wording of the funding statement) visibility requirements between cohesion funding and the RRF differ. In these cases, for RRF-financed projects the RRF requirements would have to be met.

2. We would like to ask for your help in establishing a position on the rules for identifying projects with support from various EU funds — the National Recovery Plan (including plaques and posters) and projects co-financed by the European Funds from the programmes indicated in the OP. Our doubts arise from the various obligations concerning project marking and the need to label materials with different European Union marks (EU symbol and different wording in the logo) resulting from Regulation (EU) 2021/241 of the European Parliament and of the Council of 12 February 2021 establishing the Recovery and Resilience Facility and Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021.

We wonder whether, if the project is funded under the RRF and also co-financed by the ESIF, a solution would be allowed to combine information about it in a single medium. In the 2021-2027 perspective, the CPR allows information on different projects to be grouped into a single table. Point 1.8 of Annex IX CPR expressly states ‘Where several operations are implemented in the same place, with support from the same instrument or from different funding instruments, or where further funding is subsequently granted for the same operation, one or more information plaques or commemorative plaques shall be placed’.

We would therefore ask you to confirm the possibility of including information on a project funded by the RRF and ESIF on a single common table. At the same time, if it is acceptable or whether two different EU characters would have to be used in this case: for the RRF (funded by the European Union — NextGenerationEU) and for the ESIF (co-financed by the European Union)?

Or for such projects, will it be necessary to display two different plaques with different EU marks?

- The information on an operation funded by RRF and, say, ERDF can be on the same plaque/poster/billboard and in that case we suggest to use the RRF funding statement as it legally satisfies both instruments' requirements.

COST OF PROJECT

1. We have a question regarding the obligation to place a billboard on-site, once implementation of a project involving 'physical investments' starts or as soon as equipment has been purchased, in the case of RRF actions whose total cost exceeds EUR 500,000. We understand that the billboard must indicate the project budget – the question is: in case the actual project budget exceeds the amount approved for funding by the RRF, which amount should be indicated on the billboard? Should we include the project's total budget only or should we demonstrate explicitly the exact contribution from the RRF and also the total project cost?

- As set out in Art. 34(2) of the RRF Regulation, recipients shall ensure the visibility of the EU funding by displaying the EU emblem with an appropriate funding statement that reads (translated into local languages where appropriate) 'Funded by the European Union – NextGenerationEU'. The EU emblem and the funding statement are available on the [EC download centre for visual elements](#). When displayed in association with another logo, the EU emblem must be displayed at least as prominently and visibly as the other logos. The emblem must remain distinct and separate and cannot be modified by adding other visual marks, brands or text. Apart from the emblem, no other visual identity or logo may be used to highlight the EU support.
- As the RRF is a performance-based funding instrument, the estimated cost of a reform or investment initially included in the Recovery and Resilience Plan may in practice be lower or higher than the initially estimated amount. The estimated amount was used to establish the financial allocation of the Member State, but it is not always fully accurate to say this reflects the funded amount. In light of this, and since there is no obligation to show the exact contribution from the RRF, member states can choose not to report on the amount of the funding. If the amount of funding needs to be provided due to national rules or due to funding conditions or funding requirements stemming from another funding source, and in order to align the reporting on the RRF with that of ERDF or other cohesion funds, the total cost of the project as well as the EU funding part of the total cost should be displayed in billboards, plaques and posters. The figures mentioned in such products will normally be the contracted ones.
- Please note, however, that the RRF Regulation does not foresee a cut-off of EUR 500,000 (as for ERDF or the cohesion funds); accordingly, the requirement to assure visibility of Union funding generally applies to all investments and reforms included in the Plan and/or funded by RRF funds, irrespective of the amount/share of actual or estimated funding.

2. How to account for the information on the investment amounts to be placed on the plaques/posters: should it be per property or per total investment?

