

Key 2 Circularity – Voucher scheme

Subsidy regulation

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1. General

1.1 Context & background

The **circular economy** is a top priority across all levels of governance – from the EU Green Deal to regional initiatives such as Vlaanderen Circulair, Circular Wallonia and Runder Tisch Zirkuläre Wertschöpfung NRW. The focus now lies on accelerating the transition toward circularity. Yet, the *Circularity Gap Report 2024*¹ highlights a stark reality: only **7,2%** of all materials used are cycled back into the economy.

The **Meuse-Rhine Region** remains heavily reliant on imported primary raw materials, leaving it exposed to price volatility and supply chain disruptions. To build economic resilience, reduce dependency on imports and meet climate commitments, the region must urgently prioritise resource efficiency and the advancement of a circular economy.

This calls for increased investment in strategies that boost resource productivity and extend product lifespans – through repair, reuse, remanufacturing and high-quality recycling – as well as the development of innovative circular business models.

1.2 Objective Key 2 Circularity

The **Key 2 Circularity (K2C) project** aims to support manufacturing Small- and Medium-sized Enterprises (SMEs) in their transition towards a circular economy by offering financial support for innovative projects that optimise resource use, extend product lifespans and improve recycling processes.

Initiatives must focus on the **crucial design phase**, targeting at least one of following objectives:

1. Increase resource efficiency by using fewer, existing, or bio-based materials;
2. Extend the use and lifespan of products and materials through designs that allow easy reuse, repair, or refurbishment;
3. Create clean material cycles that enable high-quality recycling.

Using the terminology of the R-strategies (see Figure 1 in annexes), this means that the K2C project targets initiatives that focus on higher R-strategies:

- Refuse: avoid using unsustainable products or materials altogether;
- Rethink: rethink product design and usage (e.g. sharing instead of owning);
- Reduce: minimise the use of materials and energy;
- Reuse: reuse products without significant modification;
- Repair: fix broken products to extend their life;
- Refurbish: update or modernise products to restore functionality;
- Remanufacture: rebuild products to original specifications;

¹ Circle Economy Foundation. (2024). *The Circularity Gap Report 2024*. <https://www.circularity-gap.world/2024>

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- Repurpose: use products for a different purpose than originally intended.

The lower R-strategies (Recycle and Recover) are not eligible to receive funding under K2C when they form the primary objective of the innovation project. Nevertheless, they may still be quantified in the final evaluation report as part of the overall outcomes.

The K2C project is initiated by a strong consortium of partners who bring extensive knowledge and expertise in circularity, along with close ties to local SMEs. Throughout the project, SMEs in the Meuse-Rhine Region will be connected with one another and with external experts to scale up circular solutions, creating markets with solid business models at their core.

1.3 Applicable legal provisions

This regulation is subject, among others, to the following provision:

- **Commission Regulation (EU) 2023/2831 of 13 December 2023** on the application of Articles 107 and 108 of the Treaty on the Functioning of the European Union to de-minimis aid

2. Support provided by Key 2 Circularity

The **Key 2 Circularity voucher scheme** supports manufacturing SMEs within the Meuse-Rhine Region in their transition towards a circular economy by encouraging projects that optimize resource use, extend product lifespans and improve recycling processes. Financial support is provided for **up to 50% of the project budget**, with subsidies ranging from **EUR 10.000 to EUR 40.000 (incl. VAT)**.

To be eligible for a voucher, the SME must co-fund 50% of eligible expenses. Each SME can only once be approved for a voucher.

The Key 2 Circularity project aims at issuing a total of 32 vouchers during the project period.

3. Conditions for the granting of subsidies

An application form is provided on the Key 2 Circularity Online Portal², which will guide the SME through every step of the application process, to make sure that all necessary information and documents will be provided.

3.1 Conditions to be met by the applicant

To be eligible for a voucher, the applicant must meet the following conditions.

² <https://www.interregmeuserhine.eu/en/projects/key-2-circularity/>

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The K2C voucher can only be applied for:

- 1) by a SME;
- 2) which has a separate legal entity;
- 3) which is located in the MR Region;
- 4) which is not in difficulty;
- 5) complies with the de-minimis regulation;
- 6) a project that has not received any other EU or regional subsidies.

The SME confirms to meet the conditions above by signing the application form, in order to be able to receive funding.

Further explanation of a few conditions below:

1) SMEs

Commission Recommendation of 6 May 2003 concerning the definition of micro, small and medium-sized enterprises (Text with EEA relevance) (notified under document number C (2003) 1422) – EU Recommendation 2003/361

What is an enterprise? (art.1)

An enterprise is considered to be any entity engaged in an economic activity, irrespective of its legal form. This includes, in particular, self-employed persons and family businesses engaged in craft or other activities, and partnerships or associations regularly engaged in an economic activity.

