



European Network for
Rural Development

EFSI

Achieving complementarity with the EAFRD and setting up Investment Platforms

Collection of FAQs

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This set of FAQs on the complementarity between the European Fund for Strategic Investments (EFSI) and the European Structural and Investment Funds (ESI Funds) and on the setting up of Investment Platforms is a follow-up to a [first set of FAQs](#) on the basic features of the EFSI, the European Investment Advisory Hub (EIAH) and the European Investment Project Portal (EIPP).

The present set of FAQs is an output of a recent [workshop](#) titled 'EFSI: Achieving complementarity with the EAFRD and setting up investment platforms' in Brussels on 19th April 2016, which was jointly organised by DG AGRI and the ENRD Contact Point, and its preparation was kindly supported by – among others - members of the European Investment Bank (EIB), the European Investment Fund (EIF), DG ECFIN and DG CONNECT.

The questions are organised in four sections:

1. Support opportunities under the EFSI;
2. Complementarity between EFSI and other support instruments;
3. Investment Platforms; and
4. Initiating and running EFSI projects.

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I. Support opportunities under the EFSI

1. Organisations at European and national levels would like to function as **multipliers in promoting the potential of the EFSI**, yet the available information material on the EFSI is of limited help. Is it possible to have a range of concrete **investment examples** or lists of fields and types of investments, which are comprehensible for the actors at local level on the ground?

DG AGRI is in favour of such an approach to transfer information about the potential of the EFSI to the grassroots level and acknowledges any contributions made by organisations at European and national levels. The scope of DG AGRI's work includes communication, dissemination and coordination of actors (potentially) involved in EFSI implementation. DG AGRI itself plans to involve actors at the local level and to examine how ideas for EFSI projects can be put into practice. DG AGRI is ready to participate in activities on the ground jointly with promotional banks and/or Managing Authorities from the region, for example. DG AGRI, like other services of the European Commission, can definitively support EFSI-related initiatives and liaise with the European Investment Bank (EIB) or its advisory services. For instance, first project ideas could be discussed with DG AGRI officials bilaterally before they are presented to the units specialised in project financing or EFSI-related issues -- the EIB or the EIAH, respectively.

A complete list of projects that have been approved for EFSI support can be found on the EIB [website](#) and one can search for projects by Member State, sector, etc. Though it offers limited information about the individual projects, it provides a useful overview. DG AGRI will continue with awareness-raising and networking activities in the framework of the ENRD.

2. Considering the current financial situation of many farmers across the EU, particularly in the dairy sector, the question arises whether there is the option of allowing EFSI to make a direct or indirect contribution to increase the **working capital of farm businesses**?

The European Commission/DG AGRI is aware that in certain branches of the agricultural sector the main problem is the lack of liquidity and working capital in the very short term. However, it is difficult to conciliate this problem directly with the EFSI. EFSI support can be provided for investments in the real economy which may bring new cash flows only in the medium or long terms. Moreover, EFSI support has to be repaid.

Nevertheless, financial instruments in the agriculture and forestry sectors (e.g. guarantee schemes) backed by EAFRD can support working capital to the extent it is ancillary to the eligible investments and within the limit of 30% of the total amount of eligible expenditure for the investment. Working capital can also be financed under the uncapped guarantee of Art. 39 of Reg. 1303/2013 (so called SME Initiative) and under COSME schemes which benefit from EFSI front-loading (see a recent [example](#) from Estonia).

3. Are there opportunities for receiving support for **small-scale, short-term investments** under the EFSI?

The principle objective of EFSI's 'Infrastructure & Innovation Window' (I&I) is to support strategic investments of larger scale. Yet, the following example underlines that it is possible to support investments of smaller scale under the EFSI I&I Window.

The region Nord Pas de Calais initiated a [project](#) to support SMEs in investing in activities contributing to a low carbon economy ('Third Industrial Revolution') with investments ranging from €1 million to €10 m. The overall size of the investment fund (i.e. a kind of Investment Platform) has a capacity of €50 m, of which the EIB has provided a loan for €15 m (to be extended to a maximum of €20 m) and the remainder consists of public and private investors' contributions. Support under the fund is provided in the form of equity or acquisition of shares. Furthermore, the project benefits from support under the European Regional Development Fund (ERDF), which is not only fed into the budget of the investment fund, but will also be used for technical assistance provided to (potential) project promoters. This promises to increase the quality and success of projects and attracted the EIB-/EFSI contribution.