- As set out in Art. 34(2) of the RRF Regulation, recipients shall ensure the visibility of the EU funding by displaying the EU emblem with an appropriate funding statement that reads (translated into local languages where appropriate) 'Funded by the European Union – NextGenerationEU'. The EU emblem and the funding statement are available on the EC download centre for visual elements. When displayed in association with another logo, the EU emblem must be displayed at least as prominently and visibly as the other logos. The emblem must remain distinct and separate and cannot be modified by adding other visual marks, brands or text. Apart from the emblem, no other visual identity or logo may be used to highlight the EU support.
- Since there is no obligation to show the exact contribution from the RRF, member states can choose not to report on the amount of the funding. If the amount of funding is

provided, the total cost of the project as well as the EU funding part of the total cost should be displayed on plaques/posters.

3. We were informed that the same generator should be used for RRF that is also being used for ERDF funding. However, there are a number of particularities of the platform, in relation to the RRP projects:

(i) Although the RRF is a performance-based instrument, and it might not always be useful to include the RRP cost (The RRP cost might not be known, as the RRP estimation might no longer be accurate, or it might not be relevant). Nevertheless, the platform makes it compulsory for the RRP cost to be inserted.

- There is no obligation under the RRF to display the cost of a measure. If the beneficiary prefers not to display it, the online generator offers the following possibilities:
 - For the plaque format, the online generator does not display information on cost;
 - For posters and billboards format, a modification of the online generator is not possible. Users that prefer not to show such information could post-edit the template once created to take away the unwanted cost information.
- Please also note that there is no obligation to use the online generator in order to meet the RRF visibility requirements.

(ii) Similarly, in the platform it is necessary that the total project cost is included, which for the moment is not known. It is likely not to be covered entirely by the RRF, as for example in the cases that the scope of the project has been extended, or the initial RRP costing was not entirely realistic.

- Concerning the type of cost that may be displayed, the figures would normally be the contracted ones.

(iii) Along the same line, the duration of the project might be different to the original design, as it might have been extended to a wider scope, to what was included in the RRP.

- The contract would normally include the timeline of the project. This information could be used to complete the online generator and/or manually created display.

OTHER

Website/Platform for EU-funded projects

1. Can a Member State create a single website both for the RRF and ESIF 2021-2027? Is it possible to have a joint communication strategy both for the RRF and ESIF 2021-2027?

- A single web space providing information on the RRF and related projects may be combined with a website for the ESIF 2021-2027. We would suggest, however, that the projects financed under each of these instruments are clearly delineated – possibly through the use of unique pages within this common website.
- It is also possible to have a joint communication strategy, provided the requirements from both programmes are met. The requirements under the RRF are set out in Art. 34 of the RRF Regulation and Article 10 of the financing agreement. Further information can be found in the [Guidance document](#).
- For ESIF, it is important to note that Member States would have to provide the Commission in the communication chapter of their programme(s) the description of their approach to communication, according to Article 22 of the Common Provisions Regulation, where they can quote refer to such general communication strategy if they already have one officially endorsed.

Royalties

2. What is meant by the term ‘use’ in the article “The Member State grants the Commission the right to use free of charge the communication materials relating to the RRF.”, especially regarding campaign videos and campaign adverts? Is it ‘use’ as in displaying the campaign materials as a reference on EU-channels (EU-website etc.) or is the word ‘use’ to be understood as distributing the campaign via paid advertising online or on print with the campaign materials (possibly edited) in other EU member states than the Member State itself?

Regarding the legal rights owned by the actors performing in the campaign materials, the additional cost for ‘a royalty-free, non-exclusive and irrevocable license’ will be at least the double of a normal actor fee agreement for legal rights to national broadcasting. Are we not obliged to grant the ‘royalty-free, non-exclusive and irrevocable license’ because of the additional cost it will demand?

- In relation to your first question, “what is meant by the term “use”, please note the following:
 1. Article 10.6 of the RRF Financing agreement, provides that the Member State grants the Commission the right to use free of charge the communication materials relating to the RRF.
 2. Heading 3.9. of the [Guidance for Member States](#) (“Communication and visibility rules, European Union funding programmes 2021-27. Guidance for Member States”) stipulates that the granting authority has the right to use communication material produced by the recipients of EU funding. This right is granted in the form of a royalty-free, non-exclusive and irrevocable licence.
 3. The licence is granted solely to the granting authority, which can decide on its use, in line with the applicable legal acts and financing agreements. This may include the possibility, among other things, to make communication material produced by recipients of EU funding available to other EU institutions and Member States.