What are SMEs? (art.2)

- I. The category of micro, small and medium-sized enterprises (SMEs) is made up of enterprises which employ fewer than 250 persons and which have an annual turnover not exceeding EUR 50 million, and/or an annual balance sheet total not exceeding EUR 43 million.
- II. Within the SME category, a small enterprise is defined as an enterprise which employs fewer than 50 persons and whose annual turnover and/or annual balance sheet total does not exceed EUR 10 million.
- III. Within the SME category, a micro-enterprise is defined as an enterprise which employs fewer than 10 persons and whose annual turnover and/or annual balance sheet total does not exceed EUR 2 million.

Category	Staff headcount	Turnover	or	Balance Sheet
Medium-sized	<250	≤ € 50M		≤ € 43M
Small	< 50	≤ € 10M		≤ € 10M
Micro	<10	≤ € 2M		≤ € 2M

Those entities that do not correspond to the definition of SMEs should be considered as large enterprises.

2) Separate legal entity

Applicants should be a private organisation with its own legal personality. Individuals/natural persons are not eligible.

3) Located in the Meuse-Rhine (MR) Region

The Meuse-Rhine Region is defined as follows (see Figure 2 in annexes):

- German regions: Aachen (AAC) (with the districts Aachen, Düren, Heinsberg and Euskirchen), Eifelkreis Bitburg-Prüm (BIP) and Landkreis Vulkaneifel (VUL))
- Belgian regions: Province of Liège (LIE) – only arrondissement Liège and Verviers – and Province of Limburg (BLI)
- Dutch regions: Zuid- & Midden-Limburg (NLI)

Either headquarters or establishment in the MR Region are allowed, on the condition that the voucher-funded projects are carried out within the MR Region.

SMEs located outside the MR Region are not eligible for a voucher, unless Interreg decides to expand the region. Should this be the case, this will be communicated via the K2C communication channels.

4) Not in difficulty

According to the EU legislation (Regulation (EU) 1301/2013, Article 3(3)) undertakings in difficulty are not eligible to receive funding from the European Regional Development Fund (ERDF).

Regulation (EU) No 651/2014, article 2 (18)

- In the case of a limited liability company (other than an SME that has been in existence for less than three years or, for the purposes of eligibility for risk finance aid, an SME within 7 years from its first commercial sale that qualifies for risk finance investments following due diligence by the selected financial intermediary), where more than half of its subscribed share capital has disappeared as a result of accumulated losses.

This is the case when deduction of accumulated losses from reserves (and all other elements generally considered as part of the own funds of the company) leads to a negative cumulative amount that exceeds half of the subscribed share capital.

For the purposes of this provision, ‘limited liability company’ refers in particular to the types of company mentioned in Annex I of Directive 2013/34/EU (1) and ‘share capital’ includes, where relevant, any share premium.

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- (b) In the case of a company where at least some members have unlimited liability for the debt of the company (other than an SME that has been in existence for less than three years or, for the purposes of eligibility for risk finance aid, an SME within 7 years from its first commercial sale that qualifies for risk finance investments following due diligence by the selected financial intermediary), where more than half of its capital as shown in the company accounts has disappeared as a result of accumulated losses.

For the purposes of this provision, ‘a company where at least some members have unlimited liability for the debt of the company’ refers in particular to the types of company mentioned in Annex II of Directive 2013/34/EU.

- (c) Where the undertaking is subject to collective insolvency proceedings or fulfils the criteria under its domestic law for being placed in collective insolvency proceedings at the request of its creditors.
- (d) Where the undertaking has received rescue aid and has not yet reimbursed the loan or terminated the guarantee, or has received restructuring aid and is still subject to a restructuring plan.
- (e) In the case of an undertaking that is not an SME, where, for the past two years:
- the undertaking's book debt to equity ratio has been greater than 7,5 and
 - the undertaking's EBITDA interest coverage ratio has been below 1,0

5) De-minimis regulation

The value of the voucher provided to the SMEs complies with the State Aid rules under the de-minimis exemption detailed in EC Regulation 2023/2831.

Under the de-minimis exemption scheme, an SME can receive up to EUR 300.000 of state aid in a period of 3 consecutive years. Every kind of state aid received in this period must be included in the calculation.

The SME must demonstrate compliance with the de-minimis regulation by completing and signing a de-minimis self-declaration form. This form must be uploaded when submitting the online application. A template of the form is provided within the application. Compliance with the State Aid rules under the de-minimis exemption is the sole responsibility of the eligible SME. Non-compliance will invalidate the right to a voucher and any payments already made will be recovered.

3.2 Conditions to be met by the project

1) Duration of the project

The duration of the project may not exceed **nine (9) months**.

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Only in exceptional circumstances, an extension of the duration of the project may be granted in mutual agreement with the K2C Project Partners. For more details, refer to section “5.3 Extension of the implementation period” later in this document.

2) Location of the project

The project must be carried out within the **Meuse-Rhine Region**. For a visualisation of this region, see Figure 2 in annexes.