Under the EFSI 'SME Window', investments into the real economy are supported through financial intermediaries.

One example is a €60 m [risk capital fund](#) (i.e. a 'Fund of Funds' initiative) in Estonia set up by the EIF, KredEx, and the Estonian Ministry of Economic Affairs and Communications. Building upon the experiences with an innovation fund, the new risk capital fund targets mainly small investments of SMEs and facilitates access to equity financing. The EIF will manage €48 m ERDF resources on behalf of the ministry. The overall investment is estimated at €100 m. The EIF will contribute €12 m, an amount that is backed by the EFSI in the form of a counter guarantee. This is the first case of a project being supported under the Structural Funds into which the EIF has also invested.

4. Can guarantees for loans covering the **re-financing of credits** once received for (short-term) investments under national schemes be provided under the EFSI?

Under the EFSI I&I Window, long-term strategic investments of larger scale are supported and under SME Window investments in the real economy are supported, where support for working capital can also be provided (see Question 2). Therefore, there is currently no option to provide guarantees for credits whose purpose it is to enable farmer to repay other loans.

5. The support for **producer groups** under CAP Pillar 1 is often not sufficient to cover all the needs of a producer group. Are there options for producer groups to benefit from the EFSI support portfolio?

Yes, there are at least three feasible options for a producer group to receive support under the EFSI:

- 1) Provided that the critical mass of the investment is sufficient and makes up around €25 m, the producers group could apply for support for one project, e.g. for large-scale collective infrastructure, under the EFSI I&I Window.
- 2) If the producer group intends to bundle the investment interests of its members in a certain field that falls into the scope of EFSI's general objectives (see 1. set of [FAQs](#), and also Question 14 below), an Investment Platform could be set up, which is supported under the EFSI. For instance, if all members want to invest in new technologies, EFSI support might take the form of a guarantee or a co-investment. The platform would be managed by a fund manager (see Question 17) and would serve the needs of the producer group's members who can submit an application as individual project promoters.
- 3) In the case, that
 - a) the producer group is small and can be regarded as small-, medium- and mid-cap enterprise, and
 - b) a suitable COSME- or InnoFin-scheme or another scheme supported under the EFSI SME Window is offered by a financial intermediary, such as national or regional guarantee banks, the producer group might apply there for support.

6. How can a project aiming to extend fast **broadband** to rural areas be set up to receive support under the EFSI?

There is certainly no 'one-fits-all' solution and different project designs are feasible for EFSI-supported broadband projects. Examples of rural ultrafast broadband projects supported under the EFSI I&I Window can already be found in the French regions of Alsace and Nord Pas de Calais. While both of these projects will be implemented by a concessionaire under a concession contract with the region, at the EFSI workshop in April 2016 a [presentation](#) provided by DG Connect introduced different options of combining EFSI and EAFRD resources for establishing rural broadband, among others through Public-Private Partnerships (PPPs). Beside PPPs, a rural broadband project can be envisaged through a public entity owned by a region or a province or through pure private companies willing to invest in rural areas. Features of such rural broadband projects vary across Europe. The presentation also pointed out that the EC and the EIB are currently exploring ways of driving the rolling out of rural broadband under the EFSI through the upcoming creation of a 'layered fund' initiated at the European level and involving public and private actors, under which smaller broadband projects of these various types are bundled and managed by a single financial intermediary.

7. Can a **publicly owned company** operating in the field of irrigation apply for EFSI support?

Publicly supported companies can submit projects to the EFSI, but they will have to prove their capacity to attract private investors.

8. In spring 2016 it looked like the **EFSI SME Window**, serving the front-loading of the instruments **COSME** and **InnoFin**, among others, would run out of resources by the end of the year. Are the European institutions thinking about solutions to overcome this problem?

Indeed, the uptake of the EFSI SME Window has been quite successful so far, which has also been acknowledged in the EU Commission' stocktaking on the implementation of the Investment Plan for Europe¹ in early June 2016. Building on this success, new financial instruments are under development, including equity financing and microfinance, a Pan-European Venture Capital Fund-of-Funds for the support of the most promising new enterprises, and instruments targeting social enterprises. Also being developed are products to enhance innovative SMEs' and small mid-cap companies' access to finance through guarantees for uncollateralised loans.

The EU Commission will work with the EFSI Steering Board to use all the existing possibilities under the EFSI-Regulation to reinforce the SME Window; possibilities to stock up its budget, for COSME, InnoFin and the EU Programme for Employment and Social Innovation (EaSI) will be investigated. Resources could come from the released funds which were foreclosed and EFSI funds can be freed and reconstituted. There is also a possibility for a shift of up to €500 m of the EU guarantee from the EFSI I&I Window to the SME Window.