4. The legal rights owned by the actors performing in any campaign materials are governed by national law. Therefore, the beneficiaries are responsible for clearing the necessary IP and image rights of the actors involved in the communication materials in a manner that would allow the granting authority to use such materials for promotion and communication purposes.
 5. The aforementioned rights of use may include, among other, the following rights:
 - a. Internal use for its own purposes (i.e. right to reproduce, copy and make available the communication and visibility materials to Union's institutions and agencies, Member States' authorities and their employees).
 - b. Reproduction of the communication and visibility materials and communication to the public by any means and in any form, in whole or in part.
 - c. Editing or redrafting (in particular shortening, summarising).
 - d. Translation.
 - e. Storage and archiving of the communication and visibility materials.
- Regarding your question whether beneficiaries “are not obliged to grant the ‘royalty-free, non-exclusive and irrevocable license’ because of the additional cost it will demand?”, we would like to clarify that the beneficiary remains indeed obliged to grant the Commission a royalty-free, non-exclusive and irrevocable license to use the materials and that additional costs associated with said license do not constitute a legal ground that would preclude the beneficiary from complying with this obligation.
 - We can, however, reassure you that it is not our intention to use communication materials produced by beneficiaries in a way that require significant additional costs or a significant administrative burden for the beneficiaries.

Communication Strategy

3. ***As outlined in the Guidance on communication and visibility rules each Member State shall have a communication strategy for RRF, that should base on the outline, provided in RRF plan. In our plan, communication was formulated as a communication strategy. It outlines objectives of the communication strategy, target groups of communication strategy, communication channels and communication tools, communication and labelling according, active communication of projects of strategic importance, financing communication activities, communication rules, monitoring and evaluation of communication.***

The general guidelines of coordinating body, that we are preparing, will also define the tasks of individual participants in the field of communication. Guidance for visibility should also be part of the guidelines. We plan to prepare annual communication plans together with the ministries that will implement the RRF plan.

What additional content must the communication strategy contain in order to comply with EC rules? How detailed should it be? Can the strategy be part of the general guidelines?

- Regarding your questions on the communication strategy:
- Art. 34(2) of the RRF Regulation sets out that Member States shall "provid[e] coherent, effective, proportionate targeted information to multiple audiences, including the media and the public". This obligation is operationalised in Art. 10(2)a of the financing agreement, which states that Member States shall "have a strategy at Member State level to raise awareness and ensure recognition of the RRF's contribution to Europe's recovery and, in particular, the twin green and digital transitions." Further guidance on the communication strategy can be found in the RRP Template (p. 11) and the Guidance document (p. 51).

- The Commission does not provide detailed prescriptive conditions on the content and drafting of communication strategies, provided they contribute to meet the above-mentioned objectives. Your description of the national communication strategy sounds complete. In addition, we would remind you that the European Commission – via the European Semester Officers in the Representation – stands ready to communicate jointly on the RRF. If not yet done, we would encourage you to contact the European Semester Officers in your capital.

Events

4. *Should a communication event or activity be held for events above EUR 10 million with relevant media impact?*

- We would like to highlight that (a) there is no horizontal obligation to hold ‘events’ to highlight the funding and (b) the obligation to reference EU funding does not apply just to events, but generally all relevant communication. For instance, mentions of the relevant funding scheme on official websites, announcements or billboards on the funding possibilities, flyers informing potential beneficiaries, presentations on the measure, project reports, contracts with beneficiaries, etc.

Penalties for non-compliance with reporting rules

5. *What specific penalty may the beneficiaries suffer in the event of non-compliance with the reporting rules?*

- The visibility provisions are a requirement under the RRF Regulation and the financing and loan agreements. The Member State is obliged to ensure such communication, including, as provided in the financing agreement, to “Ensure that the final recipients of Union funding under the RRF acknowledge the origin and ensure the visibility of the Union funding.” Any breach by the specific beneficiary should therefore generally be detected and highlighted by the Member State (i.e. the responsible authority). We note that non-compliance by the Member State may however result in a serious breach of obligations under the financing agreement and, where relevant, the loan agreement. The Commission would consider in each specific case whether and which any financial or other penalties might be appropriate.