3) Content of the project

- The project should contribute to circularity in the MR Region. The **objective** of the project is to:
 - Increase resource efficiency by using fewer, existing or bio-based materials; AND/OR
 - Extend the use and lifespan of products and materials by designing them to be easily reused, repaired or remanufactured; AND/OR
 - Create clean material cycles that enable high-quality recycling.
- Projects must demonstrably be at a **Technology Readiness Level (TRL) between 6 and 9**. For an explanation of the different TRLs, see Figure 3 in annexes.
 - Projects at TRL 5 are also eligible, provided that it is clearly demonstrated in the application form how the voucher will help the SME to grow the project to at least TRL6 (or higher). In the evaluation process, projects at TRL6 or above will always be given priority over those at TRL5;
 - Projects related to TRL4 or lower are not eligible for subsidy.

4) Eligible expenses

The Key 2 Circularity voucher scheme provides a subsidy covering 50% of project expenses, with a minimum grant of EUR 10.000 and a maximum grant of EUR 40.000 (incl. VAT). Accordingly, projects must have a minimum total budget of EUR 20.000 to be eligible for funding. Projects with a total expense greater than EUR 80.000 may also be submitted but will, when eligible, receive the maximum subsidy of EUR 40.000.

The remaining 50% of the project expenses are to be covered by the SME. This contribution may consist of financial resources or in-kind support, such as staff involvement.

Following expenses are eligible to receive a 50% grant. The examples provided under each category are illustrative and not exhaustive:

- a. Investment in equipment:** for example purchasing machines to enhance circular production processes, Computer-Aided Optimisation software whose usefulness for the project is demonstrated, material purchase, moulds required for the project etc.;
- b. Business development activities:**

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- i. Design expertise: for example modelling, prototyping, users experience research etc.;
 - ii. Technical expertise: for example testing, consultancy on the application of European regulations and standards (e.g. reparability index, Eco-design for Sustainable Product Regulation (ESPR) etc.);
 - iii. Business model refinement.
- c. Training programs:** for example capacity building for employees in circular practices;
- d. A combination of the above categories, depending on the SME's needs.**

The exact grant amount is determined based on the estimated project expenses provided by the SME in its application. Upon submission, the project is divided into specific deliverables. For each deliverable, a detailed cost plan is prepared, which may include the following eligible expenses:

- **Staff costs:** expenses for employees listed on the payroll of the project partner who are directly involved in the project. Salary costs for support staff (e.g. accounting, communications) are not eligible;
- **Operational costs:** expenses directly linked to the project that are essential for its general operation and the achievement of its objectives. These may include costs for organising content-related activities, participating in events, equipment rental etc.;
- **Costs for external expertise and services:** costs for services provided by third parties in the context of the project. Rates must be in line with market standards;
- **Equipment-related investment costs:** purchase of equipment or materials necessary for the execution of the project.

The following expenses are not eligible for subsidy:

- **Overhead costs:** Expenses that are indirectly related to the execution of the project, as they are integrated into the general operations of the organization (e.g., office supplies, electricity, gas and water, internet, etc.).
- **All other costs** that are not directly linked to the implementation of the project activities as described in the project application.

For **each successfully completed deliverable**, the SME will receive a subsidy covering up to 50% of the proposed expenses as outlined in the application. If not all deliverables are achieved, funding will be provided only for those that are completed. The total subsidy across all deliverables is capped at EUR 40.000 (incl. VAT).

The realisation of the predefined deliverables and the submission of corresponding proof are mandatory conditions for grant disbursement. Advance payments and instalments are not permitted; payment will only be made upon verified completion of the deliverable.

Projects under this fund follow the **lump sum method**, which emphasizes verifying the achievement of project objectives rather than actual incurred costs. At the end of the project,

the applicant must demonstrate – through a **final evaluation report** – that the objectives outlined in the original application have been met.

The proposed expenses are approved during the subsidy allocation process, provided they align with prevailing market standards. As a result, **actual costs do not need to be individually justified** at the end of the project.

4. Procedure of the voucher application

The procedure for obtaining a voucher from the K2C project consists of the following steps:

1. Preparing & submitting the voucher application
2. Administrative verification of the submitted voucher application
3. Substantive evaluation of the application by a jury
4. Approval or denial of the subsidy application

4.1 STEP 1: Preparing & submitting the voucher application

While it is not mandatory, we strongly recommend that applicants contact their regional K2C Project Partner early in the process. This can help clarify any questions and ensure a smooth and timely submission.

A voucher application can only be submitted via the provided online application form. This tool can be consulted via the K2C Online Portal³ and guides the SMEs through the entire application process. Should any questions arise during completion of the application form, **please reach out to your regional K2C Project Partner**. Contact details can be found on the K2C Online Portal.

For every application, the following data and documents have to be submitted:

- A fully completed, dated and signed digital application form;
- A fully completed, dated and signed de-minimis self-declaration form;
- Optional: supporting documents such as a project plan, budget plan, timeline etc.

The application form must be completed in **English**.

Deadline: The deadline for applications will be communicated by the launch of each call, via the communication channels of Key 2 Circularity.

Communication: Applicants will receive a confirmation via email whether the application has been successfully received.