¹ Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions Europe investing again Taking stock of the Investment Plan for Europe and next steps. Brussels, 1.6.2016 COM(2016) 359 final, available at: http://ec.europa.eu/priorities/sites/beta-political/files/1_en_act_part1_v11.pdf.

II. Complementarity between EFSI and other support instruments

9. Many farmers have applied or would like to apply for **EAFRD agri-investment support** but face challenges in receiving loans for making the necessary **private co-financing** contribution. Is there any option to receive EFSI support allowing farmers to make a private contribution to an investment project?

Both Art. 37 of Reg. EU 1303/2013 and Art. 59 of Reg. EU 1305/2013 have to be applied to the combination of EAFRD and EFSI support at the level of one operation. Therefore, support received under the EFSI SME Window or EFSI I&I Window cannot be used for covering the private minimum co-financing obligation to an EAFRD investment project. But there are other options for combining EFSI and EAFRD support at project, project portfolio or programme level (see Question 11).

Questions related to the combination of Financial Instruments with other forms of support are extensively discussed in a [guidance document](#) on the implementation of Art. 37 7, 8, 9 of Reg. 1303/2013.

10. Pursuant to the current way of interpreting **Art. 59 of Reg. 1305/2013** a loan provided under **COSME** to a final recipient/beneficiary cannot be combined with an expenditure co-financed by the EAFRD, which is an impediment in practice. Are there any plans envisaged by the European Commission to change this interpretation or the related regulatory framework?

Yet, as is regards the EAFRD, the requirement of the minimum private/own contribution of beneficiaries is a core funding principle, which is laid down in both Reg. 1305/2013 and Reg. 1303/2013 (see Question 9). These basic acts cannot be simply modified or interpreted in ways different from what has been laid down in the related [guidance document](#) on the implementation of Art. 37 7, 8, 9 of Reg. 1303/2013.

Article 59 of Reg 1305/2013 ensures that there is no-double funding for the same expenditure. Other types of combinations, as pointed out in the previous paragraph and respecting the relevant provisions in Regulation 1303/2013, can be made.

In practical terms, for all ESI Funds in general, if a beneficiary receives a loan financed by COSME for the entire investment project, then no other type of support (e.g. grant) can support the project.

11. What options are there to achieve **complementarity** and synergies between the EAFRD and the EFSI at **project or project portfolio level**?

As explained under Question 9), it is not possible to cover private co-financing for an EAFRD investment operation through EFSI support. However, there are several options to effectively combine EFSI and EAFRD resources.

1) 1 project idea – 2 operations

A farmer aiming to extend his farm to bioenergy production facilities can divide/structure his project idea into two components and apply for two operations. He can apply for a grant under the EAFRD for investment support for establishing a biogas plant and simultaneously apply under COSME to the regional guarantee bank for a loan for establishing a silo.

This approach of realising one project idea by splitting it into two operations can also be followed if it is about the same object, which can be divided into two parts. For instance, a waterline for an irrigation system, of which the establishment of the first 500 metres is supported under the EAFRD, and the establishment of the remaining 500 metres is financed with a loan under the COSME scheme.

2) 1 operation – 2 kinds of support

In accordance with Art. 37, 7 of Reg. EU 1303/2013 one operation which is supported through a Financial Instrument (e.g. the EFSI SME Window and the COSME scheme) can be combined with certain kinds of support under the ESI Funds (e.g. the EAFRD in one operation, for instance with technical support, as long as records for both kinds of support are kept separately).

3) Project portfolio

There are several options for combining EFSI and EAFRD resources at the level of a project portfolio (see a comprehensive [overview](#) and a [brochure](#) on ESI Funds-EFSI complementarities). Examples are provided below:

- a) A Managing Authority can decide to devote EAFRD resources to an EU-level Financial Instrument which benefits from EFSI frontloading, e.g. COSME or InnoFin.
- b) A Managing Authority can initiate the set-up of a Financial Instrument, e.g. an Investment Fund, to which private resources and EFSI resources are also contributed (see [example](#) of this approach).
- c) A Managing Authority can devote EAFRD resources to an Investment Platform which has been set up under the EFSI I&I Window.
- d) The members of a producer group, which has received support under the EAFRD (or under CAP Pillar 1), can initiate the setting up of an Investment Platform supported under the EFSI I&I Window.
- e) An EIP Operational Group, after having developed a project within a pilot project supported under EAFRD Measure 16, can submit a project application under the EFSI I&I Window for bringing the developed innovative product to the market.