³ <https://www.interregmeuserhine.eu/en/projects/key-2-circularity/>

4.2 STEP 2: Administrative verification of the submitted voucher application

After submitting, the voucher application will be checked for completeness and eligibility by POM Limburg. An application is considered complete and eligible if it meets the conditions and the voucher application procedure.

- **The application is submitted too late?**
If the application is not submitted on time, it will be declared inadmissible and will no longer be eligible for subsidy allocation under the respective call.
- **The application is incomplete?**
If the application form is incomplete or unsigned, the SME will be informed and be given the opportunity to complete and resubmit the application within fourteen (14) calendar days. An application that is not completed within this period will no longer be eligible for a subsidy under these regulations on the call to which the SME applied. The applicant will be informed of this by email.
- **The application is submitted on time and meets the requirements?**
If the grant application is submitted on time and meets the eligibility criteria, it will be deemed admissible. The application will then proceed to the substantive evaluation phase.

Communication: Applicants will receive an email regarding the completeness and admissibility of the application within fourteen (14) calendar days. Both the applicant and the K2C Project Partners commit to communicating in good faith during the admissibility review period of the application.

4.3 STEP 3: Substantive evaluation of the application by a jury

Submitted subsidy applications will be evaluated by a jury based on relevant criteria and ranked in order of priority. A separate ranking will be compiled for each region: Flanders, Wallonia, The Netherlands and Germany.

Jury composition

The jury will consist of eleven (11) experts:

- Seven (7) project officers, one from each K2C Project Partner. If two project officers are located in the same region, they represent one voice:
 - a. Flanders: UCLL
 - b. Flanders: POM Limburg
 - c. Wallonia: Wallonie Design
 - d. Wallonia: EKLO
 - e. The Netherlands: LIOF
 - f. Germany: ZENIT

- g. Germany: EFA
- Four (4) external jury members, each one representing one of the regions:
 - a. Flanders: OVAM / Vlaanderen Circulair
 - b. Wallonia: Wallonie Entreprendre
 - c. The Netherlands: *to be specified*
 - d. Germany: NRW.BANK

Evaluation

The evaluation will be conducted focussing on the following criteria:

1) Relevance & circularity (30 points)

1. To what extent does your project advance the circular economy? (*max. 15 points*)
Please structure your response around the three Primary Circularity Objectives. Explain how your project contributes to at least one of the following goals and contributes to a more sustainable, circular system:
 - a. Efficient use of raw materials
 - b. Extended product lifetimes
 - c. Clean and closed material cycles
2. What is the main innovation in your project? (*max. 10 points*)
Describe the core innovation your project introduces for your company – whether it involves new materials, enhanced recyclability, increased product longevity, improved efficiency in processes or resource use etc. Explain how this innovation differs from or improves upon current market standards.
3. How will your project inspire or influence circular practices within the MR Region? (*max. 5 points*)
Explain how your solution can be scaled or replicated to benefit other companies. Consider whether it could serve as a pilot, demonstration or reference case for others. Mention any planned knowledge-sharing, partnerships or visibility efforts.

2) Technical feasibility (20 points)

1. Provide a concise overview of your project activities, including a timeline. (*max. 10 points*)
Briefly describe the main activities planned within your project, highlighting key milestones and deliverables. Include an indicative timeline that outlines when each phase or activity is expected to take place, from initiation to completion. Please note that the maximum allowed lead time is 9 months.
2. Explain the technical feasibility of your project. (*max. 5 points*)
The technical feasibility of the project refers to the practicality and reliability of implementing the proposed solution using existing or proven technologies. For

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example: has your solution been tested as a prototype, in a pilot project or been validated by a third-party? See TRL-levels above.

3. What are the main technical risks or challenges and how will you mitigate them? *(max. 5 points)*

Identify any potential risks or uncertainties that could affect the successful implementation of your project. These may include limitations in technology, integration issues, supply chain dependencies, operation constraints etc. Describe the strategies or safeguards you will put in place to manage these risks and ensure project continuity.

3) Environmental impact (20 points)

1. How does your project integrate sustainable design? *(max. 10 points)*

Explain how your project incorporates principles of sustainable design to reduce environmental impact and extended product value. Consider addressing following aspects (non-limitative list): repairability, ease of maintenance, ease of disassembly, material efficiency, modularity etc.)?

2. What is the expected environmental impact of your project and how will you measure this? *(max. 10 points)*

Provide the expected environmental impact (in numbers) and describe the methods you will use to evaluate the environmental benefits of your project. This may include metrics such as energy savings, waste reduction, CO₂-reduction, decreased use of raw materials, lower transport-related emissions etc. Please explain how you intend to measure or estimate these impacts – whether through calculations, monitoring tools or other relevant approaches.

4) Economic feasibility (20 points)

1. Provide a realistic and well-supported budget breakdown for your project. *(max. 10 points)*

Present a clear and structured overview of your project's budget using the table below as a template. Break down the expenses by category – such as equipment, business development activities or training program – and include a brief description and the estimated amount for each item.

If your project involves investment in machinery or training programs, please explain how these investments are justified in relation to the expected circular impact. To demonstrate that the expenses are reasonable and aligned with market standards, you may include supporting material such as quotations, benchmark data or references to similar projects.

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Expense category	Expense description*	Expenses [€]	Explanation / supporting material
Investment in equipment			
Business development activities			
Training program(s)			

*For example: staff costs, external expertise & service cost, equipment expenditure etc.

2. What is your strategy for ensuring long-term financial sustainability of the project? (max. 10 points)

Describe how your project will remain economically viable beyond the initial funding period. Consider aspects such as revenue generation, cost-efficiency, partnerships, or integration into existing business models.

5) Team capacity and social impact (10 points)

1. Describe the expertise of your team and project partners and explain how this enables them to operate new equipment, implement new business strategies or apply training outcomes at TRL 6-9. (max. 5 points)

Highlight relevant skills, experience and technical capabilities that demonstrate your team’s readiness to implement and scale the project. Include examples of past work, certifications, or collaborations that support your ability to manage advanced technologies and integrate results effectively.

2. What is the social impact of your project (in terms of training, development of new skills, inclusion of people far from employment, etc.) and how will you implement and evaluate it? (max. 5 points)

Explain the methods you will use to implement these social components and outline how you plan to measure success – such as through KPIs, participant feedback, employment outcomes or certification rates.

Maximum score

The maximum score across all criteria is 100 points. The following approval thresholds apply:

- The minimum total score for approval of the project is 60 points.
- At least 50% of the points required per category

If the number of admissible applications exceeds the available budget, subsidies will be awarded according to the established priority ranking.

4.4 STEP 4: Approval or denial of the subsidy application

The jury's substantiated recommendation will be forwarded to the governing body of the regional K2C Project Partner.

- **Flanders:** POM Limburg or UCLL*
- **Wallonia:** Wallonie Design or EKLO*
- **Germany:** ZENIT
- **The Netherlands:** LIOF

* For each application, one of the organisations listed for the region will act as the regional K2C Project Partner responsible for evaluation and decision-making. The internal division of applications between them will be determined within the regional partnership.

The governing body of the regional K2C Project Partner will make the official decision regarding the approval or rejection of the subsidy application within sixty (60) calendar days following the admissibility decision.

Communication: Applicants will be notified via email after the decision regarding the granting or denial of the subsidy.

After approval of the application, the grant decision is signed by the respective regional K2C Project Partner and (a copy) is sent in an official start conformation email to the SME.

5. Implementation of the project at the SME

5.1 Start of the project

The SME can only launch the project after the official start confirmation email by the respective regional K2C Project Partner.

5.2 Progress, changes & discontinuation

In the event of a situation that affects the execution of the project, the SME is obligated to inform the regional K2C Project Partner immediately in writing. The K2C Project Partners will decide on the situation and inform the SME on the impact on the voucher and how to proceed.

Upon request, the SME must provide insights into the project status.

5.3 Extension of the implementation period

In exceptional circumstances, the duration of the project may be extended once by a maximum of three (3) months, resulting in a total maximum implementation period of twelve (12) months.

A request for extension must be submitted in writing by the SME to the respective regional K2C Project Partner (and lead partner UCLL) before the original project end date, stating the reasons and providing appropriate justification.

The extension is only valid after written approval by the K2C Project Partner (and lead partner), which will issue a formal written decision confirming the new end date. Verbal or implicit agreements shall not be considered valid.

6. Payments, recoveries and penalties

6.1 Payments and supporting documents

The grant will be paid **lump sum upon verified completion of deliverables**. This means that the grant amount to be awarded is a fixed amount per deliverable and not a refund of each real cost.

For **each successfully completed deliverable**, the SME will receive a subsidy covering up to 50% of the proposed expenses as outlined in the application. If not all deliverables are achieved, funding will be provided only for those that are completed. The total subsidy across all deliverables is capped at EUR 40.000 (incl. VAT).

1) Deliverables

To ensure a smooth process and reduce administrative burden for SMEs, the verification methods for voucher deliverables are predefined. SMEs do not need to choose their own verification methods but must comply with the following reporting requirements (Table 1).

Deliverable Type	Verification Method	Explanation
Equipment purchase / investment	Photos or video of the installed equipment + site visit	Visual proof of installation and commissioning, combined with an on-site visit by a K2C Project Partner
Process optimization	Project report + on-site demonstration	Brief description of process changes, supported by an on-site check
Training / capacity building	Certificates (if available) + attendance list	Upload training certificates (if available) and signed attendance list
Product redesign / prototype	Photos/videos of prototype + technical report	Provide visuals and documentation showing the redesigned product or prototype
Circularity improvement results	Before/after documentation + measurable KPIs	Demonstrate impact with clear metrics (e.g. resource savings, improved recyclability etc.)

Table 1: Deliverables & verification methods

For any anticipated deliverables that fall outside the categories listed in the table above, please contact your regional K2C Project Partner.

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During the implementation of the voucher project, SMEs are expected to achieve the agreed deliverables within the maximum project duration of nine (9) months. All evidence must be send by email to k2c@pomlimburg.be.