12. If a **pan-European project** aims to bring **precision farming** to medium-sized farms and further collaboration among machinery businesses, research institutes and farmers, at what level could complementarity between EAFRD and EFSI be achieved?

There is certainly no 'one-fits-all' solution for such an undertaking. But if a project to be supported under the EFSI has a pan-European scope, setting up an Investment Platform appears to be the obvious solution. Machinery companies, the EIB and other actors could invest into the Investment Platform which would provide loans to farmers and research institutes to invest in precision farming equipment. Managing Authorities could devote EAFRD resources to that Investment Platform as well. However, those EAFRD resources could only be used for projects in the territories covered by the respective RDP.

13. What are the options to include **Technical Assistance/advisory and training components** in an EFSI- and EAFRD-supported project?

There are several options to link assistance, advisory and training components to an EFSI project. One [project example](#) in which advice to project promoters is well embedded into the project design forms an investment fund which has been set up in Northern France. In that project ERDF resources are not only used as input into the investment fund, but also for the delivery of advisory services for projects into which the fund invests. This approach can be also applied to other projects that are supported under the EAFRD and the EFSI.

III. Investment Platforms

14. What can be realised and **supported under Investment Platforms**?

Under Investment Platforms any kind of investments into the real economy which fall under the scope of the EFSI can be supported. Possible fields of action which appear to be particularly relevant for the agri-business sectors and the development of rural areas are:

- Circular/Bio-economy
 - Reduction of food waste
 - Recycling of phosphorus
- Precision farming
 - Marketable smart technical solutions that are also accessible to smaller farms
 - New models for data management
- High-speed broadband
- Water infrastructure
 - Bundling small-scale irrigation projects
 - Water savings and efficiency projects

For further information on the scope of the EFSI and its links to the rural sectors, click [here](#).

It is essential that the purpose and scope of an Investment Platform is clearly defined and that the overall investment amount is more than €25 m. EFSI resources could either be used as a guarantee for the platform or be directly fed into the Investment Platform. Products that the platform can provide are equity and quasi equity investment in projects or funds, loans to projects, guarantees to projects and guarantees and/or counter guarantees to intermediaries.

15. What is (a) the process of **application for a project** supported by EFSI and (b) of **setting up an Investment Platform**?

In general, there is no differentiated application process for EFSI projects. Project proposals are submitted to the EIB in the same way as proposals for regular EIB projects. When examining the project proposal, the EIB will assess whether a project would fall under and should benefit from EFSI -- e.g. because of high financial risk or whether the project would fall under the scope of regular EIB financing.

The steps in the [project cycle](#) are the same for both EFSI and regular EIB projects, with the exception of the approval by the EFSI Investment Committee.

Project promoters have the opportunity to consult the EIAH for receiving advice on setting up an Investment Platform. (An Investment Platform, if supported under the EFSI, can be regarded as EFSI project.)

Particularities in the application for Investment Platforms in comparison to other types of projects potentially concern a) the identification of a fund manager or financial intermediary (see Question 17), and b) the demand for an ex-ante assessment, which is needed for any ESI Fund-supported Financial Instrument, in the case that ESI Funds are involved in the Investment Platform.

16. Who are the **key players and stakeholders** in setting up an Investment Platform?

The setting up of a platform for investments into the real economy is likely to be a bottom-up process: regional investment interests, needs and ideas, as well as technical knowledge in the field of action concerned, are complemented by financial management advice through the EIAH or the EIB local offices, for example. If there is a rough concept for an Investment Platform, which might have been initiated by producer groups, a sponsor, who specifies the details on the objectives and the functioning of the Investment Platform, and a fund manager, who runs the platform, are identified. The recruiting of further investors might also be required. For details, see the [guidance on Investment Platforms](#).

Managing Authorities and Promotional Banks might support such processes by proposing the setting up of an Investment Platform, given that many rural actors might not be aware of such an opportunity. Managing Authorities and Promotional Banks may also take responsibility for the establishment and running of an Investment Platform and/or allocate resources to one.

In some cases, such as investments in rural broadband, an active search for an investor might be necessary. In those instances, show-casting the investment offer at the European Investment Project Portal (EIPP) might be helpful.