Deadline deliverables: the approved project end date

2) Final evaluation report

During the final evaluation of the voucher program, it will be assessed whether SMEs have effectively executed their projects. Each SME is required to submit a **final evaluation report** via the online form provided on the K2C Online Portal. This report must detail the project outcomes, the achieved circular improvements and the lessons learned. The findings will contribute to the overall impact report, which highlights K2C's success in promoting the circular economy within the Meuse-Rhine region.

Deadline final evaluation report: 30 calendar days after the approved project end date.

3) Verification deliverables & final evaluation report

The K2C Project Partners will review the submitted deliverables for accuracy. If any documents are incorrect or missing, the applicant will be notified by email and asked to provide the necessary corrections. The deadline for submission will be determined by the K2C Project Partners at that time.

4) Site visits

To verify the results, an **on-site visit** will be conducted by at least one of the K2C Project Partners. These inspections will ensure that the agreed objectives have been met.

Timing: within 30 calendar days after the approved project end date

5) Payment of the Voucher

Subsidy payments will be processed within 45 calendar days after the approved project end date, provided that all required deliverables have been submitted and validated. Validation includes:

- Confirmation that the deliverables demonstrate achievement of the defined KPI; and
- Submission of the final evaluation report; and
- Completion of a site visit by a K2C Project Partner.

Once these conditions are met, the funds will be transferred to the bank account specified by the applicant in the original subsidy application form.

6.2 Check, refund and recovery

The K2C Project Partners reserve the right to exercise supervision and control over the applicant to whom the subsidy was granted under this regulation. The applicant commits to providing the necessary information and accepting the K2C Project Partners' possible oversight.

The applicant must use the subsidy for the purpose for which it was granted and must justify its use accordingly.

If the applicant fails to comply with one or more obligations arising from this regulation or fails to submit the required documents, the K2C Project Partners may decide not to pay or to partially withhold the granted subsidy. Furthermore, the applicant may be excluded from future eligibility for subsidy calls within the K2C project.

7. Communication obligations

If, within the scope of this regulation, a subsidy is granted to the applicant, they commit themselves:

- To have the project realised within 9 months of the granting of the subsidy;
- If requested, to cooperate in reports and research purposes, monitoring and evaluations with regard to K2C;
- If requested, to participate in publications and PR activities of K2C.

All information and communication measures provided by the beneficiary shall acknowledge support from the funds to the operation by displaying:

- The combined logo (Interreg Meuse-Rhine & European Union). This logo will be provided on the K2C Online Portal.
- A clear indication that support has been obtained by the Interreg V-A Euregio Meuse-Rhine Program through the European Regional Development Fund (ERDF).
- A clear indication of the project name “Key 2 Circularity”

8. Final provisions

This regulation enters into force as of November 23rd, 2025.

In order to get a broader outreach to the SMEs in the different regions, translations of this document can be provided. In case of any disagreement or inconsistency, the English version will be considered the authoritative reference.

Regarding the English version of this subsidy regulation: all differences in interpretation and unforeseen circumstances regarding the application of this regulation will be handled by the K2C consortium.