17. How can **Investment Platforms** be **organised**?

As the definition of Investment Platforms laid down by the EFSI Regulation is quite broad, there are several options for setting up the organisational structure of an Investment Platform. Platforms can be set up in different forms, such as Special Purpose Vehicles, Managed accounts, Contract-based co-financing, or Risk-sharing arrangements. For details, see the [guidance on Investment Platforms](#).

It is important to have an acknowledged fund manager, usually a financial intermediary or NPB. Then, in addition to the group of private (and public) investors, an Investment Platform could have a Steering Board which may include non-investors.

Which project promoters can apply for support under an Investment Platform and how final recipients are selected depends on the platform-specific regulatory framework (see also Question 16).

18. Are the **members** of an Investment Platform the same as the **sponsors**?

The sponsors of an Investment Platform, often referred to as ‘founders’, can also invest in the platform. Investors do not need to be sponsors of the platform². The role of the sponsors is to initiate the creation of the platform; they could be producer groups or associations or Managing Authorities in collaboration with banks or other financial institutes. Other tasks performed by the sponsors include: performing a market analysis; carrying out an ex-ante assessment for setting up a financial instrument (if applicable); and defining the scope, objectives and governance structures of the platform.

19. What is the difference between the **sponsors** of a platform and the **management** of a platform?

The role of the sponsors should not to be confused with that of the platform manager, who runs the platform’s day-to-day operation. A sponsor can take over the role of a platform manager, but he doesn't have to do so. The platform could also be run by an independent fund manager, a (National) Promotional Bank, the EIB, the EIF or a commercial bank.

20. How do **project promoters** relate to an Investment Platform?

Using the EU programming terminology, project promoters can be regarded as the final recipients of an Investment Platform. Project promoters submit an application to an Investment Platform. Their projects are supported under an Investment Platform, for instance through a loan, guarantee or equity. The precondition is that their project ideas fall under the scope of the platform and match the objectives of the EFSI. How the decision on whether a project is supported under an Investment Platform is taken depends on the governance structures of the platform. In some cases, the EFSI Investment Committee might also need to approve a project supported under an Investment Platform (see Question 15).

² Any institution or a group of institutions can become a platform sponsor. Such institutions include National Promotional Banks or Institutions, EIB Group or other International Financial Institutions (e.g. the EBRD and the World Bank Group), government agencies, EU Institutions, agencies or bodies, commercial banks and other lending institutions, investment funds and investment companies, corporates, managing authorities of European Structural and Investment Funds (ESI Funds), sovereign wealth funds or third country entities.

21. Assuming that members of an Investment Platform have to contribute to it financially, the question arises, how can **small farmers participate in the decision-making processes** related to the steering and activities of an **Investment Platform**?

The governance structures of an Investment Platform are likely to include a Steering Board and/or an Advisory Board (see Question 17). Actors that do not belong to the groups of sponsors and investors can also have a stake in those bodies and thus insert an influence on the strategic orientation of an Investment Platform. The EFSI-Regulation does not stipulate the set-up of a Steering Board or an Advisory Board. As a rule of thumb, final decision-making power lies in the hand of the investors.

22. If an Investment Platform follows a **macro-regional or transnational approach**, rather than a regional or a national one, how will the flow of information between the involved **National Promotional Banks** be organised?

Given that Promotional Banks are likely to support projects which are located within their territorial scope, a (National) Promotional Bank will probably not be the sole sponsor or fund manager of a transnational Investment Platform. Either Promotional Banks from all the countries concerned are involved in the foundation and running process or those tasks are performed by an overarching institute at European level or an independent fund manager. In the latter case, National or Regional Promotional Banks can still play a pivotal role in setting up and running the transnational Investment Platform. For instance, they can assess the market situation in the creation process of a platform or advise (potential) project promoters.

The communication among National Promotional Banks as such should not hamper the establishment of a transnational Investment Platform as the Promotional Banks are well connected.

23. Can the **administrative costs for running an Investment Platform** (e.g. the set-up of a secretariat) be covered by EFSI support? Are those costs eligible for support?

EFSI financing and guarantee only covers/secures part of the funds in an Investment Platform (i.e. 20-30%, in exceptional cases up to 50%); administrative costs are not covered by EFSI resources, whereas fund management fees/costs could potentially be covered where this is needed as part of delivering the Investment Platform.

Generally, a platform should reach a critical mass so that the administrative costs for setting it up and running it make up a small share of the overall budget of the platform.

24. If a **Managing Authority** decides to allocate **EAFRD resources** to an Investment Platform, what are the options to contribute to it?