9. Annexes

9.1 Visualisation of the 10 R-strategies

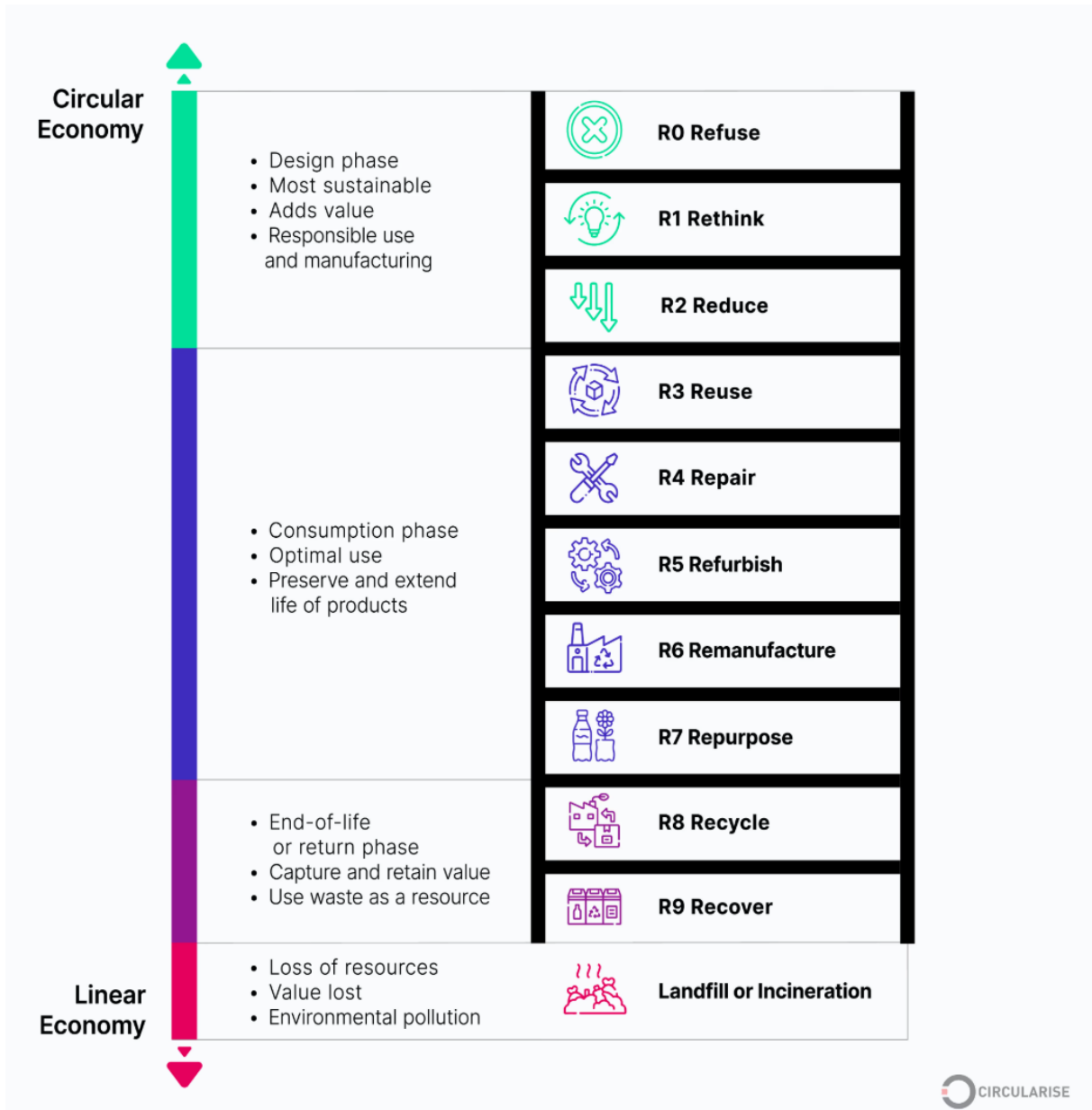


Figure 1: Visualisation of the 10 R-strategies

9.2 Visualisation of the Meuse-Rhine Region

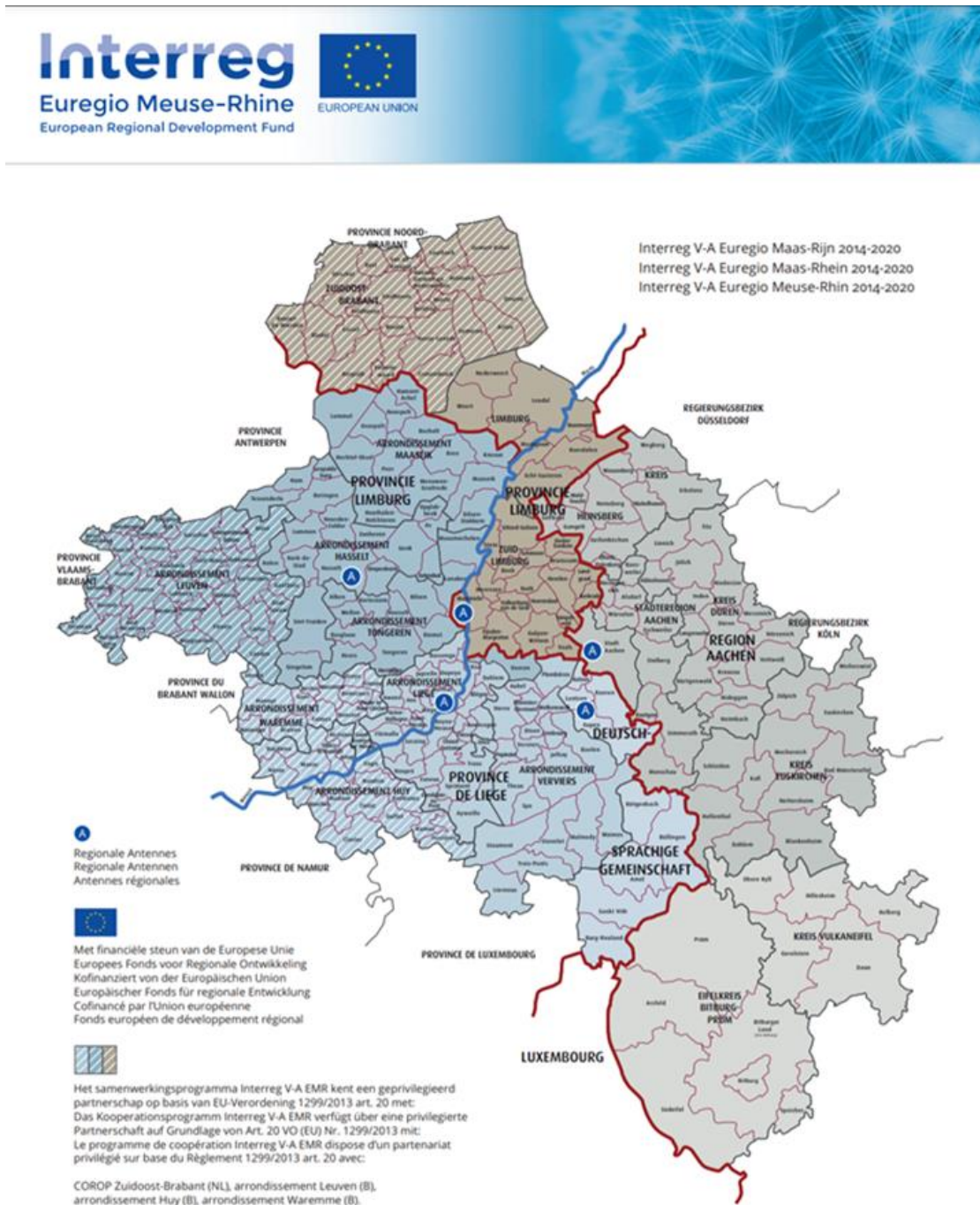


Figure 2: Meuse-Rhine Region

9.3 Technology Readiness Levels

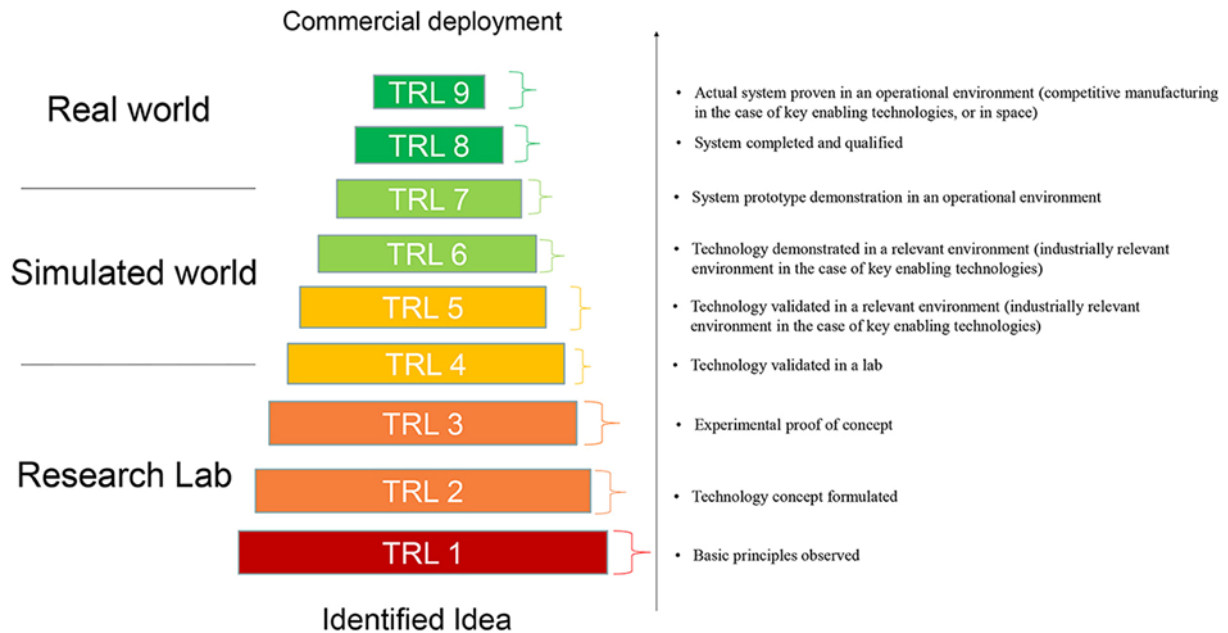


Figure 3: Graphical representation Technology Readiness Levels (TRL)⁴

Technology Readiness Levels (TRL) describe the maturity of a technology:

- **TRL 1:** Basic principles observed and reported.
- **TRL 2:** Technology concept and/or application formulated.
- **TRL 3:** Analytical and experimental critical function and/or characteristic proof of concept.
- **TRL 4:** Component and/or system validation in a laboratory environment.
- **TRL 5:** Component and/or system validation in a relevant environment.
- **TRL 6:** Prototype demonstrated in a relevant environment.
- **TRL 7:** System prototype demonstrated in an operational environment.
- **TRL 8:** Actual system completed and qualified through tests and demonstrations.
- **TRL 9:** Actual system proven in operational environment; technology is fully mature and commercially viable.

⁴ As defined in the General Annexes of the Horizon Europe work program

9.4 Abbreviations & definitions

K2C	Key 2 Circularity
K2C Online Portal	https://www.interregmeuserhine.eu/en/projects/key-2-circularity/
K2C Project Partners	The different organisations working on this project: EFA, EKLO, LIOF, POM Limburg, UCLL (lead partner), Wallonie Design and Zenit
MR Region	Meuse-Rhine Region
SME	Small and small and medium-sized enterprise according to European SME definition as provided by the Regulation No. 70/2001 as amended in 2004 and 2006).
TRL	Technology Readiness Level