A Managing Authority can either allocate EAFRD resources to an existing platform or initiate the setting up of an Investment Platform as a sponsor (see Questions 17-19). An example for the allocation of ESIF resources to an EFSI supported Investment Platform is illustrated here. The first loss of the guarantee backing an Investment Platform could be covered by EAFRD/RDP resources, which might attract private investors to invest in the platform.

Furthermore, Managing Authorities could decide to support the activities carried out under a certain Investment Platform indirectly by, for instance, supplementing it by offering special advisory services under their RDPs or by opening investment measures to fields which fruitfully complement the activities of an Investment Platform. For instance, an Investment Platform invests in large-scale irrigation infrastructure, while the RDP could offer additional support to farmers who want to invest in pipes to connect their fields to the main irrigation system.

25. If an Investment Platform invests in a range of projects over time, is **approval of each individual project** by the **EFSI Investment Committee** necessary?

Whether the EFSI Investment Committee has to approve the support of an Investment Platform and related activities only once or has to approve each individual investment, depends on how concretely the scope and eligibility rules for the investments have been defined at the stage of the initial approval of support to the platform by the EFSI Investment Committee.

IV. Initiating and running EFSI projects

26. Will there be a **'one-stop-shop' support service** that would allow applicants to easily set up a project, a Financial Instrument or another kind of Investment Platform?

The [European Investment Advisory Hub](#) (EIAH) can be regarded as a central entry point for advisory services to all (potential) EFSI applicants and, more generally, as a gateway to investment support, which is also provided to investment initiatives that do not fall under the scope of the EFSI. The EIAH is one of the elements of the Investment Plan for Europe and is a joint undertaking of the EIB and the European Commission.

27. If a **Managing Authority** is considering to allocate **EAFRD resources** to an **Investment Platform** or to set up a Financial Instrument including EAFRD and EFSI resources, two administrative processes might get activated and run in parallel even though the European Investment Advisory Hub (EIAH) could provide a common entry point:
- the consultation of Commission services in Brussels, which Managing Authorities are used to in the context of EAFRD-related issues, and
 - the consultation of the EIB services in Luxembourg.

How should those consultation processes work in practice?

The EIAH can coordinate the interplay of relevant actors in the advisory process, if required.

Managing Authorities can definitively always seek advice from the DG AGRI unit in charge of their RDPs.

It is worthwhile noting that the EIAH does not only deal with issues that are directly related to the EFSI, such as Investment Platforms, but it also supports investment projects that would be funded from other sources (such as bank/private funding and ESIF). The EIAH has access to and can make use of EIB's existing advisory services, such as fi-compass and its bilateral advisory services to Managing Authorities. Further, the EIAH is establishing a widespread partner network with National Promotional Institutions and other national Managing Authorities, which have signed an MoU with the EIB, and most of which can serve as an entry point to the EIAH (in addition to its webpage www.eib.org/eiah, which is open to every project applicant).

28. What are the **main steps to be taken by a Managing Authority** when setting up an **Investment Platform** that benefits from both EAFRD and EFSI support?

Provided that the Managing Authority has not had contact with an advisory service at the European level for an alternative Financial Instrument under its RDP, it can contact the European Investment Advisory Hub (EIAH).

As for the setting up of any Financial Instrument, the first step to be taken is an ex-ante analysis. Based on the ex-ante analysis, the final decision whether to set up or not an Investment Platform with or without support of the EFSI should be taken jointly with the EIB/EIF services.

Further steps, including the selection of a fund manager, are illustrated in a [presentation](#) on the setting up of an investment fund in France.

In general, the steps to be taken by a Managing Authority when setting up an Investment Platform benefitting from EAFRD and EFSI support are quite similar to those when setting up a Financial Instrument under the EAFRD. The main differences are the check by the EIB/EIF services and the approval of the provision of the EFSI support by the EFSI Investment Committee. Therefore, the [guidance documents](#) related to setting up Financial Instruments under the ESIF might provide further support.

29. If a Managing Authority has already performed an *ex-ante* analysis for the setting up of a **Financial Instrument** under the EAFRD, could the same *ex-ante* analysis form a basis for the setting up of a Financial Instrument that is supported under the EAFRD and the EFSI instead?

The ex-ante assessment, which has been conducted for the setting up of a Financial Instrument under the EAFRD, should be in line with the possibility to contribute to an Investment Platform. Otherwise, the ex-ante assessment should be modified in order to evaluate such an approach.